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July 18, 1979

MEMORANDUM FOR: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

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

SUBJECT: TMI-2 LESSONS LEARNED TASK FORCE
REPORT (SHORT TERM) NUREG-0578

Enclosed is the first report of the TMI-2 Lessons Learned Task Force. It contains a set of short term recommendations to be implemented in two stages over the next 18 months on operating plants, plants under construction, and pending construction permit applications. There are 23 specific recommendations in 12 broad areas (nine in the area of design and analysis and three in the area of operations). The 23 recommendations would provide substantial, additional protection which is required for the public health and safety.

All but one of the 23 recommendations have a majority concurrence by the Task Force. The exception is the recommended requirement to provide capability to install an external recombiner at each reactor plant for post-accident hydrogen control, if necessary following an accident. The majority of the Task Force recommends that this matter deserves further evaluation in conjunction with other hydrogen generation and control questions being reviewed by the Task Force for its final report.

Three of the recommendations appear to require changes in existing regulations for which the Task Force recommends immediately effective rulemaking. They are: 1) inerting of MK I and MK II BWR containments that are not already inerted; 2) provision of the capability to install an external recombiner for plants that do not already have recombiners (minority view); and, 3) revised limiting conditions of operation in operating licenses for total loss of safety system availability through human or operational error. The Office of Standards Development has agreed to develop the required Commission papers and carry through with these rulemaking actions.

The 23 recommended actions were discussed with the Regulatory Requirements Review Committee (June 22, 1979), the Commission (June 25, 1979), the TMI-2 Subcommittee of the ACRS (July 11, 1979), and the ACRS (July 12, 1979). In addition, meetings were held with various groups in the Office of Nuclear Reactor Regulation in the course of the last few weeks to discuss technical aspects of specific portions of the recommended actions and the implementation alternatives.

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The Task Force recommends that time not be taken to request and evaluate public comments on these short term requirements prior to their promulgation as licensing requirements or rules because they are safety significant matters that require prompt application to operating reactors and operating license applications in the late stages of review. Other TMI-2 accident review groups and the Lessons Learned Task Force are continuing to evaluate the longer term implications of the accident. Any public comments on the short term recommendations that are received after their issuance (just as in the case of the earlier IE Bulletins) can be factored into those continuing evaluations.

Having identified the 23 specific recommendations for short term action, the Lessons Learned Task Force will turn to the broader, more fundamental regulatory questions which should be addressed in the longer term (some of them likely to require evaluations that extend beyond the life span of the Task Force) before other regulatory actions are recommended. These longer term interests of the Task Force are described in Section Three of the report. The Task Force intends to develop its final recommendations and issue a final report in early September 1979. The topics to be addressed in the final report could affect the future structure and content of the licensing process to correct deficiencies identified by the TMI-2 accident and to further upgrade the level of safety in operating plants and plants under construction. The Task Force does not believe that allowing new plants to begin operation in the next few months will foreclose further design changes that may be shown to be desirable by its continuing review of the accident.

On July 11, I solicited the comments of the principal NRR line organizations on the final draft of the report and its central conclusion regarding the necessity and sufficiency of the short term recommendations for continued operations and licensing. General support for the conclusions of the Task Force report was expressed by all of the principal NRR line managers. We have reviewed and considered the detailed comments supplied by the various NRR organizations in the course of their review. Where appropriate, we made clarifying changes in the language of the report. The principal substantive change occurred in the form and schedules of the implementation section (Appendix B). Some of the comments addressed matters that the Task Force has deferred for consideration in its final report. There are significant differences of opinion within the staff on two of the Task Force recommendations, as follows: a) the need for recommendation 2.2.3 concerning rulemaking for revised limiting conditions for operation (some agree with the recommendation and others prefer more stringent enforcement actions using existing regulatory machinery) and b) the need for the minority Task Force recommendation 2.1.5.c concerning rulemaking for backfit of recombinant capability (some support the minority recommendation, others do not. Having considered these comments and made changes to the report where appropriate to reconcile them with the intent of the Task Force, I recommend that you:

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e. direct the immediate implementation by DPM, DOR, or BDOT, as appropriate, of all the short term recommendations, except the three rulemaking matters, through the issuance of licensing positions to operating plant licenses, plants under construction, and construction permit applicants.

b. request the formulation of immediately effective rules by the Office of Standards Development for action by the Commission on the three rulemaking matters.

Another matter that needs to be considered by you in deciding upon the additional requirements for near term CP and OL decisions and for operating reactors is improvements in licensee emergency preparedness.

Original signed by
Roger J. Mattson

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

Enclosure: as stated

- cc: Chairman Henrie
- Commissioner Gilinsky
- Commissioner Kennedy
- Commissioner Bradford
- Commissioner Ahearne
- ACRS (20)
- Policy Evaluation
- SECY
- L. V. Gossink, EDO
- S. Levine, RES
- R. Minogue, SD
- V. Stello, IE
- M. Rogovin, Special Inquiry
- J. Fouchard, PA (20)
- C. Kannerer, CA (20)
- NRC PDR

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