

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BRIEFING ON THE STATUS OF GENERIC ISSUES

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PUBLIC MEETING

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Nuclear Regulatory Commission
One White Flint North
Rockville, Maryland

Tuesday, April 25, 1989

The Commission met in open session, pursuant to
notice, at 10:00 a.m., the Honorable LANDO W. ZECH, JR.,
Chairman of the Commission, presiding.

COMMISSIONERS PRESENT:

- LANDO W. ZECH, JR., Chairman of the Commission
- THOMAS M. ROBERTS, Member of the Commission
- KENNETH C. ROGERS, Member of the Commission
- JAMES R. CURTISS, Member of the Commission

1 STAFF AND PRESENTERS SEATED AT THE COMMISSION TABLE:

2 SAMUEL J. CHILK, Secretary

3 MARY WAGNER, General Counsel's Office

4 JAMES TAYLOR, Deputy Executive Director, Operations

5 THEMIS SPEIS, RES

6 WARREN MINNERS, RES

7 FRANK GILLESPIE, NRR

8 WALT SCHWINK, NRR

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P R O C E E D I N G S

(10:02 a.m.)

CHAIRMAN ZECH: Good morning, ladies and gentlemen.

Today the Commission will be briefed by the NRC's Office of Research and the Nuclear Reactor Regulation Office concerning the status of the Generic Safety Issues Program.

We last heard from the staff on this subject in a public meeting in October, October 21, 1987. At that time, the staff's briefing focused on the process and potential improvements plan for resolving generic safety issues.

And, subsequent to that meeting, the Commission specifically requested that the staff provide a progress report to the Commission, concerning improvements in processing and resolving the unresolved and generic safety issues, including the status of each remaining unresolved safety issue.

The resolution of generic safety issues is an important aspect of NRC's overall program, to assure the continuing safety of nuclear power plants.

The Commission reviews the staff's progress in resolving these issues on a quarterly basis, and today's information briefing will provide us an opportunity to

1 hear from the staff concerning the effectiveness of the
2 improvements instituted in 1987.

3 I understand that copies of the staff slides are
4 available at the entrance to the meeting room.

5 Do any of my fellow Commissioners have any
6 opening comments to make?

7 (No response.)

8 If not, Mr. Taylor, you may proceed.

9 MR. TAYLOR: Good morning, sir.

10 CHAIRMAN ZECH: Good morning.

11 MR. TAYLOR: At the table with me are Mr.
12 Schwink and Mr. Gillespie from NRR, and Mr. Minners and
13 Mr. Speis from the Office of Research.

14 The briefing will be in two parts. The areas of
15 identification, prioritization and resolution will be
16 given by the Office of Research, and then the areas
17 covering imposition, implementation and verification will
18 be provided by NRR.

19 Mr. Speis will start the briefing.

20 CHAIRMAN ZECH: All right. Thank you very much.
21 You may proceed.

22 DR. SPEIS: Mr. Chairman, Commissioners.

23 The first Vu-Graph, please? (Slide) The
24 contents. Basically, in today's presentation, I will
25 briefly go over the history of the generic issue program,

1 including the process and its key parts, and also
2 summarize the progress made since the October 21st, '87
3 briefing that you mentioned, Mr. Chairman.

4 Also, I will provide a status of the remaining
5 unresolved safety issues and a selected number of generic
6 issues; discuss our other activities involving a re-review
7 of low-priority issues, and share with you some reasons
8 for occasional schedule slippages and, of course, as Mr.
9 Taylor mentioned, the later part of the briefing will be
10 provided by NRR.

11 The first Vu-Graph -- (slide) -- I have provided
12 to you a graphic illustration of the generic issues
13 process. You see the number of steps identified in the
14 Vu-Graph, the step which involves the identification,
15 prioritization and resolution. These are the three parts
16 of the process which are done in the Office of Research,
17 and then the imposition, implementation and verification
18 by the Office of NRR and the regions.

19 The identification of the process is the first
20 part, of course. This is where the issues are identified,
21 based on concerns raised by ACRS, staff operating
22 experience, technical reviews, risk assessment studies.
23 Also, once in a while, we have some issues from the
24 public. In fact, the last four or five years, two issues
25 have been raised by the public, which I'll mention them

1 later on.

2 The step involving the prioritization -- this is
3 where an assessment is made of the potential safety
4 significance of these issues. Basically, this process is
5 mostly risk-based, but also it involves different
6 and distinct overviews.

7 The resolution part of the process -- this is
8 where the resolution is developed. Potential
9 identification of improvements are made at this stage of
10 the process. Also, any potential requirements are
11 developed here. This is a very intensive effort. It
12 involves, in addition to the staff, the CRGR, the ACRS
13 and, if the process leads to a rule, the Commission, of
14 course, gets involved. So, the approval -- this stage
15 also involves regulatory analysis.

16 Then, once this process has been completed, if,
17 as a result of the resolution, something has to be done in
18 a power plant, then the process proceeds and the
19 implementation is implemented by rules, or generic
20 letters, or changes into the standard review plant,
21 regulatory guides, and so on and so forth.

22 This whole process is struck by SIMS, which NRR
23 people will be discussed later. In addition to the SIMS,
24 we in the Office of Research would have a document called
25 NUREG 0933, which -- it's a kind of a depository. Every

1 issue has been identified. Even issues that turn out to
2 be of no safety significance, they are documented there.
3 The prioritization of the process is described in NUREG
4 0933. So, we have a very well documented system where
5 every issue -- any issue has been raised the last 10 or 15
6 years can be found in those two documents, especially in
7 NUREG 0933.

8 So, with this brief overview of the process --
9 COMMISSIONER ROGERS: Just before you leave
10 that.

11 DR. SPEIS: Yes.

12 COMMISSIONER ROGERS: I assume that there really
13 is -- that it is as you've said, that it's a much more
14 complex interactive situation than this little line
15 diagram implies, that in any one of these areas, general
16 areas of responsibility -- other parts of the organization
17 are called upon and is consulted and so on.

18 DR. SPEIS: Of course, let me -- no question
19 about it. The prioritization, for example. We take -- we
20 in the Office of Research, take the lead in prioritizing
21 an issue, and then every issue is sent to NRR for their
22 review. Also, the ACRS participates in the
23 prioritization. And, of course, in the resolution, the
24 process is much more compact.

25 COMMISSIONER ROGERS: There's a certain amount

1 of cycling back and forth.

2 DR. SPEIS: Yes, this is too linear. This is for
3 presentational purposes, yes, sir.

4 CHAIRMAN ZECH: Let's proceed, please.

5 DR. SPEIS: On Vu-Graph number two -- (slide)--
6 I have summarized the process, the accumulation of the
7 issues from the beginning of the process. The formal
8 program start in 1981, with 511 issues identified to be
9 prioritized. Three hundred sixty-nine of those issues
10 came from TMI-related reviews, and the remaining 142 came
11 from a number of other documents that the staff had put
12 together.

13 For example, the TMI-related issues, if you
14 recall, came from the Rogovin Commission, from the
15 Presidential Commission, and from other internal staff
16 reviews related to the TMI accident.

17 So, if we go to the next Vu-Graph -- (slide)--
18 in addition to the 511 mentioned already, we had an
19 additional 224 issues, including human factors issues that
20 have been identified in the past eight years. So, that
21 gives us a total of 735 issues. In fact, these are four
22 more since the briefing we made to you back in October of
23 -- 21, 1987.

24 CHAIRMAN ZECH: Four more?

25 DR. SPEIS: Yes, sir.

1 CHAIRMAN ZECH: We had 220 --

2 DR. SPEIS: We had 731. We had 731 in 10-21-87,
3 and now we have 735 issues. So, we have added four more
4 issues since October.

5 CHAIRMAN ZECH: Thank you.

6 DR. SPEIS: So, as I said earlier, every one of
7 these issues can be found documented in NUREG 0933, and
8 their disposition.

9 For your information, these additional 224
10 issues, the large majority of them came from reviews done
11 by the Office of Nuclear Reactor Regulation, as well as
12 from programs directed by the Office of Research. The
13 AEOD provided 31 issues, the ACRS 12, and the public came
14 up with two issues and, also, the regions provided one
15 issue. So, that's kind of a --

16 On page number 4 -- (slide) -- I have
17 summarized the progress we have made since the November
18 21, '87 briefing. I guess I can address some of this.
19 For example, the subtotal in '87, we had resolved 610.
20 When we briefed you on the progress of the program back in
21 May 12, '88, we had resolved 628, and today's briefing we
22 can report that we have completed the resolution of 655
23 issues.

24 You see here that when I say resolution, they
25 fall under a spectrum of categories, some of them

1 prioritized low, some issues have been integrated with
2 other issues, some issues turned out to be non-safety
3 issues -- for example, what we characterize as licensing
4 issues, regulatory improvements, environmental. For
5 example, licensing issues are issues that involve getting
6 knowledge and expertise in the staff itself, to be able to
7 review the submittals -- you know, like having depend
8 capability for audits, either calculational or otherwise.

9 So, on the next Vu-Graph -- (slide) -- I have
10 summarized the issues still to be resolved. The most
11 important category of unresolved safety issues, you see
12 that we have reduced the number to three and, as I will
13 address each one of them shortly, hopefully, those issues
14 will be finished within the next four or five months.

15 So, we have three USIs to complete. We have 20
16 high generic issues, we have 13 medium. So, we have a
17 total --

18 COMMISSIONER ROGERS: Just a second. I'm a
19 little confused about the distinction there between those
20 top three.

21 DR. SPEIS: Yes. Actually, in practice, we
22 really have three categories. We have high, mediums and
23 low -- okay -- generic issues, but earlier on, by
24 congressional mandate, the number of high priority generic
25 issues assumed more importance and they were designated as

1 USIs. This was at the beginning of the program. So, we
2 have to report progress made on the resolution of USIs to
3 Congress, and we do that now via the NRC's annual report.

4 COMMISSIONER ROGERS: Okay.

5 DR. SPEIS: For your information, we had 29 USIs
6 on the books, and now we have, as I say here, three
7 remaining. Okay. Last time -- once in a while -- not
8 once in a while -- we go through the process of distilling
9 important issues that rise above the thresholds of highs
10 and mediums, and put them into the category of the USIs.
11 The last time we did that was, I guess, a few years ago,
12 but as far as we are concerned, the issues that are
13 designated high, they received the same effort as USIs,
14 you know, except for these mandated -- congressional
15 mandate to report.

16 Our schedule calls for resolving 80 percent of
17 the remaining highs by the end of next year, and the
18 remaining the following year. There is a number here
19 which is said to be prioritized -- you see at the last
20 column, right at the bottom of the last column, which says
21 36 issues to be prioritized.

22 Now, because of our concern that maybe among
23 those issues there could be some very important ones, we
24 don't wait for the full process to reach its conclusion.
25 We go through a screening process to make sure that there

1 are no important safety issues hiding in this column of To
2 Be Prioritized and, for example, we have done that, and we
3 have found out that we didn't identify any high issues.
4 We identified nine medium, and the remaining 27 were
5 either low or subsumed or in the other categories.

6 So, even though, you know, it's still on the
7 books, you know, as far as we, the staff, are concerned,
8 as far as assessing the safety significance of issues that
9 come in front of us, you know, we pursue an expedited
10 process and, unfortunately, sometimes, the numbers don't
11 tell the gain, don't tell the --

12 COMMISSIONER CURTISS: Does that mean you have
13 taken what amounts to a rough cut at priority?

14 DR. SPEIS: Yes, sir. Yes, sir.

15 MR. TAYLOR: Yes, that's what it does.

16 DR. SPEIS: Yes, sir. Yes. And most of the --

17 COMMISSIONER CURTISS: You further refine them.

18 DR. SPEIS: We further refine, but so far, most
19 of the times, we have been -- I don't think we have
20 changed any. Maybe one -- once a rough cut was changed,
21 you know, from the more erudite process itself, you know.

22 COMMISSIONER CURTISS: And the purpose of that
23 is to ensure that we don't have any high priority issues
24 that have to be prioritized.

25 DR. SPEIS: Yes, sir, that's right. Yes. Yes.

1 Yes. Yes. That's very important to us.

2 So, since the October '87 briefing, we have
3 completed the resolution of 45 issues.

4 On page 6 -- (slide) -- I have a summary. It's
5 basically the same numbers. The issues Resolved and To Be
6 Resolved, and the percentage, and you see that we have
7 Resolved 89 percent, and To Be Resolved 11 percent and,
8 again, as I mentioned, that 11 percent includes the issues
9 that we already have taken through a preliminary risk
10 evaluation.

11 I would like to focus on the remaining USIs now.
12 (Slide) On page 7, we have three USIs remaining -- the
13 A-17, Systems Interaction in Nuclear Power Plants; A-40,
14 Seismic Design Criteria; and A-47, Safety Implications of
15 Control Systems, and I will discuss the status of each USI
16 separately.

17 On page 8 -- (slide) -- I will start with the
18 USI A-17. We have completed the technical work on this
19 USI and have developed a proposed resolution. If you
20 recall, the purpose of this USI was to investigate the
21 potential that there could be some unrecognized subtle
22 dependencies among structural systems and components that
23 could have remained hidden, and that could lead to safety
24 significant events.

25 In fact, in the past, we have noticed from our

1 scrutiny of the LERs, a number of events that have
2 involved unintended or unrecognized dependence among the
3 systems that I mentioned earlier.

4 As I said, we have concluded that certain
5 actions should be taken by NRC and licensees, and we have
6 -- the issue has been reviewed by CRGR, the ACRS, and
7 we're in the final process of putting the issue resolution
8 together.

9 The most important thing that has come out of it
10 is the issue of flooding, to make sure that at least some
11 older plants have examined their plant for some flooding
12 vulnerabilities. And because the IPE process involves
13 explicitly an examination of flooding, we are going in the
14 direction of including this -- the resolution of this
15 issue in the IPE system, in the IPE process.

16 A number of other things have come out, mostly
17 for information, which we'll be providing to the utilities
18 for their information, via generic letter.

19 The next issue, number 9 -- (slide) -- USI A-40,
20 Seismic Design Criteria. It basically involves future
21 plants. It involves only four existing facilities, and it
22 has to do with taking another look at some tanks above
23 ground, where we have revised the standard review plan to
24 provide guidance for future plants, and the specific
25 issues deal with seismic design parameters, seismic system

1 analysis, and vibratory ground section.

2 So, we will be finishing this issue in the next
3 few months, as is indicated on this slide here.

4 The last, remaining USI A-47 -- (slide) --
5 Safety Implications of Control Systems. The issue--
6 again, this concerns -- there may be failures initiated or
7 aggravated by non-safety systems, and we want to make sure
8 that the design basis events that have been analyzed don't
9 lead to significant -- don't change the evaluation as a
10 result of these failures initiated by the non-safety
11 systems.

12 We have completed, again, the technical work to
13 resolve this issue. A small number of limited
14 requirements have come out of it. For your information,
15 because of the variety of plants, the resolution has
16 varied considerably.

17 For example, we will be recommending over-fill
18 protection for over plants -- for all plants, steam
19 generator over-fill. For some plants like Oconee, we're
20 talking about providing diverse automatic initiation of
21 emergency feedwater. For some other plants involving
22 combustion engineering design plants, which have low head
23 pumps, we're talking about improving the emergency
24 procedures involving low break -- small break lock
25 accidents.

1 COMMISSIONER ROGERS: Are those related to this
2 control systems, or to the other --

3 DR. SPEIS: Yes, to the control systems -- A-47,
4 Safety Implications of Control Systems. So, the reason I
5 went into some detail is to show you that, you know, we
6 come up with a generic resolution, but then when we start
7 looking at the large variety of plants, that resolution
8 has to be tailored very specific. So, we have to do the
9 work ahead of time to make sure that some safety
10 enhancements can be justified on a plant-specific basis or
11 on a class of plants. And here is an example where this
12 issue had to be tailored to the specifics of the plants or
13 to the class of plants.

14 CHAIRMAN ZECH: What's your confidence in your
15 ability to meet the schedules that you've given us for
16 these unresolved safety issues?

17 DR. SPEIS: Oh, it's 99.9 on these three issues.
18 There's no question about it that we're going to meet them
19 the next time.

20 CHAIRMAN ZECH: Can you predict how long it
21 might be required to implement and verify the actions on
22 these remaining USIs? In other words, does the resolve
23 mean that you've finished your work, or does the resolve
24 mean they are implemented?

25 DR. SPEIS: No, it means that we have finished

1 our work, and then the next stage involves notifying the
2 licensees of actions that they have to take.

3 CHAIRMAN ZECH: Well, when are they going to
4 finish implementation?

5 MR. TAYLOR: He's not 99.9 percent --

6 DR. SPEIS: I'm talking about resolution. I'm
7 sorry, Mr. Chairman. I withdraw the 99. It's only for
8 the resolution part.

9 MR. GILLESPIE: It depends on what we're asking
10 a licensee to do. A typical time would be two outage
11 periods, to give them enough time to plan and do any
12 engineering that might be required, if engineering is
13 required. Two outage periods can approximate about three
14 years.

15 CHAIRMAN ZECH: Well, if they are really safety
16 issues, it seems to me that's a long time. First of all,
17 we're taking a long time to address them. I recognize
18 that if there are urgent safety issues, that you act on
19 them more promptly, but it still seems to me that when
20 you've finished your work, that when -- and you call them
21 resolved -- I appreciate the fact that means you've
22 resolved them, but that doesn't mean they're implemented
23 by the plant. And maybe two outages is reasonable. I
24 suppose it would depend on the --

25 MR. TAYLOR: What the fix is; what procurement,

1 if procurement is involved.

2 CHAIRMAN ZECH: Certainly. But it seems to me
3 that if we really do conclude that there are unresolved
4 safety issues, that we should put some fair amount of good
5 judgment into scheduling their implementation because
6 that's really what we are talking about.

7 So, I hope you'll take a good hard look at that.
8 It does seem to me that perhaps two outages might be
9 reasonable, but it may not be either. That's a very
10 important call, and NRR makes that, is that right?

11 DR. SPEIS: Yes, sir.

12 MR. GILLESPIE: Yes, sir.

13 CHAIRMAN ZECH: After Research has completed
14 their part of the program. So, we're hearing --

15 MR. TAYLOR: That agency interacts.

16 CHAIRMAN ZECH: Yes, NRR is going to tell us a
17 little bit about this. When you come on the program, will
18 you elaborate on this point a little bit, please?

19 MR. GILLESPIE: We will.

20 CHAIRMAN ZECH: All right. Fine. Let's
21 proceed.

22 DR. SPEIS: The next Vu-Graph, please? (Slide)
23 At the last briefing we mentioned some important generic
24 issues that we were in the process of resolving, and I
25 thought I'll bring you up-to-date, Mr. Chairman. In fact,

1 this specific issue -- and Mr. Commissioners -- this issue
2 here on page 11, which discusses the Loss of RHR
3 Capability in PWRs -- in fact, the letter has gone out
4 from NRR, and the implementation process is underway
5 because we consider this to be an important issue.

6 This issue involves, broadly speaking, the loss
7 of core cooling during cold shutdown, but the most
8 significant part of the issue involves the air binding of
9 RHR pumps during mid-loop operation. This is the time
10 where the containment could be open and you are in the
11 process of performing operations in the steam generator
12 itself.

13 So, in fact, when we started this issue, we
14 focused early on the second part of the item shown on the
15 Vu-Graph here, the loss of RHR pump suction due to
16 autoclosure interlock-related -- but then, from
17 operational experience, we found out that the most
18 important part of this issue had to do with the operations
19 during mid-loop -- during mid-loop operations, and we
20 focused on this issue, and we have completed the work on
21 this issue.

22 In fact, I understand that Tom Murley, of NRR,
23 felt so strongly about this issue that he personally sent
24 a letter to every CEO and operator of the plant, and the
25 type of actions that have taken place are on page 12, the

1 next Vu-Graph.

2 CHAIRMAN ZECH: Well, before you go off that one

3 --

4 DR. SPEIS: Yes.

5 CHAIRMAN ZECH: I understand that the ACRS
6 essentially agreed with the position that staff took in
7 that regard, is that right?

8 DR. SPEIS: Yes. They had some questions about
9 the -- they want to review the procedures for containment
10 closure, you know, if you have one of those events --

11 CHAIRMAN ZECH: Yes, and it seems like --

12 DR. SPEIS: -- plus the resolution.

13 CHAIRMAN ZECH: But they made a broader
14 statement, I think, that -- where they stated that they
15 didn't believe there's any well-defined policy direction
16 from the Commission concerning the regulatory approach
17 that should be taken.

18 If the staff feels that way, then the Commission
19 needs to consider such guidance. So, I believe the ACRS
20 had such a comment. Would you check on that --

21 DR. SPEIS: Yes.

22 CHAIRMAN ZECH: -- and, if so, we need to hear
23 from the staff as to whether you agree and, if you need
24 any guidance from the Commission, please let the
25 Commission be informed by some kind of a written response.

1 MR. MINNERS: Are you talking about their recent
2 letter about the integration of issues?

3 CHAIRMAN ZECH: Yes, right.

4 MR. MINNERS: Uh-huh.

5 DR. SPEIS: Okay. Yes, Mr. Chairman. So, on
6 the --

7 CHAIRMAN ZECH: But there might have been an
8 earlier comment, too, on this specific issue. I recognize
9 there is a very recent letter on integration, but I think
10 there might have been one earlier on this particular
11 issue, too.

12 DR. SPEIS: When we discussed farther with the
13 ACRS, one of the concerns was the procedures for closing
14 the containment during the degradation in decay heat
15 removal. So, that was the specific -- but we will check
16 farther, Mr. Chairman.

17 CHAIRMAN ZECH: Okay. If I recall, I was
18 informed that the staff was going to respond to that ACR
19 comment here in the next month or so and, of course, the
20 ACRS is going come before the Commission here in early May
21 and, at that time, we will discuss that with them, as well
22 as their latest letter, but it is an important area. The
23 integration of all of these major issues involving severe
24 accidents, the safety goal, MARK I containment, and all
25 the rest of it, but this particular one, I agree with Tom

1 Murley's approach to it. I think he did exactly the right
2 thing. And as I recall, you certainly acted responsibly,
3 but I do think the ACRS comment, kind of implying on this
4 particular issue that you may need more direction from the
5 Commission, I'd ask you to look specifically at that.

6 It may be that it is, indeed, part of the more
7 recent letter, but I'd ask the staff to look and give us
8 your comments, if you would.

9 DR. SPEIS: Okay. We will.

10 MR. TAYLOR: I might say, on this one, sir, that
11 the action of the staff came by virtue of the occurrence
12 of loss of RHR and, in all cases, recovery took place, but
13 it was just happening, and because of the conditions
14 usually being in the service condition and so on, this
15 clearly needed attention, and that's why staff proceeded
16 to point that out.

17 CHAIRMAN ZECH: All right. Thank you. You may
18 proceed.

19 DR. SPEIS: The next slide, please. (Slide) As
20 we said, we have issued the generic letter back in October
21 of '88. It was issued to all PWRs because this involves,
22 of course, only PWRs, and the staff's guidance focused on
23 actions to reduce the likelihood and consequences of the
24 loss of decay heat removal. It addressed improvement in
25 procedures and instrumentation to help operator prevent

1 and mitigate loss of decay heat removal.

2 On the next Vu-Graph, page 13 -- (slide)--
3 development of procedures that will permit timely closing
4 of containment during a degradation in decay heat removal.

5 CHAIRMAN ZECH: I understand that the staff is
6 planning to conduct inspections on this particular item--

7 DR. SPEIS: Yes.

8 CHAIRMAN ZECH: -- and on the effectiveness of
9 the proposed containment closure procedures. When are you
10 going to do this? When is the inspection scheduled to
11 take place?

12 MR. GILLESPIE: We'll be starting in about two
13 months, and then -- some of these have actually already
14 been done in developing the inspection procedure itself.
15 And, normally, when we issue a temporary instruction like
16 that, inspection procedure, it normally spans about two
17 years because you're going to be hitting -- trying to hit
18 these facilities during shutdown periods. So, we'd
19 anticipate that we would be completed inspections at all
20 facilities within two years.

21 Now, the exception will be that facility which,
22 for some reason, has been shutdown and not started up and
23 not gone into this condition, but that would be the rare
24 exception.

25 CHAIRMAN ZECH: All right. Let's proceed.

1 DR. SPEIS: The next slide, please. (Slide)
2 The next issue that I would like to say a few things is
3 the B-56, which involves the Diesel Generator Reliability.
4 This is an issue that has been -- was coupled with the
5 station blackout rule.

6 If you recall, the station blackout set some
7 goals for reliability of the systems and, for example, for
8 the diesel, it set a goal of somewhere between .95 and
9 .97, and the effort here involves defining a -- developing
10 and defining a program that addresses the principal
11 elements of a good reliability program, to make sure that
12 the -- indeed, the diesels perform well.

13 We're working with industry on this issue here,
14 with NUMARC, and we hope to adopt the reliability program
15 into one of our reg guides and, as you see here, we hope
16 to finalize this issue this September.

17 On page 15 -- (slide) -- which, basically, I
18 have said that already. It's the coupling of this issue
19 to the station blackout issue, A-44.

20 And on page 16, the next Vu-Graph -- (slide)--
21 again, our efforts are directed at defining the principal
22 elements of a good emergency diesel generator reliability
23 program and technical guidelines for use in revising a
24 number of reg guides that deal with diesels as well as in
25 revising the standard review plan and developing

1 appropriate inspection modules.

2 So, as I said, we are working with NUMARC to
3 develop these and, hopefully, we'll reach agreement that
4 we'll be able to use the information that is developed and
5 adopt it into one of our reg guides.

6 On page 17 -- (slide) -- I want to say a few
7 things about review of low priority issues. The
8 Commission mentioned that at the last briefing. It's part
9 of the process. In addition to having a -- I think we
10 have said many times in the past that when information
11 comes that is relevant to an issue that has been
12 prioritized low in the past, then we revisit the issue and
13 we go through the process again, and we have done it on
14 the issue involving reactor vessel supports, which could
15 degrade as a result of embrittlement -- that's the issue
16 GSI 15 -- we worked on this issue a long time ago and, at
17 that time, we gave it a category of low priority, but
18 then, as a result of research information that has come to
19 our attention from programs that we conduct at Oak Ridge
20 involving radiation, then we find out that the information
21 was very important, and when we utilized it in the
22 reprioritization, we found out that this issue is, indeed,
23 important, so we have to work on it.

24 COMMISSIONER ROGERS: Have you got a tentative
25 schedule for closing?

1 DR. SPEIS: Do we have one?

2 MR. MINNERS: No. We're working on a task
3 action plan, but there is ongoing work at the moment, it's
4 not just sitting there. We just have not fleshed out
5 everything to complete the issues.

6 CHAIRMAN ZECH: Let me just commend the staff
7 for the action you took to raise the priority on this. I
8 think you did the right thing.

9 Could you tell us very simply about the
10 significance of GSI 15, with respect to the safety of
11 nuclear power plants? Could you just briefly describe it
12 because I think I understand it, but I think it's a very
13 important issue, and it certainly deserves a high
14 priority, in my judgment.

15 DR. SPEIS: The information came to us from
16 experiments done at one of the experimental reactors at
17 Oak Ridge. We saw that there was a large amount of
18 embrittlement at low flux and low temperatures, and it
19 wasn't -- it was a little bit unexpected.

20 So, then the issue itself involves the potential
21 failure of the supports. If you have a flow to start
22 with, then if you have an earthquake or some other forces
23 applied to it, then this flow could propagate as a result
24 of the material having been embrittled as a result of the
25 radiation.

1 In fact, even though we haven't developed a firm
2 schedule, we're already looking at potential solutions to
3 this issue. For example, we can heat the supports,
4 application of local heaters and insulation to maintain
5 temperatures above the so-called nil ductility transition
6 temperature. So, we have an intensive effort underway
7 right now, that involves both the Office of Research and
8 the NRR.

9 CHAIRMAN ZECH: Let me just say, in your best
10 judgment, is there any safety concern in this regard, on
11 this issue, as far as any current operating plants are
12 concerned?

13 DR. SPEIS: There is no immediate safety
14 concern.

15 CHAIRMAN ZECH: Well, if there's no immediate
16 safety concern, that's very important. It seems to me,
17 though, that there certainly might be concern on this
18 issue as far as plant life extension and license renewal
19 is concerned.

20 DR. SPEIS: That's an important point, and no
21 question about it, and that's the part that we're
22 addressing very carefully.

23 CHAIRMAN ZECH: Have the ACRS been involved in
24 this particular issue yet, do you know?

25 DR. SPEIS: Yes, the ACRS has been involved. In

1 fact, if you recall a year and a half ago, they had some
2 concerns, and they were not in total agreement with the
3 staff, but subsequent to that the actions that we have
4 taken, we have worked the program together with ACRS, and
5 the last letter we got from the ACRS on this subject, they
6 are in total agreement with us on the course and direction
7 that we're taking.

8 MR. MINNERS: They were just briefed on this
9 issue last month.

10 CHAIRMAN ZECH: All right. Fine. And they are
11 in total agreement now, with the approach that's being
12 taken?

13 DR. SPEIS: Yes, they are in total agreement,
14 yes.

15 CHAIRMAN ZECH: All right. Commissioner Rogers
16 asked you about, you know, you're working on a current
17 schedule, I guess, and you're trying to do that now. Is
18 there anything a little more specific you can give us in
19 that regard?

20 MR. MINNERS: Well, we're supposed to have a
21 final test action plan approved by the Division of Safety
22 Issue Resolution in August of this year, and that's the
23 schedule.

24 CHAIRMAN ZECH: In August of this year to do
25 what?

1 MR. MINNERS: To have a approved task action
2 plan, which would set out what work would be done, and the
3 schedule and the final completion dates.

4 CHAIRMAN ZECH: So, you'll have the plan laid
5 out in August of this year?

6 MR. MINNERS: Correct.

7 DR. SPEIS: But at the same time, in parallel,
8 our Office of Engineering -- our Division of Engineering
9 is looking at potential solutions, as well as categorizing
10 plants because, as all plants don't have the same
11 supports, and even if there is a failure or partial
12 failure, it doesn't mean that as a consequence this would
13 be severe, so it depends on the types of plants and the
14 types of other supports that exist. So, we -- in
15 parallel, we are looking at all these things, and we'll
16 have all these things together in August.

17 CHAIRMAN ZECH: Okay. Well, it seems to me, if
18 I understand what you're saying, that's extremely
19 important because it could well be that even though you've
20 determined that there are no immediate safety concerns,
21 that between now and the time that perhaps certain plants
22 that might have this concern -- and not all plants have
23 it, as I understand.

24 DR. SPEIS: That's right.

25 CHAIRMAN ZECH: How many have it, do you know?

1 DR. SPEIS: I'm sorry, Mr. Chairman, I cannot
2 give you that information. We will provide that.

3 CHAIRMAN ZECH: It's not all; it's a certain
4 design, as I understand, that has it.

5 DR. SPEIS: Yes.

6 CHAIRMAN ZECH: Well, in any case, I hope you'll
7 look at every plant that does have this particular design
8 and might have this concern, and recognize that if there's
9 no immediate safety concern, that's very important, but
10 between now and the time you might be looking at it for
11 plant life extension or for license renewal, it seems to
12 me that that could be a considerable period of time, and
13 you need to make a judgment as to whether there's anything
14 that should be looked into more carefully, at any one of
15 the plants that has this particular design, between now
16 and that time.

17 So we shouldn't wait, in my judgment, until too
18 far into the future, to make a confident determination
19 that it's not only safe at this time, but it will be safe
20 for a period of time. So, Research will be involved in
21 that kind of a decision, to assist the NRR, but I think
22 that's a very important issue, and I hope you're looking
23 at that.

24 DR. SPEIS: We are looking into, each one of us,
25 highest priority. In fact, I see here I have some notes

1 that we already have categorized the type of supports that
2 exist. I understand that we have put them into five
3 categories, and the thing that we're looking very
4 carefully is that each one of these -- the susceptibility
5 of each one of these varies because of its location and
6 because of distance from the core and other things like
7 that.

8 CHAIRMAN ZECH: Yes.

9 DR. SPEIS: But the work is progressing. It is
10 underway and --

11 CHAIRMAN ZECH: Are we involving the utilities
12 themselves in this issue? Are they aware of our concern
13 that the plants effect that?

14 DR. SPEIS: They are aware, and I think when we
15 define more what has to be done, we're going to get them
16 more involved in that.

17 CHAIRMAN ZECH: Yes. It seems to me we should
18 at least alert them to this issue because it's something
19 that they may be able to contribute to.

20 DR. SPEIS: Yes. I'm sorry I don't have the--
21 Serpin, who is the branch chief, who is the real expert in
22 this area, to address some additional information.

23 CHAIRMAN ZECH: Perhaps when you get that, you
24 might send the Commission a paper. This, to me, is an
25 extremely important matter, and I know you're working on
26 it, it's a high priority, I appreciate that.

1 MR. TAYLOR: We can update you on that.

2 DR. SPEIS: Yes, we can update you. We can send
3 you all the information that we have developed --

4 CHAIRMAN ZECH: That would be helpful.

5 DR. SPEIS: -- we can relay it to you so that
6 you will have it.

7 MR. TAYLOR: We'll do that.

8 CHAIRMAN ZECH: Thank you very much. You may
9 proceed.

10 DR. SPEIS: My last Vu-Graph -- (slide)--
11 summarizes some occasional problems that we encounter, and
12 I don't want to, you know, give excuses for them, but the
13 type of things that appear once in a while when we go
14 through the process of resolving issues -- I have listed
15 two things, one of them having to do with some delays from
16 a cooperative effort with industry; the other one involves
17 testing that has to be done to different valve materials
18 and before that testing is -- that testing has to be
19 complete before we decide that, you know, the proper
20 material has been selected. So, I don't want to say
21 anymore on that, basically, but, again, I don't want to
22 use this as excuses, you know.

23 COMMISSIONER CURTISS: On GSI-29, the first one,
24 that says "the resolution of this issue is dependent upon
25 certain industry actions".

1 DR. SPEIS: Yes.

2 COMMISSIONER CURTISS: What is it that we're
3 waiting for there?

4 DR. SPEIS: Well, they have -- basically, we had
5 work underway, contractual work, and then we stopped it
6 because the industry told us that they would assume the
7 effort, and then it just took them longer, you know, two-
8 two and a half years or so, than anticipated in the
9 original schedule.

10 Now, we have gotten their technical information,
11 and we are in the process of integrating into the
12 resolution, okay? So, that's what that issue is.

13 COMMISSIONER CURTISS: You do have the
14 information?

15 DR. SPEIS: Now we have the information, yes.

16 COMMISSIONER CURTISS: And we're in the process
17 of integrating that.

18 DR. SPEIS: Yes, we got it from EPR, yes, sir.

19 COMMISSIONER CURTISS: Okay.

20 DR. SPEIS: The second issue involves --

21 COMMISSIONER ROGERS: Excuse me -- but just as
22 an example of how this whole schedule works --

23 DR. SPEIS: Yes.

24 COMMISSIONER ROGERS: Even when that is done,
25 this so-called resolution still is not implementation.

1 DR. SPEIS: No, it's not implementation, sir,
2 no.

3 The second issue, we are getting good
4 cooperation from industry. It involves testing -- well,
5 the issue arose as a result of pilot valves sticking, you
6 know, if I want to use that word, and we're testing new
7 materials to make sure that the valves don't stick, okay?
8 And those have to be done in plants themselves, and we
9 expect that information to be developed in about another
10 year, and then we'll make a decision at that time, if,
11 indeed, you know, this is the appropriate material for
12 future usage in these valves, basically.

13 So, with that, Mr. Chairman, I complete my part
14 of the presentation, and NRR can discuss now the
15 implementation of the -- some of these issues.

16 CHAIRMAN ZECH: Thank you very much.

17 You may proceed.

18 MR. GILLESPIE: Let me sketch out the process of
19 the pathing of the work that comes from Research to NRR,
20 so you can see how it gets in our chain because this
21 becomes a part of our MPA program and, in fact, this tends
22 to be a smaller part of the overall multi-plan action
23 program itself.

24 Generally, a package gets prepared. The
25 technical resolution then goes to CRGR. One of the pieces

1 that goes to CRGR is normally the technical resolution in
2 the implementation vehicle. In the majority of cases, the
3 implementation vehicle is a generic letter, be that
4 generic letter for information purposes -- and I'll give
5 some examples of the different kinds -- or a request for
6 information, or something that's telling someone to do
7 something.

8 We work very closely in the formulation of the
9 generic letter and, in fact, the process has changed in
10 about the last 18 months. In the past, a generic letter
11 would be sent out, might request some action, and it would
12 not always require or ask the licensee to respond back to
13 us when he was complete in his action.

14 For about the last 18 months, we've been very,
15 very careful with generic letters. Anytime we ask someone
16 to do something, we're asking them to write back and tell
17 us when they've completed it. This has become a very,
18 very important step and, you know, it was a very
19 significant change.

20 From the CRGR package, we then have a generic
21 letter which is agreed upon and consistent with the
22 technical resolution. That will get then sent out to the
23 applicable licensees. At the same time it's sent out, a
24 decision is made internally as to whether it needs to be
25 verified or not, by the inspection group.

1 Every generic letter and every requirement is
2 not necessarily verified. Conscious decisions are
3 sometimes made not to, and many of them are not conducive
4 to verification.

5 At that point, let me give some examples which
6 go either way, and also some examples of some parallel
7 programs. We in NRR react to operational events, such as
8 mid-loop operations. In fact, in the past several years,
9 going back before the reorganization, there were bulletins
10 put out by the Office of Inspection and Enforcement on
11 mid-loop operations. This has been kind of a continuing
12 concern. It also happens to be a generic safety issue.

13 So, we've got two processes that are coordinated
14 as they're going down, and Tom Murley's reaction was
15 partially a frustration to continued problems coming up
16 over the years in this area, which caused him to write to
17 the CEOs and all the operators.

18 In some cases -- we have a second case very
19 similar to in us reacting to operating events, we are
20 doing something that actually can produce the resolution
21 of an ongoing GSI. In another case that we have one which
22 has an inspection procedure code on it, dealing with
23 flooding of equipment. So, flooding of equipment while
24 also being addressed by A-17, is something, in fact, that
25 the regulatory arm has also been concerned about as an

1 operating event.

2 So, indeed, all of the USIs and GSIs that you're
3 seeing, just because they have not been resolved in a
4 broader context, doesn't mean the narrower, immediate
5 safety problem is not being addressed. And, in fact, in
6 several cases, we have examples where we are addressing it
7 in parallel, so that the long-term safety action is
8 somewhat separable from the short-term. So, it's not a
9 three-year or two-year shutdown wait.

10 On the point of issuing a generic letter and
11 then making a decision on whether it's suitable for
12 inspection and whether it's of a level that needs to be
13 inspected, the inspection is then kept track of in two
14 parallel systems, which allows us to check back and forth.
15 It's kept track of in the 766 and now the master
16 inspection system, and it's also kept track of in SIMS
17 and, in fact, we bounce those against each other on about
18 an annual basis, and then we call up the regions and we
19 resolve any differences to ensure that what we thought we
20 looked at and eyeballed, we can go to inspection report
21 and see that it was satisfactorily resolved and there were
22 no outstanding items on it. And that's where it comes
23 together; at the end it's complete.

24 Now, let me go back and give some examples
25 because we have different perturbations that seem to occur

1 depending on what the requirements are coming out of the
2 USI or GSI.

3 Information only. We have information only
4 generic issues -- that is, the resolution ends up being
5 forward looking, so it is a change to the standard review
6 plan, and we send it out for information to licensees. An
7 example would be maximum permissible precipitation. This
8 affects flooding, people with dams upstream. We sent out
9 for information a new NOAA publication that said you need
10 to be aware of this, although we see no immediate problem
11 to it and, indeed, in future plants, the standard review
12 plan then was updated so that any future plants that came
13 in would be cognizant of the current information. That
14 was generally sent out information only, we saw no
15 immediate problem.

16 SPDS. SPDS -- and I might throw in a little
17 plug for our office. When the reorganization occurred,
18 SPDS was one of 11 items that NRR had cognizance of
19 because of a long history and the staff that was solving
20 it was still there. We have, in fact, as of Friday, sent
21 our last two letters to Mr. Stello, saying that we've
22 finished our mortgage. So, NRR has now completed all of
23 its assigned USIs and GSIs since the reorganization, and
24 that was a push over the last year, to get those
25 resolutions out and complete.

1 SPDS is a program where resolution has just been
2 achieved, resolution in the sense of what Themis is saying
3 is technical resolution, but technical resolution has
4 fundamentally also been achieved verse to implementation.

5 There we have a long-standing program where it
6 was intended to be a post-implementation review, after
7 TMI. Utilities went forward, put in systems, the best
8 systems that they thought completed with the requirements,
9 and we never basically caught up with the paper.

10 We did do several reviews. We did almost 50
11 reviews, found certain deficiencies in certain systems
12 acceptable, in which case, the resolution now is -- and
13 we've issued the generic letter. We've got a NUREG
14 report, but also basically a -- I'll call it -- it's a
15 checklist, but a list of attributes of what an acceptable
16 system has been found by the staff.

17 The industry is therefor now being requested to
18 look at those attributes and come back and tell us whether
19 their system fits those attributes and, if not, what are
20 the exceptions to it. This is in lieu of going out and
21 doing some very manpower-intensive efforts to review
22 systems that we basically know are in place, and in place
23 adequately, we believe, in most places.

24 So, what we've got is a cleanup job on that
25 that's going on right now, and we believe that's well on

1 its way to actually being closed off and completely off
2 the books.

3 COMMISSIONER ROGERS: Excuse me -- just on the
4 SPDS, how plant-specific are the SPDS systems? Is there a
5 big difference between SPDS systems and different combined
6 plants?

7 MR. GILLESPIE: I don't want to say that because
8 I haven't eyeballed enough of them myself to say that
9 they're -- the attributes are generally the same. Now,
10 what -- where the wiring goes --

11 COMMISSIONER ROGERS: Oh, yes.

12 MR. GILLESPIE: That's plant-specific.

13 COMMISSIONER ROGERS: Of course.

14 MR. GILLESPIE: But the attributes -- and what
15 we're doing now really recognizes that the attributes of a
16 good system and the parameters you need to control or
17 understand what's going on in the course of an accident,
18 are fairly consistent from plant-to-plant.

19 Now, a plant may choose to put more parameters
20 in or upgrade the system more than we even desired, and
21 that's fine, but the general basic requirements are the
22 same plant-to-plant -- the types of parameters we want to
23 see, the pressures, the temperatures, the power supplies
24 for it.

25 COMMISSIONER ROGERS: So, your work now has

1 really just been to clean up the attributes definitions?

2 MR. GILLESPIE: Yes.

3 CHAIRMAN ZECH: Well, what do you mean by the
4 SPDS status report then? How does it stand?

5 MR. GILLESPIE: The generic letter --

6 CHAIRMAN ZECH: Is it in all the plants that you
7 think it's in? Can you say that for sure? Has it been
8 implemented in all the plants?

9 MR. GILLESPIE: It has not been implemented in
10 all the plants, we know --

11 CHAIRMAN ZECH: But your work is finished, is
12 what you're telling us. In other words, as far as the
13 attributes or the requirements for the SPDS --

14 MR. GILLESPIE: Yes.

15 CHAIRMAN ZECH: But you don't know -- are you
16 saying that you do know that it is not fully implemented
17 in all the plants?

18 MR. GILLESPIE: We do know some plants that do
19 not have it fully implemented, yes.

20 CHAIRMAN ZECH: Do all plants have it partially
21 implemented?

22 MR. GILLESPIE: I believe there's one plant that
23 does not.

24 COMMISSIONER ROGERS: Well, let's see, you had a
25 -- didn't you have a kind of tentative approval status for

1 SPDS systems?

2 MR. GILLESPIE: Yes.

3 COMMISSIONER ROGERS: I think maybe the question
4 is, are all the plants except one operating under that,
5 with that kind of equipment set?

6 MR. GILLESPIE: Yes. What we are doing now is,
7 we're really evaluating consistency with the general
8 precepts of what it's supposed to be.

9 CHAIRMAN ZECH: If I recall, a number of plants
10 that I've visited have the SPDS system installed, and they
11 have had for sometime.

12 MR. GILLESPIE: Yes.

13 CHAIRMAN ZECH: But if we're just getting out
14 the specific attributes we want of the system, you know,
15 now, I can understand that there could be some plants out
16 there that, for some reason or other, don't have or don't
17 meet all our final requirements but, in any case,
18 certainly most all the plants I visited, I can recall, do
19 have some kind of SPDS system installed.

20 Many of them apparently have it installed it for
21 sometime, and they've used it.

22 MR. GILLESPIE: Yes.

23 CHAIRMAN ZECH: But whether or not it meets the
24 specific requirements or not that you've just released, I
25 guess, is what you're telling us now, how are you going to

1 check to make sure? Are you going to ask the utilities if
2 they do -- if their SPDS is installed and has been
3 installed for -- maybe for many years, does meet those
4 requirements, how are you going to find out about
5 implementation?

6 MR. GILLESPIE: We've asked that question.
7 That's the specific question that's asked in the generic
8 letter, so that we will have a definitive answer which we
9 can then go out and choose to verify either completely or
10 on an audit basis, and that's a definitive answer we've
11 been lacking, lacking for --

12 CHAIRMAN ZECH: But this is just kind of a
13 question of general interest. Do you have different
14 requirements, for example, for a BWR plant as opposed to a
15 PWR plant?

16 MR. GILLESPIE: Yes.

17 CHAIRMAN ZECH: You do have?

18 MR. GILLESPIE: Yes. The parameters are going
19 to be different.

20 CHAIRMAN ZECH: Do you have different parameters
21 for each particular design plant?

22 MR. GILLESPIE: Not in general, no.

23 CHAIRMAN ZECH: But it's generally broken down
24 into boiling water reactor and pressurized water?

25 MR. GILLESPIE: Because you're going to have

1 different parameters you're monitoring.

2 CHAIRMAN ZECH: I understand that. We have some
3 older plants and some new plants, too. Some of them are
4 quite -- you know, the designs are different. That's part
5 of our regulatory challenge, is to regulate all these
6 custom-built plants.

7 MR. GILLESPIE: Right.

8 CHAIRMAN ZECH: I guess I'm trying to figure out
9 when you put out attributes for a SPDS system, it might be
10 quite different for one of our earlier plants than one of
11 our later plants, even though they're both PWR or both
12 BWR.

13 MR. GILLESPIE: Yes. I think you'll find the
14 report we compiled was based on a review of 50 different
15 plants.

16 CHAIRMAN ZECH: Yes.

17 MR. GILLESPIE: And what we've done is taking
18 the acceptable attributes across that sample of plants.
19 We firmly believe that we've covered the broad range of
20 what would be expected at any particular plant that wasn't
21 one of those 50.

22 CHAIRMAN ZECH: Have you involved the utilities
23 in any of the review process?

24 MR. GILLESPIE: No, they were not involved in
25 the review process.

1 CHAIRMAN ZECH: Dr. Speis, have you got
2 something you want to tell me?

3 DR. SPEIS: No, I just -- basically, the
4 information is generally the same because, you know,
5 you're focusing on the key parameters and information that
6 you need to --

7 CHAIRMAN ZECH: Yes. No, I understand that, I
8 just wanted to know if you'd made any provision for
9 differences.

10 DR. SPEIS: So, even between BWRs and PWRs,
11 it's mostly the same. There are some differences, but
12 they are essentially are the same.

13 CHAIRMAN ZECH: So, the utilities shouldn't be
14 surprised --

15 MR. GILLESPIE: Oh, no, no.

16 CHAIRMAN ZECH: -- by the attributes that you're
17 requiring them to have.

18 MR. GILLESPIE: No. This was very -- this was
19 very well worked within the staff document, to ensure that
20 we were not putting any new requirements on anybody, and
21 it's a final step in, actually, the requirements that were
22 put out for post-implementation review in 0737 Supplement
23 1 many years ago, and this is promulgating from those
24 broad requirements, which systems that we reviewed that
25 looked very, very acceptable to the staff, what were the

1 attributes of those systems for other people to compare
2 themselves against, and then let us know what are the
3 results of their comparison, and then we can deal only by
4 exception.

5 So, it is not promulgating any new requirements.
6 It is trying to give examples of what we generally found
7 acceptable for requirements that have been long-standing.

8 CHAIRMAN ZECH: All right. Fine. Thank you.
9 Let's proceed.

10 COMMISSIONER CURTISS: On that point, do the
11 attributes that you've recently identified differ in any
12 significant way from the system that was envisioned right
13 after TMI in 0737? Have we focused on the bells and
14 whistles problem?

15 MR. GILLESPIE: No, we don't believe we do. If
16 anything, we've taken a step back and taken the more
17 global look, and many, many of the same people involved
18 then, were actually involved with CRGR at this time.

19 COMMISSIONER CURTISS: So, would it be fair to
20 say that on SPDS, the only real change in direction here
21 is that the -- sort of the burden of proof, if you will,
22 on demonstrating that your system complies with these
23 requirements that have been in place since TMI and that
24 have been expanded upon in this recent attributes document
25 --

1 MR. GILLESPIE: Yes.

2 COMMISSIONER CURTISS: -- is to say to the
3 utilities, examine your system against this list of
4 attributes, and tell us whether you think your system
5 meets all of these attributes, identify areas where you
6 think there are exceptions to your system -- in other
7 words, where you don't comply -- and then based upon that
8 submittal, with the burden being on the utility, we will
9 then evaluate the submittal for purposes of determining
10 whether to conduct selective audits.

11 MR. GILLESPIE: Yes.

12 COMMISSIONER CURTISS: Okay.

13 CHAIRMAN ZECH: All right. Let's proceed.

14 MR. GILLESPIE: Proceeding down, let me give an
15 example of one that was resolved with no new requirements
16 -- and this was on steam generators -- three long, long-
17 standing issues which were finally brought to conclusion
18 this last year.

19 USIs A-3, 4 and 5 and, in fact, in this case, we
20 have the technical resolution. The basic finding was that
21 we had -- in the course of our day-to-day business of
22 operational safety, we had overcome the problem that was
23 originally formulated.

24 We did issue a generic letter, for information
25 only, and we issued it with a closeout report on what the

1 specifics were. This is an older issue, again, that has
2 been now cleaned up and documented, so if questions ever
3 come up in the future we can go back and reference it.

4 Let me give one last -- maybe one last example,
5 and that's GSI-86. It was issued by generic letter in
6 '88, and it was a long-range plan for dealing with stress
7 corrosion cracking in BWR piping and, in fact, in that
8 case, we are going out and we are observing some of the
9 testing and inspections going on, of stainless steel
10 piping in BWRs during shutdowns.

11 And, again, that is generally a two-year
12 envelope, and we try to get it all done within two years
13 because many of these tend to be event-oriented, and it
14 just takes that long before you get the opportunity to
15 observe it at a plant.

16 That takes me through to inspection closeout.
17 It also, I think, demonstrates certain ones are
18 information only, certain ones are licensee response
19 without an inspection, and that covers -- those are really
20 the three alternative approaches we have.

21 Oh, I didn't focus on the chart. There is a
22 chart with some numbers, which is the status. It's page
23 19 in the handout. (Slide) We are focusing only now on
24 the high priority GSIs for inspection purposes, and we
25 totally agree and support Research, and we just focus our

1 resources generally in the high area.

2 CHAIRMAN ZECH: Well, let me just ask you, if
3 you didn't have any new safety issues coming up, when
4 would all the safety issues that you have identified now,
5 be resolved through implementation and verification, the
6 whole way?

7 MR. TAYLOR: I think --

8 MR. GILLESPIE: Yes, let me give you -- I would
9 like to --

10 CHAIRMAN ZECH: If no new ones came up.

11 MR. GILLESPIE: If no new ones came up --

12 CHAIRMAN ZECH: Just what we're looking at here.

13 MR. GILLESPIE: -- I would like to be able to
14 say within two outages from right now --

15 CHAIRMAN ZECH: Why don't we say it.

16 MR. GILLESPIE: -- or from when the last
17 resolution that we're currently working on is out but,
18 inevitably, there is the exception, and I can give you--
19 I've got an exception in front of me, which is reactor
20 vessel overpressurization. The last plant to be -- have
21 that implemented in it will be Comanche Peak, and it's
22 actually waiting for down the road, for after it's
23 licensed, and some things that need to go on then.

24 So, there's always going to be that one on
25 someone that has an operational reason for being --

1 CHAIRMAN ZECH: No, I agree. Certainly, we
2 understand that there could be exceptions, and for valid
3 reasons, but I guess it would be good to know that we're
4 making significant progress on these generic issues, as it
5 would appear to me we're making on the USIs. Are we?

6 MR. GILLESPIE: Yes. We generally have a two-
7 outage envelope that we've been looking at when we
8 promulgate a generic letter.

9 CHAIRMAN ZECH: Well, let me just ask you this
10 then. Do you think the utilities themselves, the
11 licensees, are making reasonable progress towards
12 implementation and resolution both, of these safety
13 issues?

14 MR. GILLESPIE: Yes.

15 CHAIRMAN ZECH: You think they are. And I
16 think that's very important. I recognize that, you know,
17 you have a part of the work to put out what's required,
18 but it simply doesn't solve the problem until they're
19 implemented and, as long as you feel that they are
20 responsible and responding to your direction, that's very
21 important, so they are making progress and you believe it
22 is reasonable progress.

23 MR. GILLESPIE: Oh, yes. I might give an
24 example where follow-up has caused more work for us, and
25 that was emergency operating procedure inspections which

1 we started about a year and a half ago, which actually
2 involved -- it touches upon three different resolutions
3 for three different generic issues, and we are going to
4 continue those, and we have a NUREG report being put
5 together right now to give some lessons learned from the
6 initial group of those types of inspections. We will
7 continue those inspections because we were not necessarily
8 entirely happy with the way it had been resolved and
9 implemented in the plants, how the procedures were being
10 put in place, so we aggressively pursue -- when we do go
11 out and check on the important ones, we aggressively
12 pursue getting adequate implementation in all facilities.

13 CHAIRMAN ZECH: Do you make any requirements on
14 the licensees, to complete it after one outage or two
15 outage, or whatever might be reasonable?

16 MR. GILLESPIE: Yes. The way we have been
17 approaching for somewhat over a year now, when we put out
18 a generic letter, we will normally put "Please submit us a
19 schedule not to exceed two outages" right in it, so we
20 know up front what we're dealing with, and that's --

21 CHAIRMAN ZECH: And you can keep track of that
22 and that's a commitment on their part.

23 MR. GILLESPIE: -- and that's a commitment on
24 their part and, if there is an exception, we know about
25 the exception up front. So, our approach to the

1 promulgation of the requirements has been very, very much
2 refined over about the last year and a half.

3 CHAIRMAN ZECH: Yes. Good. Excellent.

4 COMMISSIONER ROGERS: I wonder if there is any
5 kind of a little report that you could give us that
6 doesn't take an enormous amount of effort to prepare, that
7 documents in some way the kind of qualitative answer that
8 you just gave to the Chairman's question of how do you
9 feel that industry is implementing this on a -- I take it,
10 on a rolling basis, that once they get something from us
11 and they have two outages to do it, then there's a firm
12 time, but I take it there's activity going on all the
13 time, to implement these things, even if we haven't quite
14 completed our work because we have enough dialogue with
15 people that they understand that we're about ready to come
16 out with a something. I mean, is there some kind of a
17 report that you could give us, that in some way gives us
18 some picture of how this process is taking place, that
19 indicates what work is already going on in industry, that
20 isn't just waiting for the bell to ring with a generic
21 letter coming out from NRC. Is that possible to do, or is
22 that too difficult to do?

23 MR. GILLESPIE: Well, I'm trying to make sure I
24 understand your question.

25 MR. TAYLOR: You'd like to have a periodic

1 report potentially of a sample across some of the outlying
2 issues that have either been delayed, or are being
3 accomplished, is that --

4 COMMISSIONER ROGERS: Well, I take it that what
5 we're hearing from you is that there's an NRC procedure
6 that's being followed in looking at all these things, that
7 at some point has an end, an end date, and it may be quite
8 far out if it depends on some operational requirement of a
9 particular plant.

10 So, if we look at that as an isolated process,
11 it doesn't give us a true picture of, in fact, what is
12 happening with implementation across the broad industry
13 picture. It may be distorted somewhat just because of
14 maybe one or two outlying plants that something is waiting
15 for that they have to operate to finally close out
16 something.

17 In other words, I think that what I'm a little
18 uncomfortable about here is that we don't really have a
19 sense of what the impact of the NRC activity is on what is
20 happening in industry, or already has happened in
21 industry, as a result of this.

22 It looks like we're breaking this into an NRC
23 generic issue resolution program and then industry
24 implementation program, that one follows the other but, in
25 fact, they overlap, is what I see you're saying.

1 MR. GILLESPIE: Yes. Okay.

2 COMMISSIONER ROGERS: And, so, what are the
3 benefits that already have taken place from what we've
4 done in the way of industry implementation, that won't be
5 complete until some later date when the whole, entire
6 program resolution and implementation has been completed,
7 which may be some time.

8 MR. GILLESPIE: Yes. We have -- at least right
9 now within the system, we have a list of items that, in
10 fact, have been completed or implemented before the plant-
11 specific SERs have been issued and they've been imposed.
12 The majority of those tend to have been TMI items, where
13 the industry had the broad direction, went out and they
14 did it, and specific SERs, or safety evaluation reports,
15 were issued after the fact.

16 That tends not to be the case on most issues
17 that we're dealing with today. So, yes, we --

18 COMMISSIONER ROGERS: I'm just trying to get a
19 little more quantitative feeling about a qualitative
20 statement that you made that says, well, you feel good
21 about what industry is doing here.

22 Now, I don't want to seem nitpicking about it,
23 but I'd like to feel that I had a little better handle on
24 what the basis is for your judgment there.

25 MR. TAYLOR: Why don't we make a commitment to

1 take a look at a potential report of some type, and we'll
2 come back to the Commission --

3 COMMISSIONER ROGERS: I don't think we want to
4 -- I'm not asking for a major effort, but I need something
5 that --

6 MR. TAYLOR: No, I understand, and this is a big
7 program with lots of issues across lots of plants. Why
8 don't we take a commitment from this meeting, to take a
9 look at a type of periodic report, and we'll recommend to
10 the Commission at what periodicity to provide it,
11 depending upon what --

12 COMMISSIONER ROGERS: I think that would be
13 good.

14 CHAIRMAN ZECH: Very useful.

15 MR. TAYLOR: -- let us get a look at that as
16 part of what we take from this meeting, so that you will
17 feel more informed not only that the technical process has
18 gone on, but progress is being made, and at what degree
19 because this is negotiated through outages, through--
20 actually, some of these take procurement, and the planned
21 outage work, and outages grow, and people -- we, of
22 course, put the highest priority on the highest priority
23 generic issues, and that is from a safety standpoint, and
24 that's what we always press on, that some of the other
25 mediums may slip.

1 So, let us take a commitment to try to formulate
2 some type of periodic report and come back to the
3 Commission and at least try at giving you some periodic
4 staff report.

5 CHAIRMAN ZECH: All right. Fine. Thank you.

6 COMMISSIONER ROGERS: Good.

7 CHAIRMAN ZECH: Does that conclude your
8 presentation?

9 MR. GILLESPIE: Yes, it does.

10 CHAIRMAN ZECH: All right. Questions from my
11 fellow Commissioners? Commissioner Roberts?

12 COMMISSIONER ROBERTS: I understand we're going
13 to hear from the ACRS next week?

14 CHAIRMAN ZECH: I think it's May 3rd.

15 COMMISSIONER ROBERTS: I'm not asking for your
16 response now, but will we get a response from the staff on
17 the ACRS questions because they had some disagreements
18 with you.

19 DR. SPEIS: On the mid-loop operation?

20 COMMISSIONER ROBERTS: USI A-45 and generic
21 issue 99, RHR Reliability in Decay Heat.

22 MR. MINNERS: We have replied to ACRS on A-45,
23 and I wouldn't characterize that as a disagreement.

24 DR. SPEIS: We will get the information to the
25 Commission before you meet with the ACRS.

1 CHAIRMAN ZECH: All right. Fine. Thank you.

2 DR. SPEIS: We'll do that.

3 COMMISSIONER ROBERTS: That's all I have.

4 CHAIRMAN ZECH: Commissioner Rogers?

5 COMMISSIONER ROGERS: I don't think so, no.

6 CHAIRMAN ZECH: Commissioner Curtiss?

7 COMMISSIONER CURTISS: Just a couple of things.

8 Going to that last chart, to make sure I understand what
9 those numbers are there. It's labeled Summary of Generic
10 Issue Resolution Status. This really -- this focuses on
11 the number of actions required to implement the issues
12 that have been resolved?

13 MR. GILLESPIE: Yes.

14 COMMISSIONER CURTISS: So that the 735 issues,
15 655 have been resolved, 80 remain that we talked about in
16 the Research presentation. This is actually the
17 translation of the implementation of those resolved
18 issues? Do I read that correctly?

19 MR. GILLESPIE: Yes.

20 COMMISSIONER CURTISS: Let me go back to the
21 schedule for a minute and ask a couple of questions. If I
22 understood what you've said, all of the three remaining
23 USIs will be resolved by the end of 1989, and 80 percent
24 of the high priority issues will be resolved by the end of
25 next year.

1 DR. SPEIS: Yes.

2 COMMISSIONER CURTISS: Calendar year?

3 DR. SPEIS: Yes.

4 COMMISSIONER CURTISS: So, 16 of those have been
5 resolved, four remain. At the end of 1990, if we have no
6 new issues, we'd have four high priorities. Do we have a
7 schedule for the 13 medium priorities?

8 DR. SPEIS: We have a schedule for all of them.

9 COMMISSIONER CURTISS: Do you have an idea, say,
10 at the end of 1990, where we will be on the medium
11 priorities?

12 DR. SPEIS: On the medium -- I have some of my
13 notes here -- 70 percent next year.

14 COMMISSIONER CURTISS: By the end of '90?

15 DR. SPEIS: By the end of '90, yes. That's an
16 approximate --

17 COMMISSIONER CURTISS: The question I'm really
18 driving at is, under the Part 52 regulations that we put
19 out, where the applicant for a design certification has to
20 propose a solution to, what, the medium and the high
21 priority issues?

22 DR. SPEIS: Yes. Yes. Yes.

23 COMMISSIONER CURTISS: At the end of 1990, those
24 will be roughly four high priority and whatever 30 percent
25 of 13 is, that will still be unresolved, that will be the

1 pool of issues that would be unresolved that, for the
2 purposes of a design certification, the applicant would
3 have to address?

4 DR. SPEIS: Yes, that's true, but you have to
5 realize that the resolution of most of these issues is
6 clear -- you know, because we are talking about potential
7 enhancements to existing plants, we have to go through the
8 backfit rule, okay, so this is a very easy problem to
9 resolve for future plants, where you are starting from
10 scratch, from -- you know -- and the improvements that are
11 called in these issues, it's very easy to accommodate.
12 So, industry has told us that 99 percent of the times
13 there's no problem, they know how to resolve, and we agree
14 with them, okay. So, in most instances, again, you know,
15 the difficulty we're having is not a difficulty, the time
16 that it takes us to complete a resolution for existing
17 plants is that we'll have a number of options, okay, and
18 we have to go through the backfit and the regulatory
19 analysis for that.

20 COMMISSIONER CURTISS: You see a fairly clean
21 process for the new plants.

22 DR. SPEIS: Much more clean, yes, much more
23 clean, and we have discussed this. In fact, when we
24 started the process of reviewing the EPRI requirements
25 document, okay -- and we worked through every issue, and

1 it was clear from those discussions that there was no
2 problem resolving most of these issues, okay, for future
3 plants it's much easier. You know, most of them involve,
4 for example, a material that we know works versus
5 something that was put into a plant 15 years ago, you
6 know. It's not very easy to go in and break something
7 down, but for a future plant, it's no problem.

8 COMMISSIONER CURTISS: That's all I have.

9 CHAIRMAN ZECH: Well, thank you very much for a
10 very useful discussion of the results of your efforts to
11 improve the processing of these generic safety issues.
12 The progress, as far as I'm concerned, that's been made
13 since our last meeting is very encouraging, and I'm
14 pleased that all unresolved safety issues are scheduled to
15 be resolved by the end of this year.

16 I commend the staff for this very aggressive
17 effort. You've heard from the Commission, I know at least
18 the years that I've been on the Commission, about trying
19 to do a better job in resolving these generic issues and
20 unresolved safety issues, and I feel that you have made
21 real progress, significant progress, and I think that we
22 can all be encouraged by the progress you've made, and I
23 certainly commend you for the efforts, and ask you to
24 continue the momentum you've got going and to keep it up.

25 You did describe the rigorous process that

1 requires a coordination among your own technical
2 organizations as well as those outside the NRC, and I
3 recognize that that coordination process is a challenge,
4 but I think the significant efforts you've made to
5 complete resolution of these issues, and the
6 implementation, too, and the follow-through to make sure
7 that they do get implemented and verified, really, I feel
8 that we do have a good handle on this program now,
9 certainly much better than we had a few years ago and,
10 again, I commend you for the progress that you've made,
11 all of you, Research as well as NRR. However, there
12 really does appear to be a lot more work to be done, and
13 the remaining issues are not insignificant, as we know,
14 and as time goes on and we learn more, we may add to the
15 list.

16 So, I would certainly encourage you to press
17 forward and complete the work as efficiently and timely as
18 you can, while at the same time maintaining a very high
19 quality of your technical efforts. Safety is our business
20 and that's what it's all about, so we do care about
21 schedules, and we do like to see progress but, again, we
22 count on you mainly to resolve them technically and do the
23 right thing and, certainly, my observation of your efforts
24 in that regard is that's exactly what you're doing, but
25 please keep in mind that quality of the work is awfully

1 important and we appreciate that.

2 And, so, as far as I'm concerned, I'd rather
3 have you take the time you need to do it right, than to
4 hurry up with a schedule, but it is important we make
5 progress here, and I think we are making progress, and I'm
6 pleased to see that.

7 The Commission will want to continue to monitor
8 the progress that you are making, and I believe it would
9 be helpful for at least another progress report on this
10 matter, perhaps sometime not too long after the first of
11 the year, when you expect to finish your unresolved safety
12 issues, it might be appropriate to come to the Commission
13 at that time and give us another report on this whole
14 issue.

15 So, again, I commend the staff for the progress
16 you're making. It's very encouraging.

17 Any other comments from my fellow Commissioners?

18 (No response.)

19 If not, thank you very much. We stand
20 adjourned.

21 (Whereupon, at 11:23 a.m., the meeting was
22 adjourned.)

23

24

25

CERTIFICATE OF TRANSCRIBER

This is to certify that the attached events of a meeting
of the United States Nuclear Regulatory Commission entitled:

TITLE OF MEETING: BRIEFING ON THE STATUS OF GENERIC ISSUES

PLACE OF MEETING: ROCKVILLE, MARYLAND

DATE OF MEETING: APRIL 25, 1989

were transcribed by me. I further certify that said transcription
is accurate and complete, to the best of my ability, and that the
transcript is a true and accurate record of the foregoing events.

Phyllis Young

Reporter's name: Phyllis Young

COMMISSION BRIEFING
ON
THE STATUS OF
THE GENERIC ISSUES PROGRAM

T. P. SPEIS
RES, X23710
APRIL 25, 1989

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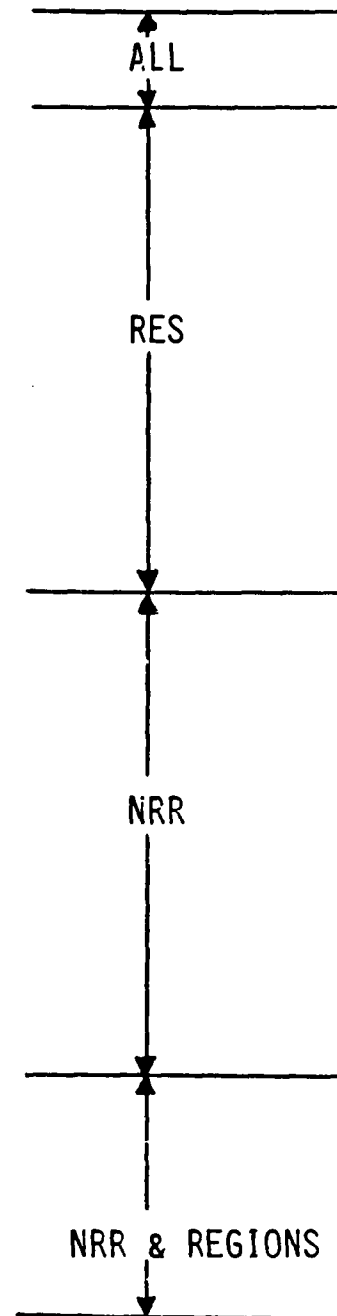
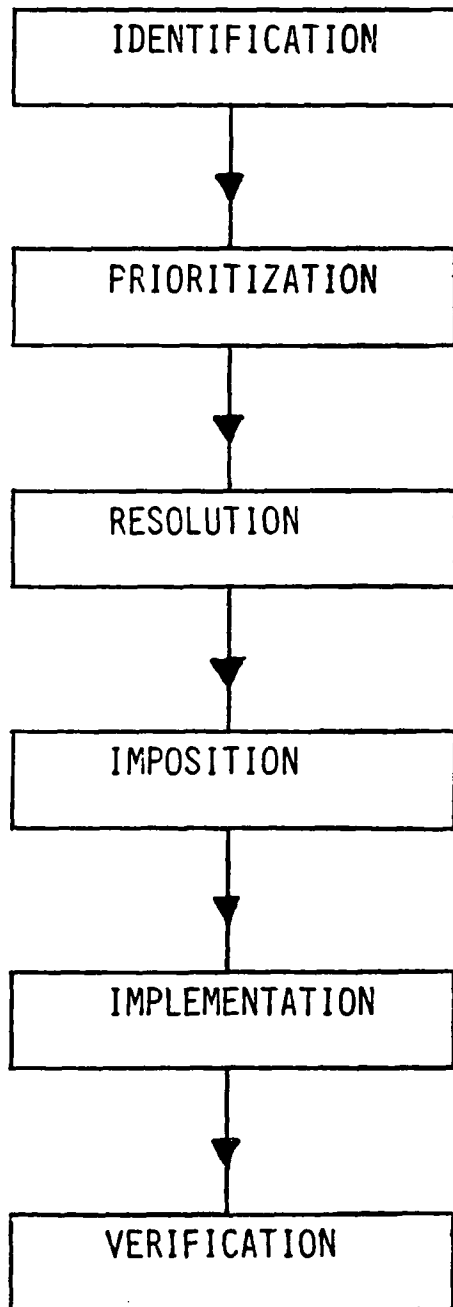
IDENTIFICATION, PRIORITIZATION, RESOLUTION (RES)

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GENERIC ISSUE PROCESS



RECAP

- PROGRAM STARTED IN 1981 WITH 511
ISSUES IDENTIFIED TO BE PRIORITIZED:

TMI ITEMS (NUREG 0660	- 369
& 0737)	
NUREGs 0371 & 0471	- <u>142</u>
	<u>511</u>

- ADDITIONAL 224 ISSUES (INCLUDING HUMAN FACTORS ISSUES) IDENTIFIED IN THE PAST 8 YEARS
- TOTAL ISSUES IDENTIFIED AS OF 04/25/89 = 735

PROGRESS SINCE 10/21/87 BRIEFING

<u>RESOLVED</u>	<u>10/21/87</u>	<u>5/12/88</u>	<u>4/25/89</u>
PRIORITIZED LOW	25	24	24
PRIORITIZED DROP	62	66	73
INTEGRATED			
W/OTHER ISSUES	119	121	122
RESOLUTION			
DEFINED IN			
NUREG-0737	88	88	88
RESOLVED	275	285	303
NON-SAFETY (LI,			
RI, &E)	<u>41</u>	<u>44</u>	<u>45</u>
SUB-TOTAL:	<u>610(+18)</u>	<u>628(+27)</u>	<u>655</u>

ISSUES STILL TO BE RESOLVED

	<u>10/21/87</u>	<u>5/12/88</u>	<u>04/25/89</u>
USIs	9	9	3
HIGH	32	28	20
MEDIUM	16	12	13
NEARLY			
RESOLVED	12	11	8
TO BE			
PRIORI.	<u>52</u>	<u>45</u>	<u>36</u>
SUB-TOTAL:	<u>121</u>	<u>105</u>	<u>80</u>

SUMMARY

	<u>10/21/87</u>	<u>5/12/88</u>	<u>04/25/89</u>
RESOLVED	610 (83%)	628 (86%)	655 (89%)
TO BE			
RESOLVED	<u>121</u> (17%)	<u>105</u> (14%)	<u>80</u> (11%)
TOTAL:	<u>731</u>	<u>733</u>	<u>735</u>

REMAINING USIs

A-17

A-40

A-47

USI A-17: SYSTEMS INTERACTIONS

5-YR. PLAN RESOLUTION DATE:	12/89
CURRENT RESOLUTION DATE:	12/89
STATUS: CRGR REVIEW OF DTR	10/88C
ACRS REVIEW OF DTR	08/88C
CRGR REVIEW OF FTR	09/89
ACRS REVIEW OF FTR	09/89
FRN	12/89

USI A-40: SEISMIC DESIGN CRITERIA

5-YR. PLAN RESOLUTION DATE: 06/89

CURRENT RESOLUTION DATE: 06/89

STATUS: CRGR REVIEW OF DTR 03/88C

ACRS REVIEW OF DTR DECLINED

CRGR REVIEW OF FTR 04/89

ACRS REVIEW OF FTR 04/89

FRN 06/89

USI A-47: SAFETY IMPLICATIONS OF CONTROL
SYSTEMS

5-YR. PLAN RESOLUTION DATE:	06/89
CURRENT RESOLUTION DATE:	08/89
STATUS: CRGR REVIEW OF DTR	12/87C
ACRS REVIEW OF DTR	11/87C
CRGR REVIEW OF FTR	03/89
ACRS REVIEW OF FTR	04/89
FRN	08/89

GSI-99, "LOSS OF RHR CAPABILITY IN PWRs"
(HIGH PRIORITY)

- FOCUSED ON 2 MODES OF CCF OF RHR

COOLING:

- AIR BINDING OF RHR PUMPS DURING
MID-LOOP OPERATIONS
- LOSS OF RHR PUMP SUCTION DUE TO
AUTOCLOSURE INTERLOCK-RELATED
SPURIOUS CLOSURES OF THE RHR
SUCTION/ISOLATION VALVES

GSI-99 CONT'D.)

ISSUE RESOLVED IN 10/88.
GL 88-17 ISSUED TO PWR OLS & CPs WITH
GUIDANCE AND RECOMMENDATIONS TO REDUCE
THE LIKELIHOOD AND CONSEQUENCES OF A
LOSS OF DECAY HEAT REMOVAL:

- IMPROVE PROCEDURES AND
INSTRUMENTATION TO HELP OPERATOR
PREVENT AND MITIGATE LOSS OF DECAY
HEAT REMOVAL

GSI-99 (CONT'D)

- DEVELOP PROCEDURES THAT WILL
PERMIT TIMELY CLOSING OF
CONTAINMENT OPENINGS DURING A
DEGRADATION IN DECAY HEAT REMOVAL.

B-56, "DIESEL GENERATOR RELIABILITY"
(HIGH PRIORITY)

5-YR. PLAN RESOLUTION DATE:	09/89
CURRENT RESOLUTION DATE:	09/89
STATUS: CRGR REVIEW OF DTR	09/88C
ACRS REVIEW OF DTR	11/88C
ISSUE REG. GUIDE FOR	
COMMENT	11/88C
CRGR REVIEW OF FTR	07/89
ACRS REVIEW OF FTR	07/89
ISSUE FINAL REG.	
GUIDE	09/89

B-56 (CONT'D.)

RESOLUTION OF USI A-44 INCLUDED THE NEED
FOR A DIESEL RELIABILITY PROGRAM TO
MAINTAIN THE RELIABILITY LEVEL OF EDGs
AT OR ABOVE LEVELS SELECTED FOR RESPONSE
TO THE SBO RULE (10CFR50.63)

B-56 (CONT'D)

- CONCLUDING STAFF EFFORTS DIRECTED AT
DEFINING THE PRINCIPAL ELEMENTS OF AN
EDG RELIABILITY PROGRAM AND TECHNICAL
GUIDELINES FOR NRC USE IN REVISION OF
REG. GUIDES, SRP, AND INSPECTION MODULES.

- COORDINATING WITH NUMARC TO DEVELOP A
RELIABILITY PROGRAM CONSISTENT WITH
INDUSTRY PRACTICES AND COMMISSION
DESIRE TO MINIMIZE UNNECESSARY TESTING.

REVIEW OF LOW PRIORITY ISSUES

IN ACCORDANCE WITH COMMISSION REQUEST, EXTENSIVE STAFF REVIEW OF 25 LOW PRIORITY ISSUES RESULTED IN 1 ELEVATED TO HIGH: GSI 15, "RADIATION EFFECTS ON REACTOR VESSEL SUPPORTS." TASK ACTION PLAN FOR RESOLUTION BEING DEVELOPED BY STAFF.

DELAYS

- DEPENDENT ON INDUSTRY ACTIONS FOR RESOLUTION E.G., GSI-29, "BOLTING DEGRADATION OR FAILURE IN NUCLEAR POWER PLANTS."
- DEPENDENT ON PLANT EXPERIENCE TO DEMONSTRATE EFFECTIVENESS OF RESOLUTION, E.G., GSI B-55, "IMPROVE RELIABILITY OF TARGET ROCK SAFETY RELIEF VALVES."

SUMMARY OF GENERIC ISSUE RESOLUTION STATUS*

<u>GI TYPE</u>	<u>TOTAL ACTIONS</u>	<u>ACTIONS IMPOSED</u>	<u>ACTIONS IMPLEMENTED BY LICENSE</u>	<u>ACTIONS VERIFIED BY NRC</u>
HIGH GSI	1,540	1,420	1,278	1,150
MEDIUM GSI	1,366	1,308	1,260	1,107
LOW GSI**	630	628	607	567

* REPORTED BY SIMS (R-1216505-002 DATED 4/14/89)

** PRIOR TO THE FORMALIZATION OF THE GENERIC ISSUES
PROCESS