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OFFICE OF THE
EXECUTIVE DIRECTOR
FOR OPERATIONS

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

May 2, 1995

Cathy/Sally

RE: Attached WITS item 9400062

Rather than track each action separately, King was going to ask NMSS to prepare an annual report to Hugh Thompson reporting on the implementation of the action plan items. The report will be due at the end of each year until all items are completed. First suspense date: 12/29/95

Margo

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 24, 1995

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: Robert M. Bernero, Director
Office of Nuclear Materials Safety
and Safeguards *Carl P. Bernero*

Edward L. Jordan, Director
Office for Analysis and Evaluation
of Operational Data *E. L. Jordan*

SUBJECT: ACTION PLAN RESULTING FROM THE LESSONS LEARNED REPORT AND
NMSS REVIEW OF OIG REPORT ON SEQUOYAH FUELS CORPORATION
NOVEMBER 17, 1992, ACCIDENT

In the October 27, 1994, memorandum from Robert Bernero and Edward Jordan conveying the Lessons Learned Review of the Sequoyah Fuels Corporation Event of November 17, 1992, NMSS and AEOD committed to developing an Action Plan to address the items identified in the Lessons Learned Report. The Action Plan, Attachment 1, identifies specific recommendations made as a result of the Lessons Learned Report and the NMSS review of the OIG report, the group responsible for completing the action, and the due date.

Some of the recommendations from the Lessons Learned Report and the NMSS review of the OIG Report were not included in the Action Plan due to resource considerations and government streamlining efforts. These recommendations are listed in Attachment 2.

Attachments: 1: Action Plan
2: Recommendations Not Included in the Action Plan

ACTION PLAN RESULTING FROM THE LESSONS LEARNED REPORT AND NMSS REVIEW OF OIG REPORT ON SEQUOYAH FUELS CORPORATION NOVEMBER 17, 1992, ACCIDENT

TASK	REF.	RESPONSIBLE OFFICE	DUE DATE
1. Review the status of emergency plans, including amendments thereto, for fuel cycle facilities to ensure all plans are current.	A	NMSS/FCSS	June 1, 1995
2. Encourage fuel cycle licensees to write emergency plans with more clarity and to identify the minimum number of personnel and positions needed to respond during accident conditions, including manning a control room when employed for accident control.	A	NMSS/FCSS	During inspections
3. Evaluate regional practices to ensure all fuel cycle emergency plans are current.	A	Regions	September 30, 1995
4. o Review existing NRC/EPA Memorandum of Understanding and revise, as necessary, to clearly delineate how the respective responsibilities are carried out in emergency situations where the potential threat to offsite residents is from a nonradiological hazard.	A	AEOD	April 30, 1997
o Develop implementing procedures from NRC/EPA Memorandum of Understanding that clearly delineate how the respective responsibilities are carried out in emergency situations where the potential threat to offsite residents is from a nonradiological hazard.	A	AEOD	December 31, 1997
5. Revise Manual Chapter 2600 and its associated Inspection Procedures.	B	FCSS/Regions	December 31, 1995
6. Inform fuel cycle and other major materials licensees that timely, accurate public information is expected in an emergency.	B	OPA	September 30, 1995
7. Re-emphasize that the Agency will issue information on its own about incidents if a licensee refuses to do so or issues inadequate, misleading or false information.	B	OPA	September 30, 1995
8. Develop a procedure to evaluate media response during AITs and IITs.	B	OPA	September 30, 1995
9. Verify whether enforcement action could be taken with respect to operability of emergency onsite communications.	C	FCSS with OE and OGC	June 1, 1995
10. Encourage licensees to incorporate more realistic emergency exercise scenarios to test emergency preparedness of facility.	B	FCSS/Regions	During next license renewal and inspections.
11. Encourage licensees to conduct a systematic evaluation of a facility's process and equipment that identifies hazards and their consequences.	B	FCSS	With the next license renewal.
12. Evaluate the accessibility of remote readout equipment in a control room if utilized for mitigating emergency events.	B	Regions	During inspections.
13. Ensure licensees have committed to the following in their emergency plans: a. offsite response agencies are invited to participate in emergency preparedness drills b. offsite responders receive emergency response training c. the supply and accessibility of respiratory equipment for emergencies are adequate d. quarterly testing of emergency communication equipment is performed e. verify licensees are complying with the Emergency Planning and Community Right-to-Know Act of 1986	B	FCSS/Regions	During next license renewal and inspections.

BACKGROUND DOCUMENTS: A - Review of OIG Report (February 27, 1995)
B - Lessons Learned Review (October 27, 1994)
C - Approval Letter from J. Tylor, EDO (December 8, 1994)

RECOMMENDATIONS NOT INCLUDED IN THE ACTION PLAN¹

1. Revise 10 CFR Part 70 to include requirements for chemical safety, maintenance, quality assurance programs, and an integrated safety analysis.²
2. Revise 10 CFR Part 40 to include requirements for maintenance, quality assurance programs, and an integrated safety analysis.
3. Develop a Standard Review Plan to aid staff in reviewing an application for a new license or renewal of an existing license.²
4. Monitor the installation and operation of licensee control rooms, when licensees elect to use a control room.
5. Extend NRC policy to obtain expert and independent medical evaluation of persons exposed to hazardous chemicals and develop a formal process to implement this policy. (To be addressed in action item 4.)
6. Investigate the possibility of Regions participating in the Regional Response Team activities related to the Local Emergency Planning Committees whose emergency plans include major NRC licensees.
7. Develop and distribute to staff a procedure to ensure requirements of MD 8.3, and MC 0325, and Inspection Report 93800 are met.

¹ Recommendations from Lessons Learned Review

² This action may occur, but will not be tracked as part of this action plan.