

May 30, 1979
JEA-P-3

US Nuclear Regulatory Commission
H 1149
1717 H Street NW
Washington DC 20555

Gentlemen,

I am writing this letter in response to telecon communications that I recently had with Messrs. Thompson, Sauter, Mosley and others in an effort to present my own personal ideas and points of view concerning actions that could be taken to promote nuclear safety in light of recent events in the nuclear power industry. I am presently the operations superintendent for GE at the Zimmer I Nuclear Power Plant and have been in the startup business with GE for 6 years (including the startup of Browns Ferry 1,2,3.) Pre-vious to that I was in the nuclear navy on submarines (USS Silversides SSN679 and USS Lafayette SSBN616) as a qualified submarine officer. I received my B.S. in Nuclear Engineering in 1969 from Texas A&M University. With this background I now state my ideas which again are personal, not corporate.

I believe our basic existing problem today (aside from the established need for re-design in some cases) is the credibility of the utilities to operate their plants in a responsible and reliable fashion in the eyes of the American public. I also believe that the public is not totally convinced that the NRC is maintaining its credibility in enforcing the utilities to this. I would respectfully suggest the following changes:

1. Training

- a) There is a distinct need for more training for the operators, shift supervisors or any other licensed person who could take charge under casualty conditions (this would include operations superintendents, plant superintendents if their procedures indicate for them to take control under any conditions). I would recommend this training take the form of simulator training involving casualty drills once a year which would be culminated by NRC evaluated drills. This evaluation should be used when considering the re-licensing of the operator. In addition to the simulator training, I believe a specialized team of NRC inspectors should visit (unannounced) each site once a year to evaluate the plant in the following areas:

1. Interview each operator and shift supervisor in the area of casualty drills, tech specs and other information needed to operate the plant.

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2. Examine the plant records such as the daily log, night order book, tag out log, etc. to see how the plant is doing business. In turn, some of the interview questions would be to see if the supervisory people understood what was out of service, what standing orders were in existence, etc.
3. Examine their emergency procedures - see if the operators understood it as well as anyone else identified in it (local civil defense, sheriff's office, etc.)
4. Examine the condition of the plant - what equipment is out of service and how long has it been that way, oil spills, water leaks, conditions of the rad/chem labs, maintenance shops, how many outstanding work orders are not done, etc.
5. Interview their instrument and maintenance technicians - do they understand what an essential piece of equipment is, how do they take it out of service and coordinate this with the control room.
6. Interview the plant superintendent and operations superintendent. Do they understand the condition of their plants?
7. There are many other areas too numerous to list in this letter, but the idea is there.

2. Casualty Training in Plant

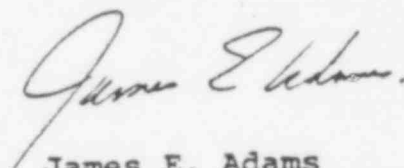
This is a very sensitive area which most utilities and people in the industry feel is detrimental to the industry. My personal feelings are that random drills of a nature that affect plant availability or potential equipment damage are detrimental, but I feel there are times something of this nature can be useful. The one time I believe scam drills are possible is when the utility is already planning to shut-down for refueling or planned maintenance. In this situation drills could be initiated by the NRC or, if this is too harsh, NRC evaluated trips in which the operators are aware that they will be scrambled and how. The NRC is there only to witness how they handle it and how the plant handles it. The details on this are lengthy, so I will delete them unless more information is desired.

3. Emergency Teams

I believe one other area the NRC is considering is sending emergency teams to a site under extreme casualty conditions to take charge. I am sure this sounds good to the general public but, in my opinion, this is not feasible. I say this because I witnessed chaos that this can create at the Browns Ferry fire. It is literally impossible for someone (even if they are certified and qualified on that particular plant)

to come into a casualty condition and hope to direct activities unless they actually work in that capacity at that plant everyday. Each site is unique in its configuration and in order to direct the plant and its people you have to know its history, the capabilities of the operating people and all the events which have occurred leading up to the casualty condition. It is not even possible, again in my opinion, for the plant superintendent or the operations superintendent to take charge under these conditions unless they also go through the casualty re-training the operators and shift supervisors do. In short, if your operations and shift supervisors can't handle it, no one can. An NRC casualty team can be used in many ways, but don't take the control of their plant away from them - that's what they get paid to do.

Very Respectively,



James E. Adams
Operations Superintendent
Zimmer I
Nuclear Power Plant