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 IPPOLITO,T.A. Operating Reactors Branch 3

SUBJECT: Plans to submit response to 790713 request for addl info via group response of BWR Post-TMI Owners Group on 790817.

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Iowa Electric Light and Power Company

August 10, 1979
LDR-79-139

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
NUCLEAR GENERATION

Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Ippolito:

Our response to your request, dated July 13, 1979, for additional information for the NRC Staff Report on BWR's, will be submitted via the group response of the BWR Post-TMI Owner's Group on August 17, 1979.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
Nuclear Generation

LDR/RFS/mz

cc: R. Salmon
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S. Tuthill
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UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D. C. 20555

AUG 8 1979

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MEMORANDUM FOR: D. B. Vassallo, Acting Director, Division of Project Management, NRR
 D. Eisenhut, Acting Director, Division of Operating Reactors, NRR

FROM: R. A. Benedict, Project Manager, Light Water Reactors Branch
 No. 2, DPM

SUBJECT: SUMMARY OF MEETING HELD AUGUST 1, 1979 TO DISCUSS STATUS OF TMI-2
 RELATED ACTIVITIES BY NRC TASK GROUPS

A meeting was held in Bethesda on August 1, 1979 to discuss the status of TMI-2 related activities by NRC task groups. Invited to attend were all utilities with operating plants and seven with OL applications for which licensing action is scheduled to be completed in the near term. These two groups are listed in Enclosures 1 and 2 respectively. Enclosure 3 presents the agenda for the meeting.

Mr. Denton noted that, since the occurrence of the TMI-2 accident, both the NRC and the industry have been active in studying the accident to arrive at means to prevent or mitigate future accidents of this type. He stressed that the purpose of this meeting was to present to the industry what the NRC has in mind to propose in the way of new requirements and to obtain feedback from the industry on these thoughts. He expressed hope that the industry could combine the efforts of all its parts and provide, ultimately, a single report presenting the industry's proposed alternatives. Such a combined effort would help reduce the time and manpower that would otherwise be spent by both industry and the NRC in evaluating the alternatives. He noted that the formation of owners groups was already helping to expedite and consolidate this process.

Lessons Learned

Mr. Mattson reviewed the major recommendations of the "Lessons Learned" Task Force, as presented more fully in NUREG-0578, "TMI Lessons Learned Task Force Status Report and Short-Term Recommendations." He noted that implementation of the recommendations, some scheduled for January 1, 1980 and others for January 1, 1981, should be accomplished on time. However, for good cause shown, some of those scheduled for January 1, 1980 implementation might be delayed a few months until the usual refueling shutdowns in the spring of 1980. Such delays would be handled on a case-by-case basis.

Mr. Mattson stated that early meetings between NRC and industry would probably be needed in order to expedite the implementation process. He also noted that the "lead plant" process might be used, indicating that Salem 2 and North Anna 2 might be such lead plants. Concerning operating reactors, the Babcock and Wilcox plants would probably be first for implementation, followed by the Westinghouse and Combustion Engineering plants. For near-term OL's, we would write SER supplements that would address all the near-term Lessons Learned and Bulletins and Orders. The TMI-2 items for plants not as advanced in the licensing process would be handled as part of the normal review process.

Memo

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Questions from the floor, concerning Lessons Learned, concentrated on three items:

1. Performance testing of relief and safety valves,
2. Requirements for a shift technical adviser,
3. Revised limiting conditions for operation.

Industry concern about testing of relief and safety valves centered on the present lack of test facilities in the United States, which would delay implementation of this item. Mr. Mattson noted that there may be foreign facilities that might be used. He also noted that, some years ago, General Electric had performed tests on main steam isolation valves at an existing fossil-fueled boiler plant. NRC might become a party to such testing but a detailed test program from industry would be needed in order to justify expenditure of R&D funds.

Concerning the shift technical supervisor, comments from the floor indicated that the industry does not particularly object to the NRC proposal to have the talents required be available on shift, but industry does object to the requirement that these talents be vested in a separate, advisory-type individual. There would probably be severe conflicts between the experienced Senior Reactor Operators (SRO's) and a technical advisor whose background did not necessarily include "hands-on" operating experience. Also, it would be difficult to hold graduate engineers on shift work. Several questioners asked that industry be permitted to upgrade the SRO to have the required talents. This would be much easier to accomplish than to find 350 qualified individuals to staff approximately 70 plants within the next five months.

Mr. Mattson indicated that NRC is willing to consider industry proposals but that the function of the advisor must be provided on shift. Future improvements in control room design, combined with upgrading the SRO's, may ultimately provide the function, thus eliminating the need for a separate advisor. And Mr. Denton noted that industry self-interest in reliability of plant operation and in liability protection should be leading industry in the direction of having the required talents on site at all times rather than only in the central office during the day.

Concerning the recommended changes to the limiting conditions for operation, interest from the floor centered on the proposed requirement that the plant be shut down to a cold condition upon total loss of a safety function. Several commentators stated that the NRC already has the authority to require such a shutdown, and shutdown should not be required for a short-term violation. Mr. Mattson responded that responsibility for safe operation still resides in the utility, and should not be shifted to the NRC. Moreover, some plants have had many violations while others have had none, indicating a difference in management attention to operational safety. The NRC believes that these violations underscore the need for operational excellence and only by forcing management's attention to this matter can there be assurance that no one individual

AUG 0 8 1979

can jeopardize safe operation. A further point raised from the floor concerned the "disgruntled" employee who could force a plant shutdown intentionally. Mr. Mattson reiterated that, although this point had not been considered, no one person should be able to cause a safety function to be negated. The industry further noted that shutdown penalizes the consumer in increased costs for replacement power, not the utility which can pass on its increased costs. Industry requested that it be heard more fully on this matter before the subject goes into the rulemaking process.

Mr. Denton mentioned that he is considering adding to the Lessons Learned recommendations a requirement for the capability to remotely vent the reactor vessel, during operation, to the pressurizer or quench tank. This would prevent formation of a bubble in the reactor vessel as a result of a transient or accident.

Bulletins and Orders

Mr. Ross presented the status of the work being done by the Bulletins and Orders Task Force. His discussion is outlined in Enclosure 4.

The work has concentrated on the loss-of-feedwater event and on the small-break loss-of-coolant accident. It will result in instruction to utilities, evaluation of utility responses to these instructions, and issuance of staff safety evaluation reports, followed by utility implementation of plant or operational changes.

Safety evaluation reports have been issued for B&W operating plants. Generic SER's will be issued for Westinghouse and Combustion Engineering plants.

Floor questions centered on scheduling and manpower requirements. Mr. Denton noted that the B&O group will probably cease to exist by January 1, 1980. Case-work on near-term OL's is going well and NRC is getting outside help to assist in the review of plants scheduled for later licensing decisions. In response to a point made that NRC should consider, in its requests to industry for small-break LOCA analyses, that industry's resources are limited just as are those of the NRC. Mr. Ross noted that most of the review of analytical work will be done during the normal staff review, not by the Task Group. This should help spread out the industry work over a period of time.

Emergency Preparedness

Mr. Grimes presented the status of the work being done by the Emergency Preparedness Task Force. His discussion summarized the information presented in Enclosure 5. He also noted that regional meetings will be held later with licensees and applicants and state and local officials. These meetings will be held to assure mutual understanding of the required emergency preparedness.

Mr. Grimes further noted recent Congressional actions that may lead to requiring approved state plans by mid-1980.

AUG 08 1979

Industry interest, as evidenced by questions from the floor, centered on potential difficulties with states that either have no plans or do not agree with NRC requirements. Mr. Grimes admitted that this could be a problem, but noted that shutdown of a plant due to absence of a state plan might be politically undesirable from the state's standpoint. He also believes that conducting joint emergency exercises, perhaps every five years, will point up the desirability of having good state plans.

In response to a question concerning the details of such things as the number of telephones and other lines of communication, Mr. Grimes stated that NRC would probably not provide such detailed requirements; they would be determined by the particular circumstances of each plant and each state.

Operator Training

Mr. Collins discussed the status of work being done with respect to operator training. The points he covered are outlined in Enclosure 6. He also noted that the new requirements would probably be manifested in a new or revised Regulatory Guide.

Questions from the floor were concentrated on simulator training. Mr. Denton noted that simulators should handle off-normal events as well as normal operation and design basis accidents. Mr. Collins said that a week of simulator training would be part of the requalification requirements and that the operator performance criteria for requalification would be the same as for the original training. Training instructors may be from other plants but, in most cases, should have SRO licenses. Furthermore, operating experience cannot substitute for simulator training, and a "hands-on" examination is still required for a cold license. He agreed that, if an SRO is a graduate engineer, he might be excused from that training in which he can exhibit expertise.

Mr. Denton noted that he is encouraged by the formation of the industry-sponsored Nuclear Operations Institute which is intended to be able to certify operators. The NRC is interested in this program and will cooperate in every way it can.

Closing Remarks

Mr. Denton stated that he would take the industry comments into consideration before making his final decision on these matters.

R. A. Benedict

R. A. Benedict
Light Water Reactors Branch No. 2
Division of Project Management

Enclosures:
As Stated

ccs w/enclosures:
See next pages