BROOKHAVEN NATIONAL LABORATORY
ASSOCIATED UNIVERSITIES, INC.
Upton, New York 11973

Department of Nuclear Energy (516) 345-2144

January 7, 1980

POOR ORIGINAL

Mr. Robert L. Ferguson
Plant Systems Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Bob:

I have reviewed, in detail, the present options to help expedite the completion of the supplement and design backlog in our fire protection program. As we have discussed, it is my opinion that this new emphasis can be best met by reducing the time spent in two areas. First, excessive delays in written communications have been experienced due to mailing time. We have, in the past, attempted to use a commercial courier service but have found the expense to require its limited use. In addition this method still requires a 24 hour turn around period. Therefore, to expedite the documentation of the programs reviews, we have now rented a telecopy machine, at a cost of $40 a month. This unit is now installed and operating at the New York headquarters of Gage Babcock and Associates. This now allows Brookhaven National Laboratory, its consultants (Gage Babcock and Rolf Jensen), and the Nuclear Regulatory Commission (NRC) to send information by the telephone at an approximate rate of 6 minutes per page. I believe that this solution now makes mailing delays a non-problem area.

The second area that can result in a reduction in time is that of the actual review of licensee submittals. It is my conclusion that the only present option available to use is to increase the short term manpower level. This, in addition to our past efforts to reduce total review time:

- o Detailed itemized scheduling,
- o Increased NRC/BNL management involvement,
- o Increase from 3 fire protection engineers at a half time level to full time involvement

will force the reviews to an asymptote of minimum review time without affecting the quality of the safety evaluations. If we attempt further time reductions by a reduced review on each item it is my opinion that the completeness of the results will suffer. I am now requesting contract ammendments with Rolf Jensen and Gage Babcock to meet the requirements recently prescribed by the staff.

1738 099

A005
10

8001140 491

This personnel increase must be pursued with caution since a nonsystematic approach can result in a reduction of output due to time spent in training new engineers. BNL will be contracting for the full time services of Mr. Barnes of Gage Babcock & Associates for a period of 3 months, to start as soon as the contract ammendment is processed. Mr. Barnes is presently the only full time available qualified fire protection engineer since he has worked under contract to BNL and directly to DSS for their fire protection program. He is, therefore, familiar with the regulatory needs. Mr. Barnes will help directly with the reviews of supplemental and design items. Additionally, I have requested the Rolf Jensen & Associates contract to now include an additional 1.5 man months of on-call assistance. Mr. MacDougall and myself have reviewed numerous company resumes and selected Mr. Pennel and Mr. March as the individuals to be available to BNL/NRC as the need arises. Due to their lack of past direct involvement in the NRC review, their talents will be used to help in the analysis of those subtasks that are directly related to conclusions being drawn on plant reviews (i.e. temperature change due to CO_2 actuations, water shields, separation, etc.). This will help free the remaining members of our team to work more fully on the backlog problem.

With this short term, 3 months, increase of fire protection engineering capability there will be an additional requirement for plant system engineers. To meet this need I have made available two members of my staff. Mr. R. Smith will be available in approximately 2 weeks at a full time level, if needed. Also, Mr. V. Lettieri will devote part of his time to the project provided the need arises.

It is my hope that these changes to our initially proposed commitments to the project will help the staff meet its objectives. We will work to speed the completion of the existing schedule of backlogged items over the next months, but will continue to remain flexible to the NRC's plant review priorities. All efforts will be devoted to the direct completion of supplemental and design reviews.

It must be noted that existing licensee submittals do not always adequately reflect SER requests for additional technical information. This lack of the needed details has in the past and will continue in the future to increase the review time of the program. In many cases items cannot be closed at this time thus it require an additional review at some later time. This problem has been discussed between us many times. Since additional submittals will be needed in certain cases and since some submittals are presenting facts that require more detailed, generic BNL analysis than initially planned, i.e. new subtasks, I do not feel that the increased short term manpower level will shorten the completion of the program. The best that can be expected is a timely review and response to the present backlog of licensee submittals.

This second increase in manpower, the first being the change from half time consultants to full time, will cause BNL's present funding to be exhausted prior to the end of the fiscal year. My very rough estimate is

POOR ORIGINAL
1738 100

that BNL will be now forced to terminate its fire protection consultant contracts in March. Additionally the remaining funding will not cover the expected long term BNL staff through the end of September. Instead the BNL staff team could be broken up midsummer due to lack of funds. A complicating factor in this problem is that BNL has only been funded to $300,000 which is $30,000 under our agreed upon value for the original proposed 189 program. You have stated that at least this difference of $30,000 will be forthcoming. I would appreciate you looking into its status.

This foreshortening of the originally agreed upon contract will, in my judgment, not allow the completion of all licensing actions or subtasks. Presently, I request DOR to review their full needs in this area for FY 1980 and inform me as to our near future direction. If it is desired to return for the rest of FY 1980 to the level of effort prior to this most recent short term increase, I estimate an additional need of $115,000, not including the $30,000 we are now awaiting.

I hope we can continue to successfully serve you in this and will be looking forward to further discussion on the subject.

Respectfully yours,

Robert E. Hall, Group Leader
Reactor Engineering Analysis

REH:sd
cc.: R. Cerbone
W. Kato
G. Lainas
V. Panciera
A. Romano

POOR ORIGINAL