

January 3, 1980

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MEMORANDUM FOR: Roger J. Mattson, Director
Division of Systems Safety

FROM: Richard H. Vollmer, Director
Three Mile Island Support

SUBJECT: ACTION PLAN

The participants in the Operational Safety Working Group have reviewed the December 11 version of the Action Plan and have the following substantive comments on that draft:

1. Task I.B.1 - Page 8 of the Summary states that "A significant increase in on-site capability will result from the requirement to establish an on-site safety engineering group within the next year that is to be independent of the operating staff (Task I.B.1)." This requirement is not mentioned in the detailed description of I.B.1 nor did the Working Group intend that it do so for a number of good reasons. It is our belief that this proposed action be actively studied, in concert with other proposed management/technical competence issues and technical groups already required by Technical Specifications, prior to fixing specific technical criteria or implementation dates.
2. Task I.D.1 - The Working Group does not believe that an audit of selected plants will meet the objective. It was our view that staff visit and evaluation of each control room and a questionnaire for licensed reactor operators would have important short-term benefits that do not surface in the current draft.

I believe that future revisions of the Action Plan should reflect these views.

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Original signed by:
Richard H. Vollmer

Richard H. Vollmer, Director
Three Mile Island Support

cc: Operational Safety Working
Group *

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