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

JUN 19 1979

MEMORANDUM FOR: Victor Stello, Jr., Director
Office of Inspection and Enforcement

FROM: Roger J. Mattson, Director
TMI-2 Lessons Learned Task Force

SUBJECT: TASK FORCE REVIEW OF INCIDENT RESPONSE

The TMI-2 "Lessons Learned" task force will be studying the NRC's accident response role and the adequacy of our response capabilities. We will have an NRR dominated perspective, but our area of interest will be broader. This memorandum is to suggest coordination with IE activities in this area. We should also consider together the fundamental question of NRC's role in accident situations. This question needs considerable attention early so that other task force work can proceed.

We request IE participation at a meeting with the Full Lessons Learned task force during the week of June 25, 1979, to discuss the enclosed draft paper and to discuss how we might progress together. The cognizant task force member for this area is Tom Telford (x28102).

Roger J. Mattson

Roger J. Mattson, Director
TMI-2 Lessons Learned Task Force

Enclosure:
NRC Incident Response
Program

cc w/enclosure:
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NRC INCIDENT RESPONSE PROGRAM

Program Objective

The objective of the NRC Incident Response Program is to temporarily reorganize the NRC staff into a configuration that can effectively deal with accidents at NRC licensed facilities.

Objective of this Paper

The intent of this paper is to foster the free exchange of information and ideas between the Office of I&E and the TMI Lessons Learned Task Force.

Background

The L^2 Task Force was established to assess the TMI accident and related activities. The intent is to identify areas where improvements are needed in plant design, operation, and accident response. The Task Force has identified Accident Response as an area where significant improvements can be made by both the NRC and the industry.

The Task Force expects to make specific recommendations on the NRC's accident response role and on management, administrative, and technical capabilities necessary to effectively deal with hazardous conditions that may arise at licensed facilities. The task force will review the current practices for accident response, make comparison with TMI events and provide recommendations.

The Task Force has had the benefit of the May 30, 1979 I&E Commission Briefing on Incident Management. The initial perceptions of the task force are considerably different from many of the I&E positions stated at the Commission Briefing. We request an early meeting between I&E and the Task Force to explore these differing views and to plan further mutual efforts in this area.

NRC Role for TMI-2

Before definitive recommendations can be made on the NRC framework to cope with nuclear accidents, it is necessary to define the exact role to be assumed. The range of authority possible (complete takeover, direct onsite activities using utility personnel, advise and consent with veto prerogative, advise and assist, monitor) is the single factor controlling the resources and facilities required. In the case of TMI, the task force believes the NRC role was markedly different than originally conceived and for which planning was made. Until such time as a Commission policy on incident response is affirmed, (probably after the Presidential and Commission investigation), the adequacy of the NRC's response capabilities can still be evaluated, in part, by comparison to TMI.

Areas of Concern

The following areas follow the format of the I&E briefing to the Commission on Incident Response. The intent here is to provide I&E with an indication of possibly differing views we would like to address.

Notification

A. I&E

Problems getting Licensee response to Region in timely manner. Other notification adequate: Region to HQ (15 min), HQ to Activities Center (3 min), EMT notification (10/15 min).

B. LL Task Force

Requests I&E discussion of Notification requirements and changes effected or proposed.

Initial Response

A. I&E

As planned, Region, HQ, and Incident Center responded as pre-planned.

B. Task Force

Plans need revision; Response depends on items that follow.

Organization

A. I&E

A little more planning at sites and with other agencies needed. HQ operation functioned as planned. Good contact with Congress and outside agencies. Relationship betweem EMT and IRACT good and should be retained.

Problems: Too much carryover of organizational responsibilities to Incident Center. More training and discipline required.

B. Task Force

Organization inadequate to handle emergencies.

1. Crisis Management

2. Review Structure: Analysis
Systems
HP/Radiological
Environmental
Emergency Plans

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3. Interface Structure for: Press/outside
   EMT/IRACT
   Site
   Industry Groups
   Intragroup including NRC non-response staff

4. Clerical and administrative

5. Miscellaneous: 24 hour shifts
   designated individuals

Communications

A. I&E

A few glitches, but mostly as preplanned. Hand-held radios brought to the site on the 31st proved adequate. Problems mostly qualitative. Dedicate lines in place at each control room by June 15, 1979. Investigating other means of communication.

B. Task Force

Inadequate. Need across the board improvements as function of revised Incident Response Plan.

Facilities

A. I&E

Used as planned, but staff larger than planned creating problems with: feeding, housing, noise. Couldn't handle multiple events. Need more space.

B. Task Force

Facilities totally inadequate at HQ and at the site. Possibilities include:

1. Technical staff facilities (a function of revised organization)

2. Prearranged Reactor Simulator for each NSSS on transient and accident codes

3. Technical information area including existing data and access to online data

4. Licensee Onsite Incident Center

Information Resources

A. I&E

Need for real time data. Further training of staff on information currently available. Environmental monitoring information inadequate. Information to EMT for decision inadequate.

B. Task Force

Agree that problems exist but larger. This is single biggest problem, the information available during TMI was too little and unreliable. Consider:

1. "Current" technical data must be available to the NRC staff and NSSS for immediate access.

2. Plant online data from plant computer available to: utility technical staff outside control room, NRC, NSSS, AE, State.

3. Radiological Data

   a. In containment and Auxiliary Building - on-site
   b. Points of release
   c. Off-site

Technical Support

A. I&E

Overwhelmed with support, NRC staff and other Federal agencies. Could use more coordination.

B. Task Force

Technical support staff not adequately identified, trained or drilled prior to event. Technical personnel, while readily available, were given little guidance on what needed to be done. When assignments made, information was not available to perform engineering tasks.

Administrative Support

A. I&E

Excellent response by NRC administrative staff. Possibly more pre-planning for site activities necessary.

B. Task Force

Inadequate pre-planning for contracting, transportation of personnel and supplies, advanced information exchange, copy and report preparation, filing and access to technical data and information needed, general logistics (the logistics such as food were better at trailer city than at NRC).

Information Dissemination

A. I&E

Overall not too bad.

PN's good, good briefings with FDAA.

B. Task Force

Inadequate.

PN's and press releases are not the same thing yet were used as such.