NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

BRIEFING ON INCIDENT RESPONSE PROGRAM

Place - Washington, D. C.

Date - Wednesday, May 30 1979

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BRIEFING ON INCIDENT RESPONSE PROGRAM

Room 1130 1717 H Street, N.W. Washington, D. C.

Wednesday, 30 May 1979

The Commission met, pursuant to notice, at 3:15 p.m.

BEFORE:

DR. JOSEPH M. HENDRIE, Chairman

VICTOR GILINSKY, Commissioner

RICHARD T. KENNEDY, Commissioner

PETER A. BRADFORD, Commissioner

ALSO PRESENT:

- L. Gossick
- J. Davis
- R. Kenneke

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PROCEEDINGS

CHAIRMAN HENDRIE: All right. Once more into the breach, here.

I think maybe I should just note for the record that 5 Commissioner Ahearne is not with us because he is ill today. 6 That leaves me with a reasonably straight face to remark that it seems to me that at least one way I can influence Commissioners 8 is by diseasing them; infecting them.

(Laughter.)

CHAIRMAN HENDRIE: Have a care. "Shoot a germ into the air," and you know how that poem goes. Okay.

The next item on the agenda is a briefing on the Incident Response Program. Briefly, by way of background, this is, I guess, the second of a series of about 6 briefings on major 15 elements of the I&E program.

Back about the first of May -- Well, memory falters; 17 but a while back, there was an update on the resident inspector 18 program. I remember that because I carried around the viewgraph 19 slides to an assortment of hearings, and was disappointed not to 20 be asked about the resident inspector program. So I now look 21 forward to carrying these viewgraph slides around to further hearings, and probably won't be asked about incident response.

Okay. So let's see. This is number 2 in the series. 24 The enforcement program will come along in another few weeks.

MR. DAVIS: The Performance Appraisal Team.

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CHAIRMAN HENDRIE: Oh; that's right. Okay. The Incident Response Program.

MR. GOSSICK: Let me just say a few words to start it off.

(Slide.)

As the Commission is aware, the Three Mile Island accident was the first time that we had occasion to put into effect, on a full-scale basis, the NRC's Incident Response Procedures described in our manual at Chapter 502.

It is clear as a result of this experience that a number of changes and additions to our response plans and capabilities are needed; and indeed, some of these have already been accomplished, or are underway.

The I&E briefing will review the manner in which our response to an incident is planned for in our present manual chapter; how we proceeded in the TMI accident; and some of the more important steps that need to be taken to improve our response capability.

The briefing will not deal, however, with some of the broader institutional policy issues that have been surfaced in connection with TMI. A number of such issues were spelled out in the memorandum that Al Kenneke sent to you on the 18th, having to do with our response planning.

(At 3:19 p.m., Commissioner Kennedy left the room.)
MR. GOSSICK: I will just mention 4 of these areas

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very briefly that need to be addressed.

One, there is the question of NRC operational responsibility; and as you know, questions have been raised concerning NRC responsibility for the operations of the licensee during incident situations. Planning for incident response 'id not consider NRC being directly responsible for the operations. Such direct responsibility would have certain far-ranging impact on the Incident Response Program.

The second area is NRC on-site activities. Closely related to the policy matter of operational responsibility is the matter of on-site activities actually performed by NRC.

Traditionally, NRC has not been looked upon as a source of resources in responding to an incident. Hence, NRC provided only assistance, but rapidly withdrew to its regulatory role as resources became available from the other agencies.

Thirdly, the NRC relationship to the total response. Basically, here, the question is: Who is responsible for the total response -- licensee, federal, state and local -- due to an incident or accident? The limits of responsibility of NRC must be clear, and I think there is room for additional clarity in the present situation.

(At 3:20 p.m., Commissioner Kennedy reentered the room.)

MR. GOSSICK: For example, under the IRAP, assistance is requested. Does NRC direct that agency's activity, or does

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that agency perform a predetermined function on which NRC relies?

I think there is a fourth area that the Commission may wish to consider, and that is the interaction role of the Commission and the staff, in this case, as carried out by the Executive Management Team, in responding to an accident.

We have made certain assumptions in our Manual chapter about how that relationship is to work. I think any experience we had in TMI might cause us to want to take another look at that and ask yourselves whether that is the way you want it, or whether you want to, in effect, take the functions that the EMT was carrying out, or whatever. I think that needs to be asked.

perhaps another related part of it is the physical and related aspects of the actions; and certainly the mode of operation, under the Sunshine Act; whether it would be easier to do it right there in the center, with the recorders on, I don't know. That is something we probably ought to talk about.

With that, I'll ask John to go ahead and give the briefing.

MR. DAVIS: Thank you. Just a couple of reminders.

We are going to talk about 2 aspects of the Incident Response

Program today. First we will talk about the Incident Response

Program planning as it existed predating the TMI accident.

Secondly, we will make some general comments on the implementation of the program during the Three Mile Island accident, and

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1 some early impressions concerning this implementation.

We will be making comments on the program implementation, and our comments really speak to its implementation within the confines of the plant; that is, was it implemented as pre-5 planned?

Today, the staff has not planned to comment in detail 7 on the adequacy of this preplanning. As I am sure you know, the 8 Incident Response Program is defined and derived from NRC Manual Chapter NRC-0502. That chapter makes it clear that the incident response program of the NRC is aimed at incidents which occur as a result of NRC-licensed activities.

Our current guidance for national level emergency 13 planning is not a part of what we will be talking about today, 14 and it is not a part currently of 0502.

The Office of Inspection and Enforcement, under this 16 Manual chapter, maintains the overall program coordination with 17 specific functions assigned to other offices. Under 0502, we 18 have the following assignments:

The EDO is the director of the Executive Management 20 Team, and is responsible for the functioning of the NRC response 21 organization. The Office of Inspection and Enforcement, the 22 director is a member of the EMT; the office leads in development 23 and coordination of the Incident Response Program and maintains 24 an operations center, provides administrative staff for the 25 Incident Response Program, conducts drills, maintains procedure

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for the operations center, maintains operations centers at headquarters and in the region, develops information sources, and ensures response capabilities of the regions.

The 2 licensing offices, NRR and NMSS, the directors are members of the EMT. They provide technical staff to the centers. They establish licensee incident reporting requirements, perform safety planning to supplement the Incident Response Program, develop safeguards contingency planning, and develop information sources and review the procedures of the centers.

Public Affairs provides staff to the co cer and state programs provide staff to the center.

The basic concept behind the Incident Response Program is that the offices assume their ongoing responsibility as soon as possible.

response until the Executive Management Team is available.

After that is available, that team assumes full responsibility for the incident response.

The purpose of our planning, as the overall planning is performed by I&E, is basically to move the office staffs into a configuration or a physical location where they can carry out their responsibilities most effectively in responding to an incident.

(Slide.)

Now, Mr. Thompson will brief in detail on the

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Incident Response Program.

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MR. THOMPSON: The extent of NRC response to incidents is predicated on a 4-level assessment of protection to public nealth and safety, as set forth in the next slide.

(Slide.)

For Level IV incidents which do not appear on the 7 slide, there is essentially no threat to public health and safety. 8 For these types of incidents, ther: ; no onset response by NRC 9 anticipated or required.

For a Level III incident, there is a remote threat to public health and safety that needs checking. We do provide regional response on the scene without headquarters response, explicitly identified for a Level III incident.

For a Level II incident --

COMMISSIONER GILINSKY: Could you give me an example 16 of a Level III incident?

MR. THOMPSON: Yes; radioactive spills on the highway. There is a remote threat to public health and safety in most of these, but for a variety of reasons --

COMMISSIONER KENNEDY: That is Level III or II? MR. THOMPSON: It could be a II, but most of those that we see are Level III, for which we provide NRC response on 23 the scene, partly as a matter of reassuring the public and partly as a means to provide further assessment of whether there 25 are more serious hazards involved than are apparent at the

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1 beginning.

COMMISSIONER BRADFORD: What would Oyster Creek have been?

MR. THOMPSON: I would imagine III initially, with the 5 possible overtones of a possible II, but as it developed, I think it would have remained a III. In those early stages on Oyster Creek, we had such limited information it would have been difficult for us to say "III" or "II." I think we would have called it a III to begin with, with the possibility of going into a II.

Now, in a Level II incident, we see no immediate threat to public health and safety, but recognize a potential hazardous condition, if degradation occurs in the conditions as they are identified initially.

For a Level II response, we do have regional response expected and required, plus headquarters alert, and a standby in the operations center for more active involvement by headquarters staff.

COMMISSIONER GILINSKY: Can you give me an example of a Level II, or a hypothetical example?

MR. THOMPSON: I think probably GE, Wilmington, would 21 be a good Level II example, to stay away from reactors. No imme-22 diate threat to public health and safety, but the possibility.

COMMISSIONER GILINSKY: Are you saying Oyster Creek 24 was a III, but GE, Wilmington, was a II?

MR. THOMPSON: At the time we got our initial

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notification on Oyster Creek, I think we would have assessed it as a III: No immediate threat.

COMMISSIONER KENNEDY: At the time you got it, the reactor was shut down.

MR. THOMPSON: That's correct; and in a safe configuration. There was no immediate threat. In the GE, Wilmington, case we didn't know what was going to transpire. As you will recall, we were going through quite an exercise on contingency planning if the situation degraded.

COMMISSIONER GILINSKY: But the fuel was uranium oxide.

MR. THOMPSON: But you recall we were also concerned about reassurance of the public on health hazards, and what would we do in the event the threat was carried out.

COMMISSIONER GILINSKY: I must say I am puzzled that you would regard that as more serious than almost any event in a reactor.

MR. THOMPSON. Oh, no. I wouldn't say "than almost any event in a reactor."

COMMISSIONER GILINSKY: I know there are events that you would regard as more serious, but I am saying that it seems to me that almost any event in a reactor, which after all has go a large inventory of radioactive material under high pressure and high temperature and so on --

MR. THOMPSON: It is a judgment call on the potential

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I for degradation and the immediacy of threat, and there is a judgment call.

If you want to go back in history a little further, 4 I believe that we probably would have assessed, at least ini-5 tially, the Browns Ferry fire as a Level II, because there was nc immediate threat --

'MMISSIONER GILINSKY: I guess I find it odd that 8 you would put the Wilmington incident in the same category as the 9 Browns Ferry. Let me hear what a Level I is.

MR. THOMPSON: Level I is one involving an actual hazard in existence, or an imminent threat of impact on public health and safety.

COMMISSIONER BRADFORD: Now, did we start out with TMI as though it were a II or a I?

MR. THOMPSON: We considered it a I right from the start.

COMMISSIONER BRADFORD: What about Fort St. Vrain? MR. THOMPSON: I believe we considered Fort St. Vrain 19 as a "I" to start out with, and then took it down.

MR. DAVIS: It started as a "I" and then degraded as we got more information.

MR. THOMPSON: There may be a distinction without a difference here on Levels I and II, inasmuch as in both Level I and II cases, we anticipate response by headquarters staff. It is the immediac, with which those forces are brought to bear

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that distinguishes between a "I" and a II. Essentially, however, the response of the staff is the same, with not quite the urgency associated with a II.

COMMISSIONER GILINSKY: Who assigns these levels? MR. THOMPSON: Generally, the first person receiving notification at headquarters makes an initial assessment of it. Normally, that decision is made by the Director of I&E; and it is really implemented in terms of whether to activate the center, or to place it on an alert status.

MR. DAVIS: That is a little general, of course, depending on what the preliminary information is. The first inclination, unless it is very apparent that it is a "I", is to go into what we call "standby," which means that my staff moves into the operations center and begins to operate the center, and I call the other EMT members.

And then as new, additional information comes in, I will recall them, and we will make a decision as to whether to go into an activation alert, as opposed to a standby alert. the center is really working when you are in standby. The recorders are working, and my staff is there. But the support staffs from other offices are not all there.

MR. GOSSICK: I can assure you that whoever on the EMT assigns the highest evaluation, that's going to be the way we'll proceed. We would rather go that way and then necessarily degrade than start out lower, knowing that it is going up.

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If Harold Denton says he thinks it is more inconvenient than gathering the EMT, then we will do that.

MR. TROMPSON: Before leaving this slide, let me simply note that although we have indicated national level emergencies, which are coordinated by the Federal Preparedness Agency on the slide, today's briefing does not deal with those national level emergencies.

COMMISSIONER GILINSKY: What is FPA?

MR. THOMPSON: Federal Preparedness Agency.

CHAIRMAN HENDRIE: That's when you take Charlie Team, is it, and head south?

MR. THOMPSON: In passing, it's worthy of note that the emerging organization of FEMA will involve FPA as well as some other agencies to be put into it.

(Slide.)

On the next slide, I have listed the incident response objectives which have served as the basis for the preparation of Manual Chapter 0502. The 4 functions identified as objectives for incident response, I believe, are pretty clear to most people who have been involved in recent incidents.

Our informing job involves a number of different
audiences, however. Not only does the staff feel an obligation
to keep the Commissioners and their staffs informed of the
status of the events, but increasingly, we find intimate interest
on the part of specific members of Congress, their staffs, the

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White House, and a number of other agencies. Obviously, Mr.

Pouchard and his staff are nearly always involved in providing
information to the media and through them, to the public.

The evaluation function: We have been questioned on this slide at other times on why the evaluation function doesn't come first, before informing. To some extent that is, of course, provided, in that there must be a decision made as to whether we are going to exercise our information dissemination, such as PM or telephone calls.

And that is a f of evaluation, but it is a rather superficial evaluation to reach an initial decision on how promptly we should proceed with our information dissemination.

The evaluation function, of course, is a dynamic evaluation of data as it comes in. This was readily evident throughout the TMI experience, as data came in and became clear, that earlier assessments of the situation were changing, and required again reiterating back through the informing chain.

The assessment of the seriousness of an event changes with time as more information is evaluated, and also affects, of course, the determination of what alternatives might be exercised to cope with the event.

In the "assist" function, we see a role, a very terporal role, associated with providing assistance on site to the
licensee and his staff, a continuing assist role of the state
and local agencies, and obviously, an obligation we have to the

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general public.

The last item we have on this slide, indicating the direction of activities on the part of NRC, is a "last resort" item which is exercised, of course, under the authority vested in the Commission in the Atomic Energy Act, and is brought to bear in the event of licensee failure to provide proper protection for public health and safety.

On the next slide, I have 2 points that I wish to make concerning the role of NRC in responding to incidents as we had planned for these incidents in the past.

(Slide.)

The first one is a rather general one, and it is under that one that some actions that were taken in the TMI case would most likely fall: To be sure that all the proper actions are taken by the parties involved to protect public health and safety, environment and property.

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And obviously to keep the public informed of actual potential hazards to health and safety arising from such incidents.

I have a series of slides now that show an arrangement of the organizational structure in the incident response organization.

(Slide.)

The first one I provide very quickly in passing to identify those members of the staff who participate in the various organizational segments of our response organization. The executive management team involves the EDO and the directors of I&E and the two licensing offices. They are supported by the Incident Response Action Coordination Team referred to demonically as IRACT.

members at any given moment, but from these senior staff members. The appropriate responding organizational units are pulled from their normal home and integrated into the incident response organization. In the case of the Three Mile Island incident, the leader of the IRACT team was Norm Moseley, the director of the division of reactor operations and inspection with participation, as you know, by Vic Stello from DRR and NRR. NMSS i volvement in this particular event was very minimal and the support provided by other senior members of the staff, NIE and NRR, was part of the IRACT

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support staff to the lower left of that large one.

The operations staff, which normally functions under

3 my direction, is the high paid goffers who provide the

4 operational capability of the center itself to see that it's

properly supplied to provide administrative and logistical

6 support to the IRACT support staff, IRACT and EMT.

7 I've omitted a discussion of the information assess-

8 ment team in this briefing, not because I consider it an

unimportant part of the organization, but because its

10 applicability in TMI was non-existent, for all practical

11 purposes.

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12 The next slide -

(Slide.)

- shows much these same boxes in a slightly

15 different format and provides the basis on which our planning

16 has proceeded in the past with each of the types of functions

17 for these various organizational units specified to the side

18 and above the boxes.

In this planning, we have forecast the role of the

20 commission proper and its immediate staff as to the

21 articulation of policy with decision-making and in response to

22 the incident vested in the executive management team housed

23 a, the center.

The implementation of the decisions reached by EMT

25 to be taken care of by IRACT and the support staffs that

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function under it -

COMMISSIONER BRADFORD: Is it right then that research was not involved in this organization at the outset? 3 MR. THOMPSON: Research is part of the IRACT support staff in any incident response as is any portion of the NRC 5 staff. But Saul Levine, for example, is not a pre-identified 6 member of IRACT or of EMT, though he could be called upon under 0502 to respond to any incident. And as you well know, 8 Saul Levine and his staff was very supportive throughout this entire effort, as were a number of other portions of the 10 staff not explicitly identified. 11 Standards was a big supporter, for example. 12 MR. GOSSICK: IP and OCA and PA and the whole thing. 13 MR. THOMPSON: The manual chapter does identify the 14 available on call of all the other portions of the staff to 15 respond to a particular event on an ad hoc basis. 16 (Slide.) 17 18

The next slide elaborates a little bit further on the functions of the executive management team in the initial phases of response to an incident and as it proceeds over a longer period of time.

I don't propose to read through these functions. You have them in the handout.

COMI.SSIONER KENNEDY: What does policy coordination with other agency mean?

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1	MR. THOMPSON: For example, we ran into some questions
2	on TMI on who provides coordination of environmental
3	monitoring at the site? And as you will recall, there was a
4	period of time where it was not completely clear, and it was
5	ultimately resolved with another agency involved in the
0	coordination function.
7	The function of EMT is to provide that kind of
8	liaison with other agency counterparts during the active phase
9	of the incident response.
10	(At 3:40 p.m., Commissioner Bradford leaves the room)
11	MR. GOSSICK: There were some other areas, too,
12	Commissioner Kennedy. We were working directly with the
13	military and control center at the Pentagon on such things as
14	airlift and so forth. As we got into it, though, we found that
15	FDAA really felt that that was their charter. They were able
16	to do it. All the people were just as happy to turn it over
17	to the guys in their center.
18	COMMISSIONER KENNEDY: Coordinating policy with other
19	agencies - I just wasn't quite sure what it means.
20	MR. GOSSICK: We're sorting out some roles under
21	whatever policies exist at that time in that case.
22	(Slide.)

MR. THOMPSON: The next slide provides similar 24 information concerning the IRACT function. This is the team that is normally headed by division directors from the line 25

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offices involved in a particular incident.

In the case of TMI, Norm Moseley and Vic Stello and the staffs that provided support for them.

This is the guts working portion of our instant response organization which provides information to EMT for their evaluation in reaching decisions.

7 (Slide.)

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The next slide we can pass very rapidly. It's the repeat of an organizational chart which shows the relationship of support staff, operations staff, to IRACT and EMT.

(Slide.)

The next slide I put in here for one main purpose:

As I proceed a little further, I'm going to try to

characterize some other things that we experienced during the

extended response to the Three Mile Island incident.

In order to do that, I think it's important to refresh ourselves on the physical layout of the operations center. In particular, I would like to address your attention to the executive room. This is the isolation box into which we put EMT, so they can have quiet and contemplative environments for them to make decisions.

You'll notice that there are three doors to that
room. We seriously had planned for a semi-isolated position
for EMT. One of the flaws in our planning involved the three
doors that are clear on this diagram.

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CHAIRMAN HENDRIE: It's a hallway.

MR. THOMPSON: It became a hallway and a traffic

pattern in a spot where an awful lot of staff sightseers

would stop to see what was going on because it was the hub

of where the action was.

So it was a problem.

The final slide, I've identified a number of different steps that are involved in any incident response. What I propose to do is very hastily run through some of what actually happened in each of these steps in the Three Mile Island accident and some of the lessons that we've seen from I&E's perspective.

I hasten to add that these are rather parochial viewpoints that have not had prior explicit clearance with other offices. We dign't seek them and we have let them know what's going on here. And I believe we have representatives of most of the other major offices that participated in the audience.

I encourage them to challenge me when they have concerns about what I have to say and to add anything that might clarify things for you.

The notification process for TMI, apart from questions that have been raised both here and publicly concerning the promptness or tack of it of notification from licensee to NRC proceeded very much as planned; that is, once

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the regional office was reached, and there were problems in reaching the regional office even after the licensee had made 2 his decision to notify us, the notification from the regional 2 office to headquarters occurred punctually within a matter of 15 minutes. 5 Once the headquarters had been notified by the 6 regional office, within three minutes of the completion of that 7 call, the incident center was operational, the tapes were 8 running, and the staff was in place. 9

The EMT notifications — that is, the notification to the other members of EMT — took place promptly and they assembled in a timely fashion.

COMMISSIONER KENNEDY: What was a timely fashion?

MR. THOMPSON: I don't have specific times right

now, Commissioner Kennedy. I can get them for you. But I

believe it was on the order of 10 minutes, 10 to 15 minutes

we had EMT.

MR. DAVIS: Whatever it took to come from the other building.

20 COMMISSIONER KENNEDY: That's what I wanted to know, 21 the order of time, yes.

COMMISSIONER CILINSKY: Let me ask you here, putting the accident aside for the moment, would you expect a licensee to inform you after a transient of this sort if you discovered that the valves to the auxiliary feedwater had been

Closed?
MR. THOMPSON: Today, certainly. I believe you're
asking, though, in the context of at the time that TMI
occurred.
COMMISSIONER GILINSKY: Yes, just in general. Does
that rise to the level of something?
CHAIRMAN HENDRIE: You mean if the relief valve had
closed?
COMMISSIONER GILINSKY: Just taking the fact -
MR. THOMPSON: Yes, we would expect to be notified.
(At 3:45 p.m., Commissioner Bradford enters the room
MR. THOMPSON: Prior to the TMI accident, I would not
have expected that we be notified in a one- or two-hour time
period. The requirements in the guidance provided licensees
on the timeliness of reporting that type of event calls for
it within 24 hours by telephone.
And a written report, that is, the licensee event
report, follows up immediately with a 14-day definitive
report of what's involved, or a 30-day.
So, yes, I would expect we would have been informed,
but not with the timelines that we now see as appropriats.
COMMISSIONER GILINSKY: And what will we require now?
MR. THOMPSON: One hour.
COMMISSIONER GILINSKY: One hour.
MR. GOSSICK: Not under control.

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MR. THOMPSON: If it's not under control or not 1 readily clear to the status of plant within an hour. Beyond 2 that, a transient which was controlled for which the response 3 was as anticipated, we would expect the report to be within 24 hours. 5 COMMISSIONER GILINSKY: Suppose it was discovered 6 that there be a violation of the technical specifications. 7 MR. THOMPSON: That would be a 24-hour report. 8 COMMISSIONER GILINSKY: That would still be 24 hours. MR. THOMPSON: However, I believe that in today's 10 awareness, not only within the staff but within the industry, 11 I believe there is a generalized sensitivity - now that's 12 a subjective kind of determination. How long that will 13 prevail remains to be seen. 14 As far as requirements are concerned -15 MR. COSSICK: I think that that's a question that 16 we have to look at. 17 MR. THOMPSON: As far as lessons learned about the 18 notification process, it is clear that we need to be more 19 readily available to licensees for notification, apart from 20 the question of whether the licensee notified us promptly 21 or not. 22 There was a period, you may recall, where they had 23 some difficulty reaching us. There was a period during which

we had some difficulty reaching certain senior members of the

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staff on that first morning.

2 We have taken steps to provide better availability

3 of our staff both in the regions and in headquarters by

4 24-hour coverage, both of our operations center and of each

5 of the five regional offices.

6 We had some difficulty reaching a few agencies —

7 difficulty, I say, in a relative sense. It took us slightly

8 over an hour to notify all the agencies that are on our call

9 list. There were a few agencies, three agencies, that we have

10 identified who have subsequently requested to be added to our

notification list on major events. They were FAA, the

12 National Military Command Center, and FDAA, the Federal

13 Disaster Assistance Administration we have added.

We believe it is appropriate to provide means for

15 fast dialing of key people and organizations in the

16 notification list and we will be added auto-dialing to our

17 phones in the incident center which will allow us to call a

18 limited number of key individuals or organizations by speed

19 dialing.

20 The next item on initial response, Region |

21 immediately activated its center and dispatched a team as

22 quickly as it could be assembled and supplied. It departed

23 approximately 55 minutes from first notification received in

24 the region and arrived at the site about one hour and 20

25 minutes later.

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In headquarters, the operations center was activated. I look back in my own memory and it seems to me 2 like it was activated in about ten seconds from the time that 3 Mr. Davis came out of his office. I suspect it was more on the order of three minutes.

Calls were initiated at that time down the notification list and EMT, as I mentioned earlier, assembled in a matter of 10 to 15 minutes. All the notifications to staff members and other agencies were completed in approximately one hour.

With regard to the initial response of NRC staff, we feel from a subjective point of view that the initial response functioned very much as it was pre-planned, the assembly of the staff. The notification lists was very much as we had planned.

With regard to organization at the regional office and at the site, we found, as everybody did, as the Three Mile Island accident evolved over a long period of time, the response was much, much larger than we had anticipated, both in terms of manpower and resources applied.

A lesson we've learned out of that is that we need to do a little more planning for site organizations ahead of time. There was some lack of coordination at the site among several organizations, particularly in the area of environmental monitoring.

We believe that steps can be taken through the Interagency Radiological Assistance Plan and perhaps by other means to improve that in pre-planning.

within headquarters, the organization functioned initially as planned; that is, the EMT members, the IRACT members, the support staff, that were brought to provide assistance to IRACT functioned initially as planned. It was not very long into the Three Mile Island accident that it became very clear that the number of inquiries received directly into the center from outside parties, principally members of Congress and their staffs and others who had legitimate reason to come direct to the center, was overwhelming.

And it became clear that it was appropriate to designate a staff member to provide this kind of contact with outside agencies, and particularly with members of Congress. That position was established very early on Wednesday afternoon and continued to function throughout the actute phase of the response to TMI.

The EMT/IRACT split and division of responsibilities and functions did proceed throughout this Three Mile Island incident very much as it was planned with the addition of the operations status officer.

However, it was clear that there were some lessons to be learned with regard to organization. We believe that

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there is the need for more training and discipline associated with the functions of these two organizations.

In particular, we found that a considerable amount of more or less raw information was being fed to EMT in a format that made it very difficult for them to make any decisions.

Part of that was by the very nature of the evolutionary process in the accident. Part of it was because EMT was frustrated and hungry for facts and sought out information as rapidly as it could get it.

There was some carryover of the pre-existing normal organization of NRC into the EMT/IRACT organization. To the extent that we found some evidence that NRR people would talk to the NRR/EMT members, IE people would talk to the IE/EMT member. There was some difficulty in bringing all the staff to recognize both within EMT and within IRACT and the support staff that EMT is now an organizational entity. And it all goes into all of them together.

Fundamentally, we feel that one lesson that was learned as far as pre-planning is concerned out of Three Mile Island is that basically the relationship between the executive management team and IRACT is a sound concept and should be retained.

There have been a number of statements and judgments reached in the public arena and elsewhere concerning communications in the Three Mile Island incident. Mechanically

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communications proceeded with a few glitches, much as it had been pre-planned. We did have periods of time when we lost contact because a line was dropped.

There was a period of time, a couple periods of time, when saturation of the 717 exchange, the Pennsylvania area code, wasn't counted. There was expansion provided both by virtue of assistance provided to us by the White House and the response from AT&T.

And there were a few mechanical problems associated with communication. We were dependent on one mode of communication. That was the telephone. In spite of the fact that the Forest Service and the Department of Agriculture responded with hand-held radios that were quite useful at the site, when they were called upon, they were in position on the 30th and actually in operation on the 31st.

The NEST team responded from DOE and it was functioning on the 1st of April.

Nevertheless, we feel that the biggest problem associated with communications was less mechanical than qualitative, the ability to convey information on an interpersonal basis and the diversion of manpower necessary in early phases. For example, in Bethesda, when we would seek information from the control room and it would require the man who was holding the telephone to put the handset down to go get the information and thus cut off communications

gsh | effectively, even though mechanically, the line was still 2 sound.

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We think that on the interpersonal basis, the amount of essentially unevaluated data provided to senior staff members, I believe this occurred with Commissioners as well as with EMT, was more than was appropriate. Under the circumstances, I'm not sure we would do it any differently. Nevertheless, there was a problem in communication because those who were in a position of having to make decisions were having to make decisions on the basis of raw data, or very limited data, if they had any.

We've learned some things, obvious; some of them are superficially obvious. We have moved, as I believe all of the Commissioner; are aware, for the establishment of dedicated phones in all the control rooms, and some other telephone communications.

COMMISSIONER GILINSKY: Where do we stand with that?

MR. THOMPSON: I rather suspected you might ask,

Commissioner. Bert Kerr is here today and can give you a

status report as of 11:00 o'clock this morning.

MR. KERR: Yes, sir. I just happen to have a copy of the 11:00 o'clock status report which we can pass out.

As of J1:00 o'clock, there are 13 locations installed and open cional. Also, there are five locations which are in jeopardy as far as meeting the June 1 date is concerned. One of them, as previously reported, is the Zion Power Plant.

We're still having a lack-of-cable problem out

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there which Region III is in contact with the plant people to try to resolve.

We have a similar facility problem at the Beaver Valley Station.

COMMISSIONER BRADFORD: We could probably stand that one, though.

CHAIRMAN HENDRIE: I like the one with the gunfire, Vern.

MR. KERR: Things are going hot and heavy there, I understand, Mr. Chairman.

CHAIRMAN HENDRIF: Tell AT&T to get their armored squads out.

MR. KERR: I really have been looking at the twostrike situation -- one over in Tennessee and one at Vermont
Yankee. I suspect that if any one of these five do not meet
the June 1 date, it will be the Irwin, Tennessee, job, where
the licensee has essentially kickel people out of the plant
before they could install the job.

The Peach Bottom situation --

COMMISSIONER BRADFORD: Why did they do that?

MR. KERR: Reportedly from the licensee, the United Telephone Company management people who were doing the job were causing a rucus at the gate. That's the unofficial report T got as to the reason why they were asked to leave.

I expect AT&T resolved the last problem at Peach

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Bottom, simply a matter of having to convince the independent telephone company that they were going to do this job by

June 1.

COMMISSIONER GILINSKY: It sounds good. I thought the Zion problem had been cleared up.

MR. KERR: I got the report two days ago,

Commissioner, that it had been cleared, as I had reported to

you, and apparently the licensee had another thought. It

involves a \$30,000 cost for the licensee to install isolation

filters on the new cable facilities that are into the plant

before AT&T will activate the cable.

So the only other alternative that would permit us to meet the June 1 date is for them to relinquish two of their existing telephone circuits so we can put the emergency circuit on these facilities until somebody decides whether or not they are going to pay this \$30,000 and get the filters installed.

COMMISSIONER GILINSKY: That would be two out of how many?

MR. KERR: There are 50 circuits in total feeding that plant.

COMMISSIONER GILINSKY: It seems like a reasonable use to be putting them to.

MR. KERR: I'm very optimistic that we're going to meet the June 1st date.

COMMISSIONER KENNEDY: You say there are 50 circuits

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feeding the plant?

MR. KERR: Yes, 50 pair of cables.

And we're asking them to relinquish two cable pairs so we can satisfy the termination of this hot-line circuit in the plant.

COMMISSIONER BRADFORD: In another line of work, you'd probably get the customer complaining to the Public Utilities Commission that the phone company was being a little intransigent, but it would be the first recorded complaint of one utility against another.

(Laughter.)

MR. KERR: We have had some situations similar to this which have been involving a power utility denied access to the telephone company utility. Actually, fortunately, we were able to resolve the two or three cases that did occur.

COMMISSIONER GILINSKY: It sounds like you've been pressing them pretty hard.

MR. KERR: Well, I've had the Vice President of

AT&T throwing all of his travel assignments, riding herd on

us and receiving status reports. I'm convinced they're going

to meet the June 1st date, possibly with the exception of these

five, and it depends -- two of them depend on the licensee

and the two-strike situation. I don't see how we can do too

much about that, unless they allow us access.

COMMISSIONER KENNEDY: What is the cost of this?

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Ace-Federal Reporters, Inc. 25 MR. KERR: The FY '79 costs we're estimating for the remainder of this year will be about \$455,000, and we're projecting FY '80 costs to be about \$1.2 million.

COMMISSIONER KENNEDY: \$1.2 million?

MR. KERR: Yes, Commissioner.

MR. THOMPSON: Proceeding with another aspect -CHAIRMAN HENDRIE: With those telephones in place,
and with 24-hour coverage in the regional offices as well as
here, I've got a notion that we'd get a good deal of talking
with the licensees that hasn't occurred before.

MR. THOMPSON: I'm quite sure that will be the case. I believe it's also reasonable to assume that even in the absence of more stringent reporting requirements, the likelihood of receiving a much lower threshold of event reported to us because it's expeditious, easy to do, is quite likely.

Nevertheless, the question of reporting requirements will be addressed.

Other aspects of communications associated with Three Mile Island, we were acutely conscious of our dependence on the one mode of communications. That is, telephones. We are examining other possibilities to enhance that dependence in the future.

For example, the NEST Team did respond, as I believe you heard in other forums. It's a very sophisticated

communications network involving both land lines and very high frequency radio. It could have been used, but it was not used within the NRC chain. It was used almost exclusively by DOE in its own environmental monitoring and aerial monitoring at the site. It could have been available to us had we called for it. We did not call for it.

COMMISSIONER KENNEDY: It was physically present?

MR. THOMPSON: It was physically present. It could have been put into operation for us very rapidly had we needed to go to it.

COMMISSIONER KENNEDY: Why was it that we did not call for it?

MR. THOMPSON: I don't have a ready answer for you.

CHAIRMAN HENDRIE: I think by the time it got there,

Dick, the Signal Corps was there on the 30th, and by the time

they got --

MR. THOMPSON: The difficulty we had with telephones was primarily the 29th and 30th. By the 30th, we had
the augmentation from the White House and AT&T and we weren't
quite as acutely conscious of our telephone limitations.

So it was two days after that that NEST was there. I should comment in that regard that this was characteristic of the response we got from other agencies, and not representative of any slowness on the part of DOE.

We requested assistance from a number of agencies,

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including DOE, on a rather phased basis, as it became clear to us that the problem was more severe than we had originally anticipated.

Had we, on the morning of March 28th, said to DOE "roll with everything you have, ARMS, NEST, and everything else you can get there," we are quite confident, based on their subsequent response, that they would have been there in full force by the evening of the 28th.

Very quickly, running through some of the other items on this last slide, the facilities that we had laid out were used pretty much as planned. We had a much larger staff response than was anticipated. As a result of that, the population of the center as very high.

We had some ventilat in problems, some comfort problems, some access control problems. I mentioned earlier the traffic pattern involving EMT, and also the lack of space. Feeding and housing was a problem. Then particularly acute in the IRACT room was a noise problem.

We needed some insulation to provide a little more clarity of telephone conversation and interpersonal conversation.

Based on our experience at Three Mile Island, it's quite clear to us that we need more space set aside to take care of large events, and the possibility of having to handle more than one at a time.

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COMMISSIONER KENNEDY: Are we tapable of handling more than one at a time? I'm not talking about space.

MR. THOMPSON: Well, Commissioner Kennedy, based on prior experience at the time of the Browns Ferry fire, I think we could. But we are not well-equipped to handle two events. We could establish a satallite office in another office and handle a second event, but to say we are ready to handle two events would be unfair to characterize it.

Staff availability and facilities?
COMMISSIONER KENNEDY: Yes.

MR. THOMPSON: Only on an ad hoc basis. We'd have to ad hoc it and displace somebody out of their office, which can work, but it's not very effective.

Information resources, we believe that there is a need for better real-time data. I think this was abundantly clear at Three Mile Island because of conflicting information available from different sources.

We are looking now at the question of how realtime data needs could best be met. Attempting to identify what those data needs might be is a broad planning concept that would cover a variety of different types of incidents. One, the traps we were fearful of being caught in is that we planned very well for emergency feedwater transients, and overlooked other events.

It could be equally as debilitating to the public

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Ace-Federal Reporters, Inc. and to us, so we wanted to be very careful to consider what kind of data it is that we want, and what's the best way to get it to us.

COMMISSIONER KENNEDY: You also haven't gotten it. What do you do with it?

MR. THOMPSON: When you have it, what's it going to mean to you? If you get so overwhelmed with data that you can't analyze and use it, you're better off having much less, or at least not any worse off.

COMMISSIONER KENNEDY: Prompt response to raw data can cause catastrophes.

MR. GOSSICK: I think we might want to talk to the German. Yes, that was the result of some incident they had. I talked to one of the chaps over there just recently and asked him what use they'd made of it, since they'd started monitoring it. He just didn't have too much to say. He said, "Well, we watch it to confirm whatever we might see with the plant."

So it's little question as to really what is provided.

MR. THOMPSON: We feel at this stage that one of the things that's needed on information resources, as much as anything else, is some further training of the staff on what is available where.

We did have some limitations on the readily

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available documents for TMI in the immediate vicinity of the Operations Center. Access to the files was adequate and we were able to retrieve it, but that was hampered somewhat by a lack of understanding on the part of some members of the staff on what was located where.

So there's some training called for in that regard.

Technical support, we were overwhelmed with how

much was available. I mentioned the phased involvement.

Particularly interagency, we found cooperation was excellent

from a number of agencies that we had not anticipated having

much support from at all.

And it turned out, for example, the Federal Disaster Assistance Administration was tremendous in their support, and that's not to downplay the support we got from any other agency. I mention that because it surprised us a little bit the extent to which they can provide support, and the willingness with which they did provide it.

Other agencies that provided a lot of support, we had a pretty good handle on what they could do, and they did just about as we had anticipated.

There is more need for coordination of technical support provided particularly by other agencies, particularly in the on-site situation. We went through a period of time where a number of agencies were doing their own thing -- not that anything was wrong with what they were doing, but there

was no cohesiveness and no coordination.

COMMISSIONER KENNEDY: Isn't that what the IRACT was supposed to take care of?

MR. THOMPSON: Yes, it is. But one of the things that isn't clear is whether the requesting agency should direct and coordinate the activities of the other agencies, or those supporting agencies should respond in a preplanned fashion and simply go do what was preplanned. And then at some later stage assemble it.

In the Three Mile Island event, it was clear that we could have improved the on-site coordination. That's not to criticize what was done at the time.

COMMISSIONER KENNEDY: That is something that needs to be resolved on an interagency basis. There needs to be some sort of emergency agreement. The IRACT, for example, might well be reinvigorated and restructured.

MR. THOMPSON: Yes. When we were down a few weeks ago to brief the Commission on IRACT, you'll recall that we mentioned that we have been working — been in close contact with DOE, the Secretariat, for an early reassessment of IRACT by all the signatory agencies, and solicitation among the membership. That is continuing, although I can't tell you at this time that a date has been set for such a meeting.

Administrative support within headquarters, we had excellent response to all the administrative needs that we

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dia insportara,

identified in a very timely fashion, from Dan Donahue and all of his staff, and those within I&E, as well. I think we can do with some more preplanning for providing administrative support to sites of incidents, although I believe that the response provided by Region I and other agencies and the administrative support to the Staff support at the site was excellent.

I believe we could have made it a lot less agonizing by some more preplanning.

Information dissemination, I believe all of you who are in this room are familiar with the vahicles with which we disseminated information in the TMI case.

Preliminary notifications, it became quite a library before we were finished. Joe Fouchard and his staff may want to have something to say about this. I have not even consulted with him ahead of time. They were very active, obviously, throughout the entire period.

There were briefings conducted of other agencies.

In particular, we had daily briefings of FDA and other support agencies through them at a scheduled time every day, and I would imagine on the other of a few hundred contacts by telephone with various outside interested parties -- members of Congress, their staffs, the committee staffs -- on a frequent basis.

I believe the information dissemination, at least

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from our parochial point of view at the Center went reasonably well, although it could have been improved, and there are some of us that right have been a little happier with some of the reactions, but I believe the information dissemination was not too bad in a subjective appraisal.

That completes the points I wanted to make. If you have questions, we'd be glad to respond.

CHAIRMAN HENDRIE: Questions?

MR. GOSSICK: There's a long list of what seemingly are kind of mundane questions, but just to give you an example, "the taping of conversations."

The reason they were taped was for a quick playback. If we wanted a report repeated, we found one. That's not all that convenient to do -- although there is that capability. There are two tapes going at one time. I don't think anyone ever envisioned that this was to be considered an historical record, and of course now with 13,000 cassettes or something about to be distributed to how many tens of thousands of places, but, you know, I think this is a question that probably has to be addressed.

Do we tape everything? Should we have line mikes that are capturing conversations that go on in there? Make sure that every phone call that goes out of there is recorded? Identification of callers? It's going to be hard to find out on some of those tapes who's talking. That's just an example

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of some of the nitty gritty kind of things that come out of this.

MR. DAVIS: I think in Mr. Kenneke's memorandum there are some policy determinations that at some point have to be addressed, but I&E is not awaiting the addressing of these policy matters. We are moving on an operational basis.

The policy matters that Lee mentioned -- like what is the operational role of NRC? What is the role of the Commissioners as one of these events unfolds? What is our on-site responsibility? This type of thing, which will really affect --

COMMISSIONER GILINSKY: Are you going to give us some options?

(Laughter.)

MR. DAVIS: Not today, Commissioner, but eventually they will have to be addressed. But I sould like to assure you, we are moving on the operational level to take care of those obvious deficiencies that we saw in ways in which we can improve the operations center.

And that concludes the presentation.

COMMISSIONER KENNEDY: Thank you very much.

CHAIRMAN HENDRIE. Thank you.

(Whereupon, at 4:15 p.m., the meeting was

adjourned.)

NRC INCIDENT RESPONSE PROGRAM

NRC INCIDENT RESPONSE PROGRAM

PURPOSE

COMPRESS NRC STAFF INTO A CONFIGURATION WHERE IT CAN MOST <u>EFFECTIVELY</u>
RESPOND TO AN INCIDENT

PROGRAM SCOPE

IE RESPONSE NRC RESPONSE NATIONAL LEVEL EMERGENCY (FPA)

LEVEL III

LEVELS I AND II

INCIDENT SEVERITY

INCIDENT RESPONSE OBJECTIVES

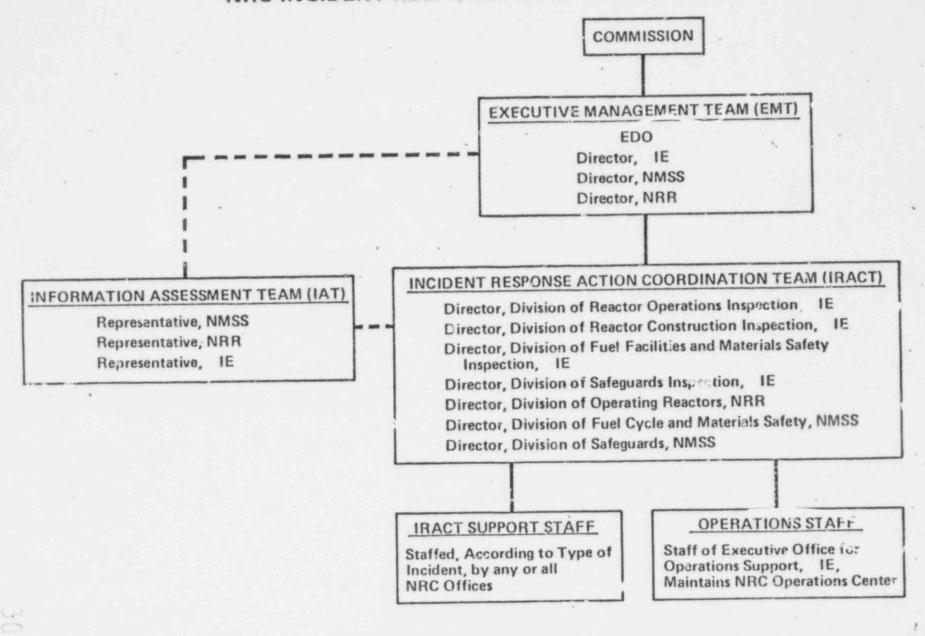
- INFORM
- EVALUATE
- ASSIST
- DIRECT

NRC ROLE IN RESPONDING TO INCIDENTS

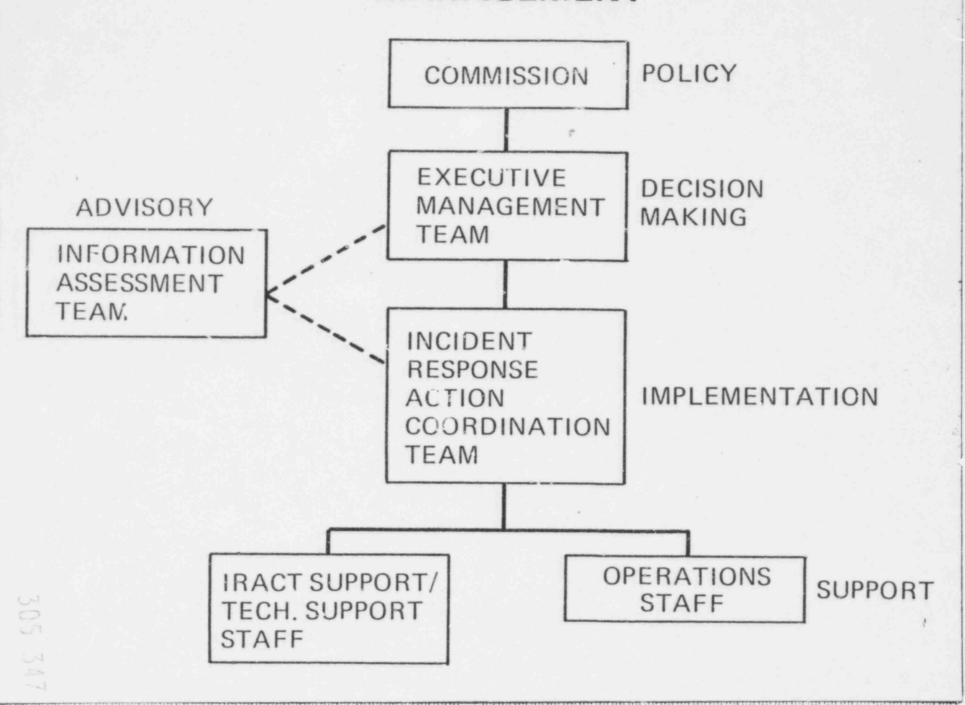
Assure: Proper Actions are Taken to Protect Health and Safety, the Environment, and Property From the Consequences of Incidents Which Occur as a Result of NRC-Licensed Activities.

Assure: Public is Kept Informed of Actual or Potential Hazards to Health and Safety Arising From Such Incidents.

NRC INCIDENT RESPONSE ORGANIZATION



MANAGEMENT

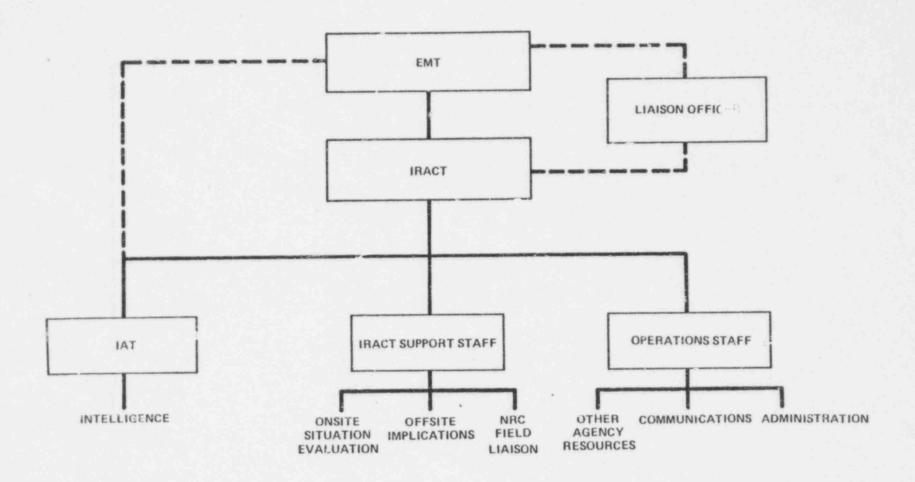


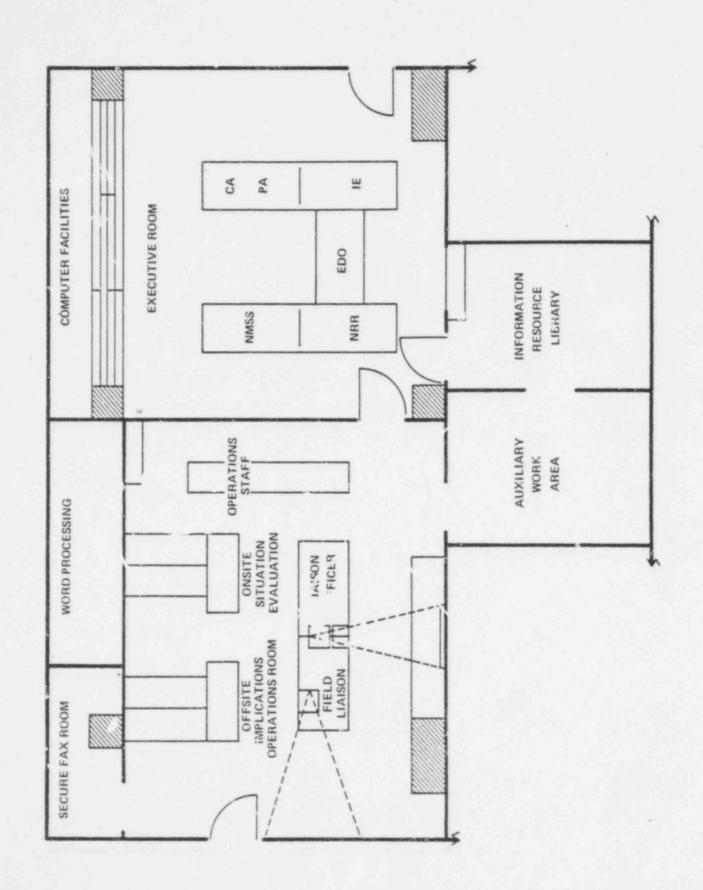
EMT FUNCTIONS

- Activate IRC
- Provides Guidance for NRC Actions
- Coordinates NRC Joint Activities
- Coordinates Policy with Other Agencies
- Approves Public Information Releases
- Notifies Senior Government Officials

IRACT FUNCTIONS

- Assures Notifications Disseminated Swiftly
- Performs Actions to Carry Out IR Functions
 - Inform
 - Evaluate
 - Assist
 - Direct
 - Coordinate
- Directs IRACT Support Staff
- Identifies Problem Areas
- Develops Alternate Solutions





NRC IMPLEMENTATION

NOTIFICATION

INITIAL RESPONSE

ORGANIZATION

COMMUNICATIONS

FACILITIES

INFORMATION RESOURCES

TECHNICAL SUPPORT

ADMINISTRATIVE SUPPORT

INFORMATION DISSEMINATION

NRC INCIDENT RESPONSE PROGRAM

PURPOSE

The purpose of this briefing is to provide the NRC Commissioners with information on the basic precepts in planning the NRC Incident Response Program; how it functioned during the Three Mile Island accident; lessons learned to improve the program; and activities initiated or planned to make appropriate modifications.

SCOPE

The briefing will provide initial staff impressions of the operation of the Incident Response Program. The discussion will be limited to the response of NRC once it learned of the accident and how the staff responded with the information provided. It is not the purpose of the briefing to evaluate licensee response, NRC decisions or the effectiveness of other agencies.

BRIEFING OUTLINE

- I. Planning Prior to TMI
- II. Implementation of NRC Incident Response Program
- III. Lessons Learned for Improving the Incident Response Program
- IV. Plans to Change the Incident Response Program