

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

TERA

OCT 4 1979

Docket No. 50-289

Mr. R. C. Arnold, Senior Vice President
Metropolitan Edison Company
260 Cherry Hill Road
Parsippany, New Jersey 07054

Dear Mr. Arnold:

RE: MODIFIED TMI-2 RESTART REQUIREMENTS

Section II of the Commission's Order of August 9, 1979 on TMI-1 identifies short-term and long-term actions recommended by the Director of Nuclear Reactor Regulation to be accomplished to resolve concerns of the Commission and permit a finding of reasonable assurance that the facility can safely resume operation.

Since issuance of that Order, various of these recommendations have been modified and some added, as discussed below.

Lessons Learned Task Force Report (NUREG-0578)

The Advisory Committee on Reactor Safeguards has completed its review of the Task Force report. The several public meetings of the ACRS subcommittee on TMI-2 and the public meeting of the full committee on August 9 provided an opportunity for the presentation and discussion of public comments on the report. The ACRS letter of August 13, 1979 to Chairman Hendrie states that the Committee agrees with the intent and substance of all the Task Force recommendations, except four upon which the Committee offered constructive comments to achieve the same objectives articulated by the Task Force. The Committee also noted that effective implementation will require a more flexible, perhaps extended, schedule than proposed by the Task Force. A copy of the ACRS letter is provided as Enclosure 1.

After considering all comments received, we have concluded that the following actions are appropriate for operating nuclear power plants.

- (a) The staff will be proposing a new rule on a Limiting Condition of Operation to require plant shutdown for certain human or procedural errors, particularly those which are repetitive in nature. As such, no action is required on your part at this time.

1160 241

7910170

735

P

- (b) At the present time we are delaying efforts regarding proposed rulemaking on both the inerting requirements for Mark I and II BWR containments, and the requirement regarding hydrogen recombiner capability; accordingly, no action is required on your part at this time.
- (c) The ACRS comments on the shift technical advisor have resulted in our reassessment of the possible means of achieving the two functions which the Task Force intended to provide by this requirement. The two functions are accident assessment and operating experience assessment by people onsite with engineering competence and certain other characteristics. We have concluded that the shift technical advisor concept is the preferable short-term method of supplying these functions. We have also concluded that some flexibility in implementation may yield the desired results if there is management innovation by individual licensees. We have prepared a statement of functional characteristics for the shift technical advisor that will be used by the staff in the review of any alternatives proposed by licensees. A copy is provided as Enclosure 2.
- (d) Three additional instrumentation requirements for short-term actions were developed during the ACRS review of NUREG-0578. These items relate to containment pressure, containment water level and containment hydrogen monitors designed to follow the course of an accident. Descriptions of these items are provided in Enclosure 3.
- (e) An additional requirement following issuance of NUREG-0578, which concerned a remotely operable high point vent for gas from the reactor coolant system, was developed. A description of this requirement is provided in Enclosure 4.
- (f) The Lessons Learned Task Force has compiled a set of errata and clarifying comments for NUREG-0578. It is provided as Enclosure 5.

Other Review Areas

Enclosure 7 outlines the requirements developed to date resulting from the staff's Emergency Preparedness Studies. Enclosure 8 provides the implementation schedules for the emergency preparedness requirements which, you will note, includes three of the Lessons Learned Topics. We also require that you provide commitments to comply with each of the requirements of Enclosure 7 in accordance with the implementation schedules shown in Enclosure 8. Further, the Commission has initiated a rulemaking procedure, now scheduled for completion in January 1980 in the area of Emergency Planning and Preparedness. Additional requirements are to be expected when rulemaking is completed and some modifications to the emergency preparedness requirements contained in this letter may be necessary. The items above were discussed further in the meeting on emergency preparedness held in Middletown during the week of September 25, 1979.

Enclosure 9 outlines the staff recommendations concerning improvements in the area of operator training. These recommendations are undergoing Commission review, and are expected to be adopted as requirements in the near future. Further Commission review in the areas of operator training and qualification can be expected to result in substantial additional requirements.

A number of other related actions on your facility have been underway for some time under the direction of the NRR Bulletins and Orders Task Group. You will receive additional guidance from this group, particularly related to auxiliary feedwater systems and small break LOCAs, in the near future. Your activities should continue in these areas, as all the mentioned activities are meant to complement one another.

The measures discussed above modify the set of requirements that should be implemented at this time. As stated earlier, other requirements may follow in the future. To assist in explaining in more detail each of these requirements, the NRC held regional meetings during the week of September 24, 1979. Changes described at these meetings are not included in the scope of this letter, but should be assumed to modify further the recommendations of NUREG-0578.

POOR ORIGINAL

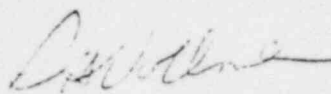
1160 243

Mr. R. C. Arnold

- 4 -

If you have any questions regarding these actions, please contact the NRC Project Manager for your facility, Harley Silver.

Sincerely,



Richard H. Vollmer, Director
TMI-2 Support

Enclosures:

1. ACRS Ltr: Carbon to
Hendrie dtd 8/31/79
2. Alternatives to Shift Technical
Advisor
3. Instrumentation to Monitor
Containment Conditions
4. Installation of Remotely
Operated High Point Vents
in the Reactor Coolant System
5. NUREG-0578 Errata
6. Implementation Schedule
7. Requirements for Improving
Emergency Preparedness
8. Emergency Preparedness Improve-
ments - Implementation Schedule
9. Improvements in Operator Training

1160 244

Mr. J. G. Herbein,
Vice President Nuclear Operations
Metropolitan Edison Company
P. O. Box 480
Middletown, Pennsylvania 17057

Mr. E. G. Wallace, Licensing Manager
Metropolitan Edison Company
260 Cherry Hill Road
Parsippany, New Jersey 07054

Mr. G. P. Miller,
Manager Support Services and Logistics
Metropolitan Edison Company
260 Cherry Hill Road
Parsippany, New Jersey 07054

Mr. J. L. Seelinger,
Superintendent, Unit 1
260 Cherry Hill Road
Parsippany, New Jersey 07054

Mr. J. J. Colitz
Manager Plant Engineering
260 Cherry Hill Road
Parsippany, New Jersey 07054

Mr. I. R. Finfrock
Jersey Central Power and Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960

Mr. R. W. Conrad
Pennsylvania Electric Company
1007 Broad Street
Johnstown, Pennsylvania 15907

Mr. George F. Trowbridge, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D. C. 20036

J. B. Lieberman, Esq.
Metropolitan Edison Company
260 Cherry Hill Road
Parsippany, New Jersey 07054

Ms. Mary V. Southard,
Chairperson Citizens for a
Safe Environment
c/o Metropolitan Edison Company
260 Cherry Hill Road
Parsippany, New Jersey 07054

Chauncey R. Kepford, Esq.
Chairman
York Committee for a Safe
Environment
433 Orlando Drive
State College, Pennsylvania 16801

U. S. Environmental Protection Agency
Region III Office
Attn: EIS Coordinator
Curtis Building
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

Director, Office of Radiological
Health
Department of Environmental
Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17105

Mr. Weldon B. Arehart, Chairman
Board of Supervisors
Londonderry Township
RFD #1, Geyers Church Road
Middletown, Pennsylvania 17057

Mr. Harry B. Reese, Jr., Chairman
Board of County Commissioners
of Dauphin County
P. O. Box 1295
Harrisburg, Pennsylvania 17120

Mr. Gustave A. Linenberger
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. Ernest O. Salo
Professor, Fisheries Research
Institute, WH-10
College of Fisheries
University of Washington
Seattle, Washington 98195

POOR ORIGINAL

1160 245

Alan S. Rosenthal, Esq., Chairman
Atomic Safety and Licensing Appeal
Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. W. Reed Johnson, Member
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Jerome S. Sharfman, Esq., Member
Atomic Safety and Licensing Appeal
Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

POOR ORIGINAL

Dauphin County Office Emergency
Preparedness
Court House, Room 7
Front & Market Streets
Harrisburg, Pennsylvania 17101

Director, Technical Assessment
Division
Office of Radiation Programs
(AW-459)
U.S. Environmental Protection
Agency
Crystal Mall #2
Arlington, Virginia 20460

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 420, 7735 Old Georgetown Road
Bethesda, Maryland 20014

Governor's Office of State Planning
and Development
Attn: Coordinator, Pennsylvania
State Clearinghouse
P.O. Box 1323
Harrisburg, Pennsylvania 17120

1160 246