

**ORIGINAL**  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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In the matter of:

BRIEFING ON STATUS OF UTILITY  
AND NRC COMPLIANCE WITH TMI  
ACTION PLAN

Docket No.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BRIEFING ON STATUS OF UTILITY AND NRC COMPLIANCE  
WITH TMI ACTION PLAN

Public Meeting

Nuclear Regulatory Commission  
1717 H Street, N.W.  
Room 1130  
Washington, D.C.

Thursday, April 5, 1984

The Commission met, pursuant to notice, at  
2:00 p.m.

Commissioners Present:

NUNZIO PALLADINO, Chairman of the Commission  
JAMES ASSELSTINE, Member  
THOMAS ROBERTS, Member  
FREDERICK BERNTHAL, Member

Staff and Presenters Seated at Commission Table:

S. CHILK  
R. ROTHSCHILD  
J. ZERBE  
A. KENNEKE  
D. EISENHUT  
J. ROE  
T. SPIES  
W. MINNERS  
F. MIRAGLIA

Audience Speakers:

B. RUSSELL  
S. SCHWARTZ  
D. WEIGEL  
V. BANAROYA  
R. MATTSON  
C. PATEL

# DISCLAIMER

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P R O C E E D I N G S

CHAIRMAN PALLADINO: Good afternoon, ladies and gentlemen. We are meeting this afternoon to review the status of utility and NRC compliance with the TMI Action Plan. I understand that we will be briefed on the status of items that are to be yet resolved, as well as those that have been resolved and are in various stages of implementation.

NRR will discuss most of the items, and OPE is prepared to address the Chapter V items from the Action Plan involving NRC policy, organization and management issues.

Are there any additional remarks that Commissioners would like to make before we start?

If not, then, let me turn the meeting over to Mr. Eisenhut.

MR. EISENHUT: Thank you. The briefing today will cover a number of pieces. Themis Spies, who is Director GST in NRR will address the overall framework of where we are on the entire Action Plan and what we commonly call the developmental end. We'll have a discussion also on the implementation portion. That's the portion where we as an agency have approved a requirement to go out to the utility, and this will be the implementation and review status, implementation action.

The third part, OPE will be addressing Chapter V



1 status and where we are on those issues.

2 Before I turn it over to Themis, I have just one  
3 comment. You know, we've had briefings on the overall status  
4 of the implementation of the Action Plan now, probably  
5 every year and multiple times during the year for the last  
6 five years. I think when you'll go through you'll find that  
7 there has been a tremendous lot of things that have been  
8 actually accomplished, implemented and put in place. We  
9 quite often focus on the one or two or the issues at great  
10 length where we haven't accomplished anything. I think if  
11 there's a message today, there was an awful lot in the  
12 Action Plan. A tremendous lot of that has already been  
13 implemented in the Plan, and a lot of the items are working  
14 their way along. And I think you'll see that as we go  
15 through.

16 We're prepared to go into whatever depth you  
17 like today. There's a very large number of backup slides  
18 that were passed out. We'll go through it in somewhat of an  
19 overview with the principal slides and we're prepared to go  
20 into whatever depth you would like on whatever you want to  
21 get into.

22 With that, I'll turn it over to Themis Spies.

23 (Slide.)

24 MR. SPIES: Thank you. I thought I would start  
25 the presentation by providing a flow chart, an overview of

1 where the original TMI Action Plan stands today. I would  
2 characterize it as the geography of the TMI Action Plan, the  
3 way I have laid it out.

4 We started with NUREG-0660 which was the original  
5 comprehensive, integrated document that was put together in  
6 one place -- all the lessons learned from the TMI accident,  
7 of course. If you recall, NUREG-0660 was conceptual to some  
8 extent, and provided overall direction. There were a number  
9 of areas that there were no specific requirements, criteria  
10 of what to be done or what plants things were applicable to  
11 and things of that sort.

12 The first thing that was done was to take the  
13 items in NUREG-0660 that were more developed, the so-called  
14 short and intermediate items, and put them into a document  
15 called NUREG-0737. The Commission approved those items  
16 for implementation at power reactors. These items, as I  
17 said, to some extent were further clarified, including the  
18 articulate of more specific criteria of exactly what had  
19 to be done, applicability and things of that sort. And  
20 these are the items that have been implemented to a large  
21 extent and they will be discussed in more detail by  
22 Mr. Miraglia later on.

23 Leaving that aside, we go to the -- I guess for  
24 completeness I have added a number of items that were  
25 incorporated into the so-called CP & ML rule, 10 CFR 50.34(F).

1 At that time we were reviewing a number of CP's, I guess five  
2 or six of them, and a number of ML's, and we put a sample of  
3 requirements together that we thought were the minimum that  
4 those plants had to meet at that time.

5 I would say that 80 percent of them were similar  
6 to the 0737 items. In addition, we had put in some long-  
7 term items so that when the longer term issues were studied  
8 and finalized, you wouldn't preclude potential implementation  
9 in those CP plants. Let me give you an example.

10 Some of those were mostly in the -- dealt with the  
11 severe accident area. We, for example, told the CP's make  
12 sure that you put a three-foot diameter hole into your  
13 containment in case the long-term severe accident program  
14 comes to the conclusion that you will need a filtered  
15 vented containment system. So in order not to preclude that  
16 possibility, we had them put a three-foot diameter hole into  
17 the containment.

18 But this is academic to some extent because there  
19 are no CP's and ML's right now.

20 Moving to the right of the picture, we see the  
21 non-0737 and Chapter V items; the so-called developmental  
22 items. Those were assigned to the major offices, NRR, I&E,  
23 RES, and the resolution process began. Those items were --  
24 a tracking system was developed to track them. It was called  
25 the so-called APTS system, action plan tracking system.

1           Also, if you recall, NUREG-0660 Chapter IV,  
2   Item E called for a plan for early identification, assessment  
3   and resolution of safety issues. Taking that as a clue, we  
4   developed a process which is described in the so-called  
5   prioritization of generic issues process described in  
6   NUREG-0933 and presented to you people last year in  
7   SECY 83-221, where we took all the remaining issues and we  
8   kind of distilled them to see which ones were important,  
9   which ones were safety related, which ones were not safety  
10   related. And for the important safety ones, which ones  
11   were high, medium priority and which ones were of low priority.

12           So those issues we put into this system, and  
13   out of it came the issues that we are pursuing today, the  
14   so-called high and medium priorities. The resolution of  
15   them is proceeding right now. Warren will tell you the  
16   precise status of those issues. We have a system where  
17   we track them. It's called the generic issues management  
18   control system, GIMCS.

19           When an issue is resolved technically, it finally  
20   goes into the document that you probably are already familiar  
21   with called ORLAS, operating reactor licensing action  
22   summary. It's a management tool that keeps up with the  
23   implementation in the plants themselves.

24           Maybe I should say a word about what we mean by  
25   the resolution of the issue. It involves the staff technical

1 evaluation, it involves the ACRS technical review, it  
2 involves COGA review. Many times it involves review by the  
3 Commission, especially when it involves rulemaking. Finally,  
4 it would go out for public comment and when that process is  
5 completed then the technical resolution has been completed.  
6 The outcome of the technical resolution could be a rule or  
7 a reg guide or a revised Standard Review Plan. And having  
8 completed that, then we go into the implementation phase.  
9 And that's where the operating reactor licensing action  
10 summary, ORLAS, goes. And you see that's a box that many  
11 other items lead to.

12 Having provided this overview or the geography  
13 of the original TMI Action Plan, we can go into some more  
14 details on this developmental -- the status of the develop-  
15 mental action items. If I didn't confuse you by now, I'll  
16 have Warren continue.

17 COMMISSIONER ASSELSTINE: On that last box you  
18 talked about, the ORLAS, is that the point where you begin  
19 implementation, where you'd expect someone to actually go  
20 out and put in the hardware or adopt the new procedure  
21 or whatever it is?

22 MR. EISENHUT: The answer to that is yes. It  
23 really is a tracking of all items that have been issued to  
24 utilities as requirements. Be it a procedural, administrative,  
25 hardware, whatever. We track it item by item. The one

1 generic issue immediately goes into 70 or 80 different plants,  
2 and tracked on each individual plant with its own  
3 individual staff.

4 CHAIRMAN PALLADINO: You show off to the right  
5 TMI Action Plan tracking system. Are you tracking everything  
6 in 0660, or are you tracking --

7 MR. SPIES: Everything that is not in 0737 or  
8 Chapter V.

9 CHAIRMAN PALLADINO: I'm sorry, I missed it.  
10 The tracking system, is it tracking 0737?

11 MR. SPIES: No.

12 CHAIRMAN PALLADINO: It's tracking everything but  
13 0737?

14 MR. SPIES: Everything but 0737 and Chapter V  
15 items, which the Commission decided to handle personally  
16 through the OPE.

17 CHAIRMAN PALLADINO: What is NUREG-0718 doing?

18 MR. SPIES: As I said, at that time we were also  
19 reviewing a number of CP's, and we thought that the minimum  
20 number of items from NUREG-0660 that those CP's should meet  
21 were put into this NUREG-0718, and finally it became a rule  
22 and went into 10 CFR 50.34.

23 Warren, why don't you proceed to say a few more  
24 words about the right side, the non-0737 items, the status  
25 of them.



1 MR. MINNERS: I'd like to make two points. At  
2 the bottom there, the generic issues management control  
3 system, the lines are dotted going to the Standard Review  
4 Plan and the ORLAS book because that system has not been in  
5 place long enough to really have any issues that have actually  
6 been transferred over. So that's a future action that we  
7 expect to occur but has not yet done.

8 (Slide.)

9 I want to show this slide only for the purpose  
10 to give a little more description of what the box "prioriti-  
11 zation of generic safety issues" was. It was a well-  
12 described, systematic system based on agreed-upon methods  
13 and criteria to sift again through the TMI Action Plan plus  
14 other generic issues, and try to make another assessment of  
15 their safety significance and their worthwhileness based on  
16 our current status of knowledge and our improved PRA  
17 techniques.

18 So that had a process that it went through. And  
19 item 6 I think was one of the more important steps in that  
20 process where each assessment of the priority of each generic  
21 issue was circulated within NRR for peer review, and it's  
22 also been circulated outside NRR and the NRC for review by  
23 people. And that's to assure the accuracy and completeness  
24 of the assessments.

25 So we think we've done a pretty good job of



1 prioritizing the issues.

2 (Slide.)

3 This slide is a summary of the status of all the  
4 TMI Action Plan items. Starting on the left is NUREG-0737;  
5 that is items that are implemented, and it runs to the right  
6 all the way over to issues that are yet to be prioritized.  
7 And there are gradations in between them. So this can give  
8 you a picture of where we stand in the resolution process.

9 CHAIRMAN PALLADINO: I thought 0737 had more  
10 than 63 items.

11 MR. MINNERS: There's always a problem with that,  
12 Mr. Chairman. It's how you count them because they're  
13 broken down into subgroups. But for our accounting purposes  
14 and the headings we took it was 63. You can get different  
15 count numbers depending on how you do it.

16 MR. MIRAGLIA: We have some examples of that,  
17 Mr. Chairman. For example, certain items in the Action Plan  
18 in the 0933, which are counted as one item, we, to track the  
19 implementation of these items, tracked discrete sub-items.  
20 Two best examples of that is in 0933, II.K.2 is an Action  
21 Plan item which was all the requirements that came out of  
22 the Commission orders on the B&W plants. 0933 considers that  
23 as one. There are 13 subparts to II.K.2, so in the ORLAS  
24 book we are tracking the implementation of those 13 subparts  
25 as discrete items.

1 Another example of that is II.K.3, which is the  
2 recommendations from the Bulletins and Orders Task Force  
3 that was established after TMI. And 0933 counts those as  
4 one. II.K.3 as one item. Within that II.K.3 there's a  
5 II.K.3.1 through .40, so there's 40 discrete pieces.

6 CHAIRMAN PALLADINO: I can appreciate that, but  
7 it would be desirable, I believe, to have one common base  
8 so that we don't have to always try to juggle the numbers.

9 MR. MINNERS: I think from the perspective of  
10 implementation we believe we're capturing everything that  
11 the GIMC system is not accounting for. We try to avoid  
12 that phrase.

13 (Laughter.)

14 MR. SPIES: I think, Mr. Chairman, the most  
15 important difference is in the original plan you see here  
16 63, but later on we have to multiply by the number of plants,  
17 and that's the big difference.

18 CHAIRMAN PALLADINO: No, no. I was thinking of  
19 as opposed to 124, or whatever the number is. It just makes  
20 it hard to keep any continuity in thinking from briefing to  
21 to briefing.

22 Okay, go ahead. At least you clarified that.

23 MR. MINNERS: In the process of prioritization,  
24 we looked at issues and issues which we thought were really  
25 parts of issues. We combined them together, so there's a

1 step that was done which reduces the number of issues that  
2 are being tracked.

3 The next step was after 0737 was issued, 50 more  
4 Action Plan items were resolved. And those issues were those  
5 that had requirements and they were passed on to ORLAS for  
6 implementation. A majority of those issues were "no  
7 requirements," the resolution was "no requirements."

8 The next two are just a breakdown. Some  
9 resolutions have been identified or available. The next  
10 step in the process is to go through the review and approval  
11 procedure before it's being issued as a requirement to  
12 licensees and applicants.

13 CHAIRMAN PALLADINO: What do you mean available?  
14 How do you differentiate available and identified?

15 MR. MINNERS: Available -- we think there's a  
16 piece of paper that has a well-written recommendation or a  
17 well-written statement of what the licensee should do, and  
18 all that has to be done is to get that approved. Identified  
19 means that it's a more conceptual idea of what -- the people  
20 know what they want to do, they haven't written it down in  
21 a detailed, formal way that they can present it to a review  
22 group.

23 USI's are in there because this table was  
24 extracted from 0933, and the USI's are also listed in there,  
25 and there are no TMI Action Plans that are also USI's.

1           The next four items --

2           CHAIRMAN PALLADINO: Wait a minute. Did you say  
3 that right, or did you mean that there were no new USI's  
4 that came out of TMI Action Plan?

5           MR. MINNERS: You could say it that way, too.

6           The next items are the result of our actual  
7 quantitative analysis and prioritizations of issues, and  
8 the number of TMI issues that we said were high and medium  
9 priority.

10           The next two categories, "low" and "drop" probably  
11 should be one category, because both low and drop we are not  
12 allocating resources to for further resolution of those  
13 issues. And as I said, there are two issues to be prioritized,  
14 which is more an administrative problem. We have the right  
15 answer; that is, that they're probably in the "drop"  
16 category, but we don't have the right reason. Our analysis  
17 has omitted an area that should be covered.

18           In addition to the safety issues, the Action Plan  
19 also included some non-safety issues, the majority of which  
20 have been resolved. Most were programmatic changes, and  
21 a lot of those may be ongoing programs but once the program  
22 was established we considered that a resolution of a non-  
23 safety issue. And as I say, there are still some that are  
24 being worked in that area.

25           CHAIRMAN PALLADINO: And resolution doesn't

1 necessarily mean that they've been implemented in the field.  
2 Is that right?

3 MR. MINNERS: We've been criticized for our use  
4 of "resolution" but maybe there are better words.

5 CHAIRMAN PALLADINO: I'm just trying to understand.

6 MR. MINNERS: We tried to define resolution as  
7 where you have -- you know what you want the licensee to do  
8 and it's been reviewed and approved by the proper people  
9 and it's over in DL ready to be sent to the licensees.  
10 The next step beyond that is beyond resolution.

11 MR. MIRAGLIA: I think it should be pointed out  
12 that some of the resolution is "no new requirements", and  
13 therefore, there's no follow-on implementation.

14 MR. MINNERS: A "no action" resolution is a  
15 possible set.

16 (Slide.)

17 The next slide is, again, to try to give a status  
18 picture of where the resolution of the remaining TMI Action  
19 Plan items stand, the ones that we're going to do something  
20 about. And as you see, we still have three schedules to  
21 complete on some of these issues.

22 CHAIRMAN PALLADINO: You say the remaining TMI  
23 Action Plan items. Which are they -- ?

24 MR. MINNERS: This would be the issues that in  
25 the previous slide were -- resolution was available,

1 identified or was a high or a medium issue. Those are active  
2 issues that are being actively resolved.

3 MR. SPIES: Again, Mr. Chairman, we're talking  
4 about non-0737. We'll address the 0737 items separately.  
5 The near and intermediate term.

6 MR. MINNERS: And as you can see in the other  
7 three columns, we are making some progress on resolving  
8 those, and we have a more detailed breakdown of schedules  
9 and that type of stuff. But the program is moving along.

10 (Slide.)

11 CHAIRMAN PALLADINO: Are these safety items?

12 MR. MINNERS: These are only safety items. We are  
13 not tracking the resolution of non-safety items, and there  
14 aren't very many of them. I doubt if it's worthwhile to  
15 start up a tracking system.

16 In this slide, this is to try to give you some  
17 idea of when the resolution process will be completed and  
18 what the workloads are. So on the left are the issues that  
19 were resolved in fiscal 1983, beyond 0737 and things that we  
20 identified at that time.

21 The next is just the current fiscal year broken  
22 down into quarters to give some idea of how many issues will  
23 be done in each quarter and in the total year. And then we  
24 projected out for the ongoing fiscal 1985 and 86 years.

25 CHAIRMAN PALLADINO: When you say non-0737 items,



1 are those -- do those include Chapter V items, or are those

2 MR. MINNERS: No, these do not include Chapter V  
3 items.

4 CHAIRMAN PALLADINO: I'm not sure I know all the  
5 history, but I thought the Commission had specifically  
6 approved the 0737 items. Did they approve other items to  
7 be undertaken?

8 MR. MINNERS: Well, in varying degrees. I think  
9 some of the human factors items have been down before the  
10 Commission and they have been approved. So yes, I think the  
11 Commission has approved other TMI Action Plan items beyond  
12 0737.

13 This chart does not go beyond 1986. That does  
14 not mean that there might not be more work beyond 1986.  
15 Some of these issues, there's decision points out in time  
16 which says when we'll get here. Then we'll decide next  
17 what we might have to do to get the complete resolution  
18 of this. So there may be resolutions beyond FY86. But the  
19 current schedules only go out to FY86.

20 (Slide.)

21 CHAIRMAN PALLADINO: You said that the non-0737  
22 items that you were talking about were those that are  
23 approved, available, identified, high and medium. Is that  
24 right?

25 MR. MINNERS: Correct.



1 CHAIRMAN PALLADINO: And in addition to those  
2 seem to be graded and 49. I'm looking at your slide 3 and  
3 trying to compare --

4 MR. MINNERS: Just the safety line, not the  
5 total line.

6 Well, you have to subtract out the two FY83 and  
7 the two first quarter FY84 which are listed on the previous  
8 slide as approved issues, because they were resolved. So  
9 you wouldn't get it to add up.

10 CHAIRMAN PALLADINO: You didn't include the  
11 approved.

12 MR. MINNERS: Yes, I did include the approved.

13 CHAIRMAN PALLADINO: I just was trying to  
14 understand --

15 MR. MINNERS: Available, identified, high and  
16 medium are 45. Correct?

17 CHAIRMAN PALLADINO: Available, identified, high  
18 and medium. Yes.

19 MR. MINNERS: Now you add to that --

20 CHAIRMAN PALLADINO: Okay. You did not include  
21 the approved.

22 MR. SPIES: No, because they have been resolved,  
23 Mr. Chairman.

24 CHAIRMAN PALLADINO: And then add what?

25 MR. MINNERS: I was just saying that the

1 difference between the 45 and the 49 are the four issues  
2 which were resolved in FY 83 and the first quarter of FY84.  
3 On slide 3, those are listed as approved issues.

4 COMMISSIONER BERNTHAL: You know, I must say I  
5 don't have the advantage of having eaten this for breakfast  
6 every morning for some period of time, but I don't find it  
7 very enlightening to worry about the number of issues as  
8 such, since it depends on how you define them as we've just  
9 heard, and I guess I'd prefer to move on to more substantive  
10 questions as soon as we can do that.

11 MR. MINNERS: Fine. I think then maybe we should  
12 just go on to the presentation of implementation.

13 CHAIRMAN PALLADINO: Well, I must differ to the  
14 extent that if I'm going to try to follow a presentation  
15 I should be able to know what numbers go with what.

16 COMMISSIONER BERNTHAL: Yes. All I'm saying is  
17 that the numbers are pretty meaningless, it seems to me.  
18 It's the substance of what we're trying to do here that  
19 matters.

20 CHAIRMAN PALLADINO: I agree with that.

21 COMMISSIONER ASSELSTINE: I guess the message is  
22 that certainly the bulk of the items have now proceeded to  
23 being resolved.

24 MR. SPIES: And one of the remaining ones, we've  
25 put a system together to decide which ones are more

1 important and drop the ones that we didn't think resources  
2 should be allocated to them.

3 MR. MINNERS: We tried to find some better way of--

4 COMMISSIONER BERNTHAL: That's substance.

5 MR. SPIES: Yes. Resources is substance.

6 (Slide.)

7 MR. MINNERS: Next slide, please.

8 COMMISSIONER ASSELSTINE: You aren't going to  
9 talk about that one?

10 MR. MINNERS: Whatever you'd like.

11 COMMISSIONER ASSELSTINE: That was the human  
12 factors, and I guess I had a question about that.

13 MR. MINNERS: The purpose of this was just to --  
14 because I think of the visibility of the human factors issues  
15 and the Waste Policy Act. We wanted to note that with the  
16 completion of these items, the requirements of the Waste  
17 Policy Act should be completed.

18 COMMISSIONER ASSELSTINE: And I gather that with  
19 the package that we now have, that would close out all of  
20 the human factors issues. Or are there other ones that are  
21 still left over?

22 MR. MINNERS: We are switching over from tracking  
23 human factors issues as TMI Action Plan issues to tracking  
24 the human factors program plan, which people sat back a year  
25 or so ago and decided this is what we ought to be doing

1 three years after the accident on human factors, and so.  
2 we're going to transfer over and track those human factors  
3 issues and we will stop tracking them per se as TMI Action  
4 Plan issues.

5 MR. RUSSELL: Bill Russell, Deputy Director of  
6 Division of Human Factors Safety. The specific items that  
7 we have here are those which are associated with training  
8 and qualification, which are covered by the scope of  
9 Section 306. There are other human factors issues which are  
10 being tracked as a part of the human factors program plan,  
11 which also relate to TMI Action Plan items that are not on  
12 this list. This slide was just to say approval of 306  
13 would, in fact, close these items out; some of which have  
14 been previously closed out by Commission action, and the  
15 rulemaking would finalize that.

16 (Slide.)

17 MR. EISENHUT: Let me make a comment on this one.  
18 This slide -- those of you who were here a couple years ago  
19 will remember this slide. It's the same slide we used at  
20 the time, and it was a cartoon to try to show how the overall  
21 listing of all of the Action Plan things that Themis Spies  
22 was addressing -- there was a subset of that that actually  
23 was ready to be implemented in the plant, physically to go  
24 out to the utilities.

25 This was the first one. We modified it slightly

1 by the second page.

2 (Slide.)

3 Remember, there was 0737 which was a big listing  
4 of items, which as we explained the 63 general topics that  
5 Mr. Spies mentioned are actually 124 detailed items to be  
6 implemented. You'll recall we discussed Supplement 1 to  
7 0737 for a couple years. That's the emergency facilities,  
8 tech support center, EOF's, Reg Guide 1.97, et cetera.

9 I think the next slide --

10 (Slide)

11 -- shows a little bit more substance about it in one sense.  
12 Remember now that if you take all those 100 and some items,  
13 they have to be implemented at on the order of 70-some  
14 operating plants.

15 So the way we tracked it is simply each item at  
16 each plant that it's applicable to, and then you get a large  
17 number of over 5000.

18 I think the only real message we're trying to  
19 portray by this slide is that a very large percentage of all  
20 of the items that came out of the Action Plan in the 0737 to  
21 the utilities to be implemented, a very large percentage of  
22 those the staff has completed its review of what the utility  
23 proposed, a lot of them resulted in tech specs being put  
24 into place in the plants, which is the end of the process.  
25 That is well into going along. You'll see Supplement 1 of



1 0737 -- remember it just came down to you a couple months  
2 ago.

3 But I think the message is very clear that it's  
4 well along. The utilities have proceeded very well in  
5 implementing things.

6 (Slide.)

7 The next slide actually shows -- again, we tried  
8 to just graphically show where physically implementation is  
9 in the plants; whether it's hardware, whether it's a  
10 procedure, whether it's training, whether it's extra people  
11 on shift. And note that the implementation progress out  
12 there in the plant is well along, even actually preceding  
13 where we are on the review of a lot of these items.

14 That's because remember the approach in NUREG-0737  
15 was we did a lot of items by post-implementation. We did  
16 that to try to keep the staff off the critical path so that  
17 the utilities did not have to wait on us. By and large,  
18 from what we're looking at it is -- it's working very well.

19 Now, IE and the regions have a program of reviewing  
20 those items to see that the utility actually met the dates  
21 that he had committed to, and that process is they pick these  
22 items up during the normal implementation -- normal inspection.  
23 They pick up some of the implementation items. And that  
24 process is going to stretch over a few years. A couple of  
25 years at least.

1           But this is based on what we're seeing from the  
2 utilities. It appears they are well along in the implementa-  
3 tion phase. And while numbers don't mean that much, it gives  
4 you a good feeling that a lot of the items are, in fact,  
5 being implemented. There are a few hard, technical spots on  
6 the next couple slides, and Frank is going to walk you  
7 through and give you a feeling for what has been accomplished  
8 in some of the key things and what are some of the key  
9 problems we're still experiencing out there today.

10           (Slide.)

11           MR. MIRAGLIA: As Darrell had mentioned earlier,  
12 usually we lose sight of the fact of what we have  
13 accomplished. This slide is just representative; it's not  
14 an all-inclusive list. But via the same categories that  
15 are in the Action Plan, operational safety, siting and  
16 design issues and emergency preparedness issues, under each  
17 of those major headings it enumerates some of the things  
18 that have been implemented and that are in place in facilities.

19           All the items under each of these headings are  
20 substantially completed in the plants that are now operating.  
21 As I said, this is an example, an illustrative list and  
22 by no means complete.

23           (Slide.)

24           This slide discusses some of the items that have  
25 not been completed to date, and where we stand on some of



1 those issues. Post-accident sampling, about 28 percent of  
2 the reviews are complete. Our goal and objective is to get  
3 the majority of the outstanding reviews completed by the end  
4 of this fiscal year.

5 The PASS systems are installed --

6 CHAIRMAN PALLADINO: When you say 28 percent  
7 completed, does that mean installed equipment, or is that  
8 resolution?

9 MR. MIRAGLIA: That's our review being complete.  
10 Now, many of these facilities have a PASS system installed  
11 at the facility but they can't declare it operatable until  
12 they have their tech specs and review being complete.

13 MR. EISENHUT: You'll recall, I think it was the  
14 short term lessons learned, one of the January 1st, 1980  
15 items, they had to put in an interim procedure for post-  
16 accident sampling. And then we've been going through the  
17 review of the systems, the more elaborate final system.  
18 As it turned out, I think it was at San Onofre we had a  
19 discussion where we found very late in the process that the  
20 system just couldn't accomplish what it was designed to do.

21 So all the plants have installed an interim  
22 post-accident sampling system method, procedures, et cetera,  
23 but they don't have a final system installed that has been  
24 declared operational. Remember, all the new plants have  
25 post-accident sampling systems. I think we even brought it

1 up on LaSalle when we discussed it. But the question is,  
2 can that system be declared operational.

3 That is probably -- the first couple items here  
4 are some of the items that people thought could proceed along  
5 pretty well but have run into real technical problems  
6 actually out there in the field.

7 COMMISSIONER ASSELSTINE: So when you say  
8 28 percent completed, that means installed and operational  
9 so that the balance --

10 MR. EISENHUT: I don't know -- I think it might  
11 just mean review is completed.

12 MR. MIRAGLIA: It's just the review.

13 MR. EISENHUT: I'd just point out that's a post-  
14 implementation review item, and we're working our way  
15 through the reviews. The latest information I had was that  
16 I think very few have actually been declared operational in  
17 the plants. So the reviews are proceeding along but a lot  
18 of modifications are necessary out in the plants, even on  
19 the new OLs.

20 COMMISSIONER BERNTHAL: Can you give me an  
21 example of what a major technical problem is in this case?

22 MR. EISENHUT: Technical engineering problem.  
23 It's a lot harder to accomplish out in the field, it turned  
24 out, than looked at on a piece of paper.

25 MR. BANAROYA: I am Vic Banaroya, Chief of

1 Chemical Engineering. One of the problems we had is that  
2 the samples cannot be taken in the time it's supposed to be  
3 taken. Some of the analyses are not yielding the results  
4 that they should, or we don't have a procedure that will give  
5 us the core performance, the amount of core damage.

6 COMMISSIONER BERNTHAL: Thank you.

7  
8 COMMISSIONER ASSELSTINE: But I gather on the  
9 post-accident sampling systems there is a program in place,  
10 either headquarters or region, to make sure not only that  
11 they have the system in there, but that it's also tested and  
12 demonstrated to be operational.

13 What prompted the question, some of the NTOL's --  
14 and there's one I can think of where they said yes, ours is  
15 operational, it's tested, we're all set. Most of them the  
16 answer I get back is well, no. Here's the room, but --

17 MR. EISENHUT: Most of them are not operational  
18 and you have to remove the samples, bring them into the  
19 room, analyze them properly.

20 MR. MINNERS: That's why it's so important to  
21 note there was a short-term action here to develop interim  
22 procedures. So there was some capability for post-accident  
23 sampling, but it's not in the automated kind of discipline  
24 sense.

25 MR. SCHWARTZ: Shelly Schwartz from I&E. Yes,  
sir, part of TI 2515.65 does cover II.B.3 for the regions to

1 review during their inspection to close out that item.

2 MR. EISENHUT: Was that the IE temporary  
3 inspection instruction? Right.

4 COMMISSIONER ASSELSTINE: Do we have any kind of  
5 a target for when we might expect to see these kinds of  
6 systems operational, at least in most plants, or not?

7 MR. MIRAGLIA: First the reviews would have to  
8 be completed. Then it would have to follow up with I&E  
9 following up the completion of our reviews to make sure that  
10 the items identified in the reviews are closed out. So it  
11 would be sometime subsequent to September 1984.

12 Relief valve and safety valve testing is item  
13 II.D.1. Twenty-six percent of the reviews incomplete here.  
14 This required testing by EPRI of certain valves that were  
15 used in the safety systems. There was a generic evaluation  
16 presented based upon the EPRI testing and evaluation, and  
17 then the plants would take this generic analysis and show  
18 the applicability of the EPRI tests data to their particular  
19 facilities. And this has resulted in some delays because  
20 the piping in each of the PWRs -- in order to make the  
21 generic analysis applicable they have to go back and re-review  
22 and see what lengths of pipe they have before the valves and  
23 flows and to match that up requires a pretty sophisticated  
24 plant-specific evaluation to show the applicability to generic  
25 test results. So that's taken a long process to iterate and

1 to get those analyses complete.

2 I think on instrumentation for inadequate core  
3 cooling, I think there's been a number of Commission papers  
4 and briefings as to the status on those items. And B&W  
5 licensees were issued orders on those items and there's a  
6 long lead time for the procurement of equipment and there's  
7 very few of these instruments that are installed and in place.

8 CHAIRMAN PALLADINO: In your earlier handout you  
9 had a table that showed instruments to detect inadequate core  
10 cooling, 2 percent complete. Does that refer to reviews?  
11 I thought we were farther along than that. It was a tail  
12 end of your earlier set of slides where some of these items  
13 were identified. And on this side of them it showed 2 percent  
14 complete.

15 MR. MINNERS: That's the review status.

16 CHAIRMAN PALLADINO: That's the review status.  
17 How about the plants? I understand the B&W, they have long  
18 procurement times, but very few have been installed.

19 MR. MATTSON: Roger Mattson from Systems Integra-  
20 tion. Nineteen are installed, 7 partially installed and  
21 none of them approved for operation yet.

22 CHAIRMAN PALLADINO: Thank you. When you're  
23 reviewing, you're reviewing the submittals of the individual  
24 licensees?

25 COMMISSIONER ASSELSTINE: It's by owners group,



1 I thought.

2 MR. MATTSON: If you remember, Mr. Chairman, about  
3 two years ago we had the bru-ha-ha on inadequate core  
4 cooling. And the solution to that long discussion was that  
5 the review would occur in two steps; first, the generic  
6 review according to the type of instrument, not necessarily  
7 the type of reactor but the type of instrument -- a Westing-  
8 house design, a Combustion Engineering heated junction  
9 thermocouple -- and then a variety of B&W reactor approaches,  
10 mostly differential pressure measurements.

11 Once the generic review was done then there was  
12 to be a plant-specific review that was closely coupled to  
13 the human factors review. And that's the reason that  
14 although there are a number of them installed, they're not  
15 yet operational because the arrangement that was worked out  
16 to get the ACRS and the Commission and the CRGR and everyone  
17 to agree to this tracking system in the PWRs was that it was  
18 well human factors-engineered.

19 So you had to complete the emergency operating  
20 procedures for how you would rely on the thing, you had to  
21 complete the job and task analysis for the control room so  
22 that you could see who would rely on the thing, and that they  
23 had been properly instructed. And then once you had it  
24 installed, you'd be given a plant-specific approval to turn  
25 it on.

1                   Now the other complicating factor that makes the  
2 schedules hard to predict on this and other items is the  
3 flexible scheduling arrangement that we've had for about three  
4 years now on all of these items where we don't set a hard  
5 and fast implementation date; rather, we allow each plant to  
6 negotiate an implementation date on an item-by-item basis  
7 with the project manager. So these dates vary for a number  
8 of reasons.

9                   CHAIRMAN PALLADINO: Are you reviews being made  
10 of those that are installed, or are your reviews being made  
11 on those that are being proposed, plant specific?

12                  MR. MATTSON: The plant-specific review doesn't  
13 have to be tied to the installation. As long as people have  
14 got the details and they can say here's how it will work on  
15 my plant, here's the steps I'll accomplish, then we can  
16 complete a review but not issue approval for the thing to  
17 be turned on until all of the steps are accomplished.  
18 Install it, do the job and task analysis, have the emergency  
19 procedures.

20                  Once those are accomplished, then we would give  
21 approval for it to be turned on and used.

22                  CHAIRMAN PALLADINO: I still don't understand.  
23 Nineteen you said were installed. Are you reviewing those?  
24 My feeling is that you've done more than 2 percent that's  
25 shown in that other table, but I don't know whether it's



1 true or not. You said 19 were installed, 7 were partially  
2 installed. Now, are those the ones we're reviewing?

3 MR. MATTSON: The two percent is fairly easy to  
4 describe. It's Yankee Rowe. We gave them an exemption;  
5 they don't have to have one.

6 (Laughter.)

7 CHAIRMAN PALLADINO: That's all you reviewed?

8 MR. MATTSON: That's all that we can say is  
9 complete because none of them are turned on. We've given no  
10 approval to turn on any inventory tracking system, so we  
11 can't count them as complete until we do that.

12 We've reviewed all of them generically, save a  
13 few like Farley who were going to try neutron attenuation  
14 and then abandoned that approach and are still picking  
15 another approach. So but for a few we've completed the  
16 generic review of every one, and we've completed plant-  
17 specific reviews on a number but we haven't given anybody  
18 permission yet. I don't know the number we've finished the  
19 reviews on.

20 CHAIRMAN PALLADINO: Well, what you're telling me  
21 is consistent with what I thought I understood.

22 COMMISSIONER ASSELSTINE: Roger, I know that on  
23 some of the subsequent slides even though you're working on  
24 schedules for implementation on a case-by-case basis, there's  
25 some projections on when the bulk of a plants, for example,

1 would have their SPDS's operational, and when the latter ones  
2 would be. Could you give us some kind of a ballpark estimate  
3 for the inadequate core cooling instrumentation? Would you  
4 expect to see the bulk of them in place and approved within  
5 two, three, four years?

6 MR. MATTSON: Three to five years with the  
7 controlling item being emergency procedures.

8 CHAIRMAN PALLADINO: Okay, do you want to go on?

9 MR. MIRAGLIA: The last two items on the list are  
10 items that came out of the Bulletin and Orders Task Force  
11 and are essentially analytical models, and there are  
12 extensive requests for additional information. We've  
13 finally approved the generic GE model and now it's to get  
14 on with the plant-specific reviews to close out those items.

15 Some of the issues require completion of one of  
16 the items in order to follow up on the second item, so  
17 they're sort of pacing one another.

18 (Slide.)

19 This slide just depicts --

20 CHAIRMAN PALLADINO: There were a couple other  
21 items that had low percent completions like II.K.2.13,  
22 thermo-mechanical. It's 0 completion. I'm not sure I  
23 understand all the implications. You didn't list that as  
24 one remaining issue.

25 MR. EISENHUT: Do we know where we stand on that?

1 CHAIRMAN PALLADINO: All I did was circle those  
2 items that had 0 percent or low percent and looked --

3 MR. PATEL: My name is Chandu Patel, I'm from  
4 Division of Licensing. We were -- all the vendors have  
5 submitted reports to respond to II.K.2.13, thermalized  
6 shock issue, and Division of Safety Integration, DSI, is  
7 reviewing, and it is almost completed. It is just a question  
8 of the conclusion is going to be that they do not need  
9 anymore changes in this item. And completion schedule is  
10 by September 1984 it should be completed.

11 But you know, as it is going to be generally  
12 resolved issue, we do not have anything complete; it's  
13 going to be everything completed by September 1984.

14 CHAIRMAN PALLADINO: But you do have a number of  
15 reports from vendors.

16 MR. PATEL: Yes.

17 CHAIRMAN PALLADINO: I won't hold it up by  
18 asking specifics on any others. But there were a number of  
19 others that you had listed earlier that had low percentages.

20 MR. MIRAGLIA: I think many of those were in the  
21 same sort of category where work is underway and it's a  
22 question of coming to the bottom line in the generic  
23 conclusion, and we show it as no resolution until we get to  
24 that point. Most of those are expected to be completed in  
25 the fairly near term.

1 (Slide.)

2 This just depicts the items that were in 0737,  
3 Supplement 1 that are covered by the Sup 1 that was issued in  
4 December 1982. It includes the upgraded emergency operating  
5 procedures for inadequate core cooling and transients. It  
6 includes the detailed control room design review, the safety  
7 parameter display, and then the emergency support facilities  
8 like the tech support center, operational support center,  
9 emergency operations facility.

10 There have been I believe two Commission papers  
11 that reported to the Commission the status of where we  
12 stand with respect to the Sup 1 items. The next few  
13 viewgraphs are histograms that were also applied or attached  
14 to those Commission papers. The three that we're showing  
15 here were the hardware-oriented type items.

16 (Slide.)

17 The first one being on the SPDS, showing the  
18 distribution of where the utilities stand with respect to  
19 declaring SPDS's operable.

20 COMMISSIONER ASSELSTINE: Why is there such a  
21 range on that, Frank?

22 MR. MIRAGLIA: I think we discussed some of that,  
23 Commissioner Asselstine, in the Commission papers. There's  
24 a number of reasons. Some are procurement kinds of delays  
25 in picking out the system and procuring the system. Other

1 utilities have taken the approach that if I do my SPDS now  
2 and then I follow it by a control room design review, it  
3 might mean that I have to go back and modify the SPDS, and  
4 there were a whole varied set of reasons and arguments that  
5 each of the utilities came in with and we looked at and  
6 made judgments on an individual basis, and they were reported  
7 I believe in a Commission paper in January, a recent one,  
8 on those kinds of subjects.

9 But it's basically equipment procurement and the  
10 scheduling and integrating these pieces together.

11 MR. EISENHUT: It's really more than just  
12 procurement; it's sort of development of the system -- the  
13 software that goes with it, designing the program. A number  
14 of different utilities, combinations of utilities and there  
15 were a number of different approaches to design the system  
16 and then go out and get it manufactured, then get it  
17 installed and declared operational.

18 Remember, this is the operability dates is what  
19 we're focusing on, and actually that means it's generally  
20 installed quite a bit in front of that, maybe a year before  
21 then. But to declare it operational --

22 MR. MIRAGLIA: Means there has to be the procedures  
23 developed, the training and this would include all of those  
24 items.

25 COMMISSIONER ASSELSTINE: I guess maybe the four



1 plants way out there in 1988 sort of concerned me a little  
2 bit as to why it's going to take that long to do it.

3 MR. MIRAGLIA: I think the Commission asked for  
4 some explanation on a number of plants and it was provided  
5 I think in a recent memorandum.

6 MR. EISENHUT: I think we're either coming back  
7 or have come back on an explanation on those plants that  
8 are way out at the end. And this slide is taken from that  
9 Commission paper.

10 COMMISSIONER ASSELSTINE: Because I know there are  
11 a number of plants now that already have the hardware  
12 installed and they're working on the software now.

13 MR. EISENHUT: That's correct. In fact, five of  
14 them have told us that they have declared them operational.

15 CHAIRMAN PALLADINO: This is SPDS for operating  
16 plants.

17 MR. EISENHUT: Correct.

18 MR. MIRAGLIA: The next two slides are the same  
19 sort of thing. They came out of that previous Commission  
20 paper. These are really the hardware operability dates  
21 for the TSC, tech support center, and the EOF. Again,  
22 remember these are the upgraded TSC and the upgraded EOF.  
23 They all have an operational TSC and EOF as we required  
24 before, but there's been a number of items moving around  
25 and IE has been sending down a continual stream of even



1 approved locations yet for EOFs and TSCs.

2 COMMISSIONER ASSELSTINE: Are those largely driven  
3 by the same kind of considerations as the SPDS? I notice  
4 that a lot of them seem to use the same equipment.

5 MR. EISENHUT: There's some variation, but that  
6 is generally the theme, because they're really linked together.

7 MR. MIRAGLIA: The reason for grouping these  
8 particular items into a subset or the supplement was because  
9 of the interrelationships of the items. The same information  
10 that the SPDS provides to the control room is important to  
11 the TSC and perhaps a sub-tier of that back to the EOF.  
12 So they are related.

13 COMMISSIONER ASSELSTINE: Some of them, the ones  
14 they have now are still pretty rudimentary. I went to  
15 St. Lucie not too long ago and their tech support center is  
16 basically a room with a few telephones in it, and that's  
17 basically it.

18 MR. MIRAGLIA: That's correct. And you'll see a  
19 variation at the various facilities, depending on what space  
20 they had available for the interim location.

21 COMMISSIONER ASSELSTINE: Yes, that's right.  
22 Some of them are pretty small rooms.

23 MR. MIRAGLIA: Yes. That sort of summarizes the  
24 status of the 0737 items.

25 MR. EISENHUT: The other piece of the presentation

1 was I guess OPE is going to lead the discussion on Chapter V.

2 CHAIRMAN PALLADINO: Let's see if there are any  
3 other questions by Commissioners before we switch.

4 Okay, go ahead.

5 COMMISSIONER ASSELSTINE: If you had to pick a  
6 date by which you'd expect everything to be done, would  
7 the inadequate core cooling instrumentation probably be the  
8 pacing item, and would you say basically you'd expect every  
9 plant to have done everything by, say, five years from now?

10 CHAIRMAN PALLADINO: Everything in 0737?

11 COMMISSIONER ASSELSTINE: In 0737, yes.

12 MR. EISENHUT: Five years from now? I think so.

13 COMMISSIONER ASSELSTINE: Four?

14 (Laughter.)

15 MR. EISENHUT: It's hard to say, but clearly this  
16 is one of the gaiting items. As you can see, I think we  
17 may approach it asymptotically. There are plants that have  
18 been shut down for a number of years, like San Onofre 1 has  
19 been shut down for several years. While we work with them,  
20 their implementation date is clearly going to be at the end  
21 of the line because they're not even sure how they're going  
22 to approach all of the requirements, or whether they're  
23 going to approach the problems.

24 COMMISSIONER ASSELSTINE: I suppose this is all  
25 affected, too, by what we talked about this morning.

1 MR. EISENHUT: I think that's correct. Clearly,  
2 this is the kind of thing that gets factored into that.

3 CHAIRMAN PALLADINO: Okay. Al?

4 MR. KENNEKE: Thank you, Mr. Chairman. May I  
5 start out by saying OPE has been involuntarily drafted as  
6 chairman or spokesman for a collection of tasks in Chapter V.  
7 We didn't have an EDO to report to on that. But other people  
8 are here to address the specifics.

9 The tasks in Chapter V were intended to articulate  
10 NRC safety policy and to strengthen the regulatory organiza-  
11 tion and management for carrying out that policy. The tasks  
12 are unlike those of the other chapters in that they delineate  
13 the intentions of the Commission itself.

14 In the August 1980 revision of the TMI Action  
15 Plan, the Chapter V tasks were grouped under 7 subject areas,  
16 which you'll see on the first slide here.

17 (Slide.)

18 I'm prepared to briefly describe the specific  
19 tasks included in each of the seven subject areas and comment  
20 on their status, and others are available to answer specific  
21 questions, who are more familiar with the history of the  
22 specific ones.

23 (Slide.)

24 There's only one task in subject area A, the  
25 development of an NRC statement on safety policy. You are

1 familiar with the development of the issuance in March 1983  
2 of the policy statement on safety goals for nuclear power  
3 plant operation. We're now in the two-year evaluation period,  
4 and last month the EDO briefed you on the status of the work  
5 and provided a schedule which calls for a final report to  
6 the Commission by September of 1985.

7 Under Task B.1, the Commission reviewed the  
8 possible elimination of NRC's non-safety and non-safeguard  
9 regulatory responsibility. This had been recommended by  
10 some of the groups that looked into the accident.

11 Following the Commission's July 1980 briefing on  
12 Chapter V of the TMI Action Plan, the Commission decided  
13 to retain the antitrust and NEPA responsibilities. There  
14 has been no executive or congressional action on the  
15 elimination of NRC export responsibilities, and the Commission  
16 has been divided historically regarding the retention or  
17 modification of its export licensing functions.

18 CHAIRMAN PALLADINO: Is there any reference  
19 document that we might read to get a little history, and  
20 could you provide it for us?

21 MR. KENNEKE: Yes, right. Under C.1, the question  
22 of strengthening the role of ACRS, the Commission decided not  
23 to seek legislation to eliminate the statutory requirement  
24 that ACRS review each application for a reactor CP or OL.  
25 Part 2 of the regulations was revised to provide for ACRS

1 participation in rulemaking. Although that had been generally  
2 done in the past, it was not explicit in the regulations.  
3 It is now.

4 COMMISSIONER BERNTHAL: When did we decide to do  
5 that, if I might ask?

6 MR. KENNEKE: I don't have the date handy but I  
7 can find that for you.

8 COMMISSIONER BERNTHAL: I trust it was before  
9 my time.

10 SPEAKER: April 17, 1981.

11 CHAIRMAN PALLADINO: Before all of our times.  
12 That's why wherever you could, Al, if you could provide us  
13 a reference document in case we want to go back and look at  
14 some of these, it would be helpful.

15 MR. KENNEKE: Yes, sure.

16 COMMISSIONER BERNTHAL: What I mean to say is  
17 when did they decide to do that.

18 (Laughter.)

19 COMMISSIONER ROBERTS: Can you give us a timeframe  
20 on B.1, now? Can you give us when B.1 was completed?

21 MR. KENNEKE: B.1. That was in the course of the  
22 July 1980 briefing. That one I have here and I can read you  
23 some of that. This is the July 1980 SRM.

24 Item 1 of that is that no action should be taken  
25 at this time on the possible elimination of non-safety



1 responsibilities until the current Commission vacancy is  
2 filled and/or new initiatives on the matter are taken by the  
3 Executive Branch or Congress.

4 MR. ROTHCHILD: To some extent that you're talking  
5 about giving up some of our NEPA responsibilities, the  
6 licensing reform legislation that we have now pending before  
7 Congress would allow the states to take over the need for  
8 power and alternative energy source determinations under  
9 certain circumstances.

10 COMMISSIONER BERNTHAL: At the risk of going over  
11 completed items, I don't know what the purpose of this meeting  
12 is but it seems to me that by taking the action which our  
13 predecessors did in 1981, we didn't strength the ACRS's role;  
14 we probably weakened it. And I would be in favor to some  
15 extent of reconsidering some of that.

16 CHAIRMAN PALLADINO: The reason I was asking for  
17 the reference documents was that we may want to revisit some  
18 of these, and I think one of the benefits that has come out  
19 of this meeting is informing us about things in Chapter V  
20 that certainly I -- the history of which I certainly didn't  
21 have, and I think what you're providing us is helpful.

22 If we could go back and get the opportunity to  
23 look at some of these documents we may want to actually  
24 revisit some of these things.

25 MR. KENNEKE: Sure. We'll gather those together



1 and forward them to you.

2 The practice of having the ACRS meet with the  
3 Commission on a nominal bi-monthly schedule was established  
4 and a system for follow-up on staff responses to ACRS  
5 recommendations was set up.

6 Under task C.2, the study of the need for addi-  
7 tional advisory committees, in July 1980 the Commission  
8 decided not to establish additional advisory committees, but  
9 to develop a means to insure that a broader spectrum of  
10 representatives of the public and outside organizations appear  
11 before the Commission. A pilot program for consumer affairs  
12 was begun by the Office of Public Affairs in October 1980  
13 and became permanent in October 1981.

14 Another action reflecting the Commission decision  
15 to enhance public participation was the establishment in  
16 October 1980 of the Advisory Panel for the Decontamination  
17 of TMI-2.

18 Under C.3, which called for a study of the need to  
19 establish an independent nuclear safety board, following the  
20 July 1980 review of the Action Plan the Commission decided  
21 against establishing an independent safety board since the  
22 staff reorganization, including creation of the new office  
23 of EOD, addressed the intended objectives of such a board.

24 The Commission noted, however, that Congress might  
25 nevertheless decide to set up such a board, and we note that

1 the concept of an independent NTSB type of organization for  
2 nuclear accidents has been revised periodically, and is,  
3 in fact, on next month's agenda for the Commission's meeting  
4 with the ACRS.

5 Under Item D.1, the first of the tasks addressing  
6 improvements in the licensing process, development of means  
7 for improving public and intervenor participation in the  
8 hearing process. The Commission, by as I recall a majority  
9 vote, sought authorization for a pilot program of intervenor  
10 funding in the FY81 budget submission. However, the Congress  
11 responded by prohibiting the use of funds to pay the expenses  
12 of or otherwise compensate intervenors.

13 A proposal to set up an office of public counsel  
14 was studied but action was terminated in view of congressional  
15 opposition to intervenor funding.

16 Under D.2, which involved a rulemaking on whether  
17 construction should be permitted while challenges to a CP  
18 authorized by a licensing board were under review. Following  
19 the TMI-2 accident the Commission revised the immediate  
20 effectiveness rule and instituted a mandatory Commission  
21 review for a licensing decision. The rule has been revised  
22 again to authorize the staff to issue low power operating  
23 licenses without Commission review, once the board has  
24 decided.

25 The Commission published in October 1982 a

1 proposed rule that would make the effectiveness review  
2 procedures for construction permits conform with those for  
3 OL's. The final rule has not yet been promulgated. I believe  
4 this is now covered as part of the reform task force work.

5 Task D.3 was a reexamination of the Commission's  
6 role in adjudication. It was intended to eliminate  
7 undesirable and unnecessary isolation of the Commission from  
8 the decision-making activities of the staff. This matter --

9 CHAIRMAN PALLADINO: I thought they were still  
10 doing that. Does this say completed?

11 COMMISSIONER ASSELSTINE: No, continuing.

12 MR. KENNEKE: Continuing. It involved several  
13 considerations including immediate effectiveness reviews,  
14 the structure of NRC's appellate process and communications --

15 CHAIRMAN PALLADINO: I'm sorry, which one are  
16 you looking at, D.3?

17 MR. KENNEKE: I'm on D.3.

18 CHAIRMAN PALLADINO: Mine says completed.

19 MR. KENNEKE: You have an earlier version. We  
20 toned that down to say continuing and it's part --

21 CHAIRMAN PALLADINO: Okay. Because I said boy,  
22 if you've done that, why didn't we bring Congressman Bevel's--

23 MR. KENNEKE: No, I'm sorry.

24 CHAIRMAN PALLADINO: All right.

25 MR. KENNEKE: The communications between the

1 Commission and the Staff, the ex parte rules are now  
2 subsumed under Item D.2 and D.4. D.4 was the study of the  
3 reform of the licensing process. This has been undertaken  
4 since the Action Plan was published and includes issuance  
5 in May 1981 of a statement of policy on the conduct of the  
6 licensing proceedings, the establishment of the reform task  
7 force in November 1981, the submittal to Congress in  
8 January 1983 of a draft bill, the Regulatory Reform Act  
9 of 1983, and most recently, in November the advance notice  
10 of proposed rulemaking on the role of the NRC Staff in  
11 licensing proceedings.

12 Under Section E --

13 (Slide.)

14 This was various items related to the need for  
15 additional legislation. The first of these six items was  
16 resolved by the Sholly legislation authorizing issuance of  
17 license amendments prior to the hearing. Under Item 2, the  
18 President's reorganization plan of 1980 authorized the  
19 Chairman to act for the Commission in an emergency and thus,  
20 in effect, mooted the question of the need for a Sunshine Act  
21 legislation closing those meetings.

22 The cleanup question, item 3, was studied by the  
23 staff which concluded that no legislation was needed. The  
24 Commission has taken no further --

25 CHAIRMAN PALLADINO: When was that?

1 MR. KENNEKE: That was --

2 MR. ROTHSCILD: Let me add something there. The  
3 Commission in its July meeting of 1980 decided that it  
4 didn't need legislation in the area unless, I guess, OGC  
5 thought there was a need for it and asked OGC to address it  
6 in a legislative package that we sent to the Commission in  
7 1980, August 6. It was SECY 80-366, which was possible  
8 legislative ideas.

9 And in that packet we mentioned four or five of  
10 these various items that Al will mention in a moment. We  
11 said there was no crying need for the legislation at the  
12 time. The Commission decided not to act on the legislative  
13 program. I guess the packet sat before the Commission for a  
14 period of time and then the Commission decided they really  
15 weren't going to make any suggestions to Congress, and  
16 SECY sent a memorandum to OGC asking us to withdraw the  
17 paper and we withdrew the paper, and since then the  
18 Commission has never expressed any interest in some of these  
19 legislative proposals that he will be talking about.

20 CHAIRMAN PALLADINO: Actually, I think later the  
21 Congress put the provisions in our --

22 MR. ROTHSCILD: Some of them subsequently got  
23 added, such as the --

24 CHAIRMAN PALLADINO: But we're not allowed to  
25 spend money to cover cleanup.



1 MR. ROTHSCHILD: Some of them like the Sunshine  
2 Act thing, we solved through the reorganization plan.

3 As far as the specific issue about cleanup, the  
4 staff issued a document, NUREG-0689, which dealt with -- was  
5 called potential impact of licensee default on cleanup of  
6 TMI-2. In that document they analyzed what would happen if  
7 a utility defaulted, and there was a lot of discussion of  
8 legal issues in that memorandum and what the agency's legal  
9 authority was, and there were no legislative recommendations  
10 in that NUREG document, and the Commission after reviewing it  
11 never directed the staff to come up with any legislative  
12 initiatives. And that's where we're at on that one.

13 COMMISSIONER BERNTHAL: It's too bad Victor  
14 isn't here; this is taking on the aspects of a This is Your  
15 Life program for the NRC.

16 (Laughter.)

17 CHAIRMAN PALLADINO: Well, I think these references,  
18 if you can get them for us, will be very useful to look back  
19 and see what was done and see to what extent we might want  
20 to look at them again.

21 COMMISSIONER BERNTHAL: Could you supply me with  
22 a copy of that document that you just referred to?

23 MR. KENNEKE: 0689?

24 COMMISSIONER BERNTHAL: I don't remember the  
25 number.



1 CHAIRMAN PALLADINO: Yes, 0689.

2 MR. KENNEKE: Item 4 was the Price Anderson Act.  
3 The recently reissued report to Congress in large part  
4 completes that task. The outstanding issue of the ENO  
5 criteria remains to be resolved, but for that no legislation  
6 is required.

7 Under Item 5, no action has been taken to establish  
8 a new category of license during extended post-accident  
9 recovery, but we understand that at least some believe that  
10 present authority is adequate.

11 CHAIRMAN PALLADINO: Actually, I think many of  
12 our problems that led to some of the controversies still  
13 going on in the staff comes about from the fact that perhaps  
14 this might not have been such a bad idea. Because we are  
15 working as though the operating license category applies to  
16 during the post-accident recovery period, and I think that's  
17 causing a lot of the problems.

18 MR. ROTHSCHILD: This was one of the items covered  
19 in the 1980 meeting and the subsequent legislation packet  
20 the Commission decided they didn't want to do anything on.

21 CHAIRMAN PALLADINO: I'd be interested particularly  
22 in a reference for that material that I could look up.  
23 Don't have to give it to me now. I think whatever you give  
24 me should be provided to all of us.

25 MR. KENNEKE: Sure. On Item 6, the Commission

1 decided in 1980 not to seek additional authority to address  
2 the establishing of a chartered national operating company  
3 or a consortium. By the way, I must say this -- the SRM of  
4 July 1980 has a great many of these things incorporated in  
5 it -- the decisions that we brought up.

6 (Slide.)

7 The items under Section F relate to organization  
8 and management. The first of these was a proposed management  
9 study by an outside group. This was considered and, as I  
10 recall, a statement of work was drawn up but it was never  
11 initiated.

12 CHAIRMAN PALLADINO: This says completed. Or at  
13 least, mine says status, completed. I'm curious as to  
14 what they found.

15 MR. KENNEKE: I think the understanding is that  
16 the intent can be considered to be complete and to have been  
17 met by these various organization steps that have been taken  
18 since 1980 and from such things as the PPG and EDO's planning  
19 guidance.

20 Under F.2, for example, it goes on to talk about  
21 reexamination of the organization of functions of the NRC.  
22 This was completed and the staff reorganized in response to  
23 the lessons learned from the accident. Delegations of  
24 authority to staff were revised. Under item 3, the roles  
25 of the Chairman of the Commission and the EDO were all

1 strengthened. They were clarified by the President's  
2 reorganization plan in 1980, and the same presidential action  
3 delegated emergency response functions to a single commissioner  
4 and all these organizational changes have been implemented  
5 by manual chapter revision.

6 (Slide.)

7 On this viewgraph, last but not least, the TMI  
8 accident publicized the disadvantages to safety resulting  
9 from dispersal of NRC headquarters locations and the  
10 ensuing investigations included strong recommendations for  
11 consolidation. The first task was to get a single location  
12 in the long term, and second, to get at least an interim  
13 consolidation to reduce the distance between the headquarters  
14 offices. And as you know, in the February hearing the  
15 Chairman made what has become an annual request of the  
16 support of Congress in achieving consolidation.

17 COMMISSIONER BERNTHAL: I think it's safe to say  
18 we've moved backwards.

19 (Laughter.)

20 MR. KENNEKE: In summary, perhaps it's fair to  
21 say that all the Chapter V tasks have been addressed at one  
22 time or another, and most are completed. Those tasks that  
23 are continuing appear to be within the scope of the normal  
24 agency activities, but at least one task, this one of  
25 consolidation of headquarters, may go on indefinitely, and

1 it depends on the GSA and Congress.

2 That's it, Mr. Chairman.

3 CHAIRMAN PALLADINO: Any questions?

4 MR. MINNERS: Is the Commission aware that there  
5 is ongoing GAO investigation of the TMI Action Plan?

6 CHAIRMAN PALLADINO: I learned that earlier  
7 today.

8 MR. KENNEKE: GAO has some ongoing -- we have  
9 invited them. I have not determined, but I believe they are  
10 here today.

11 CHAIRMAN PALLADINO: Does the Commission wish to  
12 hear any comment from them?

13 COMMISSIONER ASSELSTINE: If they're prepared to  
14 make any, yes.

15 CHAIRMAN PALLADINO: Do you know who is here?  
16 Do you mind coming up to the mike?

17 MR. WEIGEL: I'm Dwayne Weigel from the General  
18 Accounting Office. Yes, we have an audit underway of the  
19 Commission's implementation of the Action Plan. We're  
20 looking at the 0737 items.

21 Also, the items that are included in the 0933 and  
22 the Commissioner level items. We're trying to cover the  
23 entire plan. We expect to finish our audit work in August  
24 and probably have a report issued after coming to you for  
25 comment, in December. I think that's about all I'd like

1 to say about it now.

2 CHAIRMAN PALLADINO: Okay, thank you. We'll be  
3 interested in your report.

4 Any other Commission questions on the subject of  
5 the TMI Action Plan? There was one thing. One advantage of  
6 getting early copies of the handouts is they have some  
7 interesting information that doesn't appear in the later one.

8 (Laughter.)

9 But there was a slide 8 that is not in the package  
10 now that says future activities, you plan to discontinue  
11 Action Plan tracking system, and you're going to issue one  
12 last update. Could you explain what you have in mind there  
13 and why you're dropping the tracking system?

14 MR. MINNERS: We think that the Action Plan  
15 tracking system is probably outdated, and we are trying to  
16 organize all of our generic issue management, both in  
17 resolution and implementation. And so the system that's  
18 just focusing on the Action Plan is no longer appropriate.

19 Plus, I think the way it was organized was not the  
20 most convenient way to do it, and we now have a system in  
21 which archival information is kept in a separate book and  
22 the active issues would then be kept in the tracking system,  
23 which is different than the Action Plan tracking system.

24 The suggestion has been made and we'll probably  
25 adopt it, that we will issue one last update of the Action

(Commissioner Bernthal left the room.)



1 Plan as best we can do it, and that will be its swan song,  
2 and all of the tracking then will go over to our tracking  
3 systems for all generic issues and not TMI Action Plan issues.

4 CHAIRMAN PALLADINO: Does that mean that if at a  
5 later time we want to examine the status of TMI Action Plan  
6 items, you couldn't pull it out as a subset of your generic  
7 tracking system?

8 MR. MINNERS: No. I think -- the answer to that  
9 question is yes and no. In 0933 where we're keeping track of  
10 things, I think in the generic issues management control  
11 system they are kept separate. But what is happening is that  
12 the Action Plan issues are slowly getting mixed together and  
13 combined with the other issues. As I noted, there were 14  
14 items which we went through which disappeared into other  
15 items. The human factors program plan is going to absorb  
16 some more. The QA is now developing a more integrated  
17 program and that's going to absorb a couple more.

18 So I think the answer is really no, because the  
19 Action Plan, the TMI Action Plan items are going to disappear,  
20 and they're going to be incorporated into more general things.  
21 We're no longer focusing just on the Action Plan.

22 CHAIRMAN PALLADINO: Does the staff see any need  
23 to respond to inquiries about how we're doing on the Action  
24 Plan? For example, I could see some questions coming in a  
25 future hearing by a congressional committee that says well,



1       how are you doing on the Action Plan. And then you, if I  
2       understand you correctly, will not be able to draw the data  
3       out.

4               MR. MINNERS: Well, to a degree that's the case  
5       now, because as I say, things are starting to get mixed up.  
6       And yes, I can still give you a list of items and tell you  
7       this is that and that is the other thing. But -- and I think  
8       the human factors program thing illustrates it. You may  
9       have an Action Plan item that's resolved and implemented,  
10      or mostly implemented, and yet there's a lot of ongoing work  
11      in that very same area. So it's misleading to tell somebody  
12      just that the Action Plan item is done. That doesn't tell  
13      the whole story.

14              So from the congressional questions I have seen,  
15      I think they are getting more knowledgeable of our operations  
16      and instead of limiting their questions to Action Plan,  
17      they're starting to ask us about generic issues and not just  
18      unresolved generic issues -- not just safety issues, but all  
19      generic issues.

20              And I think we should encourage them in that,  
21      because I think that's where the focus ought to be. There are  
22      many what I think -- there are many generic issues that I  
23      think are more important than a lot of the TMI Action Plan  
24      issues.

25              CHAIRMAN PALLADINO: Yes, I don't disagree with

1 you there. But this was a rather unique circumstance, at  
2 least I hope it was a unique circumstance that led to quite  
3 an ambitious program and it's going to take some time before  
4 people are used to not asking about it.

5 MR. MINNERS: Well, there's a good deal of  
6 appearance of a shall game, and I guess we get criticized  
7 about that quite often. Unfortunately, that has to be so  
8 because unless you want to stand in the same place and never  
9 change your mind, you're going to have to revise these things  
10 and make new ones and combine things together.

11 We're trying to keeping a paper trail so that we  
12 can follow where TMI Action Plan item such-and-such went.  
13 It might be hard to summarize in any kind of a table, but  
14 I think -- I hope anyway that we'll be able to maintain a  
15 tracking system such that when somebody asks about that issue  
16 we can say well, that's where it was back in 1983, but now it's  
17 part of item such-and-such.

18 CHAIRMAN PALLADINO: Any other comments on this?  
19 Any other questions?

20 (No response.)

21 Thank you very much, we appreciate the briefing.  
22 You will get us those references. We stand adjourned.

23 (Whereupon, at 3:25 p.m., the Commission meeting  
24 was adjourned.)  
25

CERTIFICATE OF PROCEEDINGS

This is to certify that the attached proceedings before the  
NRC COMMISSION

In the matter of: Briefing on Status of Utility and NRC  
Compliance with TMI Action Plan

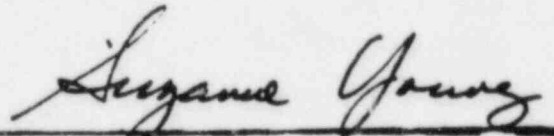
Date of Proceeding: Thursday, April 5, 1984

Place of Proceeding: Washington, D.C.

were held as herein appears, and that this is the original  
transcript for the file of the Commission.

Suzanne Young

Official Reporter - Typed



Official Reporter - Signature

COMMISSION BRIEFING

ON

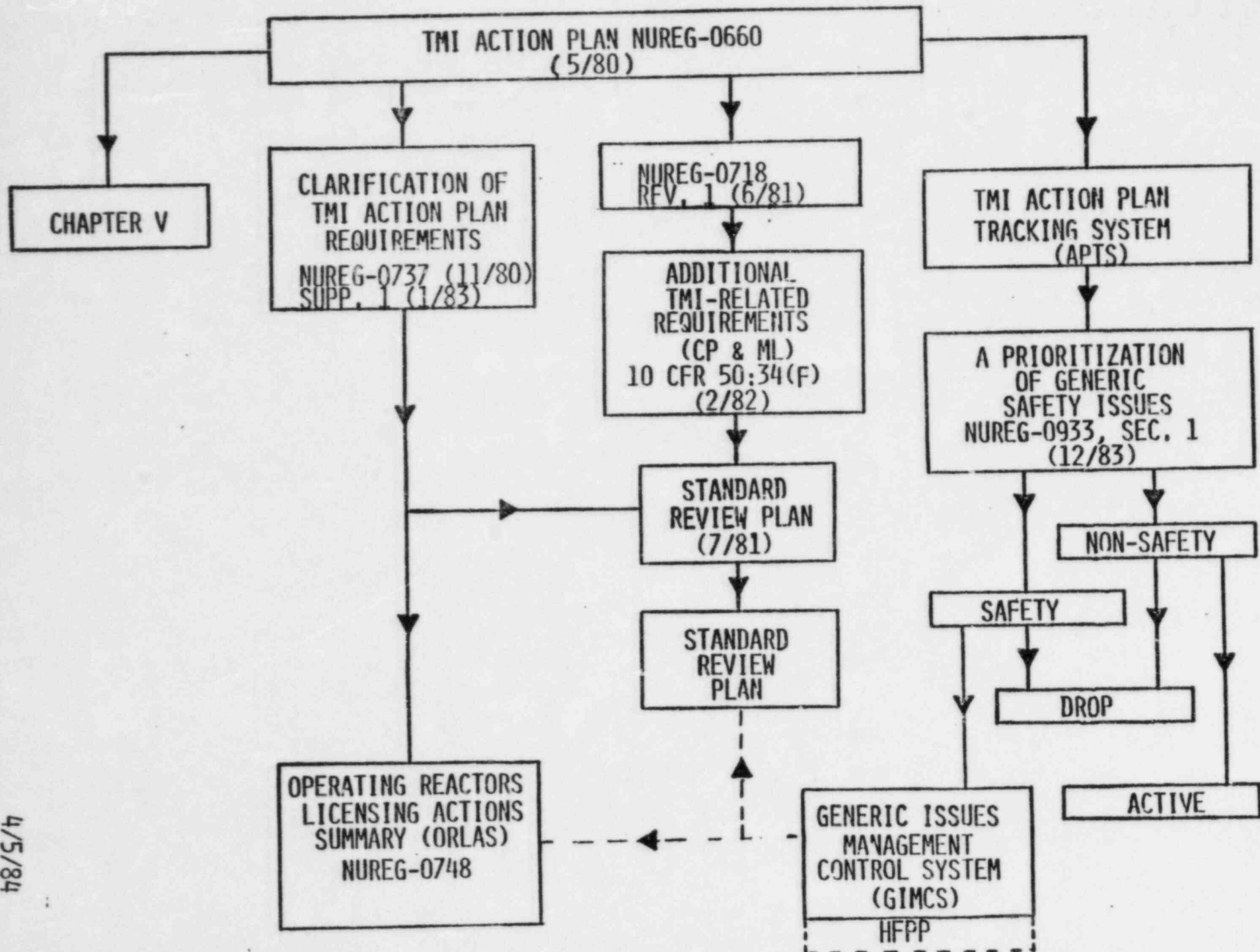
STATUS OF TMI ACTION PLAN

OFFICE OF NUCLEAR  
REACTOR REGULATION  
APRIL 5, 1984

## INDEX

1. TMI ACTION PLAN - FLOW CHART
2. GENERIC ISSUE PROCESS (NRR OFFICE LETTER 40)
3. SUMMARY OF ALL TMI ACTION PLAN ITEMS (3/15/84)
4. SUMMARY OF THE RESOLUTION SCHEDULES OF ALL TMI ACTION PLAN  
SAFETY ISSUES
5. RESOLUTION DATES FOR TMI SAFETY ISSUES BY FISCAL YEAR
6. HUMAN FACTORS ITEMS NEARING RESOLUTION
7. ORIGINAL PROGRAM FOR THE TMI-2 PLAN
8. CURRENT PROGRAM FOR IMPLEMENTING TMI-2 ACTION
9. SUMMARY - NRR REVIEW STATUS
10. NUREG-0737 STATUS
11. MAJOR ACCOMPLISHMENTS
12. PRINCIPAL REMAINING ISSUES
13. NUREG-0737, SUPPLEMENT 1 ITEMS ISSUED DECEMBER 17, 1982
14. SPDS OPERABILITY DATES
15. OPERABILITY DATES FOR TSC
16. OPERABILITY DATES FOR EOF

# TMI ACTION PLAN





GENERIC ISSUEPROCESS(NRR OFFICE LETTER NO. 40)

1. IDENTIFY ALL ISSUES
  - SOURCES - NRR, ACRS, AEOD, OIE, REGIONS
2. DEFINE ISSUES BY CONSULTING WITH LEAD NRC OFFICE/DIVISION/BRANCH
3. IDENTIFY NON-SAFETY ISSUES FOR SEPARATE PRIORITIZATION
  - LICENSING
  - ENVIRONMENTAL
4. IDENTIFY RESOLVED AND NEARLY-RESOLVED ISSUES
5. PRIORITIZE SAFETY ISSUES USING DEFINED METHOD
6. CIRCULATE PRODUCT FOR PEER-REVIEW
7. OFFICE LEVEL APPROVAL (ACRS REVIEW AND PUBLIC COMMENT IN PARALLEL)
8. SCHEDULE COMPLETION OF NEARLY-RESOLVED, HIGH PRIORITY, AND MEDIUM PRIORITY ISSUES IDENTIFIED BY PROCESS
9. MONITOR RESOLUTION (INCLUDING REVIEW, APPROVAL, AND ISSUANCE) WITH THE GENERIC ISSUE MANAGEMENT CONTROL SYSTEM (GIMCS)

4/5/84

**SUMMARY OF ALL THI ACTION PLAN ITEMS**  
**MARCH 15, 1984**

CLASSIFICATION	NIREG-0737	COVERED IN OTHER ISSUES	APPROVED	RESOLUTION			USI	HIGH	MEDIUM	LOW	DROP	TO BE PRIORITIZED	ACTIVE	TOTAL
				AVAILABLE	IDENTIFIED									
SAFETY	63	14	50	2	6	0	17	20	13	7	2	-	19 <sup>4</sup>	
NON-SAFETY	-	0	53	6	0	-	-	-	-	0	0	2	61	
TOTAL	63	14	103	8	6	0	17	20	13	7	2	2	255	

SUMMARY OF THE RESOLUTION SCHEDULES  
OF ALL TMI ACTION PLAN SAFETY ISSUES

ISSUE TYPE	ACTIVE		RESOLVED		
	TOTAL	SCHEDULES TO BE DEVELOPED	THIS QUARTER	PREVIOUS FY-84 QTRS	CUMULATIVE TOTAL
HIGH	17	0	0	0	0
MEDIUM	20	3	0	0	0
NOTE 1	6	0	0	0	1
NOTE 2	2	0	0	2	3
TOTAL	45	3	0	2	4

4/5/84

RESOLUTION DATES FOR TMI SAFETY ISSUES BY FISCAL YEAR

FY-83	FY-84				FY-85	FY-86	NOT SCHEDULED	CUMULATIVE TOTAL
	1ST QTR	2ND QTR	3RD QTR	4TH QTR				
2	2	0	11	12	25	13	6	3
								49

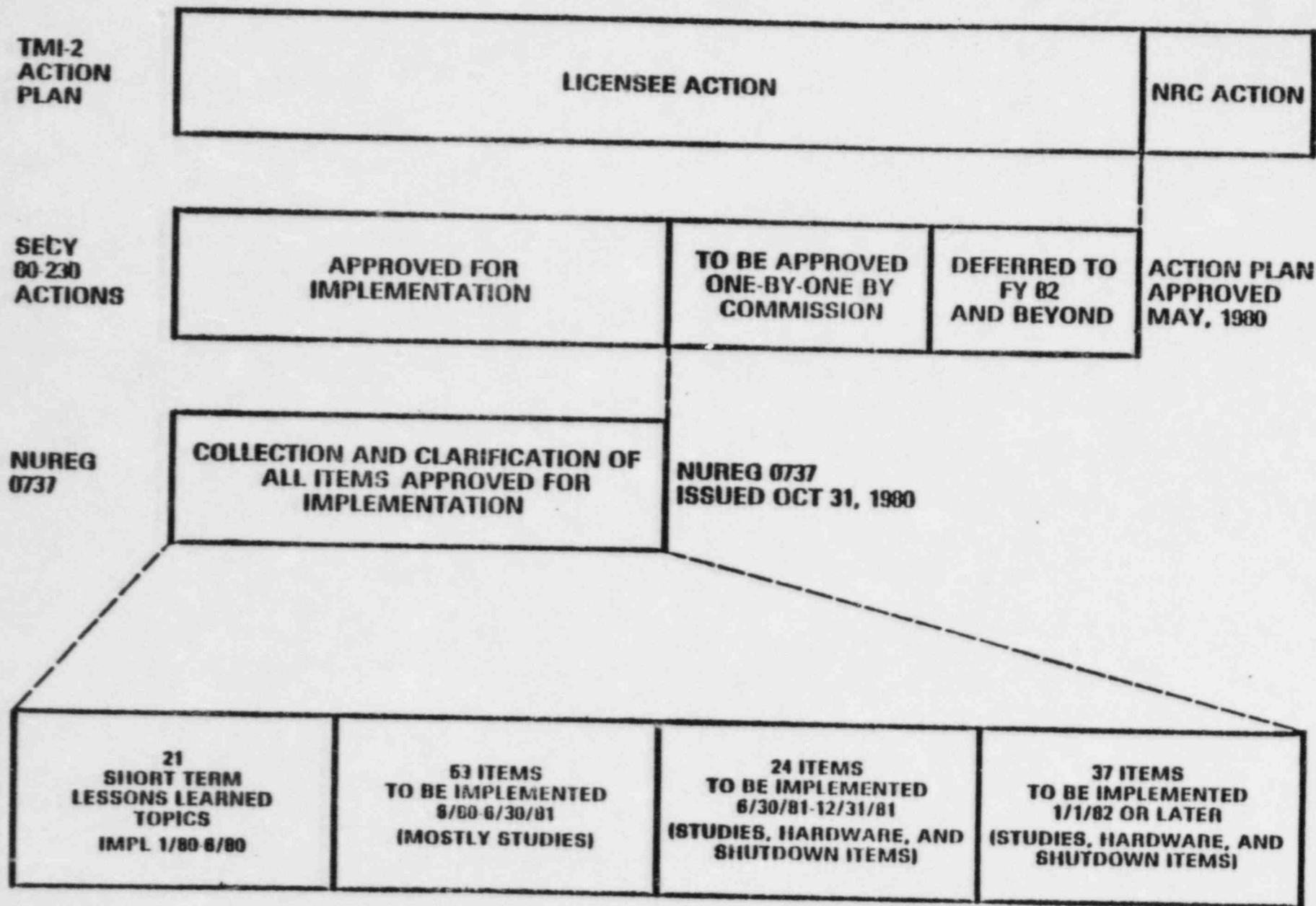
4/5/84

### HUMAN FACTORS ITEMS NEARING RESOLUTION

PUBLICATION OF THE FINAL RULES <sup>1/</sup> DESCRIBED IN SECY-84-76 WILL RESOLVE THE FOLLOWING TMI ACTION PLAN ITEMS ON HUMAN FACTORS:

- I.A.2.1 IMMEDIATE UPGRADING OF OPERATOR AND SENIOR OPERATOR
- I.A.2.2 TRAINING AND QUALIFICATIONS OF OPERATIONAL PERSONNEL
- I.A.2.3 ADMINISTRATION OF TRAINING PROGRAMS
- I.A.2.6 LONG-TERM UPGRADING OF TRAINING AND QUALIFICATIONS
- I.A.3.1 REVISE SCOPE OF CRITERIA FOR LICENSING EXAMINATIONS
- I.A.4.1 INITIAL SIMULATOR IMPROVEMENT
- I.A.4.2 LONG-TERM TRAINING SIMULATOR UPGRADE

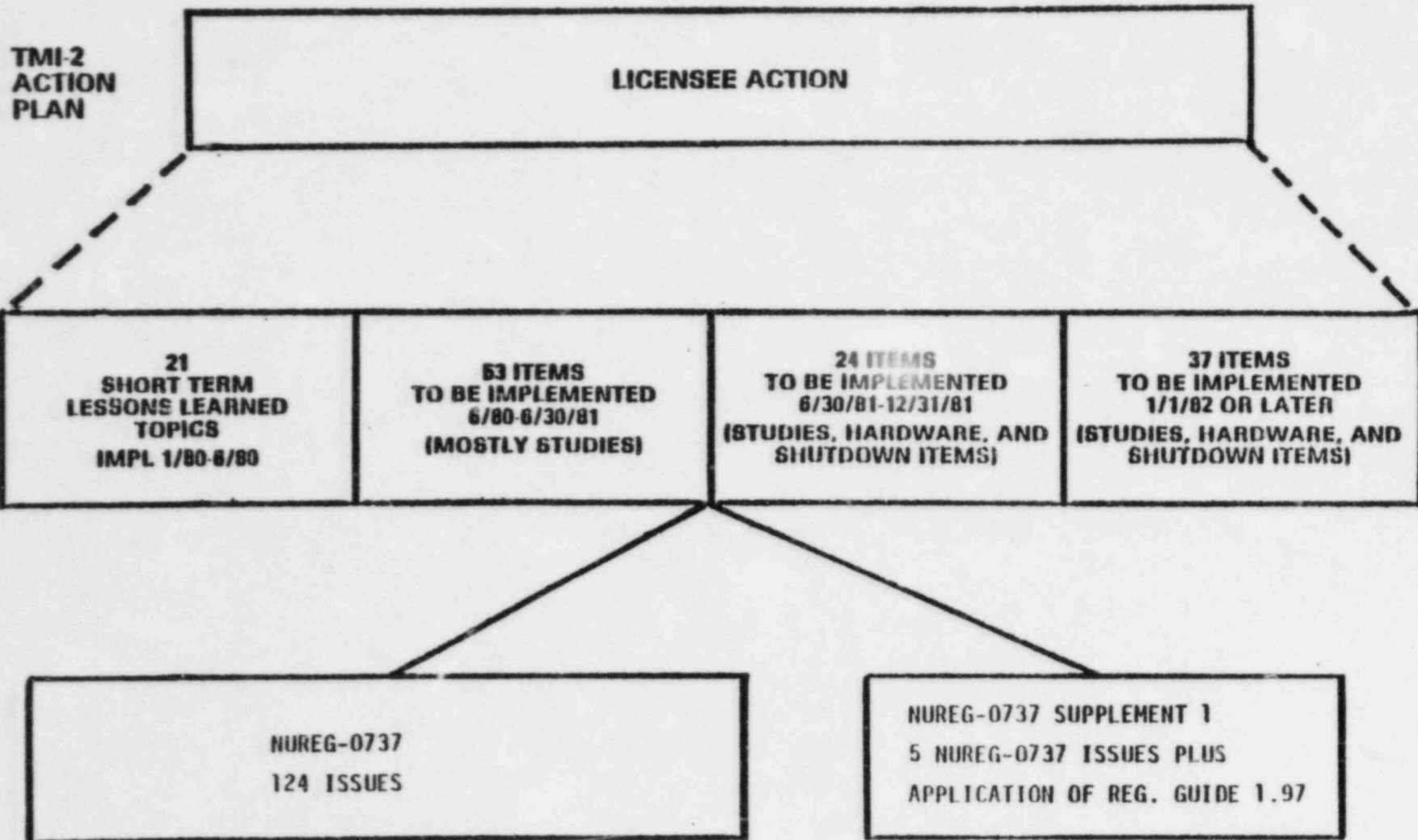
<sup>1/</sup> 10 CFR PART 50.200 THROUGH 50.250  
10 CFR PART 55.41; 55.43; AND 55.45  
10 CFR PART 50.74  
REVISION TO REG. GUIDES 1.8; 1.49; AND 1.134





CURRENT PROGRAM FOR IMPLEMENTING

TMI-2 ACTION PLAN



4/5/84

SUMMARY

## NRR REVIEW STATUS

## NUREG-0737

TOTAL NUREG-0737 PLANT ITEMS (ACTIONS).....5551

REVIEWS COMPLETED.....5094

TOTAL ACTIONS (OF 5551) REQUIRING  
TECHNICAL SPECIFICATIONS.....1727TECHNICAL SPECIFICATION ACTIONS  
COMPLETED (AMENDMENTS ISSUED).....695

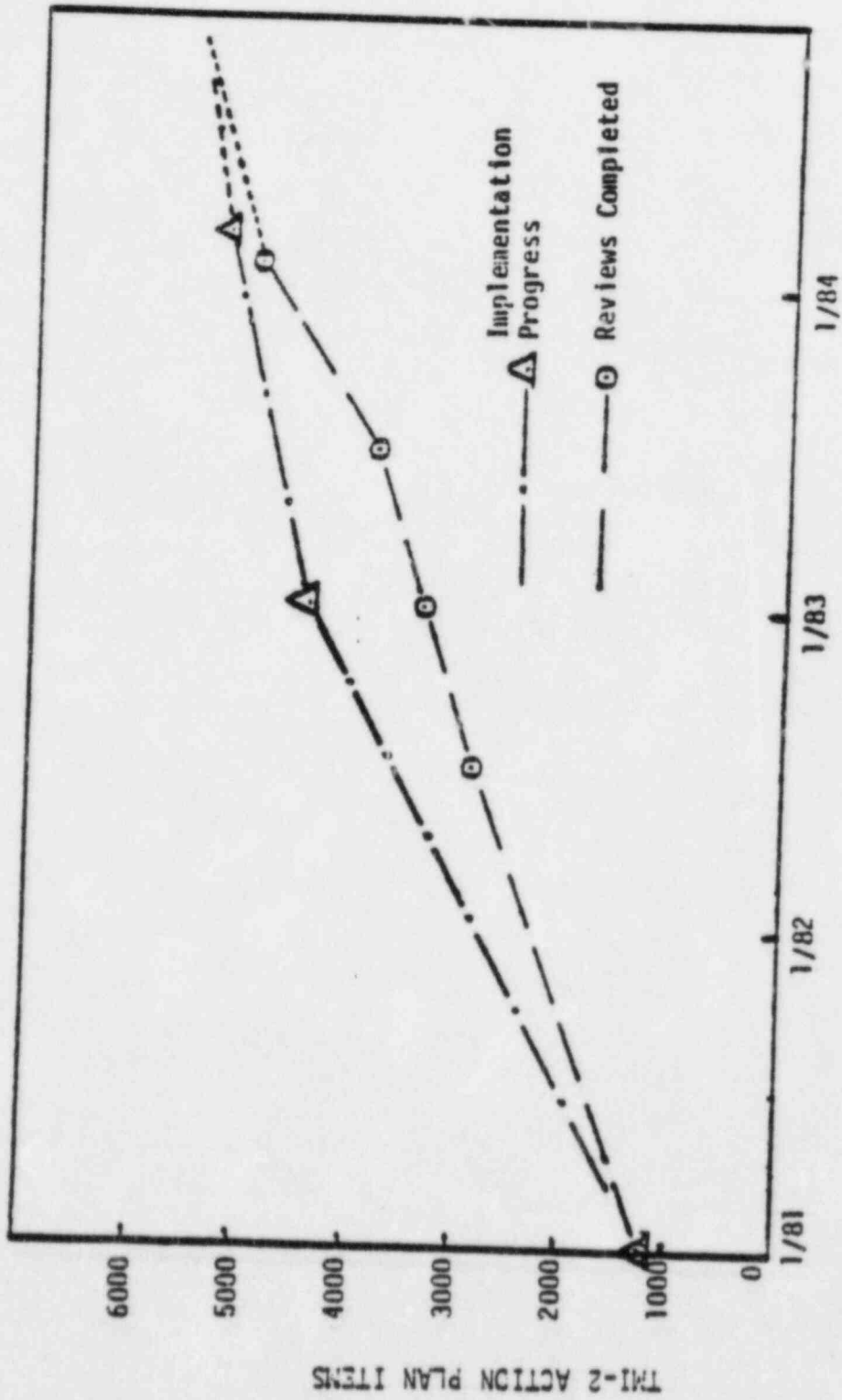
## NUREG-0737 SUPPLEMENT 1

TOTAL SUPPLEMENT 1 ACTIONS  
(ISSUED DEC. 1982).....455

SUPPLEMENT 1 REVIEWS COMPLETED.....0

TOTAL ACTIONS (OF 455) REQUIRING  
TECHNICAL SPECIFICATIONS.....195TECHNICAL SPECIFICATION ACTIONS  
COMPLETED (AMENDMENTS ISSUED).....0

## NUREG-0737 STATUS



4/5/84

I. OPERATIONAL SAFETY

- STA ON SHIFT AT ALL UTILITIES
- UPGRADE RO AND SRO TRAINING
- SHIFT MANNING IMPROVEMENTS (SECOND SRO)
- FEEDBACK OF OPERATING EXPERIENCE
- PROCEDURES FOR INADEQUATE CORE COOLING
- PROCEDURES FOR VERIFICATION OF SAFETY RELATED OPERATING ACTIVITIES

II. SITING AND DESIGN

- AFW SYSTEM IMPROVEMENTS
- PLANT SHIELDING IMPROVEMENTS
- DEDICATED H<sub>2</sub> PENETRATION
- ACCIDENT MONITORING INSTRUMENTATION IMPROVEMENTS
- RCS VENTS

LOCA AND LOSS OF FEEDWATER ACCIDENTS

- HPCI AND RCIC RELIABILITY IMPROVEMENTS
- ANTICIPATORY TRIP MODIFICATIONS
- COMMON REFERENCE LEVEL FOR BWR'S

III. EMERGENCY PREPAREDNESS AND RADIATION EFFECTS

- SHORT TERM EMERGENCY PREPAREDNESS IMPROVEMENTS
- INPLANT RADIATION MONITORING

## PRINCIPAL REMAINING ISSUES

- POST ACCIDENT SAMPLING (II.B.3)
  - 28% COMPLETED
  - MAJORITY OF REVIEWS TO BE COMPLETE BY SEPTEMBER 1984
  - MOST PASS INSTALLED AS THIS ITEM REQUIRES A POST-IMPLEMENTATION REVIEW
- RELIEF VALVE AND SAFETY VALVE TESTING (II.D.1)
  - 26% COMPLETED (ALL BWRs)
  - PWR REVIEWS ARE COMPLEX DUE TO THE ANALYSIS REQUIRED FOR PIPING AND TO COMPARE RESULTS WITH EPRI DATA
- INSTRUMENTATION FOR INADEQUATE CORE COOLING (II.F.2)
  - DIFFICULT TECHNICAL PROBLEM
  - B&W LICENSEES ORDERED TO CONFORM WITH REQUIREMENTS OF THIS ITEM
  - LONG LEAD TIME FOR PROCUREMENT OF EQUIPMENT
  - VERY FEW INSTALLED
- QUALIFICATION OF ADS ACCUMULATOR (II.K.3.28)
  - SCHEDULED TO BE COMPLETED BY SEPTEMBER 1984
  - EXTENSIVE REQUESTS FOR ADDITIONAL INFORMATION WERE REQUIRED DURING THE REVIEW
- SB LOCA METHODS (II.K.3.30 AND II.K.3.31)
  - SCHEDULED TO BE COMPLETED IN SEPTEMBER 1984
  - GE GENERIC MODEL APPROVED
  - INFORMATION NEEDED TO COMPLETE REVIEWS DUE FROM PWR VENDORS DURING MARCH 1984
  - LICENSEES REQUIRED TO RESPOND TO II.K.3.31 WITHIN 12 MONTHS AFTER APPROVAL OF II.K.3.30

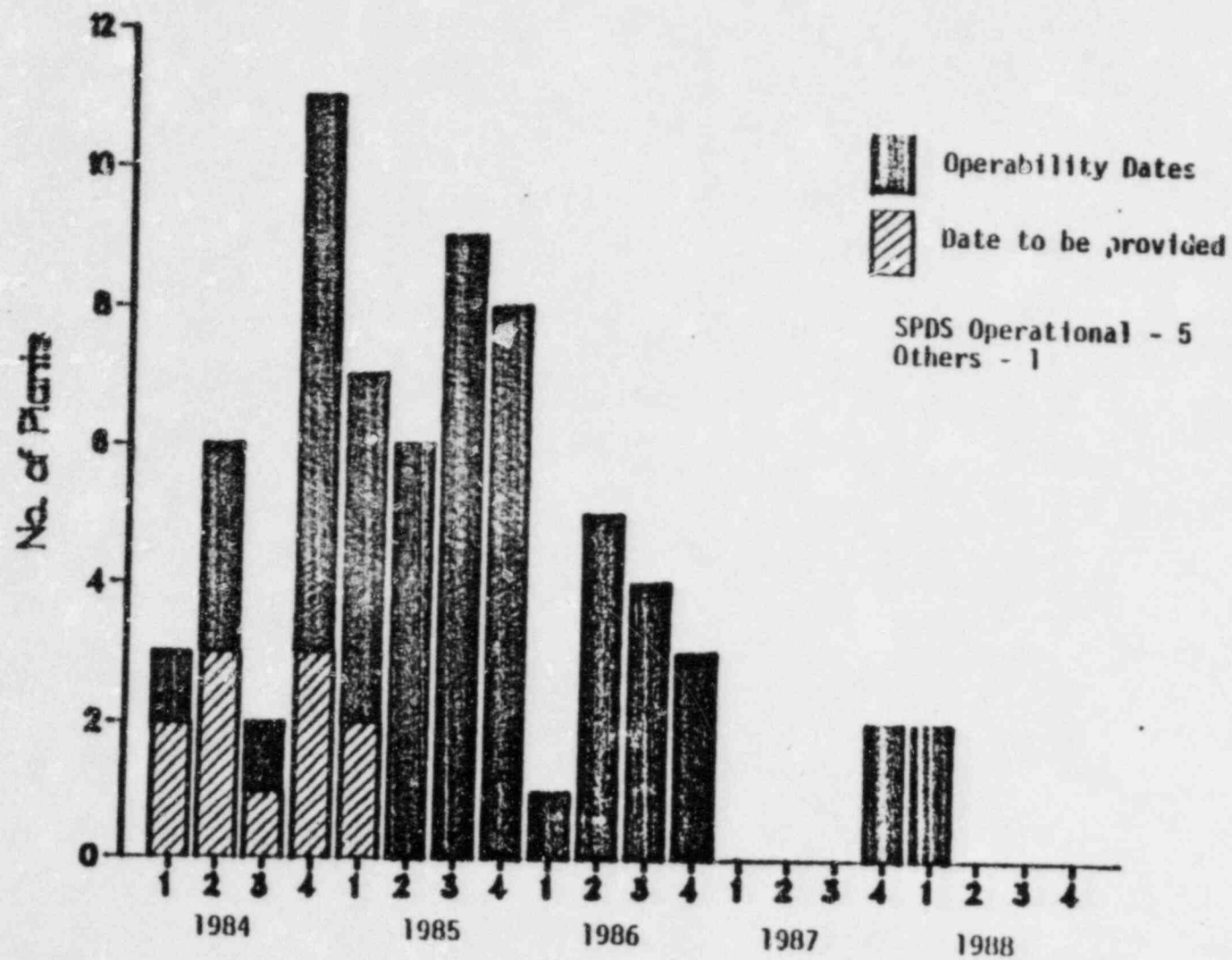
## NUREG-0737

## SUPPLEMENT 1 ITEMS ISSUED DECEMBER 17, 1982

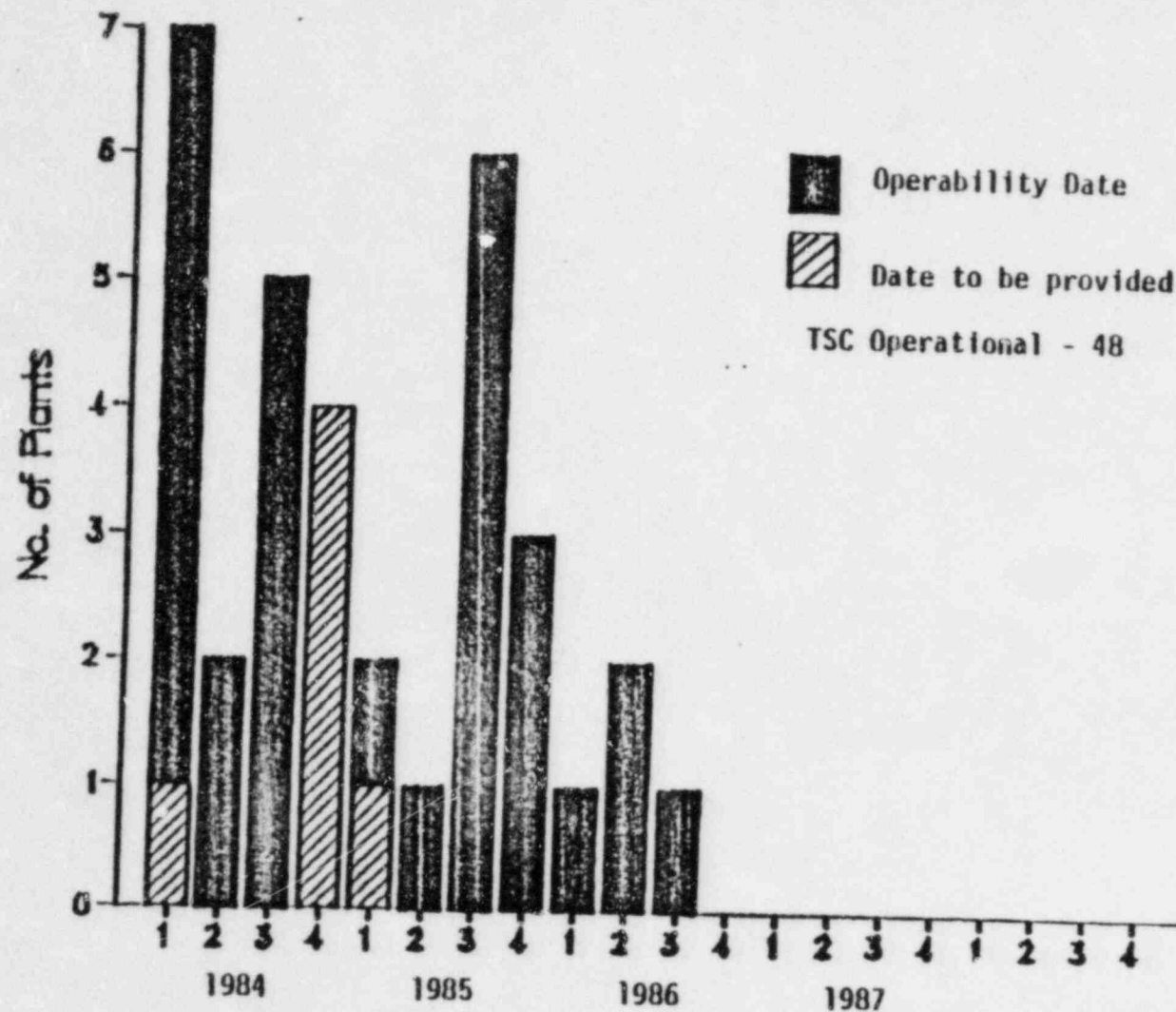
I.C.1.2	INADEQUATE CORE COOLING GUIDELINES AND PROCEDURES
I.C.1.3	ABNORMAL TRANSIENT OPERATOR GUIDELINES AND PROCEDURES
I.D.1	DETAILED CONTROL ROOM DESIGN REVIEW
I.D.2	SAFETY PARAMETER DISPLAY SYSTEM
III.A.1.2	TECHNICAL SUPPORT CENTER
III.A.1.2	OPERATIONAL SUPPORT CENTER
III.A.1.2	EMERGENCY OPERATIONS FACILITY
III.A.2.2	METEOROLOGICAL DATA UPGRADE
APPLICATION OF REGULATORY GUIDE 1.97, REVISION 2	



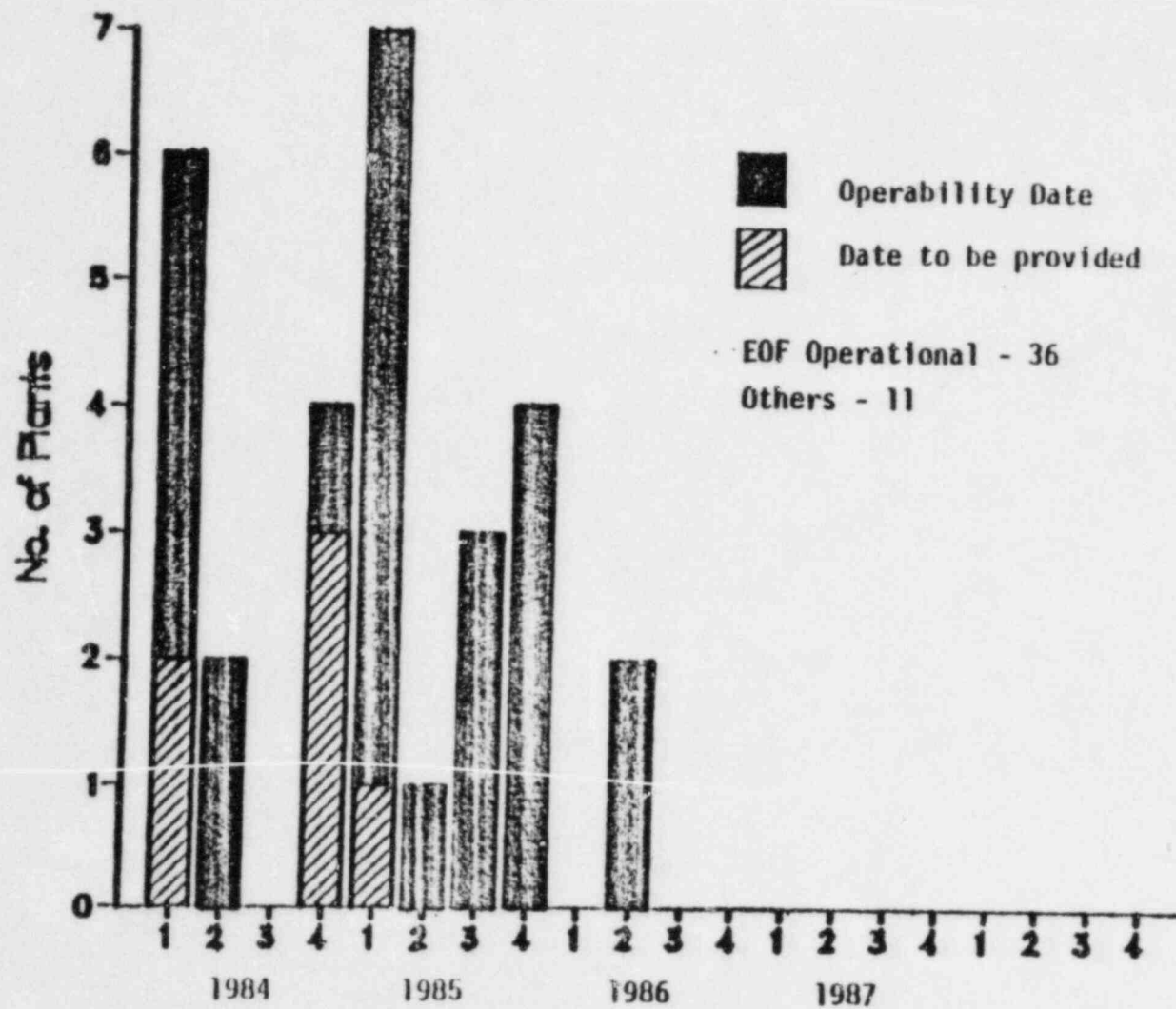
# SPDS OPERABILITY DATES



# OPERABILITY DATES FOR TSC



# OPERABILITY DATES FOR EOF



4/5/84

TMI ACTION PLAN: CHAPTER V

NRC POLICY, ORGANIZATION, AND MANAGEMENT

- SUBJECT A      DEVELOPMENT OF SAFETY POLICY
- B              POSSIBLE ELIMINATION OF NONSAFETY  
                 RESPONSIBILITIES
- C              ADVISORY COMMITTEES
- D              LICENSING PROCESS
- E              LEGISLATIVE NEEDS
- F              ORGANIZATION AND MANAGEMENT
- G              CONSOLIDATION OF NRC LOCATIONS

## TASKS AND STATUS

- A.1 DEVELOP NRC POLICY STATEMENT ON SAFETY.  
STATUS: CONTINUING PROJECT. SAFETY GOALS EVALUATION IN PROGRESS. PRA REFERENCE DOCUMENT TO BE ISSUED FOR PUBLIC COMMENT. (OPE, EDO)
- B.1 STUDY ELIMINATION OF NONSAFETY RESPONSIBILITIES.  
STATUS: COMPLETED. ANTITRUST, NEPA, EXPORT RESPONSIBILITIES RETAINED. (OGC, EDO)
- C.1 STRENGTHEN ACRS ROLE.  
STATUS: COMPLETED. 10 CFR §2.809 REVISED TO PROVIDE FOR ACRS PARTICIPATION IN RULEMAKING. ACRS-COMMISSION MEETINGS SCHEDULED ON A NOMINAL BIMONTHLY SCHEDULE. (ACRS)
- C.2 STUDY NEED FOR ADDITIONAL ADVISORY COMMITTEES.  
STATUS: COMPLETED. PROGRAM FOR CONSUMER AFFAIRS ESTABLISHED. (OPA, OGC)
- C.3 STUDY NEED TO ESTABLISH AN INDEPENDENT NUCLEAR SAFETY BOARD.  
STATUS: COMPLETED. COMMISSION DECIDED (JULY 1980) INDEPENDENT BOARD NOT NEEDED IN VIEW OF NEWLY CREATED OFFICES (AEOD, ETC.) THAT ADDRESS SAME OBJECTIVES. (EDO)

## TASKS AND STATUS (CONTINUED)

- D.1 IMPROVE PUBLIC AND INTERVENOR PARTICIPATION  
IN HEARING PROCESS.  
STATUS: COMPLETED. INTERVENOR FUNDING PRO-  
HIBITED BY CONGRESS. POSSIBLE CREATION OF  
OFFICE OF PUBLIC COUNSEL EXAMINED. (OPA, OGC)
- D.2 STUDY CONSTRUCTION-DURING-ADJUDICATION RULES.  
STATUS: CONTINUING. (OGC)
- D.3 REEXAMINE COMMISSION ROLE IN ADJUDICATION  
STATUS: CONTINUING. (OGC, ELD)
- D.4 STUDY REFORM OF LICENSING PROCESS.  
STATUS: CONTINUING. (RRTF, OGC)



## TASKS AND STATUS (CONTINUED)

E.1 STUDY NEED FOR TMI-RELATED LEGISLATION.  
STATUS: COMPLETED. (OGC, RRTF, ELD)

- (1) AUTHORITY TO AMEND LICENSE PRIOR TO HEARING WHEN NECESSARY FOR PUBLIC SAFETY.
- (2) SUNSHINE ACT AMENDMENT TO REDUCE REQUIREMENTS FOR MEETINGS DURING EMERGENCY.
- (3) NRC AUTHORITY TO TAKE OVER AND CONDUCT CLEANUP ACTIONS: LIABILITY AND REIMBURSEMENT ASPECTS.
- (4) CONTINUATION OF PRICE-ANDERSON ACT: ENQ AND LIABILITY LIMITATION CONSIDERATIONS.
- (5) DESIRABILITY OF NEW CATEGORY OF LICENSE TO REPLACE OL DURING EXTENDED POST-ACCIDENT RECOVERY PERIOD.
- (6) NEED FOR AUTHORITY TO ADDRESS ESTABLISHMENT OF CHARTERED NATIONAL OPERATING COMPANY OR CONSORTIUM.

## TASKS AND STATUS (CONTINUED)

- F.1 STUDY NRC TOP MANAGEMENT STRUCTURE AND PROCESS.  
STATUS: COMPLETED. OUTSIDE STUDY NOT UNDERTAKEN.  
ANNUAL PPG AND EDO PROGRAM GUIDANCE ESTABLISHED.  
(OPE, EDO)
- F.2 REEXAMINE ORGANIZATION, FUNCTIONS OF NRC OFFICES.  
STATUS: COMPLETED. NEW ORGANIZATIONAL UNITS CREATED,  
IE, AEOD, ORAB, DST, DHFS, DEDROGR, CRGR. OFFICES OF  
STANDARDS AND RESEARCH CONSOLIDATED. (EDO)
- F.3 REVISE DELEGATIONS OF AUTHORITY TO STAFF.  
STATUS: COMPLETED. OGC/OPE DELEGATION STUDY (SECY-  
80-497) IMPLEMENTED. NRC MANUAL CHAPTERS REVISED. (EDO)
- F.4 CLARIFY AND STRENGTHEN ROLES OF CHAIRMAN, COMMISSION, EDO.  
STATUS: COMPLETED. NRC MANUAL CHAPTERS REVISED TO RE-  
FLECT PRESIDENT'S REORGANIZATION PLAN NO. 1 OF 1980.  
(EDO, OPE)
- F.5 SEEK AUTHORITY TO DELEGATE EMERGENCY RESPONSE FUNCTIONS  
TO SINGLE COMMISSIONER.  
STATUS: COMPLETED. EMERGENCY FUNCTION TRANSFERRED TO  
CHAIRMAN BY SECTION 3 OF PRESIDENT'S REORGANIZATION PLAN  
NO. 1 OF 1980. (EDO)

TASKS AND STATUS (CONCLUDED)

- G.1 CONSOLIDATE NRC HEADQUARTERS LOCATIONS - LONG TERM.
- G.2 CONSOLIDATE NRC HEADQUARTERS LOCATIONS-- INTERIM.

(EDO)

3/84

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Compliance with TMI Action Plan

Meeting Date:

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