

# OFFICIAL TRANSCRIPT OF PROCEEDINGS

**Agency:** U.S. Nuclear Regulatory Commission  
Incident Investigation Team

**Title:** Interview of Charles E. Rossi  
(Closed)

**Docket No.**

**LOCATION:** Bethesda, Maryland

**DATE:** Wednesday, September 4, 1991 **PAGES:** 1 - 48

**ANN RILEY & ASSOCIATES, LTD.**

1612 K St. N.W., Suite 300

Washington, D.C. 20006

(202) 293-3950

Dupe of

~~9305070251~~



ERRATA SHEET

ADDENDUM

<u>Page</u>	<u>Line</u>	<u>Correction and Reason for Correction</u>
4	11	"PM" should be "PN" - spelling correction
7	15	Replace "--" with "meeting had Bill Russell" - this prevents missing words
9	3	"Madson" should be "Mathson" - spelling correction
10	2 and 21	delete "the way of my involvement was that the reclassified stuff was safely - related and the" - change made for clarity
11	16	change "Denny species" to "Thomas species"
27	17	Replace "--" with "Vern Hodge"
27	27	Replace "in" with "for" - corrects typographic error
41	19	change "come" to "cold" - corrects typographic error
45	5	change "Are" to "time" - corrects typographic error
47	9	change "go" to "to"
47	12	change "for" to "on"

Date 10/3/91 Signature Charles F. Rosen

1. 1



1. 10



## P R O C E E D I N G S

[11:05 a.m.]

1  
2  
3 MR. KAUFFMAN: Good morning. It's September 4,  
4 1991 at about 11:00 a.m. We're in Bethesda, Maryland at  
5 the Woodmont Building, conducting an interview of Ernie  
6 Rossi for the Nine Mile Point, Unit II Incident  
7 Investigation Team. My name is John Kauffman out of NRC  
8 Headquarters.

9 MR. CONTE: I'm Rich Conte, Region I.

10 MR. VATTER: Bill Vatter, from INPO.

11 MR. ROSSI: Okay, I'm Ernie Rossi. I'm the  
12 Director of the Division of Operational events assessment.  
13 Just for the record, Ernie is my nickname. My full name is  
14 Charles E. Rossi. I've been Director of the Division of  
15 Operational Events Assessment for, I guess, a little over  
16 four years since the NRC reorganization in 1987.

17 Prior to that, for about a year, I worked in the  
18 Office of Nuclear Reactor Regulation in the Division that  
19 was responsible for Westinghouse plants. And from, I guess  
20 it was about December of '83 to January of 1986, I worked in  
21 the Office of I&E, and I was Chief of the Events -- I think  
22 it was called Events Analysis Branch in I&E.

23 Prior to that time, I worked in the Office of  
24 Nuclear Reactor Regulation in the Instrumentation and  
25 Controls Systems Branch. I must have worked there from





1 about October of 1980 up until the end of 1983 when I went  
2 to I&E.

3 In the Instrumentation and Controls Systems  
4 Branch, I started as a Senior Reviewer, and I was then a  
5 Section Leader for most of the time that I was there. Prior  
6 to coming to the NRC, I worked at the Department of Energy  
7 for about three years on laser fusion and prior to that, I  
8 worked at Westinghouse Electric in their commercial reactor  
9 organizations and I was at Westinghouse from 1966 to 1977.

10 I was in the Navy from 1958 to 1962, and I worked  
11 with Admiral Rickover's group in Washington, D.C. during  
12 that time. So, do you have any other questions?

13 MR. KAUFFMAN: I think that's enough. Okay. I'm  
14 going to give you a listing of some topics, and I'm going to  
15 ask you for your involvement. Probably the latter two,  
16 there will be a little more detail on, but let me just give  
17 them to you. One is the event from August 13th on Nine Mile  
18 Two where they declared the site emergency of which we're  
19 investigating.

20 MR. ROSSI: Okay, do you want me to tell you now,  
21 what I can remember. I mean, I'll have to tell you what I  
22 can remember, which --

23 MR. KAUFFMAN: The other topic is licensing of  
24 Nine Mile II. The other one is Bulletin 79-27 on the loss  
25 of non-nuclear instrumentation and power supplies. The



1 other one is Generic Letter 83-28 on the Salem ATWS.

2 Okay, so let's start off with your involvement  
3 with the event of August 13th.

4 MR. ROSSI: My best remembrance of this was that I  
5 was -- I am the Emergency Officer, but only during the  
6 daytime, at least during that time period. Right now, I'm  
7 Emergency Officer day and night, because this is my week to  
8 be the nighttime Emergency Officer. But at that time, I was  
9 Emergency Officer only during the day.

10 The event was first called into the NRC at -- and  
11 I'm referring now to the PM issued on August 22nd, which  
12 says that the first call to the NRC would have been about --  
13 let's see if I can find this -- about 6:12 in the morning.  
14 So, I was not contacted as Emergency Officer. The nighttime  
15 Emergency Officer was contacted.

16 I found out about the site area emergency probably  
17 around 8:00, I think. My involvement then was, I did not go  
18 to the Operations Center. By that time, I guess, they were  
19 in the site area emergency. I think there were some people  
20 in the Operations Center, and I listened to the -- there  
21 must have been a Commissioner's Assistants' briefing at some  
22 point that morning, which I believe I listened to.

23 Then I had periodic but not too frequent contact  
24 throughout the day to just follow the event until I went  
25 home that night. So, that was pretty much my involvement.



1 The decision on sending people to the Operations Center, I  
2 guess, had been made before I got involved. Now, I may have  
3 been involved in deciding some people that went in there. I  
4 don't really remember. I get a lot of telephone calls on  
5 events, so this one was a --

6 MR. KAUFFMAN: For the record, who was the  
7 Emergency Officer?

8 MR. ROSSI: I think it was Cecil Thomas. I think  
9 so, but I would not be absolutely sure of even that, but I  
10 believe it was.

11 MR. KAUFFMAN: Okay.

12 MR. ROSSI: Now, I was also involved afterwards.  
13 There were discussions about having an augmented inspection  
14 team which I would have been a part of, and there were some  
15 discussions on the need for an IIT, which I would have had  
16 some involvement in.

17 MR. KAUFFMAN: Did you have any specific  
18 recommendations on AIT versus and IIT?

19 MR. ROSSI: Well, I certainly agreed with both  
20 decisions. Originally, I guess I thought that an AIT was  
21 probably sufficient, and I was not too involved in the IIT,  
22 and probably, had I been asked for a recommendation at the  
23 time, I would have felt that the AIT, for this particular  
24 event, would be sufficient.

25 However, because of the possible generic aspects



1 of it, I think an IIT was fully appropriate, but I was not  
2 very involved in the decision to go from an AIT to an IIT.  
3 And the decision to go to an AIT, I think I was somewhat  
4 involved in, but these kinds of decisions, there are a lot  
5 of people that are involved, and they eventually get made by  
6 Regional Administrator and so forth, so I had some  
7 involvement in discussions, but not -- I would not have said  
8 I was a key player in the decision to go to an IIT.

9 I probably played a greater role in the AIT  
10 portion, but it's a little hard for me to remember at this  
11 point in time, exactly how involved I was.

12 MR. KAUFFMAN: Is it fair to say that you really  
13 weren't an active responder -- you were an Emergency Officer  
14 during the day, but you -- other people were handling the  
15 Nine Mile II event?

16 MR. ROSSI: I had, yes, kind of peripheral  
17 involvement. I had to know what was going on throughout the  
18 day, and I would have had some discussions about whether  
19 people needed to stay in the Operations Center at the end of  
20 the work day and that kind of thing, but that's kind of it.

21 MR. KAUFFMAN: What's the direction of your office  
22 right now with respect to the review of this event? Any,  
23 or are you waiting for the IIT results?

24 MR. ROSSI: As far as I know, we're waiting for  
25 the IIT results, however, between 8:00 and 10:00 this





1 morning, I attended the meeting with the licensee and your  
2 team director, Jack Rosenthal, was there, and it was a very  
3 large meeting and the licensee was making a presentation on  
4 what they thought the cause of the loss of the  
5 uninterrupted power supplies were, the fixes they had made  
6 and why they believed they were basically ready to start up.

7 So, I was involved in that meeting this morning.  
8 Other than that, I've had, I guess, not too much involvement  
9 at all.

10 MR. KAUFFMAN: Okay.

11 MR. ROSSI: I probably was more involved this  
12 morning because I'm acting for my boss, Bill Russell, who's  
13 out of town, so I went to the meeting primarily for that  
14 reason. There were a number of people that worked for me at  
15 the meeting, so I may or may not have gone to the -- been in  
16 town.

17 MR. KAUFFMAN: Okay. The licensing of Nine Mile  
18 II, any involvement?

19 MR. ROSSI: I can't remember any.

20 MR. KAUFFMAN: This would have been around 1986 or  
21 '87.

22 MR. ROSSI: Okay, it's unlikely that I would have  
23 been involved in that timeframe, because if it was '86 and  
24 '87, I was working on -- primarily on Westinghouse plants in  
25 '86. This is a BWR, and in '87, I would have gone to my



1 current position and that would not have had too much to do  
2 with Nine Mile or licensing of anything. Tech specs, maybe;  
3 the tech specs for Nine Mile might have been done when I was  
4 in my current position, but I don't remember any significant  
5 involvement in the licensing of Nine Mile.

6 That doesn't mean that I might not have some that  
7 I've forgotten.

8 MR. CONTE: Okay.

9 Real briefly, your involvement in the Bulletin 79-  
10 27 and the Generic Letter 83-28, we have some specific  
11 questions on that.

12 MR. ROSSI: 79-27, just from the date of it, must  
13 have been issued before I came to the NRC. I came in like -  
14 - I believe it was October of 1980, and I don't think I was  
15 involved in the writing of it.

16 I think, when I came, as I recall, I worked in the  
17 Instrumentation and Control Systems Branch. I may have  
18 supervised some of the reviews of responses to it, although  
19 I can't remember. I can't really remember anything  
20 specific.

21 I do remember having discussions of bulletin  
22 responses and how to close it out and that kind of stuff,  
23 but the specifics, that was a long time ago.

24 MR. CONTE: Okay.

25 How about the Generic Letter, Salem ATWS, 83-28?



1 MR. ROSSI: Generic Letter 83-28, I was pretty  
2 involved in that, because that event occurred, and they had  
3 a task team that was, as I recall, directed by Roger Madsen,  
4 and I was a member of that task team, and so, we went  
5 through and looked at all of the problems with circuit  
6 breakers, and I think there was a -- I think there was a  
7 NUREG probably written on that whole thing, and I would have  
8 been a significant participant in all of that.

9 MR. CONTE: Okay.

10 MR. ROSSI: Writing of the NUREG -- I think it was  
11 a NUREG. I can't remember. I'd have to look. And I  
12 believe the generic letter, then, was written as a result of  
13 the NUREG, and I would have been a significant participant  
14 in all of that.

15 MR. CONTE: Okay.

16 We have some specific questions on that. We'll  
17 deal with them a little later.

18 MR. ROSSI: Do you have the letter here? Because  
19 you know, I'm going to have great difficulty remembering  
20 what's in either the bulletin or the letter. I don't know  
21 whether you have it. I'll do my best to answer your  
22 questions.

23 MR. CONTE: I don't have it specifically here.  
24 Maybe we can break and get it if we need it.

25 MR. ROSSI: Okay. We may not need it.



1 MR. CONTE: I'll try to summarize for you what the  
2 issue is, and then I'll ask the question.

3 MR. ROSSI: Okay. Fine.

4 MR. CONTE: Okay. Shortly after the accident at  
5 TMI 2, the staff started to encourage licensees to classify  
6 equipment in this broader sense of important to safety  
7 versus safety-related and versus non-safety-related.

8 What has been your involvement in that area?

9 MR. ROSSI: Okay. I was pretty involved in some  
10 of that during the licensing of Shoreham.

11 There was a hearing at Shoreham that dwelled for  
12 one summer, pretty much, on that issue, and I was one of the  
13 people from the NRC staff that testified during the Shoreham  
14 hearing on that issue, and I'm sure the transcripts of those  
15 hearings are available.

16 MR. CONTE: Do you know what the bottom line from  
17 the Shoreham hearing was with regard to safety?

18 MR. ROSSI: Well, it may have changed after the  
19 hearing.

20 As I recall, the crux of my involvement was that  
21 the reclassified stuff was safety-related, and the safety-  
22 related stuff was that equipment that was essential for  
23 following the events in Chapter 15 and accidents, keeping  
24 the plant safe, and that was the equipment that got the most  
25 attention from design and quality assurance standpoint, and





1 it was basically that -- that equipment that was needed to  
2 mitigate an accident, and there was a very specific  
3 definition of the functions that that equipment had to  
4 perform, which I think was taken from one of the  
5 regulations, probably Part 100, and generally, that  
6 equipment had to be seismically qualified, and then, at that  
7 time, as I recall, at least my position was that there was  
8 other stuff that was important to safety, and its importance  
9 to safety varied depending on what its functions were and  
10 that, although it wasn't safety-related, that it did have to  
11 have appropriate QA, but it was not the same as what you'd  
12 have for safety-related stuff, and let's see, as I recall,  
13 the Shoreham hearing dwelled for a whole summer on that, and  
14 I probably testified as part of a panel, with -- let's see,  
15 Jim Conran, I believe, was a member, and Ashok Thadani was  
16 there for a while, and Denny Spees was there.

17 I don't remember the others, but I, you know --

18 MR. CONTE: So, would you characterize that the  
19 staff was behind the licensee --

20 MR. ROSSI: Yes.

21 MR. CONTE: -- as a proponent of this concept of  
22 having the --

23 MR. ROSSI: As I recall, the Intervenor's felt that  
24 the QA should apply to a much broader set of equipment than  
25 what the staff did.



1           So, in that sense, the staff was behind the  
2 licensee, but my recollection is that the licensee -- I  
3 think we had a lot of difficulty getting the licensee to  
4 agree that there was a set of equipment that was important  
5 to safety that the NRC had an involvement in and that they  
6 ought to be doing something with.

7           So, my recollection -- and again, this was quite  
8 some time ago; this would have been in probably 1982 or '3,  
9 I guess -- that we were sort of between the licensee and the  
10 Intervenors, that we had arguments with the licensee over  
11 whether this stuff -- what they should be doing with it and  
12 what they should know about it and --

13           MR. CONTE: Did a definition for "important to  
14 safety" come out of that hearing, from the staff's point of  
15 view?

16           MR. ROSSI: I can't remember that, you know,  
17 without checking the transcript. I'm sure the transcripts  
18 are available, and you can look and see.

19           MR. CONTE: Okay.

20           MR. ROSSI: I would have classed annunciators as  
21 important to safety, but there is another problem.

22           In going back eight years and trying to remember  
23 what my opinions were then -- they probably may have changed  
24 between now and then.

25           Today, I would class it -- I would say



1 annunciators are important to safety, but I don't know -- as  
2 far as I know, we don't have any definitive requirements for  
3 how they ought to be designed, but I don't know whether that  
4 answers your question or not.

5 MR. CONTE: While we're on the topic of the  
6 annunciators, how about their power supplies? Should they  
7 be safety-grade?

8 MR. ROSSI: Well, if the annunciators are  
9 important to safety, the power supplies wouldn't be required  
10 to be safety-related either.

11 My understanding of our consistent position with  
12 respect to annunciators is that they aren't required to be  
13 safety-related, and if they are not required to be safety-  
14 related, they are not required to be redundant, they are not  
15 required to be seismically qualified, and they are not  
16 required to be on safety-related power supplies.

17 I mean that's my understanding of our current  
18 position, and I think that's pretty much been the position  
19 that I remember over the years, including the time when I  
20 worked at Westinghouse.

21 MR. CONTE: We have a list of parameters and  
22 instrumentation that we'd like to get your opinion on, that  
23 very thing, but let me just talk about the broader issue of  
24 "important to safety."

25 What is your understanding of the staff's current



1 view of "important to safety," in distinction to "safety  
2 related," at this point in time?

3 MR. ROSSI: Well, my understanding is that we have  
4 safety-related equipment. It's pretty much the same as what  
5 it was at the time of the Shoreham licensing.

6 We have safety-related equipment that gets special  
7 consideration and design requirements and QA and that kind  
8 of thing in our reviews.

9 There's other equipment that we do require plants  
10 to have, like the safety parameter display system.

11 I don't believe all of the Reg. Guide 197 stuff is  
12 safety-related. My recollection is that it's not.

13 And we do have certain design requirements for a  
14 lot of this kind of stuff, but it falls short of safety-  
15 related, and I don't know whether we're currently calling  
16 that stuff or classing it as important to safety.

17 It's being treated as important to safety because,  
18 you know, we have written down things that people are  
19 supposed to do with respect to that stuff, I believe, in  
20 reg. guides and standard review plans, and so, by my -- in  
21 my mind, it would be treated as important to safety but not  
22 safety-related.

23 MR. CONTE: So, there is a lot of equipment out  
24 there that is getting some additional controls, although  
25 they are not safety-related.





1 MR. ROSSI: Right.

2 MR. CONTE: They're getting some additional  
3 controls.

4 MR. ROSSI: That's right.

5 MR. CONTE: But is it our understanding that, at  
6 this point, you can't locate a staff definition of  
7 "important to safety" which to give licensees to say this is  
8 equipment that is supposed to be in that gray area  
9 classification, if you will?

10 MR. ROSSI: I think that is correct, but I'm  
11 probably not a good person to ask what our current situation  
12 is.

13 MR. CONTE: Who do you think in the NRC would be a  
14 good person to ask?

15 MR. ROSSI: I think what you need to do is --  
16 you're talking to the right people and see if any of them  
17 believe that they are sure of what our current position is.

18 You might want to talk with people in the Quality  
19 Assurance Branch that work with Jack Roe. They may be able  
20 to shed some light on it.

21 As I recall on "important to safety," it wasn't  
22 that we were going to have a list.

23 It was more that there were varying degrees of  
24 "important to safety," and there were many, many things in  
25 the plant -- almost everything in the plant has some



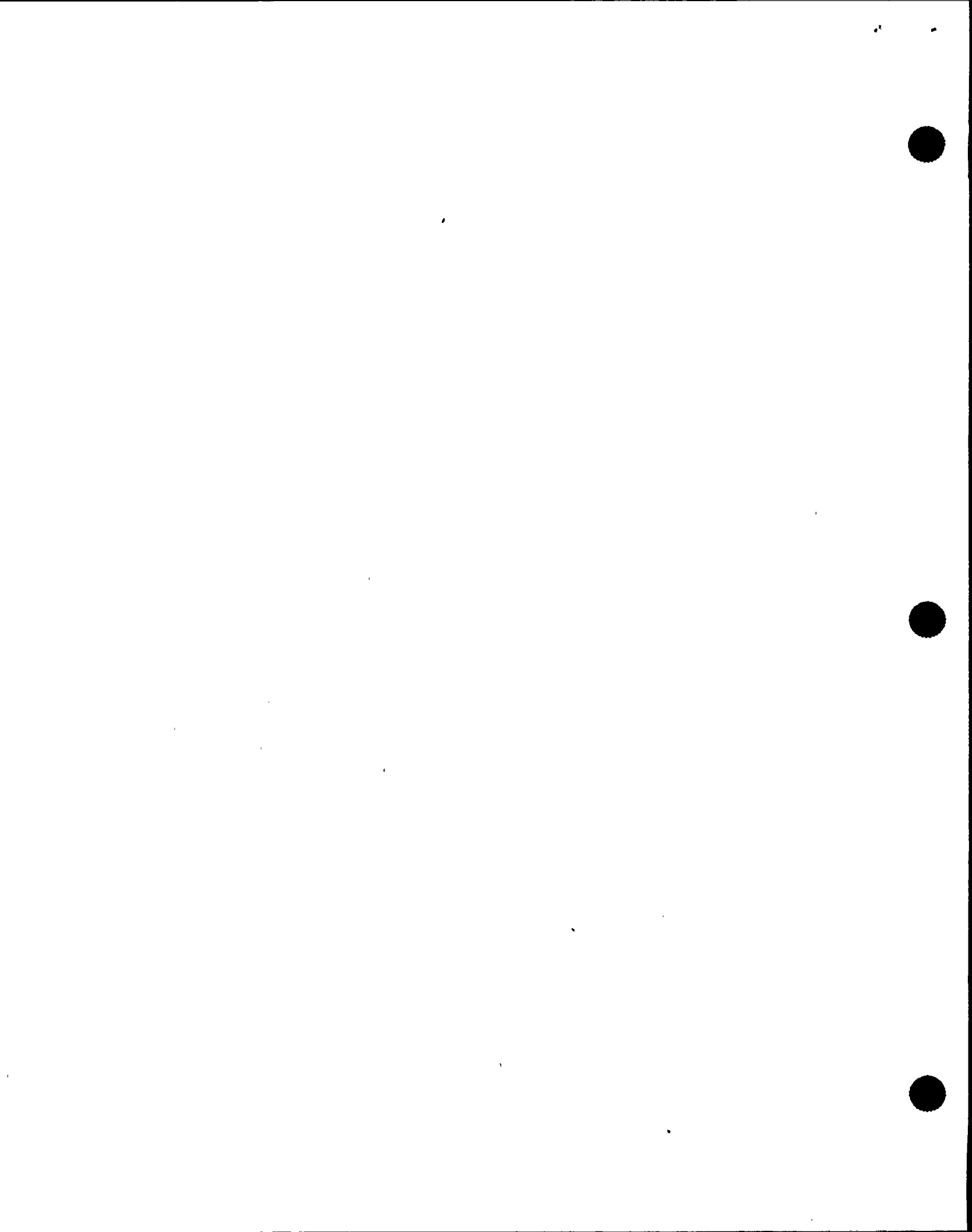
1 importance to safety, and it was, as I recall, left not too  
2 well-defined on purpose, because what you wanted to do was  
3 to have it graded, so that the more important stuff you had  
4 more requirements for than the less-important stuff, and  
5 it's been a long while since I picked up Reg. Guide 197 and  
6 looked at it, but I think Reg. Guide 197 was kind of written  
7 that way.

8 I think there were varying degrees, levels of  
9 importance of the stuff, and I believe there were written  
10 down things about what you did, depending on how important  
11 it was.

12 MR. CONTE: A couple of years ago apparently the  
13 staff -- I know I got the word in the region -- that we were  
14 discouraged from using the term "important to safety" and  
15 applying it to --

16 MR. ROSSI: I think you are correct. I think  
17 that's the case because I believe there were some efforts  
18 with the Commission at one point in time to sort of more  
19 formally recognize this stuff and I am not sure the  
20 Commission agreed with the Staff and because of that I think  
21 what you say is correct.

22 That's why I am not sure what our position is  
23 today, but the fact of the matter is that we do look at many  
24 things in the plant, like almost everything, and we do look  
25 at it in more detail depending on how important we feel it



1 is to safety, so inspectors I think look at almost  
2 everything in the plant.

3 They look at some things that more carefully and  
4 more prescriptively than they do others and so we're  
5 generally following the concept of important to safety as I  
6 understood it at the time of the Shoreham hearing.

7 It's just -- and it may be that we have sort of  
8 specifically decided to leave it graded because we didn't  
9 want to have a set of requirements for it. The set of  
10 requirements depends on how important it is to safety and  
11 there was judgment involved in that.

12 MR. CONTE: So you would characterize the accounts  
13 of importance to safety being alive and well and being  
14 handled on a case by case basis?

15 MR. ROSSI: That's probably it, yes.

16 MR. CONTE: Agency-wide.

17 MR. ROSSI: Alive and well, at least -- I don't  
18 know. Alive and well might be too strong. It probably  
19 could be better handled perhaps in terms of written down,  
20 but again I am not -- it is not an area that I am very much  
21 involved in right now.

22 You may want to talk to the QA people or the  
23 maintenance rule people also because I think they may have  
24 gotten involved in this with the maintenance rule in what's  
25 done for the balance of plant, and again I am not an expert



1 on the maintenance rule but I think it covers a lot more  
2 than just safety-related stuff, so that's another  
3 application of the concept even though we may not call it  
4 important to safety.

5 I would have to say that if it is covered by the  
6 maintenance rule in the way I think it probably is, then  
7 it's probably alive and well.

8 MR. CONTE: I'm going to go into generic  
9 communications.

10 Let me ask my colleagues here if they have any  
11 questions about important to safety, safety-related?

12 MR. ROSSI: Generic letter 83-28 -- I know the  
13 definition of safety-related I believe was given in there  
14 and some things were limited to safety-related.

15 You have probably looked at that generic letter  
16 much more recently than I have but am I not correct that  
17 that is the way it was --

18 MR. CONTE: Yes. Safety-related was given and  
19 it's fair to say that licensees were encouraged but not  
20 required, if you call a generic letter a requirement -- the  
21 word "should" was used for them to incorporate the broader  
22 classification "important to safety."

23 MR. ROSSI: We may have even used the definition  
24 in there or written some words in there, didn't we?

25 MR. CONTE: No.





1 MR. ROSSI: Not a definition but it was --

2 MR. CONTE: The reference is to the GDC-1, the  
3 General Design Criteria.

4 MR. ROSSI: I think at that time that that letter  
5 was probably written more along the lines of the thinking at  
6 the time of the Shoreham hearing.

7 I think the other thing you have to recognize,  
8 which I'm sure you have already recognized by now, is that  
9 there is probably a moderate amount of disagreement amongst  
10 people on the staff of what should be done with important to  
11 safety and there may even be some disagreements on how we  
12 have done it in the past and how we are supposed to be doing  
13 it today.

14 MR. CONTE: That everybody's got their own  
15 opinions.

16 MR. ROSSI: There may be a number of opinions on  
17 that.

18 MR. CONTE: I'm going to revisit that generic  
19 letter but let me talk generally about in the licensing of  
20 the NTOLs -- I guess Nine Mile Two was an NTOL in the mid-  
21 '80s, post-TMI plant that was getting its license. How is  
22 the handling of generic communications such as like this  
23 Bulletin 79-27 or for example 83-28, all predated that  
24 licensing.

25 How was that done?



1 MR. ROSSI: I think in some cases and again, you  
2 know, I am not absolutely sure of this, but I believe that  
3 there were probably questions back to the licensee as to  
4 whether they had looked at these bulletins and generic  
5 letters and whether they had addressed the issues in them.

6 Some of them they may have looked at in much more  
7 detail, like generic letter 83-28 might have been looked at  
8 in more detail but I think in some cases that there were  
9 probably RAIs, requests for additional information, that may  
10 have asked them to address bulletins and generic letters.

11 MR. CONTE: So you think there was some generic --  
12 general correspondence from these --

13 MR. ROSSI: Probably.

14 MR. CONTE: -- from NRC?

15 MR. ROSSI: But again, you know, this was a long  
16 time ago.

17 MR. CONTE: Okay. With respect to 79-27, and I am  
18 going to have to test your memory here because you said you  
19 were not that familiar with it, that bulletin addressed this  
20 loss of non-nuclear instrumentation and basically asked for  
21 kind of a failure mode's effects analysis on various pieces  
22 of equipment, power supplies and what have you.

23 MR. ROSSI: I think it said something like be sure  
24 that you could bring the plant to a safe shutdown condition  
25 if you lost certain power supplies.



1 MR. CONTE: It was cold shutdown specifically?

2 MR. ROSSI: Cold shutdown, if you lost certain --

3 MR. CONTE: Certain instruments --

4 MR. ROSSI: -- certain power supplies.

5 MR. CONTE: No one counted on the loss of five  
6 uninterruptable power supplies?

7 MR. ROSSI: Well, it was probably worded in terms  
8 of one instrument bus or something like that so it might  
9 have been a little fuzzy even on what that meant.

10 MR. CONTE: There was also an item there to check  
11 and to also consider the emergency procedures in that review  
12 and what emergency procedure was used, what kind of  
13 equipment, instrumentation, in order to achieve the cold  
14 shutdown and we're still looking at that, okay?

15 It's my understanding that the B&W plants, this  
16 event resulted from -- by the way, that bulletin resulted  
17 from Oconee and an incident at TMI-2 that was documented in  
18 the accident investigation with the loss of instrumentation  
19 in the control room.

20 Because of my personal involvement in TMI, I  
21 remember I believe it was an order or confirmatory action  
22 letters were issued to the B&W plants to do training on that  
23 bulletin, to train the operators on such things as loss of  
24 annunciators, loss of indicators.

25 Do you have any recollection as to why the B&W



1 plants were singled out versus any of the other plants?

2 MR. ROSSI: I can give you a hypothesis.

3 I think in that time frame because of the TMI  
4 event, B&W generally got a lot more attention than other  
5 plants and there has always been a staff feeling that  
6 because of the way the B&W control system is designed, the  
7 integrated control system, that it is much more important to  
8 running a B&W plant than the control systems on the other  
9 plants, and so B&W plants have generally gotten more careful  
10 scrutiny in these areas than the others.

11 The reason I guess that B&W plants are that way is  
12 that they have once-through steam generators and they tend  
13 to respond much more quickly to transients. They have less  
14 heat capacity in the steam generators, and for all these  
15 reasons the control system is much more integrated and  
16 interactive than the control systems on, say, Westinghouse  
17 and CE plants and then also because of TMI they tended to  
18 get more attention and then the next event that got them  
19 more attention was Davis-Besse, which was again a B&W plant.

20 MR. CONTE: Is there a source that works for the  
21 NRC -- you were speculating, at this point, as to why that  
22 happened. But do you know of any sources that authored that  
23 bulletin or was involved in that decision?

24 MR. ROSSI: The bulletin must give the names of  
25 the authors.





1 MR. CONTE: That's true.

2 MR. ROSSI: I would think it would. I'm trying to  
3 think who else was there. Jack Rosenthal, himself, may have  
4 been around at that time. He was in the Instrumentation and  
5 Control Systems Branch, as a matter of fact, he worked for  
6 me for a while there. So, he was involved in some of these  
7 same things.

8 MR. CONTE: Apparently --

9 MR. ROSSI: Other people that were there were  
10 Faust Rosa, we haven't talked to him. Tom Dunning, I think  
11 was there. He was a section leader in the I&C Branch.

12 MR. CONTE: Okay.

13 MR. ROSSI: Bill Morris was there at that time.  
14 He's in research now, Rosenthal. Marty Virgilio was there.  
15 Rick Kendall, who's out in DOE was there. All these people  
16 would have had some involvement. Which one -- I don't know  
17 exactly who wrote that bulletin.

18 MR. CONTE: All right. We have a general question  
19 on the bulletin versus the information notice and the  
20 decision process on what governs whether for any event it  
21 becomes a bulletin versus an information notice.

22 MR. ROSSI: Okay.

23 MR. CONTE: And, in particular, Frank Ashe will  
24 report on loss of uninterruptable power supplies.  
25 Apparently, it became an information notice. And the



1 question -- the broader question is how does that decision  
2 making process occur in your organization, versus AEOD's  
3 organization. And the other question is what was the basis  
4 for Frank's report on the loss of uninterruptable power  
5 supplies being in the information that was --

6 MR. ROSSI: I don't remember why that was an  
7 information notice, rather than a bulletin. Generally,  
8 well, obviously, you must know that information notices go  
9 out and the presumption is that if we provide the  
10 information to the licensees in an information notice, that  
11 they will then review them, as part of their overall review  
12 of operating experience, which they're required to do an  
13 overall review of operating experience, but an information  
14 notice. They will review it, they will decide what things  
15 in it are applicable to their plant, and they will take  
16 appropriate action to fix the problems that they feel are  
17 applicable to their plant. And, if we then go out and  
18 they've had an event that should have been very specifically  
19 prevented by addressing an information notice, that's  
20 considered in the enforcement.

21 Now, in some cases, I mean you have to talk about  
22 whether it's very specifically addressed in the information  
23 notice. If it's an information notice that says we've had a  
24 lot of problems with uninterruptable power supplies, and you  
25 need to pay more attention to maintenance and quality



1 assurance and design requirements and all that, that's not  
2 too specific in my mind. So, there you would raise --  
3 heighten their level of concern about uninterruptable power  
4 supplies or whatever else it is. But it's not a specific  
5 thing.

6 If you go out with an information notice that  
7 says, in vendor X's equipment model number 2380, they have a  
8 defect in the washer, because this washer was made to the  
9 wrong material, and therefore, most licensees are replacing  
10 it, that's very specific. And if you find that a licensee  
11 later has a problem because he didn't replace the washer, I  
12 think you can come down pretty hard on them. But these more  
13 general kinds of things, they heighten the licensee's  
14 concern. But, you know, they're nonprescriptive by intent.

15 Now, usually we start out by considering that  
16 something should be an information notice. And the decision  
17 to go to a bulletin or a generic letter is made because we  
18 feel that the problem is so safety-significant that we need  
19 to request specific actions and we need a response back from  
20 the licensee that he did indeed do something in response to  
21 the bulletin. So, generally, we probably would start,  
22 unless it's an obviously very significant issue, from the  
23 start, we would start with the information notice route, and  
24 then go to a bulletin or generic letter if it's decided that  
25 it's very safety-significant. I don't --



1 MR. CONTE: For the record, which office issues  
2 the bulletins?

3 MR. ROSSI: I -- I personally am responsible for  
4 signing all bulletins and putting them together and making  
5 decisions as to whether we have bulletins or information  
6 notices. I sign all information notices. I can --  
7 obviously all generic letters come through our division.  
8 I'm somewhat less involved in generic letters because  
9 they're prepared in a lot of different places. But any  
10 information notice or bulletin, I'm very involved in.

11 MR. CONTE: For the record, could you distinguish  
12 the bulletin from the generic letter? They both solicit  
13 responses?

14 MR. ROSSI: Yes. There's not a lot of difference,  
15 in practice. They both solicit responses and they both  
16 request -- generally request actions, although sometimes we  
17 can send out generic letters that just provide information.

18 Generic letters generally are used for more  
19 programmatic types of things. Bulletins are generally used  
20 for narrower things. But the division is pretty fuzzy and,  
21 in actual fact, if it request actions that requires a  
22 response, from the licensee's standpoint, there probably  
23 isn't any difference.

24 And I think the reason that the two exist is more  
25 from the past history of the NRC that -- prior to 1987





1 Inspection and Enforcement Office put out the bulletins, and  
2 NRR put out the generic letters. And then when we had the  
3 reorganization and everything came together, we kept the two  
4 things. And now what we generally do is generic letters are  
5 used for more programmatic kind of things, and bulletins for  
6 narrower ones.

7 But, my personal opinion is that there is no  
8 difference between a generic letter that requests actions of  
9 a licensee and requires a response from a bulletin that  
10 requests actions and requires a response. I think the  
11 licensee has got to go the same thing, whether it's called a  
12 generic letter or a bulletin.

13 MR. CONTE: What would be the process of getting  
14 all generic communications associated with losses of  
15 inverters or uninterruptable power supplies?

16 MR. ROSSI: We have a generic communications  
17 index, and you can talk to -- which has some key-word search  
18 capability. What you should do is contact Carl Berlinger in  
19 my division, and he can put you on to somebody that can show  
20 you how to use that. But it's got some search capability.  
21 And you'll have to use the right key words. I have not  
22 personally done searches because other people do them or me,  
23 but I think you can talk to him. He can help you do that.

24 MR. CONTE: In the interest of time, I may ask him  
25 to do that officially, as part of the IIT. Because we're



1 trying to get --

2 MR. ROSSI: Make sure that when you do it -- you  
3 ought to talk with him --

4 MR. CONTE: Okay.

5 MR. ROSSI: -- before you do it so that you phrase  
6 your request in the right way. Because you don't want to do  
7 a key-word search that's -- you've either got too many key  
8 words or not enough. I mean, you know, you've got to pick  
9 the right key words or you won't get everything you want, or  
10 you'll get too much to be of use.

11 MR. CONTE: And he'll be able to produce  
12 information notices, circulars --

13 MR. ROSSI: I believe he can --

14 MR. CONTE: -- bulletins?

15 MR. ROSSI: I think he's got bulletins,  
16 information notices, circulars and generic letters, I  
17 believe, in that.

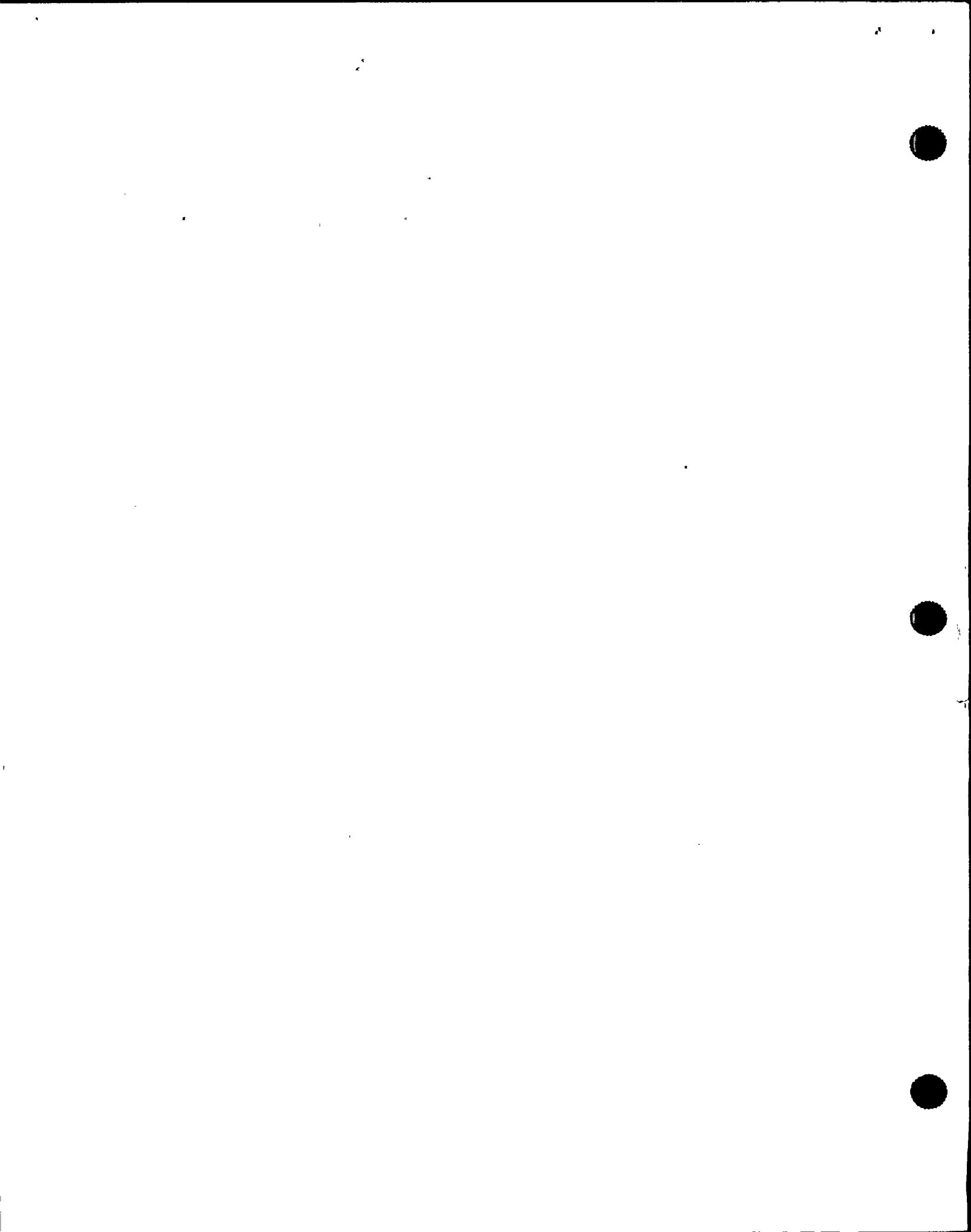
18 MR. CONTE: Okay. Good.

19 All right. Let's turn our --

20 MR. ROSSI: At least over some date span.

21 MR. CONTE: Let me turn to my colleagues again.  
22 I'm getting ready to do on with the generic letter on the  
23 same of ATWS. Questions on the bulletin and generic  
24 communications in general?

25 [No response.]



1           MR. CONTE: Okay. Hearing none, generic letter  
2 8328. You said you were very involved. I guess the first  
3 question is -- let me make a comment about the generic  
4 letter. It seems very weak in asking licensees to address  
5 this issue of importance of safety, back on that concept  
6 again, because of the words I quoted to you, it said that  
7 the three main -- the four main issues of the generic letter  
8 was the post-trip review, equipment classification, the  
9 post-maintenance testing and reactor trip reliability. And  
10 this team is focusing in on the hardware aspects of the  
11 post-trip review. As you must have heard right now, the  
12 process computer went down. SPDS went down and a lot of  
13 information could not be recovered on that trip.

14           The other thing that we're looking at is equipment  
15 classification. Once again, the Generic Letter is very  
16 heavy in the reactor trip breakers and any reactor trip  
17 equipment, and also the vendor interface on safety-related  
18 equipment.

19           Then there's a one-line item at the end of this  
20 list of the ought to -- recommending to licensees that you  
21 ought to consider the broader classification. My comment  
22 is, it seems very weakish, and we really didn't believe in  
23 it.

24           MR. ROSSI: Well, it's very weak in terms of  
25 things that are not reasonably closely related to the Salem



1 ATWS. So, the Salem ATWS event occurred and there was this  
2 task team that looked at all the generic implications and  
3 I'm sure we could have had many, many more generic things  
4 that we told licensees to do, but in the process of writing  
5 the generic letter and its review by management and its  
6 approval by the CRGR, the decision was made to make it  
7 reasonably narrow, but not too narrow.

8 That was a judgment thing. I'm sure that there  
9 was concern that staff members would use the Salem event to  
10 bring in new requirements that could be related to it, but  
11 that it would be very costly and maybe not cost effective  
12 from the standpoint of how much safety you get for the  
13 amount of money that's spent.

14 I'm sure that on the post-trip review, that there  
15 would have been a conscious decision about whether that  
16 equipment needed to be safety-related or not and it was the  
17 -- the decision was made as, you know, what you see was what  
18 was there, and I'm sure it was probably considered. The  
19 view is that the most important stuff in the plant is the  
20 stuff that has to be there to mitigate an event or an  
21 accident. The post-trip review is not there to mitigate an  
22 accident; it's there to find out afterwards what happened,  
23 and finding out what happened is not as important as  
24 controlling what happens.

25 I mean, that's probably the best way to put it. I





1 mean, mitigating the accident has the highest priority, and  
2 after the fact, analysis of what happened is not as  
3 important to public health and safety. And so, the way the  
4 post-trip reviews are written reflect that.

5 MR. KAUFFMAN: What in the Salem event gave you  
6 impetus to bring in this important to safety concept?  
7 Wasn't it all that trip breakers were safety related?

8 MR. ROSSI: I think it was all brought in at the  
9 time because it was an issue that we had controversy with  
10 the industry on, and that we wanted to further state our  
11 position officially in the Generic Letter on the existence  
12 of this kind of equipment. That's my recollection of what  
13 we did.

14 So, it was intended to express a philosophy rather  
15 than any prescriptive requests or requirements. I'm at a  
16 little bit of a handicap because I don't remember exactly  
17 what we said about important to safety in there. I think  
18 there were some words that recognized that it existed, and  
19 it sort of gave the philosophy and it gave an official  
20 status to the philosophy, but it didn't give anything  
21 prescriptive.

22 MR. KAUFFMAN: Let me give you an example. I just  
23 this morning got the series of responses on this Generic  
24 Letter.

25 MR. ROSSI: 83-28?



1           MR. KAUFFMAN: Yes, for Nine Mile II. Case in  
2 point, when you focus in on the trail on this particular  
3 issue on the broader classification, the utility's initial  
4 response was basically accepted by the staff with no further  
5 action which was essentially, we're working with a utility,  
6 a safety classification group on this issue and a very  
7 strong statement from the utility that there really isn't  
8 anything that's not classified. Anything that's important  
9 is classified safety-related.

10           MR. ROSSI: That was the position of many  
11 utilities at that time. So, they would have taken the  
12 position that if it's not required to mitigate an accident,  
13 it's not safety related, and if it's not required to  
14 mitigate an accident, it's of less importance.

15           MR. KAUFFMAN: So what did the staff do with that  
16 -- I mean, with these responses? How was the acceptance or  
17 non-acceptance of this controlled?

18           MR. ROSSI: I think, since we did not have any  
19 specific requirements in this area, but that whatever was  
20 done on the non-safety related stuff was pretty much left to  
21 the judgment of the licensees. However, the philosophy was  
22 there that if you have problems caused by this important to  
23 safety stuff that's not safety related, the NRC is going to  
24 -- has every right and obligation to get involved and do  
25 whatever inspections are necessary, and if we feel we need



1 to establish requirements in the area -- and pretty much  
2 what's happening on Nine Mile now is that.

3 I mean, the basic problem that they had was in the  
4 non-safety related stuff, and we're looking at it very, very  
5 carefully because we recognize that even though it's non-  
6 safety related, that it created a significant problem for  
7 the plant and here we are to look at it.

8 MR. KAUFFMAN: One of the problems in this event  
9 was that the operators, in using EOPs, were kind of in a do-  
10 loop, if you will. They couldn't get out of the ATWS  
11 procedure because of a condition on rod position indication.  
12 And, low and behold, rod position indication is powered, not  
13 only the displays in the control room, but the read switches  
14 themselves, are powered from these uninterruptable power  
15 supplies.

16 MR. ROSSI: Non-safety related. Position  
17 indication is non-safety related.

18 MR. KAUFFMAN: Right, and that's kind of  
19 consistent with the categorization in Reg Guide 197 on rod  
20 position. It's not listed as a Cat-A or Type-A variable,  
21 full pedigree importance. Any thoughts on that?

22 MR. ROSSI: Well, I mean, it comes back to the  
23 fact that the rod control systems on all these plants are  
24 designed where the safety function is to scram the rods, and  
25 the design basis is that when you scram the rods, all the



1 rods with the exception of one, will go in, and you do all  
2 of the analyses that way.

3           So, given the design bases that scrambling the  
4 rods, you will assume the design of the plant, that all but  
5 one of the rods goes in, and the worst rod sticks out. Then  
6 you don't need rod position indication. Rod position  
7 indication is not required to get the rods in. It's not  
8 required to mitigate the accident; it's required to verify,  
9 after the fact, that the rods went in.

10           So, rod position indication is of less importance  
11 than the stuff that's required to get the rods in. I mean,  
12 that's the philosophy.

13           MR. KAUFFMAN: I don't want to put words in your  
14 mouth, but let me say -- let me ask you this: would you say  
15 that there is -- is there a safety function for the operator  
16 to verify the proper completion of the design for any --

17           MR. ROSSI: I would say there is a safety function  
18 for him to do that, yes, but whether it's as important to  
19 design the equipment to high standards for just verifying  
20 that the rods are in, as for making sure they go in in the  
21 first place, I have to say that the most important thing is  
22 to make sure the rods go in.

23           That's the philosophy. Now, as to what is and  
24 isn't used in the EOPs, I believe -- you know, I've not been  
25 involved much in the EOPs, but I think the EOPs are sort of





1 written at various levels. They should draw the operator's  
2 attention to all the equipment that might be there, and be  
3 written in a way so that if a lot of that stuff has failed,  
4 they can go to other levels to do whatever they have to do.

5 I think, on Nine Mile, that they were able to -- I  
6 believe that they were able to verify that the power was  
7 down, probably from a number of different ways. I mean,  
8 they must have known that the turbine had tripped. They  
9 must have known the power level, so they had other, diverse  
10 ways of figuring out how to verify plant shutdown.

11 MR. CONTE: Okay. If these indicators -- once  
12 again, I mentioned having a need to clarify that these  
13 indicators and parameters are not needed for the safety  
14 function; in other words, to initiate an ECCS or to initiate  
15 a scram.

16 They are for verifying the completion of those  
17 safety functions.

18 Would you say that it's fair game than any  
19 instrumentation parameter that fits that definition would be  
20 in this "important to safety" area?

21 MR. ROSSI: It's clearly in the -- by my  
22 understanding of what I would mean by "important to safety,"  
23 it's clearly important to safety but not safety-related.

24 MR. CONTE: When you say "not safety-related," you  
25 don't have to have the full pedigree design.



1 MR. ROSSI: It doesn't have to be redundant,  
2 doesn't have to be on Class 1E power, doesn't have to be  
3 seismically qualified, that kind of stuff.

4 Now, the way things are today, the important to  
5 safety things are not further subdivided. One could  
6 conceivably have more specific requirements for things like  
7 rod position.

8 I mean one could require some redundancy in the  
9 rod position, some redundancy in the power supplies, and  
10 that kind of thing, but to my knowledge, I don't think we do  
11 that at all today.

12 MR. CONTE: Okay.

13 MR. ROSSI: Whether it's necessary or not, you  
14 know, I suspect that it's not necessary.

15 MR. CONTE: You indicated you are not that  
16 familiar with EOPs. Can you answer the question, does the  
17 staff have a position on the relationship of the EOPs being  
18 able to be implemented without safety-related equipment?

19 MR. ROSSI: I don't know the position on that. I  
20 will give you my opinion on what the EOPs ought to do.

21 MR. CONTE: What is that?

22 MR. ROSSI: I think the EOPs ought to allow you to  
23 use anything in the plant, but they ought to make sure that  
24 you know what stuff is safety-related, because the safety-  
25 related stuff is redundant and so forth, but you ought to



1 make use of anything that's there, whether it's safety-  
2 related or not, and so, it would be appropriate, in my mind,  
3 to use non-safety-related stuff, but you've got to use it in  
4 a way so that it gives you reasonable guidance of what you  
5 do if that stuff fails, and I think the EOPs, I believe, are  
6 even written so that if the safety-related stuff fails, you  
7 go to another level of looking at whether safety functions  
8 are being accomplished or not.

9           And I would assume -- again, I'm not an expert on  
10 EOP, so I'm giving you some mixtures of opinion and what I  
11 really know -- that the EOPs would give you various  
12 alternative things to look at to be sure the reactor is shut  
13 down.

14           I mean you can look at rod positions to see that  
15 the rods are in. You can look at the power level,  
16 measurements in the core, from all the various ranges of  
17 power measurements.

18           You can look at what's happening to pressure level  
19 and temperature in the reactor vessel, whether the turbines  
20 trip, whether you've got steam flow going out steam bypass  
21 valves.

22           There are many ways that you can tell, even with a  
23 lot of failures, whether the reactor is shut down. You've  
24 got lots of different things to look at.

25           MR. CONTE: Once again, going back to your



1 philosophy that you espoused previously, if the parameter is  
2 causing a trip, safety-grade, if it's used to verify the  
3 reactor shutdown, it will have some additional measures on  
4 it, as reflected in the "important to safety" concept.

5 MR. ROSSI: Yes. And some may be so important  
6 that you need it for -- if it's absolutely required for  
7 operator actions in the post-accident followup, if it's  
8 required, there isn't any choice but to have it, then it  
9 ought to be even safety-related.

10 MR. CONTE: Okay.

11 MR. ROSSI: And you know, you have to make  
12 judgments on where you draw the line. It's a little fuzzy.

13 MR. CONTE: From your vantage point, are you aware  
14 of an integrated review of the EOPs versus Reg. Guide 197,  
15 the hardware versus --

16 MR. ROSSI: I would not have been involved in  
17 that. You know, I'm just not involved enough to be able to  
18 answer that question.

19 MR. CONTE: Okay.

20 Any questions on this topic of the EOPs and Reg.  
21 Guide 197 and the Salem ATWS?

22 [No response.]

23 MR. CONTE: Yes. There's been a number -- in  
24 fact, once again, this morning, I just got my hands on the  
25 Information Notice 88-05, which talks about the loss of





1 annunciators at three plants in 1988.

2 MR. ROSSI: The fire problems?

3 MR. CONTE: The fire problems. And there again,  
4 the Information Notice focuses on some of the commonalities,  
5 the same manufacturer on the power supplies.

6 No EOP for loss of annunciators. That's a little  
7 surprising in light of all these precursor events.

8 MR. ROSSI: They have no EOP?

9 MR. CONTE: Apparently, all those three plants  
10 have that common problem, no emergency procedures.

11 Now, they may -- I guess the question, in my mind,  
12 you know, maybe there was an alarm response, maybe there was  
13 an abnormal procedure, or maybe the procedure wasn't that  
14 detailed enough.

15 You know, what's it mean in the Information Notice  
16 when it says there is no emergency procedure? Is that  
17 different from an abnormal?

18 MR. ROSSI: I don't know the answer to your  
19 question, even though I'm sure I signed the Information  
20 Notice. I just don't know.

21 MR. CONTE: Okay.

22 Is the staff -- in light of that event and, I  
23 guess, the Millstone Two, take us back a month, before the  
24 Nine Mile Two event. What were you doing, your division  
25 doing, with respect to this issue on loss of annunciators,



1 in light of 88-05 and the recent Millstone?

2 MR. ROSSI: I believe Ashok Thadani was asked by  
3 Murley after the Millstone loss of annunciators to go look  
4 at whether we ought to be doing more with annunciators, but  
5 he can --

6 MR. CONTE: He's coming at 4:30.

7 MR. ROSSI: Yes, he's coming in at 4:30. I know  
8 I've talked with him.

9 MR. CONTE: Okay.

10 MR. ROSSI: I don't know that we're doing anything  
11 on -- on the Millstone one. Let's see. I don't remember  
12 offhand what caused that, the Millstone loss.

13 MR. CONTE: I don't remember either. I've got a  
14 question in my notes.

15 MR. ROSSI: I think it went on for a longer time,  
16 as I recall. It was a much longer time. I think it was in  
17 the power supplies. I think they were the ones that --  
18 these events all get sort of mixed up.

19 I think they had some power supply failures, and  
20 they replaced the power supplies, but my recollection is  
21 that that one, that event lasted a lot longer than Nine  
22 Mile, and as I recall -- again, I'm trying to think back on  
23 Millstone -- I think they just continued to run the plant at  
24 full power, and they put additional people in to watch the  
25 meters and so forth, in case they had further problems, and



1 were careful not to do anything that might cause a  
2 transient, and in fact, they had no -- they had no problem.

3 Even Nine Mile I don't think -- Nine Mile, in  
4 spite of the fact that they lost all this stuff, had no big  
5 safety problem that developed.

6 MR. CONTE: Well, we're still looking at that.  
7 Obviously, the reactor was shut down.

8 MR. ROSSI: The reactor got shut down, and you  
9 know, of course, they got them back in 30 minutes. Thirty  
10 minutes after the loss of the annunciators, they basically  
11 had everything working again.

12 MR. CONTE: We're looking at the safety  
13 implications had that power supply been out, had all those  
14 power supplies been out longer than just --

15 MR. ROSSI: Well, the hypothesis, as I'm sure  
16 you're aware of, up until now, has been that, yes, the  
17 annunciators are important, but they are not essential for  
18 mitigating events and accidents and getting the plant to a  
19 core safe shutdown situation, that whatever is in Reg. Guide  
20 197 is sufficient.

21 The annunciators are not in Reg. Guide 197, and  
22 presumably, at the time Reg. Guide 197 was -- was written,  
23 that was thought through at the time.

24 MR. CONTE: Okay.

25 MR. ROSSI: We may change our opinion now, but it



1 was, I'm sure, considered.

2 MR. CONTE: Did you have a question?

3 [No response.]

4 MR. CONTE: Okay. The next question deals with  
5 the depth of your interface with the other NRR branches and  
6 the review of all this. Let me try to focus all this. Your  
7 generic organization issues a generic communication, I  
8 guess, the bulletin and information notice.

9 The bulletins solicit a reponse. The staff does  
10 something with that response. It could be a regional  
11 effort, it could be an NRR effort. Could you describe that?

12 MR. ROSSI: Well, recently, we have written a  
13 number of bulletins and maybe even generic letters that  
14 require a response back from the licensee verifying that he  
15 has taken the actions that have been requested or describing  
16 alternatives. And there have been conscious decisions that  
17 that's all we would do, that we would not review or inspect  
18 to make sure they did it -- that they'd come back and say  
19 under oath and affirmation that they had adopted all the  
20 requests in the generic communication. Then we would audit,  
21 if we wanted to or we would follow-up, if they had an event  
22 that maybe looked like they hadn't done what they told us  
23 they'd done. The premise is that they are unlikely to lie  
24 to us because if they do, we'll find out about it, and  
25 they're just not very likely to do it.





1           MR. CONTE: But, for a response that does come in,  
2 how do you assure a consistency of review amongst the staff,  
3 especially in the regions?

4           MR. ROSSI: There's a lead project manager who is  
5 supposed to coordinate the determination of whether those  
6 things are closed out.

7           The current situation is that if we want an  
8 inspection, we write a temporary inspection document,  
9 temporary inspection procedure, and we send it to the  
10 regions, and that provides the consistency. Because if we  
11 want the regions to inspect, then we prepare a temporary  
12 inspection instruction and that provides the consistency for  
13 the regions.

14           The reviews -- I'm usually not involved in reviews  
15 done within NRR, but they're coordinated by a lead project  
16 manager and they usually have technical reviewers that are  
17 managed by section leaders and branch chiefs, and that's  
18 part of their job, is to make sure things are done  
19 consistently. And audits and questions raised by inspectors  
20 -- I'm sure there is some inconsistency, as you must know,  
21 having presumably been an inspector, that inspectors can do  
22 a moderate amount of things without their management getting  
23 involved. But, at some point, if they're inconsistent in  
24 doing audits or doing their day-to-day inspections, it may  
25 get raised to -- back to the regional management. And if



1 the regional management has questions, it will come back to  
2 NRR. And that's, you know -- get answers to them. And  
3 that's the mechanism for consistency. But for -- for  
4 required inspections, there's supposed to be a procedure --  
5 temporary inspection, TI's they're called, to tell the  
6 regions what to do.

7 MR. CONTE: The acceptance criteria for either  
8 review or an inspection is really generated by another  
9 branch, or another division in NRR?

10 MR. ROSSI: Yes. That's pretty much the  
11 situation, right.

12 MR. CONTE: Okay. For the inspection in the five  
13 regions, it's controlled by the temporary inspection. And  
14 for reviews, you say that you may or may not have written  
15 criteria, but it's at least managed.

16 MR. ROSSI: There's a lead project manager that's  
17 supposed to be responsible for making sure all the work gets  
18 done. There will be branches that are involve in it. In  
19 some cases, the lead project manager -- all he has to do is  
20 make sure the licensee sends in a response that says you did  
21 what we requested them to do, and they can close it.  
22 Because, you know, that makes reasonably efficient use of  
23 NRC resources.

24 MR. CONTE: Is there anything else you have to  
25 offer about your interface with the divisions, branches and



1 NRR?

2 MR. ROSSI: Well, we -- it depends on the specific  
3 case. I mean, if we get an AEOD report of any sort over to  
4 NRR, we -- if it's got suggestions and recommendations in  
5 it, we review the suggestions and recommendations. Are  
6 division may, in some cases, make a decision on what to do.  
7 The more complicated situations, we do indeed involve the  
8 other branches in it. And, depending on how complicated it  
9 is, we'll get other branches to concur.

10 Generally, what I do is if it's a fairly straight  
11 forward, factual thing that AEOD is giving us, and they want  
12 an information notice, and it just describes the facts that  
13 would occur and the series of events, we would probably not  
14 involve other branches in NRR. We would take that  
15 information and, if it appears factually correct, we may put  
16 it out as an information notice, and work with AEOD on it.

17 If it's something that has implications as to sort  
18 of an overall philosophy of what should be done about  
19 events, then we would normally go to the Technical Review  
20 Branch, to make sure they don't disagree with the sort of  
21 philosophy that's espoused by the AEOD report.

22 MR. CONTE: Okay. Anything else on the interface  
23 -- this division with the other organizations?

24 MR. ROSSI: We have a lot of interfaces. You  
25 know, bulletins can be originated in other divisions. They



1 frequently are. Like on steam generator tube problems,  
2 other divisions may decide that a bulletin is needed. And  
3 our division gets involved to -- sometimes we will -- we'll  
4 disagree with that. So, we'll go back and tell them we  
5 don't think it warrants a bulletin and an information notice  
6 is enough. And if there continues to be disagreement, that  
7 will get raised up to Bill Russell or Tom Murley or somebody  
8 like that to make a decision.

9           If a decision is made that we believe a bulletin  
10 is appropriate, then our division will help the initiating  
11 division prepare the bulletin, prepare the CRGR package and  
12 will go to the CRGR meeting with the division to help defend  
13 the bulletin and will, you know, help write it so it's  
14 clear. And we'll have input into how to request actions and  
15 all that. So we do a lot of interfacing with other  
16 divisions on both information notices and bulletins.

17           A lot of information notices are originated by  
18 other divisions and then they have to come through our  
19 division and we help them in some cases, and in other cases,  
20 we will decide that we don't think an information notice is  
21 necessary, and we many times tell them that.

22           MR. CONTE: Okay. Who has the final decision if  
23 there's an argument between your division and the technical  
24 divisions, as to whether an information notice goes out? Is  
25 that escalated to Murley?





1 MR. ROSSI: Yes. Yes, I mean, it can get  
2 escalated however far up somebody wants to take it. I mean,  
3 the first level would be Bill Russell.

4 MR. CONTE: Bill Russell. Okay.

5 MR. ROSSI: I mean, sometimes it can get just  
6 raised to the division director level. Because if a couple  
7 of branch chiefs are arguing about whether a notice should  
8 or should not go out and they can't agree, then they'll  
9 bring it go the division directors and they'll talk about  
10 it, and then it can go to Russell, and whatever.

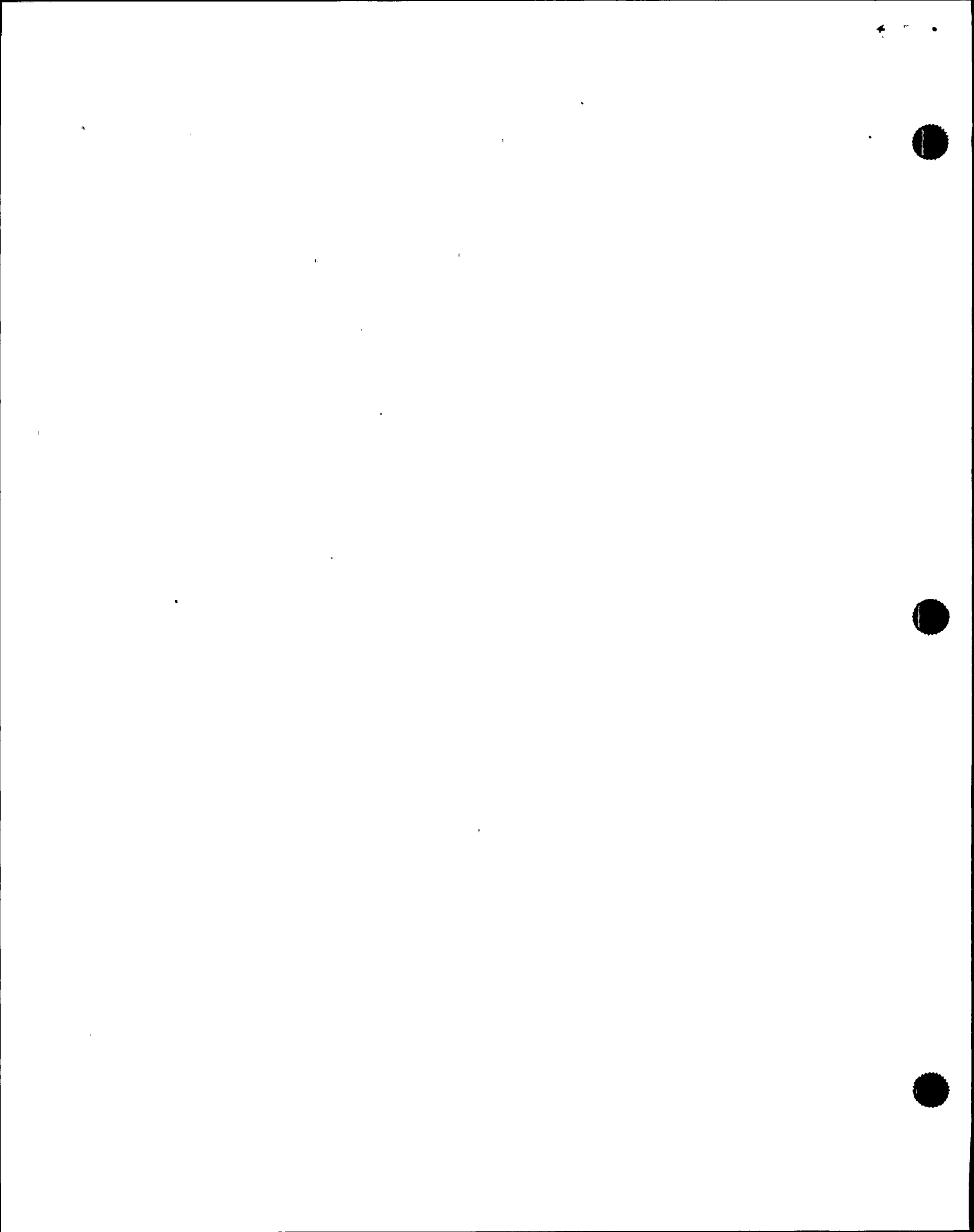
11 Sometimes we are told by higher level management,  
12 on certain issues, to put out an information notice for a  
13 bulletin. I mean, that's happened.

14 MR. KAUFFMAN: Do you have anything else to offer  
15 in any of thee areas that we've covered, either positive or  
16 negative?

17 MR. ROSSI: No. Can't think of anything.

18 MR. KAUFFMAN: Any questions?

19 MR. ROSSI: I think one thing you ought to look  
20 very carefully at, I guess, is the degree to which the  
21 enunciators are or are not required to follow the course of  
22 an accident. You know, I mean, the philosophy clearly has  
23 been that the automatic stuff is enough to take care of the  
24 immediate problems that occur when you have an event or an  
25 accident.



1 I guess the philosophy is that the post-accident  
2 monitoring equipment is sufficient to follow the course of  
3 an accident until the plant's in safe shutdown, and since  
4 the enunciators are not in either of those two categories,  
5 the question is, should they be? I mean, based on, you  
6 know, what happened on this event, were they important  
7 enough to -- the post-accident or event situation, to  
8 require that they either be safety related or have other  
9 requirements on them.

10 MR. KAUFFMAN: Okay. Thank you for the  
11 suggestion. I guess if that's all you have to say, then  
12 we'll go off the record.

13 [Whereupon, at 12:10 p.m., the interview was  
14 concluded.]

15

16

17

18

19

20

21

22

23

24

25



REPORTER'S CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission

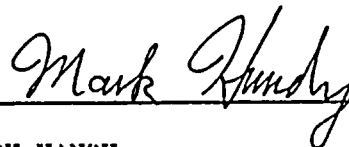
in the matter of:

NAME OF PROCEEDING: Charles E. Rossi

DOCKET NUMBER:

PLACE OF PROCEEDING: Bethesda, Maryland

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.



---

MARK HANDY  
Official Reporter  
Ann Riley & Associates, Ltd.

