



November 5, 1984

POLICY ISSUE

FOIA
85-507
SECY-84-13B

(NEGATIVE CONSENT)

FOR:

The Commissioners

FROM:

William J. Dircks
Executive Director for Operations

SUBJECT:

NRC INTEGRATED PROGRAM FOR THE RESOLUTION OF STEAM
GENERATOR USI'S - RESPONSE TO COMMISSIONER COMMENTS
(MEMO FROM CHILK TO DIRCKS DATED SEPTEMBER 13, 1984)

PURPOSE:

To respond to Commissioner requests made during the
September 10, 1984 briefing by the staff.

BACKGROUND:

On September 10, 1984, the staff briefed the Commission
on the staff's proposed resolution of the steam generator
related Unresolved Safety Issues A-3, A-4, and A-5
(SECY 84-13A). The staff proposal included, in part, the
issuance of generic letters to PWR licensees and applicants,
pursuant to 10 CFR 50.54(f), requesting information concerning
their plans and status with respect to implementation of
staff recommended actions.

The Commission requested that the staff investigate
alternatives to 10 CFR 50.54 letters as a vehicle for
obtaining this information. Specifically, the staff was
requested to explore the feasibility of obtaining this
information through the industry's Steam Generator
Owners Group (SGOG). The Commission also requested that
the staff prepare a revision to the draft generic letter
in SECY 84-13A to address Commissioner comments.

DISCUSSION:

SGOG Response

As a result of the Commissioner comments, the staff met
with representatives of the SGOG on September 20, 1984,
to discuss what role the SGOG could play in collecting
the needed information from the PWR utilities. The
SGOG position on this matter has subsequently been
documented by letter which is provided as Enclosure 1.

Contact:

G. M. Holahan, NRR
x27415

8411210357 XA

In summary, the SGOG believes it would be inappropriate for the SGOG to survey the industry and to report to the NRC on the status of how each licensee's program compares with the NRC recommended actions. The SGOG noted that utility participation in the SGOG is on a voluntary basis. Not all PWR utilities belong to the SGOG, nor is the SGOG in a position to speak for the entire PWR industry. The SGOG also stated that some of the NRC recommended actions (e.g., Coolant Iodine Activity Limit), while apparently brought to light by the Ginna tube rupture incident, are not within the scope of issues normally addressed by the SGOG.

Issuance of 10 CFR 50.54(f) Letters

As indicated to the Commission on September 10, 1984, the staff believes that the industry, as a whole, has made significant progress in upgrading the effectiveness of their steam generator programs. The SGOG has also expressed this sentiment in their October 1, 1984 letter (see Enclosure 1). However, while most plants appear to be conforming to this general trend, the staff does not have sufficient information to conclude that all plants are implementing programs which are adequately effective.

The staff has concluded that information from each PWR licensee and applicant concerning the status of how their programs compare with the NRC recommended actions, including any plans and schedules they have for implementing these actions, is needed as part of the technical resolution of the USIs. 10 CFR 50.54(f) is the regulatory authority normally invoked by the staff to ensure that all licensees provide complete and timely information regarding specific safety issues. It has been the staff's experience that where 10 CFR 50.54(f) is not invoked, some utilities will not be responsive to staff requests for information.

With regard to utilizing the SGOG to collect the needed information, the staff notes that the SGOG would have no official sanction by which to require utilities to provide the information.

Revisions to Proposed Generic Letter

The staff has revised the proposed generic letter, provided as Enclosure 2, to eliminate objectionable language (e.g., "...compliance with the staff recommended actions") contained in the SECY 84-13A version. References to proposed Technical Specifications have also been eliminated, since Technical Specification changes would be premature before the overall evaluations are completed.

The proposed generic letter has also been clarified with respect to how the information to be collected would be used by the staff. Specifically, this information would be used to evaluate the overall effectiveness of plant-specific programs to prevent and mitigate the occurrence of steam generator tube ruptures. To this end, the staff would employ the staff recommended actions as review guidance. The staff recognizes, however, that plant-specific programs may differ from some of the specifics in the staff recommended actions, yet still be adequately effective.

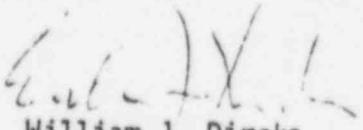
The plant-specific evaluations would be documented in a NUREG report (i.e., a separate report from NUREG-0844, which describes the staff's technical resolution of USIs A-3, A-4, and A-5). On the basis of this NUREG report, the staff will determine what, if any, regulatory actions are necessary. If generic actions are needed, they will be reviewed by CRGR prior to implementation.

In the meantime, however, pending public comment and final publication of NUREG-0844, the staff has concluded that it should proceed with issuance of the generic letter for purposes of collecting the needed information. The staff notes that the industry has already commented extensively on the initial staff proposals, and these comments have been considered by the staff in developing the staff recommendations now before the Commission. Notwithstanding any public comments which may be received pertaining to the sufficiency of the staff's proposed resolution of the USIs, the staff believes that the information it is proposing to collect from industry will ultimately be needed as part of the USI resolution.

RECOMMENDATION:

That the Commission:

- (1) Approve issuance of the generic letter
- (2) Note that the staff intends to issue the letter within 10 days of the date of this paper unless instructed otherwise by the Commission.


William J. Dircks
Executive Director for Operations

Enclosures:

1. Letter from SGOG
dtd 10/1/84
2. Revised Generic Letter
in 84-13A

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Wednesday, November 21, 1984 that the Commission, by negative consent, assents to the action proposed in this paper.

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ENCLOSURE 1