



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 05 1985

MEMORANDUM FOR: Chairman Palladino
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal
Commissioner Zech

FROM: William J. Dircks, Executive Director for Operations

SUBJECT: AUGMENTED INSPECTION PROGRAM FOR TMI-1 RESTART

BACKGROUND

The Commission in its Memorandum and Order CLI-85-09 lifted the immediate effectiveness of the 1979 Shutdown Orders on TMI-1. The Commission noted that because TMI-1 had been shut down for over six years, it imposed two conditions. The first condition was satisfied by the licensee's submittal of the power ascension schedule with hold points identified for NRC staff approval, and the staff's subsequent approval of that schedule. See Enclosures 1 and 2.

The second condition requires that prior to restart, the staff is to provide to the Commission for its information a general description of a program to provide increased NRC oversight at TMI-1 during the period of startup and power ascension, beginning with initial criticality, and any time period thereafter staff feels to be appropriate. The purpose of this Commission Paper is to respond to the second condition.

DISCUSSION

Consistent with our practice at other operating plants that have experienced extended outages, we are taking steps to monitor restart activities more aggressively in order that we can verify in a reasonable period of time that operational activities are being carried out satisfactorily. The Region I program is based on the licensee's approved plan for TMI-1 restart.

A temporary organization change has been instituted to assure that appropriate management attention is given to this activity. A separate organization (TMI-1 Restart Staff) will be managed by a dedicated SES-level manager who will have adequate personnel and procedures to effectively manage and coordinate the NRC efforts. The TMI-1 Restart staff organization is shown in Enclosure 3.

Reporting to the TMI-1 Restart Staff Director, W. Kane, will be the TMI-1 Restart Manager, R. Conte and three separate staff components. The first of these is the resident inspection staff. This will include the current resident inspector, F. Young, and two additional engineers from Region I assigned to

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this component of the staff on a rotational basis. The resident inspection staff will continue to perform routine operational reviews of equipment, followup on identified problems and events, and perform normal resident administrative functions.

The second component of the TMI-1 Restart Staff is the operational assessment staff. This staff normally will be comprised of resident inspectors and operator license examiners from Regions II and III, and operator license examiners from Battelle Pacific Northwest Laboratories and Idaho National Engineering Laboratory. The operational assessment staff will perform round-the-clock coverage initially and during critical evolutions, and interim periods of 16 hour coverage during operation at 48% steady-state power conditions and 12-hour coverage during operation at 75% steady-state power conditions. Enclosure 4 provides a representation of the scope of augmented inspection coverage during the various phases of the licensee's restart program. Enclosure 4 identifies the periods of time each type of enhanced coverage is to be provided; in summary, this equates to an estimated four weeks of round-the-clock coverage, 16 hour coverage per day for about four weeks, and 12 hour coverage per day for about six weeks. It is expected that during those periods of 24-hour coverage prior to reaching 48% power, the day shift will be manned by contractor personnel under NRC supervision, while the other shifts will be manned by NRC personnel. During periods of 16-hour coverage, the day shift will be manned by contractor personnel under NRC supervision, and the remaining 8-hour period (not necessarily aligned to a licensee shift) will be manned by NRC personnel. During the period of 12-hour coverage and round-the-clock coverage beyond 75% power, Region I and NRC contractor personnel will be used to provide the necessary coverage. Shift coverage has been arranged to assure that when NRC contractor personnel are performing shift coverage, there will be NRC personnel present on site. The on-shift inspectors will monitor the overall plant performance including event response and verification of proper control of operations, maintenance and testing.

The third component of the TMI Restart Staff is the support staff. Included in the Support Staff are Region I-based inspection specialists from the Division of Reactor Safety (DRS) and the Division of Radiation Safety and Safeguards (DRSS). The size and composition of the support staff will vary depending upon the particular mode of operation or type of special problems that may be encountered. This staff would include specialists in the areas of startup testing, radiological controls, radwaste management, safeguards, emergency preparedness and other engineering disciplines. The support staff would carry out the normal inspection program associated with a plant startup.

At the conclusion of the GPU program, i.e., the turbine trip from 100% power, Region I will conduct an evaluation using a SALP approach for the applicable activities observed of the licensee's performance during the period of restart. A SALP Board will be convened at that time to review the assessment and make specific recommendations regarding the nature of further NRC inspection coverage. Also, as directed by the Commission in CLI-85-09, the staff will conduct

a Performance Appraisal Team (PAT) inspection and Systematic Assessment of Licensee Performance (SALP) at the end of six months of operation and again at 12 months. These reports will address areas of plant operations, maintenance, licensed and non-licensed operator training, quality assurance, radiological controls, fire protection, emergency preparedness, security and safeguards, and design engineering and plant modifications. The PAT and SALP reports will be provided to the Commission and the public, as is normally done for such reports.

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

Enclosures:
As Stated

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The second condition requires that prior to restart, the staff is to provide to the Commission for its information a general description of a program to provide increased NRC oversight at TMI-1 during the period of startup and power ascension, beginning with initial criticality, and any time period thereafter staff feels to be appropriate. The purpose of this Commission Paper is to respond to the second condition.

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design engineering and plant modifications. The PAT and SALP reports will be provided to the Commission and the public, as is normally done for such reports.

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Enclosures:
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*See previous white for concurrences.

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