



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

September 19, 1985

The Honorable William V. Roth, Jr., Chairman  
Committee on Governmental Affairs  
United States Senate  
Washington, D. C. 20510

Dear Mr. Chairman:

In accordance with the statutory obligation to respond to recommendations by the General Accounting Office (GAO) within 60 days of publication, we hereby submit our responses to the recommendations made by the GAO in their report entitled, "The Nuclear Regulatory Commission Should Report on Progress In Implementing Lessons Learned from the Three Mile Island Accident."

The Commission in its responses to the five GAO recommendations notes that NRC efforts are already underway to provide a one-time report to Congress addressing GAO concerns.

Specific comments on the GAO recommendations are presented in the enclosure.

Sincerely,

Thomas M. Roberts  
Acting Chairman

Enclosure:  
Response to GAO Recommendations

cc: Senator Thomas F. Eagleton

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## RESPONSE TO GAO RECOMMENDATIONS

The Nuclear Regulatory Commission Should Report on Progress  
In Implementing Lessons Learned from the Three Mile Island  
Accident -- GAO/RCED-85-72, July 19, 1985

### Chapter 3

NRC Should Account for Action Plan Progress

1. GAO Recommendation: "...that the Chairman, NRC, report to the Congress on a one-time item-by-item accounting of the 176 items listed in the Action Plan."

#### NRC Response

NRC will provide a one-time item-by-item accounting to Congress on the 176 items listed in the Action Plan.

2. GAO Recommendation: "For the 39 utility Action Plan items, the report should address

-- items completed at all the 65 nuclear power plants that were operating when the Three Mile Island accident occurred and

-- items that have not been completed at all plants, the number of plants that have not completed each item, and the expected date that each item will be completed at all plants."

NRC Response

The NRC will include in the one-time report to Congress items completed at all 65 operating plants that were operating when the Three Mile Island accident occurred, items that have not been completed at all plants, the number of plants that have not completed each item, and the expected date that each item will be completed at all plants.

In addition, the NRC has always tracked and published the status of the licensing reviews associated with the TMI Action Plan, but has not verified the implementation of every new generic requirement by every licensee. Through the NRC inspection program, we have audited licensee performance in this area. In our November 16, 1984 response to the GAO report, "Management Weaknesses Affect Nuclear Regulatory Commission Efforts to Address Safety Issues Common to Nuclear Power Plant," (GAO/RCED 84-149), NRC made a commitment to examine the process of tracking and reporting the implementation of each generic requirement at each plant. NRC has now decided to expand the current reporting system to include written confirmation from licensees when plant modifications resulting from generic requirements are completed.

3. GAO Recommendation: "For the 120 Action Plan developmental items, the report should address

- items that have been completed, the resulting NRC staff product(s), and any related changes in nuclear power plant regulatory requirements or NRC regulatory procedures and
- items that have not been completed, when NRC expects to complete each item, or the reason why the item will not be completed."

NRC Response

NRC will include the 120 Action Plan developmental items in the one-time report to Congress and will address: (1) items that have been completed, the resulting NRC staff products, and any related changes in nuclear power plant regulatory requirements or NRC regulatory procedures; and (2) items that have not been completed, when NRC expects to complete each item, or the reason why the item will not be completed.

This information is contained in current NRC periodic reports. NRC lists in its Annual Report to Congress generic issues (including TMI Action Plan items) resolved during the year and expected completion dates of the issues

that remain to be resolved. More complete information about generic issues is provided in NUREG-0933 which is updated with supplements that are published semiannually. This report lists all previously-resolved generic issues (including TMI Action Plan items) and references the revised requirements or guidance that resulted from the resolution of the issues. Also listed are the generic issues (including TMI Action Plan items) that are not to be resolved along with the reasons for not completing each of these issues (usually because of small safety significance).

4. GAO Recommendation: "For the 17 Action Plan items assigned to the Commission, the report should discuss the actions taken, Commission plans for any additional action, and whether or not Commission action on each item has led, or may lead, to changes in NRC's policies, organization, or management practices."

#### NRC Response

The one-time report to Congress will include all actions taken on the 17 Action Plan items assigned to the Commission. Note that NUREG-0933 does not include the items in Chapter V of the TMI Action Plan which were assigned to the Commission, but concentrates on those issues that are directly related to plant safety.

5. GAO Recommendation: "...the report should address the significance of incomplete Action Plan items to public safety and show how NRC intends to pursue, account for, and report on these items in NRC's new generic safety issues management system."

NRC Response

NRC will address the significance of incomplete Action Plan items to public safety in the one-time report to Congress. The significance of unresolved generic issues (including TMI Action Plan items) is provided in NUREG-0933. Because most TMI Action Plan items that licensees were required to implement are complete, their significance has not been estimated beyond what was originally presented in the TMI Action Plan (NUREG-0660). The NRC generic issues prioritization program is described in the NRC 1982 Annual Report (p. 29). A summary of the generic safety issues management system is presented in the 1984 NRC Annual Report and will be included in future NRC Annual Reports.



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