TERA

NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

PUBLIC MEETING

BRIEFING ON RANCHO SECO

Place - Washington, D. C.

Date - Tuesday, 26 June 1979 Pages 1-55

Telephone:
(202) 347-3700

600 038

ACE - FEDERAL REPORTERS, INC.

Official Reporters

444 North Capitol Street
Washington, D.C. 20001

NATIONWIDE COVERAGE - DAILY

439 057

Stamped

7908010620

DISCLAIMER

This is an unofficial transcript of a meeting of the United States Nuclear Regulatory Commission held on Tuesday, June 26, 1979 in the Commissions's offices at 1717 H Street, N. W., Washington, D. C. The meeting was open to public attendance and observation. This transcript has not been reviewed, corrected, or edited, and it may contain inaccuracies.

The transcript is intended solely for general informational purposes. As provided by 10 CFR 9.103, it is not part of the formal or informal record of decision of the matters discussed. Expressions of opinion in this transcript do not necessarily reflect final determinations or beliefs. No pleading or other paper may be filed with the Commission in any proceeding as the result of or addressed to any statement or argument contained herein, except as the Commission may authorize.

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

PUBLIC MEETING

BRIEFING ON RANCHO SECO

Commissioners' Conference Room,
1717 H Street, N. W.
Washington, D. C.

Tuesday, June 26, 1979

The Commission met, pursuant to notice, at 10:00 a.m.

BEFORE:

DR. JOSEPH M. HENDRIE, Chairman

RICHARD T. KENNEDY, Commissioner

VICTOR GILINSKY, Commissioner

PETER A. BRADFORD, Commissioner

ALSO PRESENT:

Messrs. Gossick, Snyder, Ross, Cunningham, Case, and Bickwitt, general counsel; Messrs. Thatcher, Johnson, Wilson, and Israel.

mgc

PROCEEDINGS

(10:00 a.m.)

CHAIRMAN HENDRIE: The first order of business this morning is for me to note that the Commission, on June 23, published an order in the matter of the Rancho Seco case, which among other things noted that the staff will provide the Commission with an informational briefing as to the basis of its conclusions, prior to permitting restart of the facility.

That is informational briefing will be held now. The briefing was announced at the time of the order. It was, however, scheduled on less than one week's notice, and I will first ask my colleagues to join me in voting to hold this meeting on less than one week's notice.

All right. Those in favor?

(A chorus of ayes.)

CHAIRMAN HENDRIE: So ordered.

The second item of business is to note that the purpose of this morning's briefing is for the staff to tell us about its bases for its conclusion that the licensee, or Rancho Seco, satisfactorily completed the actions enumerated in subparagraphs A through E of Section 4 of Commission's May 7 confirmatory order.

This briefing is in no fashion intended to prejudice pending adjudicatory proceedings involving Ranco

mgc

Seco. Any adjudicatory determinations that may be made in that proceeding, including any determinations on issues related to those that will be discussed today will be based solely on the record developed in that proceeding.

However, the Commission is undertaking this rather unusual step of having an informational briefing on a matter which is involved in an adjudicatory proceeding, and due to that fact, if and when the Commission reviews any aspect of that adjudicatory proceeding, any party wishing to plead, to cite, or to refer to the transcript of today's informational briefing, they may do so. And for that limited purpose, the Commission will waive the prohibition against such use contained in 10 CFR 9.103, as was noted in a footnote to our order of June 21.

There has, I note, been a request from a party to speak to the Commission in addition to the staff since other parties in the matter have not been contacted and their wishes and ability to address the Commission at this meeting have not been ascertained, it seems to me inappropriate to hear that presentation. And we will, therefore, hear solely from the staff at this meeting.

I understand that the party making the request might wish to file a written statment with the Commission, and I don't see any objection to that if the counsel aggrees. I presume it would be attached to the transcript

mgc

and simply be available as part of the record of this meeting, to be treated in the same fashion and served on other parties, as I assume the transcript of this meeting will be.

COMMISSIONER BRADFORD: May I ask the name of that party?

CHAIRMAN HENDRIE: It is a representative of the SMUD Repairs Association, Peter, looking past the --

COMMISSIONER BRADFORD: When was this request made?

CHAIRMAN HENDRIE: Well, I learned about it about eight minutes after ten this morning.

A VOICE: To whom was the request made?

CHAIRMAN HENDRIE: As far as I know, the secretary. The secretary informed me.

There is one other matter of a sort of practical business here. We normally have a reporter who takes down the proceedings of our meeting. We also typically have a tape as a check on the reporter's transcription. The reporter seems to have not made it to the meeting this morning but may come a little later.

There is, however, a tape being made of this meeting so that a transcript can be prepared. In fact, the secretarty tells me it is a double tape system, whatever that may mean.

mgc

I mention it because it is particularly important that Commissioners and staff members speak reasonably clearly and have their microphones close at hand so that the tape is clear.

I see our problems in the matter may rapidly be alleviated. I nevertheless let stand my request that people keep their microphones close and speak clearly, and perhaps in order that this transcript can be as accurate a one as possible. And we will refrain from an occasional Commission practice of holding two simultaneous conversations, which often leads to confusion in the transcript.

I see action over there on the reporter's part. Let us move ahead, then, to the briefing.

Lee, please introduce the staff, and let us go forward.

MR. GOSSICK: Thank you, Mr. Chairman.

I believe Mr. Case has some preliminary remarks he would like to make before Mr. Ross proceeds with the briefing. We have Mr. Cunningham with us representing the Executive Legal Directors.

MR. CASE: I would just like to point out, Mr. Chairman, as you all know, we provided you on June 19 with copies of the draft staff safety evaluation and the proposed letter to the licensee concerning their response to the

mgc

Commission's order of May 7, 1979. But what we have proposed to do this morning is walk you through the safety evaluation, which will also walk you through the order and indicate what the commitments of the licensee were, and why we are satisfied with the action he has taken.

MR. ROSS: We have six viewgraph slides here. May we see the first one?

A brief chronology, the SMUD files and commitments on April 27 and agreed in that letter until the short term commitments were done that the plant will be shut down, and in fact was shut down the following day.

This was followed by confirmatory order on May 7, issued by the Commission, and as Ed stated about six weeks later the staff prepared a safety evaluation report, including the short term provisions of order had been met. We will look at slide two. At least half of the order concerns the auxiliary feed water system. This rather simplified diagram illustrates some of the key features of the Rancho Seco feed water system.

It has two trains. What is labeled as the top or Division B motor driven trubine aux pump is a 100 percent capacity feed water pump with a steam turbine on one end and electric motor on the other.

The other train is a motor driven only auxiliary feed water pump.

mgc

As you can see, either pump can be tied into either steam generator, and we will get into some subparts of Part A. The normal course of supply is from the condensate storage tank, which contains about a 24 hour supply.

You can switch to other sources.

COMMISSIONER BRADFORD: When you say "100 percent capacity" in that context what does that mean?

MR. ROSS: The analysis showed you need roughly 800 GPMs, and either pump can put out that much.

CHAIRMAN HENDRIE: Denny, are the electric drives, is that off-site power only?

MR. ROSS: No, that is the next thing. If you look at part 1 of Part A -- let's go to the next slide now.

(Slide.)

The order in paragraph A, subparagraph 1 through 9, and if you are keeping track on the SER you are now on page 3, and the first part was concerning the ability of the motor portion of the auxiliary feedwater pumps to be loaded up on the diesel in the event you lost off-site power.

The switchover is not automatic. The operator has some procedures to follow in the event he wants to load up either of those motor driven feed water pumps to on-site power, so that is a short term procedural aspect.

The long term portion of the order parallels items

mgc 1 one through nine, in subpart A, and to what extent we will
2 ask for further improvements is not yet decided. Maybe we
3 will ask this to be put on diesels automatically on loss of
4 off-site power. We just haven't had those discussions yet.
5 So that you don't load up the system
6 inadvertently, the bypass keys, so that the control room
7 operator has to go to the shift supervisor's office next
8 door to get the keys so he can load either one of these up.
9 COMMISSIONER GILINSKY: May I just ask a
10 preliminary question?
11 I got asked by a reporter in California, the fact
12 that Rancho Seco was shut down and crewing were not
13 immediately -- meant that Rancho Seco was less safe to begin
14 with or had less reliable auxiliary feedwater systems.
15 When we started this process, I told him that I
16 thought the answer was no. If anything, it may have been
17 the other way around.
18 Is that the right answer?
19 MR. ROSS: Well, there is a moving target, namely
20 the Oconee auxiliary feedwater system. I think as soon as
21 Oconee opened up the three units and manifolded three
22 turbine pumps to either of the three units, then, as a rough
23 estimate, I would say they had a fairly reliable system at
24 that point.
25 Before that, they opened up a manifold, and they

mgc

had one pump for each unit. Then I would say that's a markedly less reliable system than Rancho Seco was or is.

But after they opened them up, my feeling is that they would be about the same general order.

This has one of the good features, which is that it has diverse motor powers.

CHAIRMAN HENDRIE: As I recall the time, Peter, that would have been, it seems to me, it was actually during our discussions on the BMW shutdown.

MR. ROSS: I think Oconee opened up its three manifolds before the Commission issued its order. The things were moving very fast. Duke Power was doing things in advance of us and the Commission. We found that they had developed the appropriate procedures for loading up these motors on diesels, if needed.

The additional concern, part 2 of Part A, was while you are doing a surveillance test, there might be a need for auxiliary feedwater, so we -- the order says that the operators should be out at the physical location of the auxiliary feedwater pumps, in communication.

Then if a transit comes along and offspeed is needed, the operator has to shut a bypass valve to put the system back in operation.

Also, at the end of that test, there has to be an independent verification that the valves have been returned

mgc

to the operable position.

We found that they had procedures in the -- this is on page four of the order -- and the operator knew what to do in this event. In the long term, perhaps these valves will have to be provided with bypass or inoperable status, like, required by Reg Guide 1.147. Again, we haven't gone into that yet.

Part 3 of paragraph A starts on page five, the manual control of the auxiliary feedwater. This is getting the system more independent of the integrated control system. The operator would --

I don't want to go back to a slide, but if you will look at your picture from the pump to the steam generator, there are two valves in parallel -- one controlled by the integrated control system. That's an open or shut valve. The other is an electrical infinite position valve, which the operator would call the bypass valve, which the operator would throttle to whatever position is needed, and he would observe the flow rate in the level.

And this is how we manually control the auxiliary feedwater system.

On page six of the SER, paragraph four, part A, "Verification of Off Feed Water Capacity," is what is just what was mentioined by Commissioner Bradford, had to verify that you had at least, in fact, 750 GPMs per train, per

mgc

feedwater train. They can calibrate this by pumping in the bypass mode from the condensate storage tank back to the hot well, and then measuring the decrease in inches per minute in the condensate storage tank and converting this to flow rate.

The bottom of page seven we notice that this would be reconfirmed in the start of mode.

The next slide, now, get's to paragraph five of paragraph A, for some hardware was added to the plant.

(Slide.)

The order said there should be a way to measure auxiliary flow being delivered.

This utility bought what is known as a clamp-on flow meter. You don't have to break the top to put in an orifice.

This starts on page eight of our SER where we find that they have bought and installed these systems. As of last Thursday, they were still doing some calibrations. They were moving the clamp-on deviced from one portion of the pipe down to the other portion. It was on the wrong side of the security fence, and it was kind of hard to get to. Both local -- and then you read out, as well as read out on a new panel, on a new meter put on the panel in the control room.

Other facilities, in particular Duke Power, used

mgc

orifices put in the line. This -- depending on how this thing performs over a long period of time, this might be another item that's updated or improved in the long term portion of the work.

COMMISSIONER BRADFORD: Who does the work?

MR. ROSS: It's got a little ultrasonic. I'm one question deep, then I'll plead ignorance. Mr. Thatcher is here. I haven't answered that question, but I'll bet he can explain it.

It sends a beam and it bounces off the water. But if you ask one more question, I'll have to plead nolo contendere.

CHAIRMAN HENDRIE: I'm compelled to ask one more question.

What does it do? What does it sense in the change-- what change in the beam return does it sense, then?

MR. THATCHER: I guess you mean what property in the fluid?

CHAIRMAN HENDRIE: Yes. That is, how do you tell, how do you distinguish between, how does the beam distinguish between the static water in the pipe and the flowing water in the pipe?

MR THATCHER: Well, I don't know the internals of the mechanism, but it has to do with the reflection of the ultrasonic beam within the fluid itself.

mgc

I'm not sure that's exactly what Denny said, but that's -- it can detect the fluid flow, that's a flow meter.

COMMISSIONER KENNEDY: What is it that it reports that tells you you have fluid flow?

MR. ROSS: I had one conversation with the licensing manager of Duke Power about how the thing worked. It was his and my joint impression that it was all particles, because the theory is that if you had chemically pure water, it wouldn't work, if there were no particles.

His concern was that if he had ultrahigh grade feedwater, it might not work as well.

CHAIRMAN HENDRIE: Okay. Either particles or turbulence in the flowing fluid, and the degree is scattering the beam signal in proportion to the flow --

MR. THATCHER: The change in beam, yes.

I didn't realize you were asking about the consistency of the fluid, or whatever.

CHAIRMAN HENDRIE: Okay. Interesting.

MR. ROSS: This was an off the shelf item. It wasnit developed new for this purpose.

MR. THATCHER: I know. You know, I was just going to say, I know in other plants they quite often use these fossil fuel plants for monitoring all different kinds of flow. It's not a new item, but it's -- as far as getting qualified for nuclear power plants, they might not have done

mgc

it, and as a result we don't see it in alot of safety systems.

CHAIRMAN HENDRIE: Okay. Let's go on.

MR. ROSS: Page nine, part six, of paragraph A, the order said that you should review and revise the procedures and training for alternative sources of water. As I mentioned earlier, the condensate storage tank has 24 hours, and then switchover to a canal.

You notice in about the middle of page nine, there is -- alarms are discussed with -- alert the operator that now is the time to perform the switchover.

COMMISSIONER GILINSKY: Were there other sources available before?

MR. ROSS: Yes. They didn't add this. The concern had to do with the alarms. The sources were there.

In fact, I believe there was another source not even mentioned. I believe the service water is also a source, but you would only use this if you had prolonged loss of off-site power. Otherwise --

COMMISSIONER GILINSKY: What is it NRC requires?

MR. ROSS: I'm sorry?

COMMISSIONER GILINSKY: What is it that NRC requires?

MR. ROSS: Oh, the new stuff. To go over the procedures -- I think we noticed a new alarm was put in.

600 053

439 072

mgc

Let me ask Sandy. Was not a new alarm installed here?

MR. ISRAEL: Yes, one was installed for the three foot level left in the condensate storage tank, and this would allow greater than 40 minutes before the operator would have to go up and switchover.

MR. ROSS: Is -- this is the new aspect?

MR. ISRAEL: That is correct.

COMMISSIONER GILINSKY: Your concern was what?

MR. ROSS: Run the condensate storage tank dry, and you can damage the pump before you switched over. Because there are alot of valves -- most of this equipment is physically outdoors, and you have to go through one or two gates or security fences. It's -- you don't just push buttons and have it done in two minutes.

MR. ISRAEL: Denny, I might point out that the condensate storage tank, that the 24 hour supply is sort of unusual. Other plants generally have less.

COMMISSIONER GILINSKY: So this was in a better configuration than other plants?

MR. ISRAEL: Generally.

CHAIRMAN HENDRIE: Please go ahead.

MR. ROSS: Okay.

Page ten, paragraph seven, the enunciation of off feedwater auto start. The feeling here is that if you

mgc. get a signal that the pumps have started, that this would be an alert that verification should be done, which will be covered in the next paragraph.

So alarms would be provided -- in the middle of page ten -- if you lose all cooling pumps, main feedwater, or if the manual off feedwater, the motor driven feedwater pump had been started manually, then an alarm would come off.

Now that means we have to take that in the context of the next item, as to what do you do, verification. Then you have some immediate actions. Verify that everything has correctly autostarted. The turbine pump is up to speed. It's a single speed pump. Verify that it is up to speed, that you are delivering flow as detected by these new flow meters, then you can control level.

It's this thing that you would hope would eliminate part of the TMI-2 sequence where the pump started, but there was no verification that they were delivering flow.

Part nine, the last auto, which is on page 11 of the SER, verifies that if -- if there is a failure in the normal ISC integrated control system valves, that they would not fail closed. And at the very last of page 11 and continuing on to the next page, they were supposed to do some tests to verify that the normal flow control vavles

mgc

would fail in the open position.

CHAIRMAN HENDRIE: Are these the ones marked "modulated control"?

MR. ROSS: Yes, sir. In fact, that's probably a little misleading. The modulated -- these valves actually are quick opening, quick closing, single position -- that they don't stop in between, normally. Normally, if you get a low level in the steam generator, the valve opens, and when it comes up to the high control point, it closes. You're losing a few seconds.

If one of these valves did fail open, then the operator -- and you wanted to go to the bypass level control, which you would want to do then, you would have to send an operator out there to eventually shut the valve or else you would overcool the unit. But they can do it. They have hand wheels, and they can crank the valves shut.

COMMISSIONER GILINSKY: I wonder if you could go back, if you have finished going over your list?

MR. ROSS: Yes. I guess that's all of Part A.

COMMISSIONER GILINSKY: Go back to the diagram and indicate any physical change.

MR. ROSS: Go back to slide number two.

The alarms were provided at the low level on the condensate storage tank. Alarms were provided to indicate the autostart feature, not shown on the diagram, but

mgc

somewhere -- in the vicinity of those valves marked "modulated control" would be the new flow meters. So in relation to other, like in relation to Oconee, there wasn't a great number of physical changes made.

COMMISSIONER GILINSKY: You mean less?

MR. ROSS: There were less here probably. I believe that's all the physical changes. That's it.

On page 13 of the SER, Part B of the order, is more detail on manual control of the auxiliary feedwater system. We have already talked about loading the pumps up to the diesel bus, if needed.

We have talked about the bypass valve which is controlled manually. The thing we haven't mentioned is that we decided that a test would be needed -- this is the next to the last paragraph on page 13 -- with the plant in the steam mode, about 10 to 15 percent of power, to verify that the operator can do what he has to do. We envisioned this as a steady state test, where the operator would jog open the manual bypass valve and demonstrate that he can control level. Of course, that test is yet to be done, and we would inspect -- expect the I&E inspector to witness that test.

Incidentally, this plant will have a -- a resident has been picked, and he will be on site beofre 1 September. And in the meantime, the Region 5 mans it on a week by week basis.

mgc

The principal inspector, Allen Johnson, is in the audience should questions in that area arise.

Okay. Page 14 of the SER -- go to the next slide.

(Slide.)

Part C of the order which looks very much like the presentation we had for Oconee, anticipatory reactor trips, they did install new trips to detect -- shut the plant down in the even either the turbine trip or you lose both main feedwater pumps.

This is covered on page 14, 15, and part of 16.

They also commit to a monthly test. To start up the plant, it is necessary to bypass the main feedwater until you get the plant up to a low level in power, and then you go into normal, and all the bypass switches in the bypass position. There is an alarm on the enunciated manual. The circuit is essentially the same as we had for Oconee.

In Part D, which starts on page 16, unless the Commission has some interest, I'd like to cover it mostly by saying --

Go to the next slide.

(Slide.)

-- that the generic analysis that BMW did -- that we discussed with you in more detail on Oconee -- applies equally here. There are some variations. I believe that's

mgc

supposed to be .04 square feet instead of .01. So that typo -- it's essentially --

CHAIRMAN HENDRIE: So the .04 square feet?

MR. ROSS: Right.

CHAIRMAN HENDRIE: No core uncovery for breaks of interest, i.e. less than .04?

MR. ISRAEL: Let me correct that. .01 is correct. Those are the ones that deal with the PORV. I'm not sure with .04 whether you don't still have core uncovery. But certainly for small breaks, the analysis was acceptable.

COMMISSIONER GILINSKY: Would you explain that again, please?

MR. ISRAEL: Pardon?

COMMISSIONER GILINSKY: Could you explain that again, please?

CHAIRMAN HENDRIE: What side is the famous relief valve.

MR. ISRAEL: It's 007.

So the concern for a stuck open relief valve, you have no core uncovery; therefore, you don't have any fuel damage.

So the generic study definitely showed that .01 square feet, and below, that you don't have any core uncovery.

I'm not sure that at .04 square feet there was

mgc

another break that they did do, whether they showed there was no core uncovery. But I'm sure that they did that analysis, that they showed that peak clad temperatures were acceptably low for, so that was not a problem.

Core recovery is not a requirement for --

MR. CASE: In other words, he is saying the criteria, the ECS criteria, you were satisfied with .04 square feet, and not necessarily core uncovery.

MR. ROSS: The message that we got on Oconee, which would be applicable here, is that if there was total loss of feedwater for these SMUD breaks, HPI alone would provide core cooling. And conversely, you could use feedwater also, if you got it back in 20 minutes.

This is -- picks up on page -- eventually, you need fluid --

CHAIRMAN HENDRIE: That says simply that you can drive -- with the high pressure injection capacity that's there -- you can drive enough fluid up the relief valve or equivalent size freight to carry out the afterheat. Right?

MR. ISRAEL: That is correct.

MR. ROSS: There is a couple of new matters, and in the middle of page 22, starting about the fourth line down and going all the way down that page until the fourth -- until the fourth line from the bottom -- there is new material in there that was not provided either for

mgc

Oconee or for Arkansas.

What we did --

CHAIRMAN HENDRIE: This is in analysis sense rather than equipment sense?

e-1

~~439 080~~

mgc

MR. ROSS: Right. The matters discussed here are generic except for Davis-Besse, and they were equally applicable for all of the plants.

CHAIRMAN HENDRIE: Okay.

MR. ROSS: What we have done in our thinking is carry the analysis out further in time than we had done on those other plants. The event is either a total loss of feedwater or it could be a very small break with loss of feedwater.

But let's follow just the loss of feedwater train of thought. When both HPI pumps come on, there is a period of hours when you are pumping in cold water with the -- at least the potential for having a high pressure cold vessel, so we had a number of discussions with the district, with BMW, we had meetings here and we are still -- in fact we received what we hoped is a last piece of information this morning.

What we thought was needed was that the procedure for loss of feedwater, total loss of feedwater, at least that procedure ought to have one additional section in it, and it ought to tell the operator what to do in the event the -- he thinks the vessel has gotton so cold at a high pressure that there is a question of that vessel's integrity.

And we have built in that the admonition not to

mgc

turn off the high pressure injection. But if we could see at least potential for such instances, where it would be safer turning it off, and by this time probably the core would be adequately cooled.

The difficulty -- let's skip the next slide and go to the last slide -- go one more, now. Go one more slide.

(Slide.)

The difficutly for this event has to do with how do you measure temperature. If you look at the reactor coolant pump, where the little arrow is, and go down about two or three feet, that's the vertical section line that takes -- that feeds water from the steam generator through the elbow at the bottom and up to the pump. The cold leg temperature indicator is in the vertical pipe a few feet down from the reactor coolant pump. So in this postulated sequence, there are no pumps running. There is no coolant reactor flow. The high pressure injection is putting in water over near the vessel. So those cold leg thermometers may not be reading accurately, accurately reading the vessel.

Yet that's the thermometer that reactor operators traditionally use to see if they meet Appendix G for pressure vessel integrity.

So we worked on different alternates, and we have gotten down now to where we think we have a workable

mgc

solution, although we just got a telex this morning and we haven't had a chance to reflect on it. But what we can believe is that we can infer the vessel fluid conditions, because with this sequence there will be at least internal circulation in the vessel, and we think that probably quite a bit of it in early times. So by subtracting an appropriate amount from the outlet, you can get the inlet which is the annulus, and for that you can enter a pressure vessel integrity curve, so that would take care of half of the question.

The other half would be for this extreme scenario: what pressure vessel integrity curve should apply? And we kicked around several alternates, and what we think is appropriate would be to remove the factor of two, safety factor on the multiplier for the membrane or hoop stress, to keep the same flaw size and same dynamic properties.

We have these materials specialty people here that can discuss this, if you want to get into it any further.

We're not through with it ourselves, yet. What we think the work product is would be one more section in a procedure that tells the operator what to do in the event he perceives an ultrachilled vessel.

CHAIRMAN HENDRIE: How long does it take to get down -- there's an awful lot of stored energy in that vessel, so it doesn't happen --

mgc

MR. ROSS: It's modest. In terms of degrees per hour, it's a relatively modest transient.

CHAIRMAN HENDRIE: The flow rate just isn't that high?

MR. ROSS: Well, for the first few hours you don't have a cutaway. But the bent valves on the core barrel would be open while the vessel is steaming, and steam will be coming back -- according to BMW's prediction -- and mixing with the cold water and warming it up.

CHAIRMAN HENDRIE: Right.

MR. ROSS: To what extent it really works, this wouldn't be seen on the vessel —

CHAIRMAN HENDRIE: Yes.

MR. ROSS: After a few hours of mixing, well, now, because the valve wouldn't be shut, you would be putting warm water, pressurized water, but it wouldn't be steaming.

CHAIRMAN HENDRIE: Well, that is just because the steaming rate goes down, and you haven't got it driving.

MR. ROSS: Yes, because the pressure, the back pressure is coming from whatever is resisting in the PORV, which has to be open for this transient.

CHAIRMAN HENDRIE: Yes, so you come to a place after you have steamed awhile, and the after heat is beginning to tail off, when you might decide that you wanted to either intermittently throttle, more likely throttle than

mgc

cut off, throttle the injection flow, and let it get a little warmer in the vessel, or at least keep it from getting colder.

MR. ROSS: Now, two points. First, this is unfinished. We haven't finished our work, and it would apply equally to the other plants.

Second, the point is a more detailed analysis by BMW, and they've committed to do one. It will take them a month or two. And they show that the whole problem would go away.

MR. CASE: It's a non-problem to begin with.

MR. ROSS: Absent that, we thought we ought to build in some protection to get the appropriate balance between core cooling and reactor coolant pressure protection.

MR. SNYDER: Denny, is your relief capacity that much lower than the HPI injection rate?

MR. ROSS: When you are steaming through the relief valve, the pressure drop is higher.

MR. SNYDER: You would eventually just be going out with solid water.

MR. ROSS: As soon as it starts going solid, the pressure is going to come down. This is a calculated pressure balance between pumps with a certain flow delivery head curve and the pressure drop throughout the system, out

mgc

to the PORV.

BMW has done some craft calculations, but they want to change the code around and run it out to 10 hours. But that's going to take some time, and to change the code first, and then running it is going to take some time also.

To this end, we expect to be working with the owners who will try to get one answer for all. I don't think this will apply to Davis-Besse, because of the lower discharge head on the high head pumps. That's the additional feature of Part D.

I did want to mention, since there is no appropriate place --

COMMISSIONER BRADFORD: Does that apply to any of the other BMW pumps?

MR. ROSS: Yes, except for Davis-Besse. Whatever we do here, I believe, subject to check, BMW has sent these guidelines to all their customers, or else they will.

I'd like to mention, since there is no place --

CHAIRMAN HENDRIE: Before we leave this, as a matter of curiosity, what does system pressure come down to in this mode?

MR. ROSS: As I recall, eight pounds.

MR. ISRAEL: I really want to couch everything. We are talking about a very degraded condition. We have no auxiliary feedwater, no heat removal by the steam generator,

mgc

and this sort of went beyond whatever we have licensed plants for.

CHAIRMAN HENDRIE: Yes.

MR. ISRAEL: And my concern was that we were putting the operator between a rock and a hard place. One mode we told him to keep on two HPI pumps in order to preclude the Three Mile Island situation. The other mode, he had these pressure vessel integrity curves which were -- really weren't designed for this situation either which he was trying to follow.

But to get back to your question, we told him to put on two HPI pumps, worth about 1000 GPMs, down around six, eight hundred psi, and the pressure that BMW estimated going through one square inch PORV would be about 800 psi pressure vessel pressure.

MR. ROSS: That's in time three to five hours, right?

MR. ISRAEL: Right. That's what the water -- they're just discharging water through PORV.

CHAIRMAN HENDRIE: In this mode you have sent the PORV a signal to open, so you are not riding against its relief, automatic relief pressure.

MR. ISRAEL: That's right. The guidelines speak to two situations where you want the operator to manually open to PORV, and both situations basically speak to having

mgc

no heat sink. You are not removing heat from the steam generator, in which case you want to depressurize the plant as best you can, with whatever you have.

CHAIRMAN HENDRIE: Yes.

MR. ROSS: I think this is as good a place as any to bring up the matter that we had, that developed in the last few days. It's some allegations from a member of staff at Rancho Seco.

I received some calls, both here in Bethesda as well as last week when I was at the site, from people who asked -- didn't give me their names -- asked to remain anonymous, and since I don't know who they were it was easy to follow that request.

They asserted that there were non-licensed operators at Rancho Seco. They have --

COMMISSIONER KENNEDY: They asserted they were?

MR. ROSS: They were.

COMMISSIONER KENNEDY: They were?

MR. ROSS: Yes. I don't have any way of checking, of course, except as events -- as events turned out, I believe that these people were. I don't think they were phonies or anything.

There are three types of people out there. There are power plant aides or attendants, equipment attendants, and then I believe auxiliary operators. These -- several

mgc

people I talked to were concerned that there was a high turnover in these non-licensed operators, that they didn't get enought training, and that people would be hired in and then after a few months with only minimal training, they would be asked important safety functions. And the concern was that this represented some kind of problem that needed attention.

Like we do with any allegations, I&E was immediately notified. I&E did open an investigation. That investigation is continuing, and as of last night it has not been closed.

Following these initial allegations, there were some further -- the people I talked to by the way out there last week, they called me up in my motel. I listened to all of them, but I also said that for further, for follow-up, "Call Region 5," and I gave them the phone number. This is what Mr. Jessie Cruz and I had agreed on, so that they would have somebody out there to talk to.

Late last week there was follow-up on these allegations about concern that the procedures that were in books at local control stations -- like out near the auxiliary feedwater pump room or whatever -- had pen and ink changes. Some people had made local changes in the procedures, and were -- at least the implication is that they were unauthorized changes.

I&E did investigate last Friday. They looked at these pen and ink changes and concluded that these were not substantive, but merely reminders.

They did talk with the licensee last Friday, and reemphasized that people should follow only official control copies.

COMMISSIONER GILINSKY: Could you give an example of such a change?

MR. ROSS: No. I personally could not. The area we were talking at was in the demineralizer polisher area, and Mr. Cruz that I talked to last night said that the substance of it was just a reminder.

Now, do you have any more detail?

COMMISSIONER GILINSKY: These were not changes in procedure?

MR. ROSS: He said that they were not substantive changes in procedure.

Let me check. Al, do you have any more information?

MR. JOHNSON: No, I don't have any more information, but normally what you will have in operating procedures where the procedures are at the desk, many operators will write reminders, or write notes to themselves on a procedure. It doesn't go to the procedure itself.

For example, they might put: "Make sure you do

mgc

this step first. Make sure you do that last" or something like that.

COMMISSIONER GILINSKY: Aren't the steps written out in order?

MR. JOHNSON: I haven't personally looked at any of these procedures, because I was out of town last week and haven't been up there since. But this is the type of information I got from talking with Mr. Cruz and Mr. Morrell, who had been there, and Mr. Morrell had reviewed these procedures.

And he indicated that they were not really changes in the procedure where you change the mode or sequence of events.

MR. ROSS: Let me continue. You may want to return to that theme. I&E has now talked to 12 of the 28 non-licensed operators at Rancho Seco. Among other things, they asked each of those 12 two questions. The first was: are any of you aware of an unsafe conditions in the plant? The answer was no.

The second questions had to do with: what would you, the operator, do if you were confronted with a situation for which you didn't have a procedure?

Of course, they were trying to see if somebody would carry on and make up an ad hoc procedure, and the answer was that they'd stop and go find out and go ask what

mgc

to do.

They have discussed with the licensee -- made three points with them. They said one or two of the operators who don't have the TMI training -- I think they were in the process of going to the simulator and coming back. I just want to emphasize that these one or two people shouldn't stand watching, the work should be done. I don't have their names.

The second point was they talked about the procedures we just talked about, that they should tell everybody to follow only control copy procedures.

The third thing they mentioned to the licensee is that some of these non-licensed operators need some more instruction and training. Okay. Now that's the status of the investigation which is not complete. And the way that I&E ordinarily reports, the Commission will get copies when it's done.

COMMISSIONER BRADFORD: Weren't there allegations concerning security personnel as well?

MR. ROSS: Not really. I made a note that I sent to Mr. Mossely. The only comment that I got on security was for the -- the first anonymous call I had was, the guy said, and I think it's a fair quote: "Security has always been known to be a joke at the site, and now the training of non-licensed operators is being a joke." That's the only

mgc

way security was mentioned to me.

If there were any other security allegations I don't know about them.

COMMISSIONER BRADFORD: I'm just referring to the daily staff notes wnich I assume were based on whatever.

MR. ROSS: None of the recent allegations that I am aware of got into security.

But, Al, do you know of any security allegations?

MR. JOHNSON: No, I know of none recently.

I think it's important to note, however, that these operators of this equipment that you are speaking of is completely non-safety related. It's such as operating the mineralizers, operating this type of thing, and it's not what we usually exercise jurisdiction over, normally review or look into, because it does not involve the safety of a plant in any way.

Unless you carry it down through several sequences and you say, "Okay, this, you know, is like the horse you nail: you lose the war," this type thing. I think this is the type of thing we have to recognize.

COMMISSIONER GILINSKY: What category do you put auxiliary operators in?

MR. JOHNSON: Non-licensed people. And they do not operate safety-related equipment.

COMMISSIONER GILINSKY: In the control room?

430 093

mgc

MR. JOHNSON: No. They are over in the auxiliary building.

COMMISSIONER GILINSKY: There are no unlicensed persons operating equipment in the control room?

MR. JOHNSON: Under than trainees under direct supervision of licensed operators.

COMMISSIONER GILINSKY: Wouldn't they fall into this category?

MR. JOHNSON: No, because they have to do things under the direct control of the operator, supervisor. They can be told" "You go turn that valve." And an individual goes and turns the valve.

But the licensed operator is the one who's responsible.

COMMISSIONER GILINSKY: You sound like you haven't covered the training of the operators. I assume you will.

MR. ROSS: Well --

COMMISSIONER GILINSKY: Let me just ask a question. You can answer now or later.

Do the unlicensed operators come, or operators in training, receive the same training on TMI and related matters?

MR. ROSS: I don't think so. I don't think -- I did speak with the training coordinator out there about the training for non-licensed people. They don't go to the

mgc

simulator, which is where the licensed people —

COMMISSIONER GILINSKY: Is that the case for all the BMW plants?

MR. ROSS: I'm sure it is.

Now there was some training on the — on response to the bulletin that was supposed to go to everybody, but it wasn't that detailed.

COMMISSIONER GILINSKY: When are these trainees going to pick up that part of their education?

MR. ROSS: The new operators?

COMMISSIONER GILINSKY: Operators in training, not only at Rancho Seco, but at all of the plants.

MR. ROSS: That's not specifically covered by the orders. We will have to make up something for that.

Let me just -- I don't think —

COMMISSIONER GILINSKY: Because there could be circumstances when you have two operators in the control room one of which has not received his training.

MR. ROSS: In time, if you did nothing, then there would be no operators with TMI training, because, you know, disorderly of people up and out.

So I'm convinced there will have to be a continuous training program. But right now there is no mechanism that says, that picks up on this long term aspect.

MR. CUNNINGHAM: Well, the mechanism would be

mgc

issuance of a license to a new operator, which our examiners or licensed examiners would assure that they had TMI training.

MR. ROSS: We haven't done anything on it yet. I think it needs to be done. We just haven't done it.

To get to the bottom line on the allegations, I asked I&E management what they thought about the allegations with respect to the order. I talked to Mr. Mossely . His inclination was to keep the two things separate.

Right now there is no basis in his mind, from the allegations and the investigation, to take any harsh action. His theory was that -- he has a range of actions. They would be appropriate to whatever his investigation turns up, including, if necessary, shutting a plant down.

mgc

He did not -- he did not want to mix the two, as far as he was concerned, particularly when there was no particular bad news it turned up in his mind.

Since the allegations matter really came up rather late it wasn't discussed in the SER. It really wasn't germain to the SER, but somehow or the other the information has got to come out.

Okay. The last part had to do with training. I don't think we need to put a slide up for that.

Part E of the order, starting on page 25, as I believe, at the time the order was written, there was a concern -- at least there was an optimistic belief on the part of the district that they could get everything done in the auxiliary feedwater system area, but they might not be able to get all their operators back and get TMI through training. So the short term order and short term commitment said that they would have one senior licensed operator in the short term. And then in the long term which is -- you would have to refer perhaps back to the order -- they would have all the people trained. They are now to the point where they can have a complete set in the control room of TMI, two simulated trained people. So they are really in compliance more on the long term portion of this.

COMMISSIONER GILINSKY: All of the licensed personnel, then, would have had --

mgc

MR. ROSS: Yes. I think there may be one or two in transit. Is that right?

MR. JOHNSON: They are all trained, everyone of them.

MR. ROSS: There were some --

COMMISSIONER GILINSKY: What is the situation at the BMW plant?

Let's see, the ones that are operating are the Oconee and Arkansas.

MR. ROSS: Rancho was operating. Arkansas was down, I believe for refueling.

CHAIRMAN HENDRIE: I remember the Oconee arrangement was that only TMI operators would be allowed to operate the machines, and that if they didn't have enough, they couldn't operate all the units.

MR. ROSS: Right. I believe -- this may be the only plant that had that phraseology, as I recall. I believe all the rest of them had everybody trained.

CHAIRMAN HENDRIE: And Rancho now has all the licensed operators?

MR. ROSS: Right. They have about 22 operators. I think the routine examination -- that is, a test was contrived --

MR. CUNNINGHAM: Denny, I think that is what Commissioner Gilinsky wants to talk about: training, new

mgc

procedures, the tests that were given, passing grades and how we verified this.

MR. ROSS: Right.

The way we had the review set up, the same team that reviewed Oconee also reviewed -- it was there turn to review Rancho Seco.

So the people in the audience are the same people.

We have looked at craft's comparative tests that utilities have come up with. We have looked at the answer key. The same now "cast in concrete" of a grade of 90 has been established. If people don't pass, don't get a grade of 90, they don't get to stand watch.

COMMISSIONER GILINSKY: Now, these are tests made up by the utilities themselves?

MR. ROSS: That's correct.

COMMISSIONER GILINSKY: Do we check them before they are given, or after the fact?

MR. ROSS: Not before. I don't believe before. I know -- you don't see them until after, do you?

MR. WILSON: Afterwards.

MR. ROSS: We get copies of the utility-administered test, the utility's opinion of what the answers ought to be, plus all the written -- all the tests of all the operators.

COMMISIONER KENNEDY: Are you satisified that the

mgc

test, indeed, is a good test?

MR. ROSS: Yes, sir. I think we have provided samples to the Commission in two instances.

COMMISSIONER GILINSKY: I've received them in two cases.

MR. ROSS: As we have seen in other plants, the initial appraisal was that some of the training had some weakness and we have discussed it and needed more emphasis, both in some of the new procedures as well as some of the TMI-2 .

Of the initial tests, I believe 5 out of the 21, or 5 out of the 22 -- I forget which -- didn't make 90 on the first go-around.

COMMISSIONER GILINSKY: And there was sufficient management attention to this, in your view, on the part of Rancho Seco management in order to process and oversee it? Because we had that problem in one case before.

MR. ROSS: Well, I'm not sure.

COMMISSIONER GILINSKY: Not at Rancho Seco, but at Oconee.

MR. ROSS: In this instance, what does it -- it required, I think SMUD either concluded or agreed that they needed some external help. So they called on one of

~~439~~ 100

mgc

their prior consultants, General Physics, to come in and not only help with the training -- I met one of the fellows last week -- but also to do an independent audit of the results and oral examination.

So I think that by themselves they've probably -- they wouldn't have done as well. They did have to get some outside help.

I think that concludes our direct case, so to speak.

CHAIRMAN HENDRIE: Questions?

COMMISSIONER BRADFORD: The test consisted of typical situations and, "What would you do with them" kinds of questions?

MR. ROSS: All the training, it's really slanted toward new procedures and TMI-2. This was not a broad, "You have got a battleship on the prarie; how are you going to sink it" type thing. That hasn't come yet. I think that's -- that will come.

COMMISSIONER BRADFORD: Throughout my scholastic career, a grade of 90 was pretty good to me. But this situation does say that you are getting one out of ten wrong?

MR. ROSS: I was just glancing at this. There are six questions with -- three, four, six -- there are really twelve questions on here, subparts.

mgc

COMMISSIONER BRADFORD: I understand that.

MR. ROSS: Bruce, let me ask a question. In the training department, do they study for common mode mistakes on tests for use in recall and further lectures?

MR. WILSON: On the basis of LERs?

MR. ROSS: Yes.

MR. WILSON: Yes, these are usually factored into the test by the training period.

MR. CUNNINGHAM: Is he apprised of what the right answer is?

MR. WILSON: Yes, he is counseled on it.

COMMISSIONER BRADFORD: What I'm really after is some feel of what the process is that gives you assurance that even if somebody scores 90 on this test, it doesn't mean that he's going to make one out of ten decisions wrong when he is actually at the controls.

MR. WILSON: It's kind of a multi-layered approach. The first thing that we did was ask them to administer their own examination, and they wrote two examinations to cover all of their separate shifts, since they would be coming in at different times.

In the case of Rancho Seco, I think we did review the first exam before it was given. But it was not formally sent in: "Review this an approve it before we give it."

We judged, in our branch, that we thought his exam

mgc

was adequate to cover the situation. This was the first step -- the operator's getting 90 percent on the facility-administered exam.

The second step was the audit that we did, myself and the Region 5 inspector, and this was done on 50 percent of the operating, shift operating crews, seven out of 14.

The third step was the lecture series and retraining done by General Physics when they came in there, and that covered 100 percent of the operating people.

The fifth step was a reaudit by General Physics, which would be a different individual than the one who gave the training.

And the final one was a reaudit by eight people by NRC inspectors, so we imagine, after all of these, that they had to get the training somehow.

And the conclusion from the Region 5 inspector, who looked at 8 out of the 14 people, was that everything was satisfactory.

COMMISSIONER BRADFORD: Where in that chain did they take the tests?

MR. WILSON: The 90 percent test was the first step.

COMMISSIONER BRADFORD: I see.

MR. WILSON: This was only in the case of -- well, except Oconee, because this was kind -- it began with

~~439~~ 103

600 084

mgc

Oconee, when we went down there and decided to do the audit in the first place, and found deficiencies, and we said: "Well, why don't you administer the test."

COMMISSIONER BRADFORD: It applied to Oconee, too, as well, before you actually permitted startup.

MR. WILSON: Right.

COMMISSIONER GILINSKY: I must say I'm a little concerned that operators in training are not getting the training on TMI and new procedures that licensed operators are getting.

COMMISSIONER KENNEDY: They are not? I thought they were.

CHAIRMAN HENDRIE: I thought they were.

COMMISSIONER GILINSKY: The answer I understood Denny to say was that they were not.

MR. ROSS: We have got two different kinds of people: non-licensed operators, if you prefer --

COMMISSIONER GILINSKY: Non-licensed operators, yes.

MR. ROSS: They don't get the same training, because they haven't been designated yet to be reactor licensed operators.

COMMISSIONER GILINSKY: That's true, but at times one of these persons might be one of the two individuals in the control room.

~~439 104~~ 603 085

MR. ROSS: I don't think so.

MR. WILSON: They can be in control room, but first of all, the regulations say that they are not allowed to operate the controls unless they are in training, in a specified training program. You have to be designated for that training program.

Secondly --

COMMISSIONER KENNEDY: Excuse me, if they are designated by -- for the training program and are under it, they will get the TMI training?

MR. ROSS: Eventually. We haven't set out in some definitive mode what you just said. I'm sure it's true. We don't have any official requirement yet.

COMMISSIONER GILINSKY: They haven't had it yet, or at least the licensees have not bee required to provide it yet.

MR. ROSS: Well, under the terms of this order which, I guess, continue in effect for some period of time, they cannot stand watch until they get a grade of 90. This in turn implies some other stuff.

I think your concern is, in two or three years from now.

COMMISSIONER GILINSKY: Well, I want to understand this situation. If they are part of the control room crew, will they have received this training?

mgc

MR. WILSON: I think that's the misconception right there. They are not considered part of the control room crew. We require two licensed people in the control room. They are not one of them.

That's an extra person on shift.

MR. ROSS: He is answering a different question.

CHAIRMAN HENDRIE: I think it's the right one.

MR. ROSS: If you are going to be part of the control room crew, will you have the training?.

COMMISSIONER GILINSKY: Yes.

MR. ROSS: Yes.

Can I point to a place in the order where it says that? No.

COMMISSIONER GILINSKY: Well, how do you define "control room crew"?

As I understand it, we had a discussion about this yesterday, I think, and the operators in training are counted in the complement of three that are required to be present at the reactor.

Is that not right?

MR. ROSS: Let's ask the inspector.

MR. JOHNSON: You can count him as the individual. You need, I believe, it's two licensed operators.

COMMISSIONER GILINSKY: But there are times when only one licensed operator may be in the control room.

mgc

MR. JOHNSON: That's true. You are only required to have one licensed operator in the control room.

COMMISSIONER GILINSKY: So you may have one licensed operator and one individual in training.

MR. JOHNSON: That's true, but he cannot operate the controls unless the licensed operator supervises him.

COMMISSIONER GILINSKY: Right, but circumstances may arise when you have to rely on him to do important things.

MR. JOHNSON: By the rules, you cannot rely on him to do important things.

COMMISSIONER KENNEDY: He can only do precisely what he is told to do, and supervised while he is doing it. In other words, -- let me be sure I understand it.

He may physically go over and turn a valve on.

MR. JOHNSON: That's ture.

COMMISSIONER GILINSKY: Well, if he's one of the two persons in the control room, that's a pretty big place.

MR. JOHNSON: You only need one licensed operator in the control room to operate the plant. That's all you need.

MR. CUNNINGHAM: But there are other people there, but they are all under the direction of this licensed operator.

MR. ROSS: May I ask a question? One licensed,

mgc

senior licensed, and two licensed operators at the plant at all times: right?

MR. JOHNSON: When it's operating.

MR. ROSS: Correct. Okay.

MR. JOHNSON: But not in the control room.

MR. ROSS: I understand, but this trainee doesn't take the place of one of these three?

MR. JOHNSON: No. But he can be in the control room and he can do the things the licensed operator directs him to do, but he doesn't count, so to speak, unless he is licensed.

MR. ROSS: Now, at some point in time, this trainee would get the same training. When? We don't have that "when" defined. A week before he takes his test, a year before he takes his test, we don't have that fully defined yet.

CHAIRMAN HENDRIE: But, see, another way of saying this is that the requirements for licensed operators, both on shift and in the control room, are in no way relieved or fulfilled by the presence of a trainee?

MR. WILSON: That's true.

MR. JOHNSON: That's true.

CHAIRMAN HENDRIE: Any place a trainee appears, he is an addition to the normally required minimum shift staff and control room complement?

mgc

MR. NILSON: Yes.

COMMISSIONER GILINSKY: But it is also true, I think, that he may be one of the two persons in the control room at times and be required to perform important functions even though they are under the direction --

CHAIRMAN HENDRIE: I'm sorry. That's not the case. He may, indeed, be one of the two people in the control room under one licensed operator and one other, but the "one other" is not there to run and turn essential switches, and so on.

He is there to holler in case the licensed operator has a heart attack and drops dead before the senior people come back.

COMMISSIONER GILINSKY: Well, I'll tell you --

CHAIRMAN HENDRIE: In which case, he can be -- he's allowed to be an auxiliary operator, equipment operator, and the fact that he is a trainee, in fact, for reactor operator, is an upgrading from that situation, I would suggest, not a downgrading.

COMMISSIONER GILINSKY: Well, I guess two persons in the control room doesn't sound to me like a very large number, and I would be more comfortable if they both had a clear idea of what the problems that we ran into at Three Mile Island were and what the new procedures might be.

MR. JOHNSON: There is only a requirement for one

mgc

person to be in the control room to start with.

COMMISSIONER GILINSKY: I don't think that's a very large number either.

MR. CUNNINGHAM: One licensed person.

MR. JOHNSON: You can have five in there for lunch, or something.

COMMISSIONER GILINSKY: Well, we have six be in there.

COMMISSIONER BRADFORD: In the situation in which there is a minimum number of people there, how long does it take the other licensed operators plus other people that might be needed, to get there.

MR. WILSON: I'd say, on the outside, two minutes.

COMMISSIONER GILINSKY: I should make clear that this is a problem not specific to one reactor. It goes across the board.

MR. WILSON: Now, in the case of Oconee -- although this is not under consideration at this time -- they are requiring, administratively, two people in the control room of Unit 3, which is a separate unit, and three in the control rooms of Unit 1 and 2, which are combined control rooms.

CHAIRMAN HENDRIE: Well, it's a generic question, you know, sort of general.

Somehow it seems to me you are distinguishing this

mgc

as unique to Rancho Seco, and I couldn't see that it is a fair question as a general standard for shift manning and control room manning.

Now, let's see. Where do the other questions take us from there?

Counsel? OPE? Further from the staff?

Okay. Very good. Thank you very much.

(Whereupon, at 11:25 a.m., the hearing was adjourned.)

June 26, 1979

STATEMENT *

My name is Dee Price and I am the secretary of the SMUD Ratepayer's Assoc., Inc. Please forgive my nervousness for I have been rushing a great deal since making the decision to come here. We are very appreciative of the opportunity to speak and I will be brief. When I read in last Saturday's Sacramento Bee that we (SMUD) were to possibly be sued by a more vocal group if NRC approves Rancho Seco's start-up without first holding a public hearing, I knew we must stand up and be heard.

We are a small association, with only about 325 members but have been duly incorporated under California State law and a copy of our By-Laws and Articles of Incorporation are on file with the Secretary of State. Our purposes are to educate the public regarding different types of resources used for generating electricity, encourage energy conservation, and encourage public participation at SMUD Board of Director meetings so that people can see how Board decisions can affect their electrical rates. Most of our members are from organized labor unions and hold a very firm belief that jobs and energy go together to help produce a healthy economy.

As you may know, the SMUD Board of Directors meets on the first and third Thursday of each month and these meetings are open to the public. After approximately 30-45 minutes after each meeting begins, visitors are invited to make statements of five minutes or less. Well, since TMI occurred, each and every board meeting

*Ms. Price did not actually speak. See Chairman's statememement on pg. 4, line 22 of this transcript.

at SMUD has been a public airing of the similarities between TMI and Rancho Seco. Our Board seems to now have more difficulty conducting its regular business!

On May 16, Paul Carr, a Director of SMUD, Russ Miner of the California Energy Commission and myself toured Rancho Seco so that we could see the completed NRC requests and ask questions. Earlier on the same day, Commissioner Gene Varanini of the California Energy Commission had also been conducted on a similar tour. Later Commissioner Varanini requested the NRC staff to brief the entire California Energy Commission on the items addressed in the NRC Order and, I believe, what SMUD had done to comply with that Order. This meeting was held last Thursday, June 21, in Sacramento and was scheduled between 10:00 a.m. and Noon and stated that "An opportunity will be provided for public questions and comments. Comments will be limited to 5 minutes per person."

The dialogue between your staff people and the Commission concluded at approximately 1:00 p.m. and after lunch, reconvened at 2:15 p.m. While I was not the first to sign up for speaking, I was certainly not the last, but guess who ended up last! That was not the first time Commissioner Maullin has done that to me and I'm sure it won't be the last. The first speaker was given about 35 minutes and the ASSAULT began in earnest. We had five people who had travelled over

100 miles to speak and one of them never asked a question, she just made a statement. Your staff was questioned about emergency evacuation procedures, by a Commissioner and when Dr. Ross explained that they had not been requested to address this area of concern and that his expertise wasn't related to this item, the Commissioner was "apalled". One public member asked if any of your staff had ever seen a child die from leukemia? After a rather long pause, Commissioner Maullin allowed the question to go unanswered. At about 5:00 p.m. it ended, or did it? The California Energy Commission is now investigating appropriate legal action against NRC if Rancho Seco opens without first holding a public hearing.

Our organization isn't opposed to a public hearing but let it be after Rancho Seco is on line and producing electricity, if this Commission deems it appropriate. The authority is yours to stop operation of any nuclear facility, with due cause.

We feel a public hearing in Sacramento, conducted by NRC, may be in the best interest of the public and our members. The public who wants to learn, will, and at the same time, they can observe another meeting like SMUD held on April 7. However, we would plead that you allow Rancho Seco to resume operation as you have allowed its sister plants to resume operation. If there is some other reason, advise SMUD and allow whatever adjustments to be made but please don't allow us to be used as a political ploy.

California is unique in many ways and we have been a leader in many things. We will probably lead the nation with regularly occurring black-outs. On June 13 the Northern California area dropped to about a 4% reserve. We don't need to explain to this Commission the threat regularly occurring black-outs will pose for the health and safety of our citizens and the potential economic disaster. What faster method could be used to drop our demand other than scaring business out of the state.

Our hope for enough electricity to see us through the summer is now in your hands and your decision will not just affect Sacramento but all of California. As three of our five Directors stated at our april 7 meeting, before voting to keep Rancho Seco open, they had faith in SMUD's staff, they had faith in the NRC and they had faith in this country. The whole country will be watching this decision.

Thank you so much for letting me speak.