



July 25, 1984

Call Jim Fort at (504) 595-2427

Despite the time-consuming review by the Nuclear Regulatory Commission relative to licensing of Waterford 3, Louisiana Power & Light Company said today that it expects that the plant can be in commercial operation in the first quarter of 1985.

James M. Cain, president and chief executive officer of LP&L, said it now appears that it will be late August or possibly September before the Company obtains the necessary operating license from the NRC which will allow it to load fuel into the reactor and begin low-power testing. Construction and pre-operational testing of the plant was completed in the second quarter of 1984, and the Company was hopeful it would obtain permission to load fuel at the end of May.

"A September fuel loading would mean that it will be the first quarter of 1985 before we can put the unit into commercial operation instead of the previously targeted end-of-1984 operation," Cain said.

He explained that construction costs are currently about \$50 million below budget, and that the projected first quarter operating date is not expected to result in an increase of the present \$2.65 billion estimated cost of the plant.

"We are firmly convinced that we have an excellent, well-built nuclear generating facility," Cain said, "and we are determined to bring this plant into commercial operation safely, and within the requirements of all NRC regulations."

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R. Bangart (Task Force)
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T. Ippolito, CPSES
S. Treby, ELD, MNBB
T. Ippolito, Phillips Building, Room 542
Resident Inspector

Fax Copies of Waterford:

✓ D. Crutchfield (Task Force)
J. Gagliardo (Task Force)
S. Turk, ELD, MNBB, Mail Stop 9604
Resident Inspector

--Original in appropriate file located on Barbara Murray's desk.
--Copies of other news articles such as FSV, Wolf Creek, etc. should
be faxed to the appropriate resident.

DMC

501 21 125

MEMORANDUM FOR: Jesse L. Funches, Director
Planning & Program Analysis Staff

FROM: Darrell G. Eisenhut, Director
Division of Licensing

SUBJECT: TECHNICAL ASSISTANCE FUNDING NEEDS FOR NRR,
IE, AND REGION IV

This memorandum responds to yours of July 24, 1984, on the above subject. The enclosure provides the estimated FY84 funding needs for Comanche Peak, Waterford, and Wolf Creek.

Original Signed By:

for / F Miraglia
Darrell G. Eisenhut, Director
Division of Licensing

Enclosure:
As stated

cc: T. Ippolito
D. Crutchfield
K. Kniel
M. Williams

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OFFICE	DL: IAPMG	DL: <i>[Signature]</i>				
USERNAME	MW: <i>[Signature]</i>	DC: Crutchfield	DE: Eisenhut			
DATE	7/27/84	7/27/84	7/27/84			

FY84 ESTIMATED FUNDING NEEDS

	<u>AUGUST</u>	<u>SEPTEMBER</u>
<u>Comanche Peak</u>		
NRR Contracts (to date - 175K)		
FIN A-6819 INEL	100K	100K
B-3077 ETEC	40K	30K
A-0802 LLNL	60K	44K
A-6821 INEL	<u>60K</u>	<u>40K</u>
	260K	214K
IE Contracts (to date - 450K)		
Parameters	20K	20K
Region IV Contracts (to date - 50K)		
FIN A-3600 BNL	<u>20K</u>	<u>-</u>
TOTALS TO DATE - 675K	NEED 300K	234K
<u>Waterford</u>		
NRR Contracts (to date - 498K)		
FIN A-6819	3K	-
A-6821	-	-
B-3077	10K	-
IE Contracts (to date - 210K)	-	-
Region IV Contracts (to date - 60K)	<u>-</u>	<u>-</u>
	total 13K	-
<u>Wolf Creek</u>		
NRR Contracts	-	-
IE Contracts	-	-
Region IV Contracts		
FIN A-6701	<u>30K</u>	<u>-</u>
	TOTAL 30K	-



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

JUN 12 1984

*Copy to
Barry
Bess*

MEMORANDUM FOR: Harold R. Denton, Director, NRR
Richard C. DeYoung, Director, IE
Robert B. Minogue, Director, RES
Thomas E. Murley, Regional Administrator, R-I
James P. O'Reilly, Regional Administrator, R-II
James G. Keppler, Regional Administrator, R-III
John T. Collins, Regional Administrator, R-IV
Learned W. Barry, Director & Controller, RM

FROM: William J. Dircks
Executive Director for Operations

SUBJECT: IMPLEMENTATION OF THE COMANCHE PEAK PLAN FOR THE
COMPLETION OF OUTSTANDING REGULATORY ACTIONS

Recently, Tom Ippolito, Project Director for Comanche Peak, circulated for review and discussed with a number of us, the Comanche Peak Plan for the completion of Outstanding Regulatory Actions (Enclosure 1). This plan has been approved and I am now requesting actions by each of you, as specified below, to implement the plan. These actions are consistent with my discussions with Regional Administrators during the management meeting on May 17-18, 1984, and my memorandum of May 25, 1984.

The Plan describes regulatory actions in four major areas (licensing, hearing, inspection, and allegations) and identifies the resource requirements (including funding) needed to complete these regulatory actions. All activities are geared toward completion by October 1, 1984, the Applicant's projected fuel load date.

Most of the resources needed are to form a Technical Review Team (TRT) to evaluate and resolve a large number of technical issues, including allegations, presently identified. The TRT staffing and technical groups breakdown is shown in Enclosure 2. Approximately two-thirds of the TRT reviewers will be drawn from contracted resources; however, NRC staff resources will be used to supervise each technical group and to integrate their activities with ongoing Region IV activities.

The resources will be distributed between the various offices to minimize the impact on any single organization. Where supervisory personnel are required for the lead of each of the TRT technical groups, I expect you to nominate individuals who can manage effectively in a demanding and visible environment. All personnel should be fully qualified for the requested function and should have a proven capability of balancing a number of views to reach a conclusion. In adjusting internally for resource allocation, you should ensure that operating reactors are adequately covered.

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Resource needs, by Office, are identified below. To the extent possible, resources identified should include individuals already familiar with the Comanche Peak project, or those familiar with the regulatory actions completion program at Waterford.

1. NRR

- 2 Project Managers to coordinate additional licensing actions
- Technical Reviewer to coordinate OI activities with the TRT Program Manager

2. IE

- Assistant (Deputy) to the Program Manager of the TRT (Jim Gagliardo has already been designated to this function for both Waterford and Comanche Peak).

3. IE, NRR, RES and Regions I ,II, and III

- Group Leader to manage the Electrical/Instrumentation group of the TRT.
- Group Leader to manage a joint Civil Engineering and Mechanical Engineering group of the TRT.
- Group Leader to manage the Test Program Group of the TRT.
- Group Leader to manage the QA/QC Records Group of the TRT. The assignment of an individual who previously participated in the Comanche Peak special review held in early April 1984, would be desirable.
- Group Leader to manage the Coatings Group of the TRT.

4. Region IV

- On an as needed basis and upon request of the Project Director, Region IV will provide 2-3 inspectors to support the TRT effort.

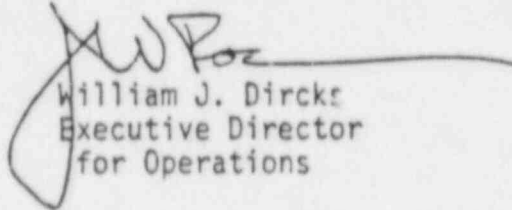
5. ORM

Financial resources (as previously identified in separate correspondence from H. Denton) to support contracted activities. These needs include:

- approximately 2/3 of the staff of the TRT
- inspection personnel to augment Region IV inspection effort
- technical expertise for coatings issues

Candidates are to be identified directly to J. Roe by June 14, 1984. Designated individuals should be available for commencement of their assigned tasks on about June 18, 1984.

If there are any questions regarding this memorandum please contact me promptly.


William J. Dircks
Executive Director
for Operations

Enclosures:
As Stated

cc: J. B. Martin, RV
B. Hayes, OI
~~P~~ Norry, ADM
G. Cunningham, ELD
T. Ippolito, DL/NRR
D. Eisenhut, DL/NRR
J Davis, NMSS

COMANCHE PEAK PLAN FOR
THE COMPLETION OF OUTSTANDING
REGULATORY ACTIONS

MAY 1984

Approval:

R. DeYoung - Telecon to T. Imbrie 6/5/84
R. DeYoung, Director, IE Date

H. R. Denton 6/5/84
H. R. Denton, Director, NRR Date

R. Baugant Jr. - Telecon to T. Imbrie 6/5/84
J. T. Collins, Administrator Date
Region IV

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COMANCHE PEAK PLAN FOR THE COMPLETION OF OUTSTANDING REGULATORY ACTIONS

I. PURPOSE AND SCOPE

On March 12, 1984, the EDO directed WRR to manage all necessary NPC actions leading to licensing decisions for Comanche Peak and Waterford. A copy of that directive is included as Attachment 1. This plan establishes the program for Comanche Peak.

The purpose of this plan is to assure the overall coordination and integration of the outstanding regulatory actions regarding Comanche Peak, and achieving their resolution prior to a licensing decision. This plan encompasses all licensing, inspection, hearing, and allegation issues. Further, this plan addresses the scope of the work needed, specifies the critical path issues, identifies the responsible line organization, the schedule for completion, and (where applicable) the need for additional resources to meet the schedule.

The planned completion date for all regulatory actions is assumed to be October 1, 1984, and resource needs are predicated on that assumption. A status report will be issued to management every two weeks starting two weeks after the approval of the plan.

II. BACKGROUND

Comanche Peak Steam Electric Station Unit 1 is in the final stages of the operating license review process. The Construction Permits for Unit 1 and 2 were issued on December 19, 1974. Texas Utilities docketed their application for operating licenses on April 25, 1978. The Final Environmental Statement was issued September 24, 1981. The Safety Evaluation Report (SER) was issued on July 14, 1981. Because of the large number of outstanding issues identified in the SER, the staff recommended delaying the ACRS review. SER Supplement No. 1 was issued on October 16, 1981, and the ACRS meeting was held on November 13, 1981. The ACRS, by letter dated November 17, 1981, supported issuance of an operating license. The latest SER supplement was issued on November 23, 1983.

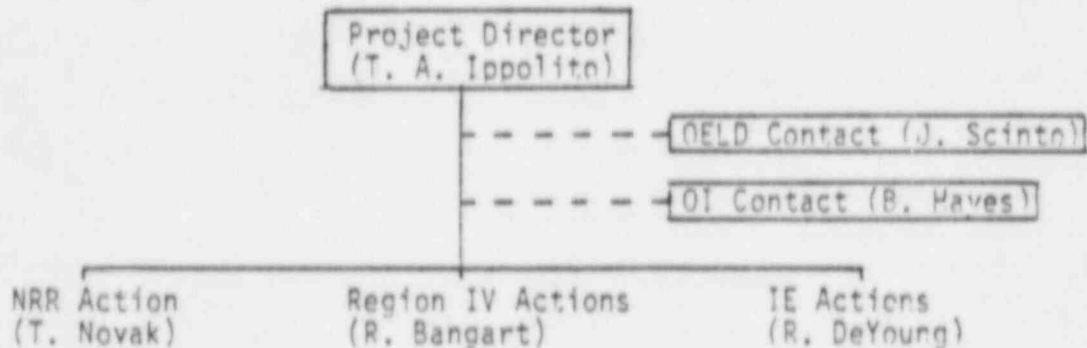
Comanche Peak has been in a heavily contested hearing for over two years. All but one contention have been dismissed. The remaining contention questions the ability of the applicant's Quality Assurance/Quality Control Program to prevent deficiencies in the design and construction of the plant. The Licensing Board has admitted many allegations of design and construction deficiencies into the hearing as relevant to this contention.

The Applicants are currently projecting a fuel load date for Unit 1 to be in late September 1984. The basis for this projection was provided to the staff on May 7, 1984. This fuel load date appears achievable but allows no flexibility for unexpected events in a very tight schedule. The number of hearing issues and uncertainty regarding the timing of the Licensing Board's initial decision may impact the fuel load.

III. PLAN FOR THE COMPLETION OF OUTSTANDING REGULATORY ACTIONS

This plan describes the method in which coordinated regulatory actions are to be taken by the staff to be ready to support an NRC decision regarding Comanche Peak licensing. As stated in the Purpose, the plan encompasses all licensing, hearing, inspection, and allegation issues. This summary addresses the scope of work needed, identifies the responsible line organization, the schedule for completion, and the resource needs to meet the schedule.

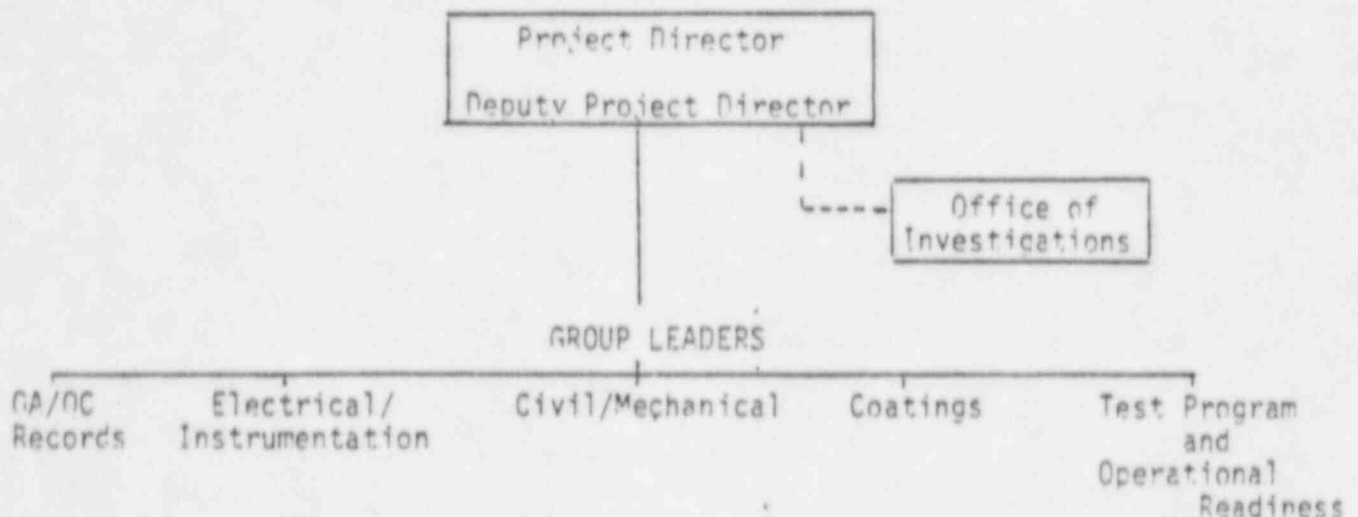
The management organizational arrangement responsible for directing the overall effort and coordinating actions by the various involved offices is shown graphically in the enclosure to the EDO memorandum of March 12, 1984 (Attachment 1). The management is under the overall direction of T. A. Ippolito, who reports to the Director of the Division of Licensing. The managers responsible for implementing and directing this organization are the following individuals:



The line offices will continue to manage their own responsibilities regarding Comanche Peak in accordance with the schedule and objectives of this plan. Line office activities are to be coordinated with the program management organization via their representative as identified above. Additional resources are expected to be necessary to support licensing, hearing, and inspection issues, and substantial resources are necessary to respond to the approximately 400 allegations regarding Comanche Peak.

This plan proposes the formation of an Technical Review Team (TRT) to evaluate and resolve a number of technical issues, including allegations, presently identified. A proposed organizational chart of the TRT is shown below. The groups identified will be assigned to evaluate and resolve technical issues and allegations that have been grouped into five technical areas: QA/QC, Electrical/Instrumentation Civil/Mechanical, Coatings, and Test Programs. The groups will be comprised of a group leader and reviewers that are specialists in the particular technical area.

Comanche Peak Technical Review Team (TRT)



The staffing of these groups will be drawn from the various NRC offices and/or contractors as arranged between the Project Director and line management. The TRT may be called together for a specified period of time, dispersed back to the individual's parent office, and then reconstituted in whole or in part as needed to complete resolution of like issues.

The TRT will be under the direct supervision of the Project Director. In accordance with the EDO memorandum of May 25, 1984, the TRT organization is scheduled to be in place and functioning by June 4, 1984.

Detailed guidance will be issued by the Project Director to the Technical Review Team and other participants in this effort. This guidance will address the following:

- Method and approach for identification and disposition of allegations
- Tracking System
- Preparation of Documentation and Records
- Protection of Individuals
- Initiation of Special NRC actions, such as Confirmation of Action Letters or 50.54(f) letters
- Manpower accounting

The basis upon which the schedules and resource estimates have been developed is that the Comanche Peak fuel load date is October 1, 1984. Figure 1 is an overall schedule and Figures 2 through 5 are individual schedules for the resolution of Licensing, Hearing, Inspection, and Allegations Regulatory Actions, respectively.

The major issues, schedules, and resource estimates needed to meet the schedules are summarized as follows:

A. Licensing Regulatory Actions

Licensing Actions are those things resulting from the design review of the FSAR. NRR is responsible for the resolution of these action items.

The total number of outstanding action items is 37.

Four of these action items are considered to have the potential for impacting the schedule. These items relate to 1) the adequacy of the TDI diesel generators, 2) the Applicants' exemption request for relief from GDC-4, 3) review of the Cygna Report of an independent assessment of design and construction, and 4) electrical equipment environmental qualification.

NRR experience with other facilities involved in complex licensing reviews (Diablo Canyon, Seabrook, and Shoreham) indicates that additional project management resources are necessary. Two additional project managers for the period from June-September will be needed, for a total of 8 man-months of additional effort.

The technical resources presently assigned by NRR to evaluate and resolve the remaining open licensing actions are sufficient to meet the schedule shown in Figure 2. Additional IE resources are not expected to be required as the CAT inspection is complete and QA/QC reviews and emergency preparedness reviews are essentially complete.

B. Hearing Regulatory Actions

Hearing Actions are those issues in contention before the ASLP.

There are three major issues each with a number of sub-issues. The three major issues are Design Adequacy and Quality Assurance, Construction Adequacy, and Construction Quality Assurance.

There are two critical path actions: Design Adequacy and Construction Adequacy. The design adequacy action concerns an IDVP being performed by the Applicants at the staff's request. CYGNA is performing the review for the Applicants. This is currently under review by the staff. Cygna personnel actions may have contributed to be prenotification of inspection areas to Applicant QA/QC personnel. Resolution of this concern may make it necessary to request additional independent assessment activities.

The critical path issue concerning Construction Adequacy is containment liner coating (painting).

The resources presently available are sufficient to resolve all hearing actions with the exception of the critical path issues. It is estimated that 10 man-months are required to resolve the Design Adequacy Action, and 6 man-months to evaluate the Construction Adequacy Action (painting). The design adequacy review will require a team composed of IE and NRR personnel, similar to the Cygna IDVP effort.

Coordination of Hearing activities is expected to be extensive and involve integrating the activities of NRR, OELD, and Region IV with the Technical Review Team. An additional senior manager (SES-level) is needed to manage this effort as it is expected that the Project Director will devote full time effort to management of the technical review team actions commencing June 4, 1984.

These estimates assume that the reviews will conclude that the existing circumstances are acceptable to the staff and/or no major corrective actions are required of the Applicants. Should this prove otherwise, additional resources will be required for resolution. See Figure 3 for Hearing Testimony Completion Schedule.

C. Inspections Regulatory Actions

Inspection actions are those that assure that adequate completion of plant construction and the readiness of the Applicants to operate the plant. These actions are the responsibility of Region IV.

The total number of outstanding action items is 377. These may be grouped as follows:

- SER verification: 30 actions
- Routine construction inspections, preoperational test program and operational readiness inspections and startup test program: 121 actions
- Operating Licensing: 20 actions
- Open items inspections (unresolved items, violations, 50.55(e) items, inspector follow-up items and Part 21 items: 201 actions
- Room inspections: TBD
- CAT follow-up: 5 actions

All the inspection items require resolution prior to OL issuance. Many require applicant actions prior to inspection or relate to hearing issues. Particularly significant is the retest inspection effort as the applicant plans to re-run approximately 25 preoperational tests to confirm system readiness subsequent to various modifications and design changes. Many of these tests will be witnessed by the NRC and test results will be evaluated as appropriate. Systems involved include safeguards systems, reactor protective system, service water, component cooling water, and the diesel generator.

The number of inspection items represents a sizeable effort that could impact fuel load.

Some additional resources will be required to complete the routine inspection program and resolve the many open items. It is expected that this area could require approximately 46 man-months. Considering the number of items and based on Waterford experience, the Region estimates that much of this effort can be handled with existing resources but that approximately 18 man-months additional resources will be required. See Figure 4 for the Inspections Schedule.

D. Allegations Regulatory Actions

The Allegation Actions are those concerns reported by various individuals, intervenors and action groups regarding the safety of construction of the plant. Concerns regarding [wrongdoings, intimidation, etc.] are not included in the technical review team effort but are referred to OI or OIA as appropriate.

To date the number of individual actions is approximately 400. These actions are grouped into specific categories to facilitate their resolution. Resolution of these actions will involve the Technical Review Team, NRR, OI, and Region IV.

The organizational group with primary responsibility for resolution of these actions is the Technical Review Team (TRT). The resources required to resolve these actions are identified below according to the Team functional group:

<u>Functional Group</u>	<u>No. of Allegations</u>	<u>Resource Estimate (man-months)</u>
QA/QC Records	180	17
Electrical/Instrum.	5	2
Civil/Mechanical	97	17
Coatings	11	4
Test Programs	14	2
Estimated Totals	307	42

The TRT effort is expected to require additional administrative support (secretarial) of approximately 3 man-months. Hence, the total TRT resource needs are 45 man-months.

The total program for resolving the allegations actions is a critical path item. See Figure 5 for the schedule for completion of the review of these allegations.

In addition, 97 allegations will be handled by the following offices:

<u>Functional Group</u>	<u>No. of Allegations</u>	<u>Responsible Head Office</u>
Intimidation	30	OI
Design Pipe/Pipe Supports	19	NRR
Vendor/Generic	18	NRR/IE
Independent Assessment Program	7	NRR
Miscellaneous	23	RIV

Design of pipe and pipe supports, and the Independent Assessment Program allegations will be dispositioned by NRR personnel that are handling these issues for the hearings. Intimidation allegations will require additional OI resources, as discussed later in this section. Existing resources in the Vendor Inspection Branch, IE and NRR will disposition the vendor/generic allegations. Existing resources in Region IV will be responsible for the miscellaneous allegations.

E. Office of Investigation Actions

OI actions are those actions necessary to support the resolution of allegations. They involve issues where wrong-doing, [intimidation, or [harrassment] may be involved.

It is clear that with the present resources assigned to the Comanche Peak investigation (one investigator) the schedule for resolving the allegations and wrongdoing issues will not be met. We estimate several additional investigators will be required on full time basis from June through September, for a total of 12 man-months of effort. During this 4-month period OI will require the full-time support of one individual with a technical background, as many allegations are a combination of technical and wrong-doing issues, for a total of 4 man-months.

The NRC staff effort to complete the actions in the licensing, hearings, inspections and allegations areas will be substantial and the impact will be felt by several Offices. The foregoing summary lists a total of 821 separate actions requiring approximately 100 man-months of effort above the existing (budgeted) resources. Personnel for much of this effort will be obtained from contractors. It is estimated that approximately \$1 million will be necessary to fund contractor assistance in support of Comanche Peak reviews during the remainder of FY 1984. The estimates are somewhat fragile and assume that no major new issues are raised, that the Applicants meet their projected schedule, and that staff review of the identified issues will conclude that the existing circumstances, or the resolution, is acceptable.



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

MAR 12 1984

MEMORANDUM FOR: John T. Collins, Regional Administrator
Region IV

Harold R. Denton, Director ~~Office of Nuclear Reactor Regulation~~

Richard C. DeYoung, Director
Office of Inspection & Enforcement

FROM: William J. Dircks
Executive Director for Operations

SUBJECT: COMPLETION OF OUTSTANDING REGULATORY ACTIONS ON
COMANCHE PEAK AND WATERFORD

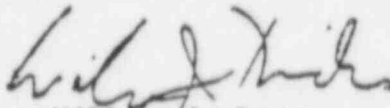
Construction of the Comanche Peak and Waterford facilities is nearing completion. There remain a number of issues that need to be resolved before the staff can make its licensing decisions. The issues remaining for these plants are quite complex and span more than one Office. In order to assure the overall coordination/integration of these issues and to assure issues are resolved on a schedule to satisfy hearing and licensing decision needs, I am directing NRR to manage all necessary NRC actions leading to prompt licensing decisions. Darrell Eisenhut, Director, Division of Licensing, NRR is being assigned the lead responsibility for this activity. He will coordinate the efforts of NRR, IE, and Region IV, and will coordinate this activity with OI and OELD. Prior to any of the affected Offices undertaking major activities (e.g., inspections) or making decisions on these plants, that activity should be concurred in by NRR.

We are presently in the process of assigning a dedicated senior manager to assist Mr. Eisenhut in the management of these activities.

The first phase of this program will be the identification of issues needed to be resolved for each plant prior to hearing and licensing decisions. Once the issues have been identified a Program Plan for resolution of each item should be developed and implemented. The Program Plan should address the scope of the work needed, the identification of the responsible line organization, and the schedule for completion. In principle, this effort will therefore be similar to the effort undertaken regarding the allegation review on Diablo Canyon except that this effort should encompass all licensing, inspection, hearing, and allegation issues.

Each affected Office will assign a full time senior manager to work with NRR to define, schedule and complete the issues. I expect these managers to be identified by each of you within a few days. All affected offices should provide dedicated resources and give their full support to this effort, to assure that all existing issues are expeditiously handled and all new issues are promptly provided to NRR so as not to delay the licensing decisions. In addition, copies of all information, documents, depositions, etc. should be promptly provided to NRR to ensure a coordinated approach.

I anticipate that the approach utilized here will be necessary for a number of upcoming OL projects, and am directing NRR to take the lead for carrying out this activity.



William J. Dircks
Executive Director for Operations

cc: G. Cunningham, ELD
B. Hayes, OI

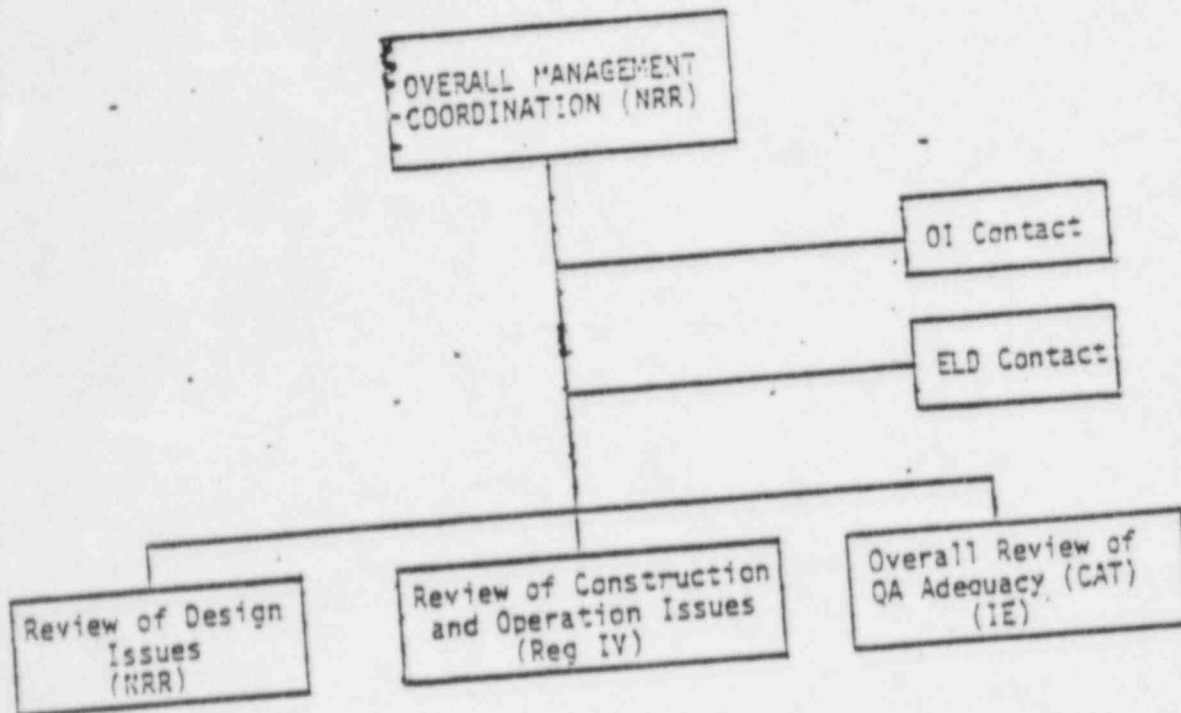


FIGURE 1

COMANCHE PEAK

Major Regulatory Actions Schedule

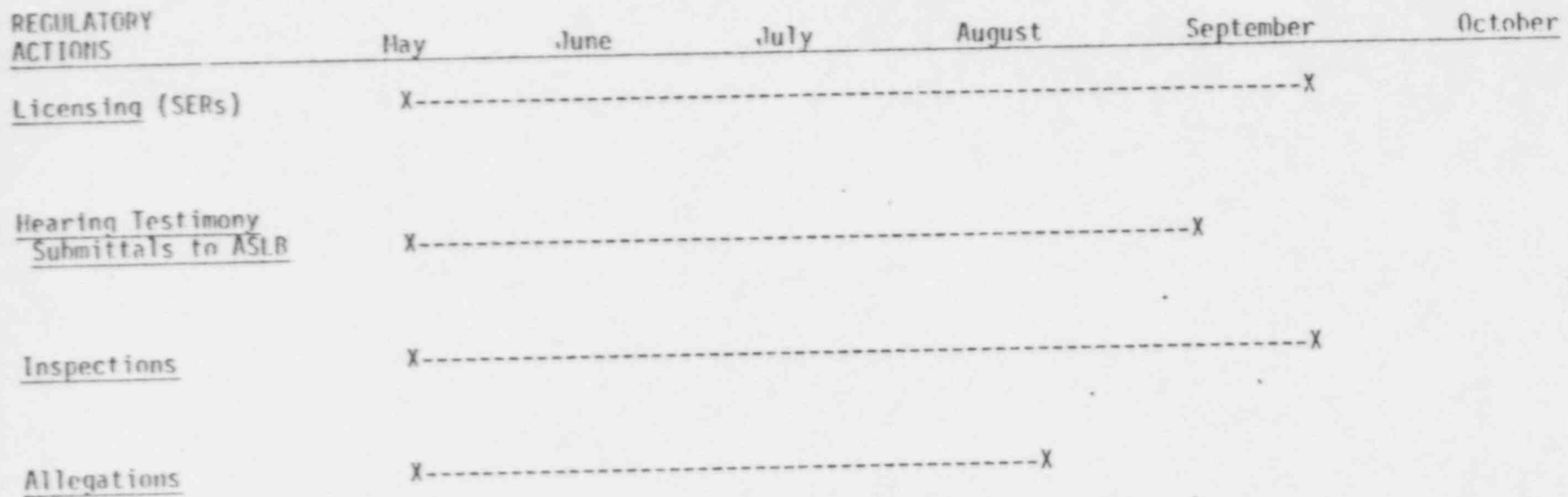
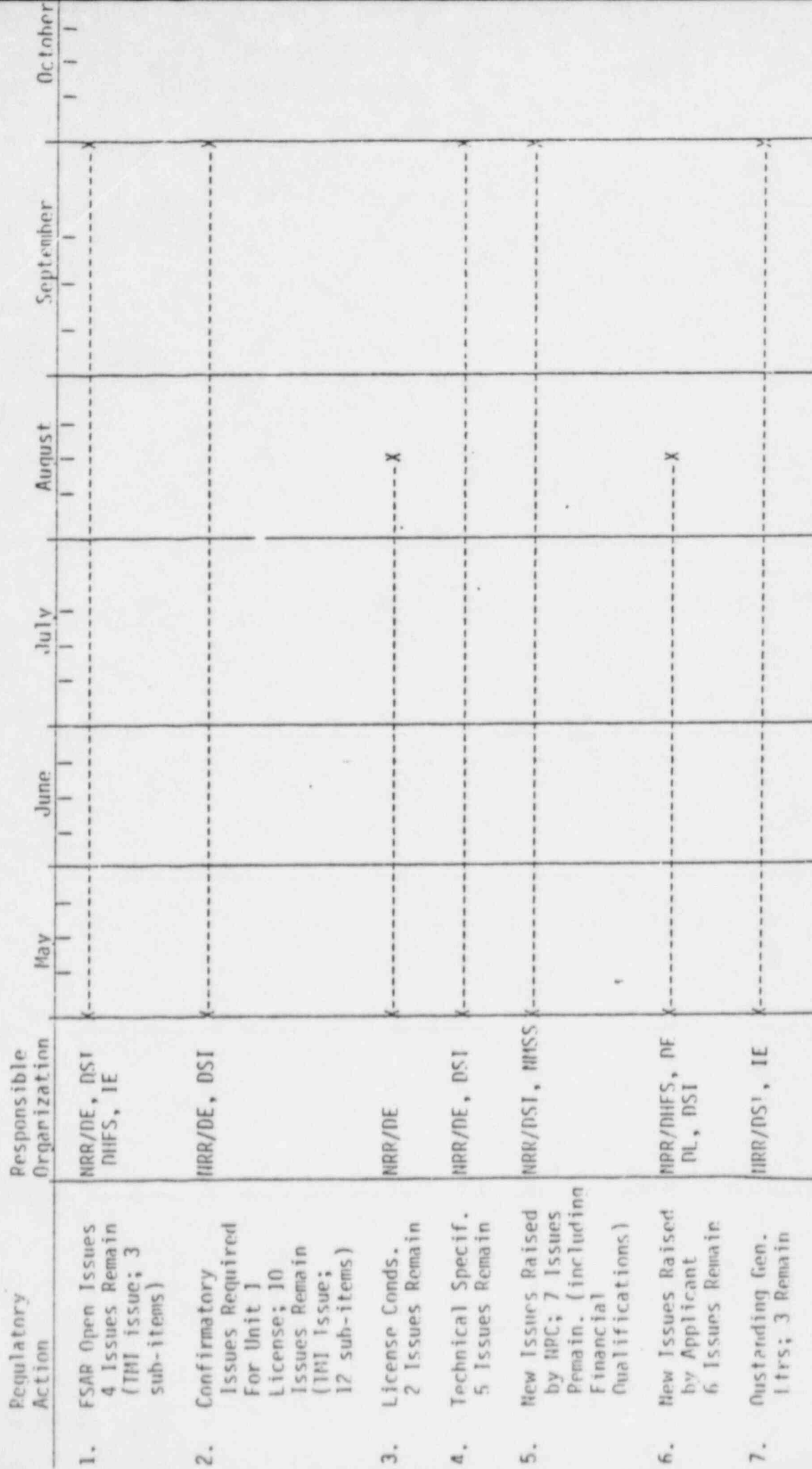


FIGURE 2

CONIACHE PEAK

LICENSING REVIEW SCHEDULE



*OI Limiting
**Technical Review Team (TRT)

HEARING TESTIMONY PREPARATION AND SUBMITTAL SCHEDULE

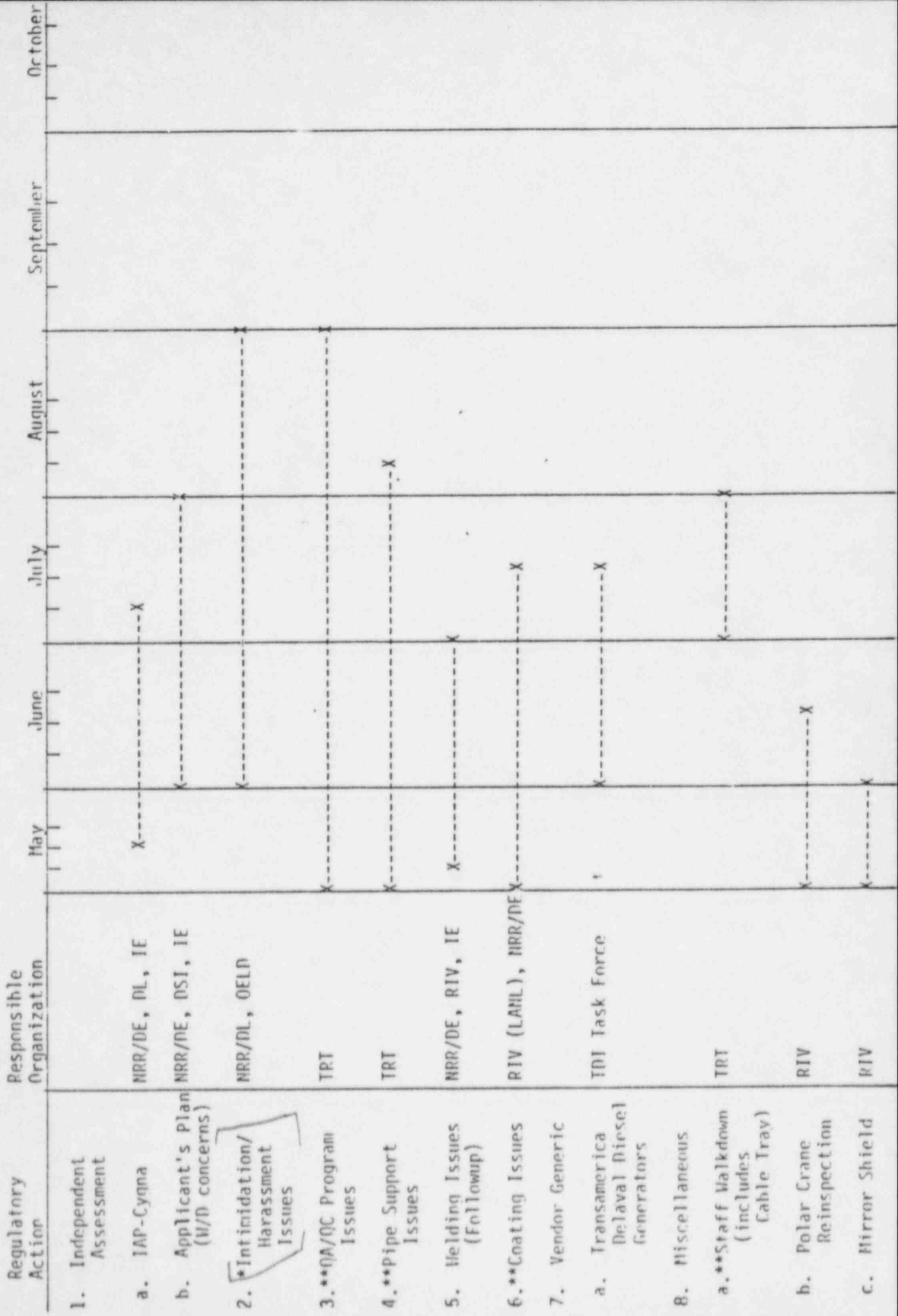


FIGURE 4

COMANCHE PEAK SCHEDULE

INSPECTION AND REGIONAL RESPONSIBILITIES

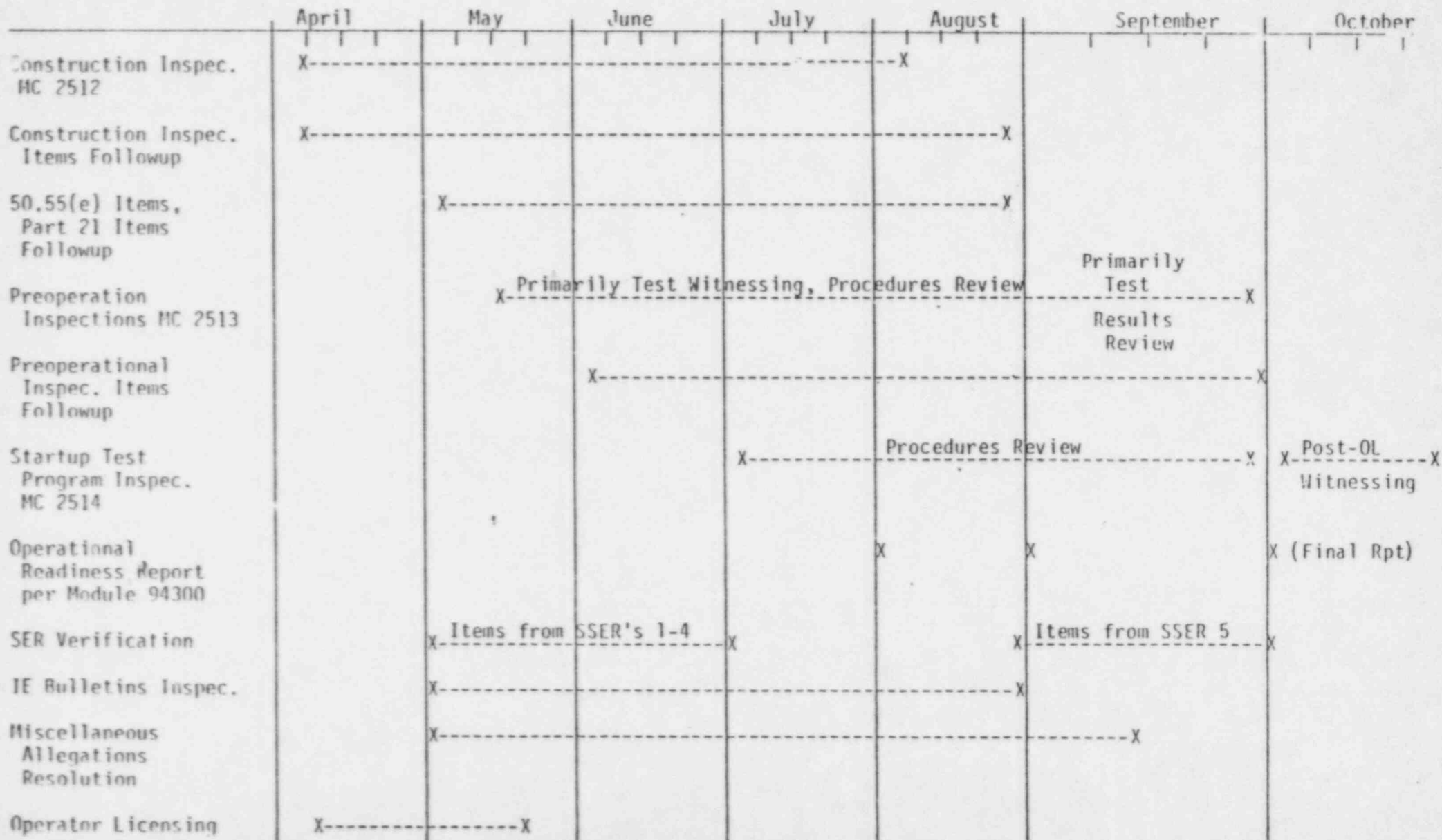
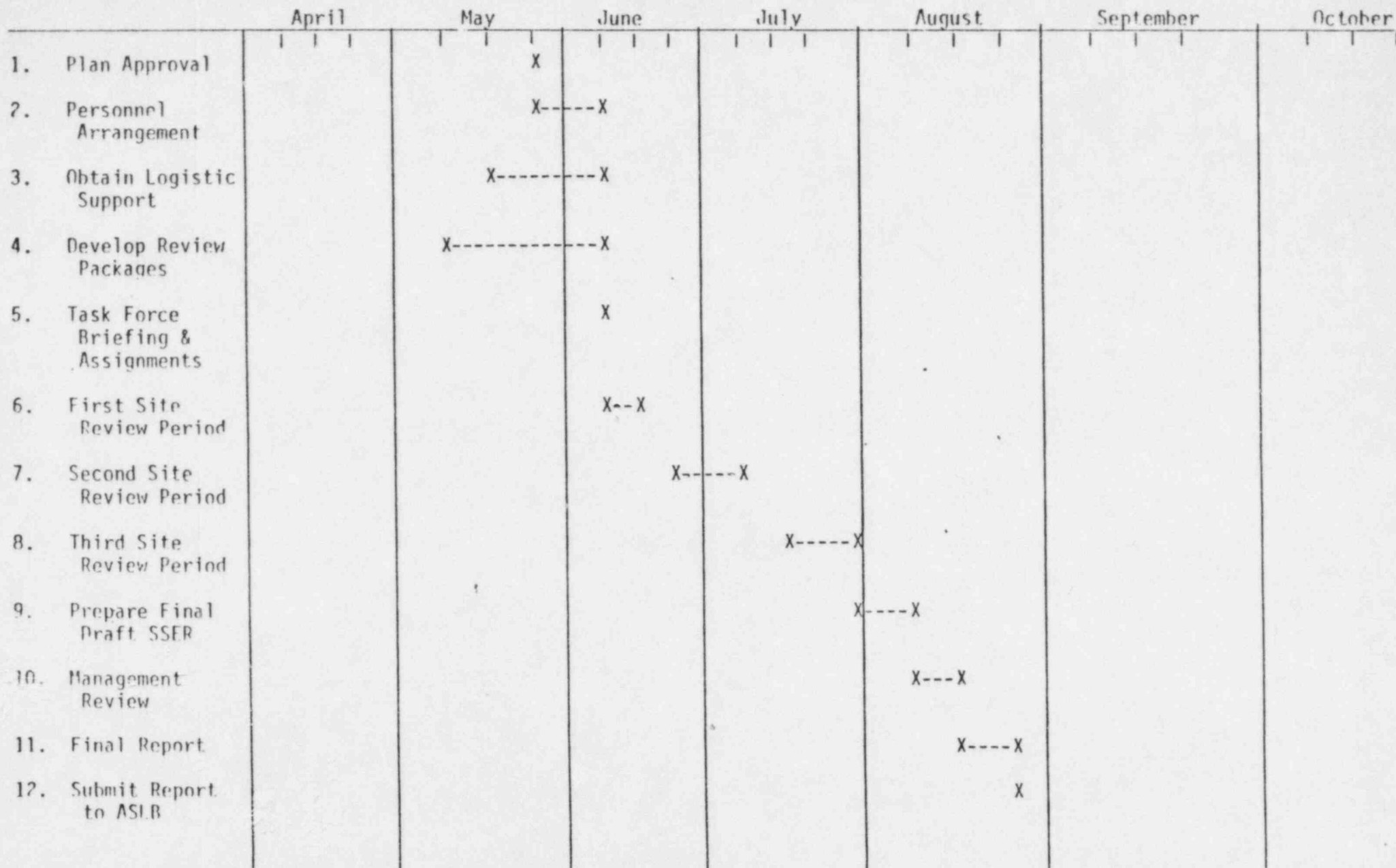
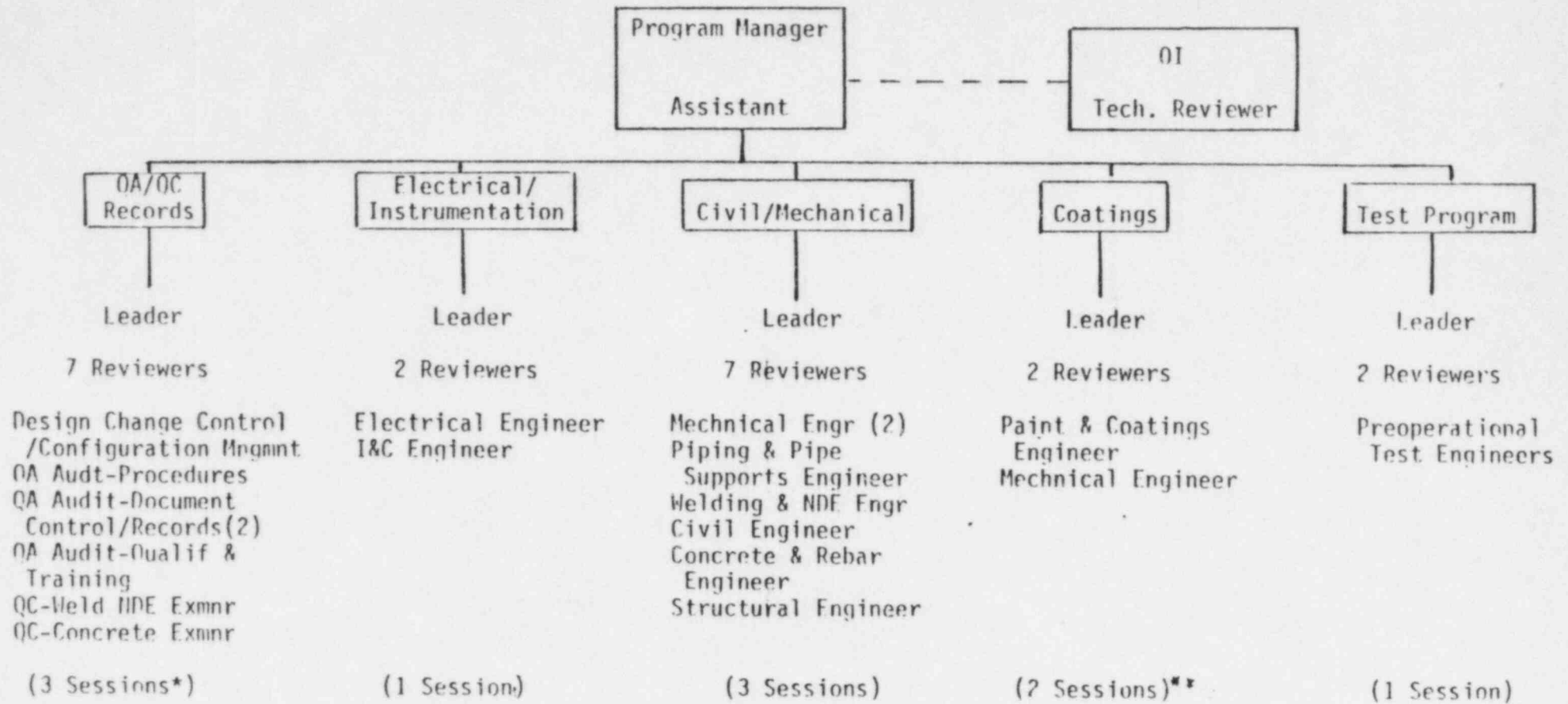


FIGURE 5

COMANCHE PEAK

Allegations Resolution Schedule

TECHNICAL REVIEW TEAM (TRT) STAFFING



* Each onsite "session" is a minimum of 12 days

**In addition to Brookhaven National Laboratory review currently in progress