

CITIZENS FOR FAIR UTILITY REGULATION (CFUR)

1668-B CARTER DRIVE
ARLINGTON, TEXAS 76010

Docket No. 50-445
and 50-446

August 25, 1979

Lawrence J. Chandler
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Chandler:

SUBJECT: CFUR'S FIRST INFORMAL REQUEST FOR INFORMATION TO THE NRC

Pursuant to our conversation of July 17th, concerning the status of the capability to request information on an informal basis, CFUR's first informal request for information follows. The request concerns information from a number of different sources and is grouped according to source.

I. NRC Staff In-House Projects

CFUR has determined that the NRC staff initiated a number of projects related to the Three Mile Island-2 accident--studies, research evaluations, and support projects. CFUR realizes that a number of the projects as originally defined have since been redefined to be incorporated into larger efforts, but CFUR requests that all interim reports as well as final reports, if available, be supplied for the following projects:

A. Inspection and Enforcement

- 1.1 ACTIVITY - IE Investigation
- 1.2 OBJECTIVE - To establish the facts concerning the TMI accident; and to evaluate licensee performance "as a basis for corrective action or enforcement action as appropriate."
- 1.3 TARGET DATE - August 1

B. Nuclear Material Safety and Safeguards

- 1.1 ACTIVITY - Recriticality Potential for TMI-2 core
 - 1.2 OBJECTIVE - Analysis of potential for recriticality
 - 1.3 TARGET DATE - Completed
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- 2.1 ACTIVITY - TMI Waste Transportation
 - 2.2 OBJECTIVE - Assess adequacy of existing package designs to transport solidified waste from TMI to disposal sites.
 - 2.3 TARGET DATE - Six weeks after determination of nature of waste and disposal schedule

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C. Nuclear Reactor Regulation

- 1.1 ACTIVITY - TMI-2 site support - core cooling, cleanup and recovery operations
- 1.2 OBJECTIVE - a) prepare Tec specs; b) analyze plant activities in relation to ALARA objectives; c) perform analysis of dose to public via all pathways; d) analyze proposed plans for major operations, including longtime cleanup and core removal.
- 1.3 TARGET DATE - Ongoing

- 2.1 ACTIVITY - Availability of Primary Financial Protection at TMI
- 2.2 OBJECTIVE - Study alternatives to NRC for dealing with \$20 million "gap" in protection.

D. Nuclear Regulatory Research

- 1.1 ACTIVITY - Long-term Cooling Plan
- 1.2 OBJECTIVE - Assess effect of HPI operation on natural circulation
- 1.3 TARGET DATE - Completed

- 2.2 ACTIVITY - Noise analysis diagnostic coordination. Determine status of TMI core using neutron noise measurements
- 2.2 OBJECTIVE - Maximum use of loose parts monitoring systems; determine the status of the TMI-2 plant
- 2.3 TARGET DATE - July 1

- 3.1 ACTIVITY - Natural Circulation System Analysis
- 3.2 OBJECTIVE - Calculate natural circulation in B&W plant with damaged reactor core
- 3.3 TARGET DATE - Completed

- 4.1 ACTIVITY - Containment venting conceptual design
- 4.2 OBJECTIVE - Develop controlled venting scheme as contingency to less of containment integrity
- 4.3 TARGET DATE - Completed

- 5.1 ACTIVITY - Inputting TMI-2 fuel parameters to COBRA to calculate fuel damage
- 5.2 OBJECTIVE - Determine extent of core damage
- 5.3 TARGET DATE - Completed

- 6.1 ACTIVITY - Hydrogen uptake and dissolution in reactor systems
- 6.2 OBJECTIVE - Predict hydrogen content of TMI cooling water and develop purging methods
- 6.3 TARGET DATE - Completed

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- 7.1 ACTIVITY - Interpret pressure level readout in TMI-2 control room during accident
- 7.2 OBJECTIVE - Determine if readout could have misled operator concerning presence of coolant in core
- 7.3 TARGET DATE - Completed

- 8.1 ACTIVITY - Independent expert study of probable core condition
- 8.2 OBJECTIVE - Advise NRR whether core condition should permit safe shutting off of cooling pumps
- 8.3 TARGET DATE - Completed

- 9.1 ACTIVITY - Compute TMI-2 response to initial transient and natural circulation
- 9.2 OBJECTIVE - Develop a version of SSC to enable simulation of system-wide transients generic to a TMI-type reactor
- 9.3 TARGET DATE - February, 1980

- 10.1 ACTIVITY - Coolability of rubblized TMI core debris
- 10.2 OBJECTIVE - Provide NRC/TMI team with results of calculations
- 10.3 TARGET DATE - Completed

- 11.1 ACTIVITY - Evaluate H₂ in reactor vessel and containment building
- 11.2 OBJECTIVE - Evaluate quantities that could be dissolved in the primary coolant water, means by which H₂ in the primary coolant system might be reduced, and available methods for reducing H₂ in containment atmosphere
- 11.3 TARGET DATE - Completed

- 12.1 ACTIVITY - Monitoring radioiodine from loss of containment accidents
- 12.3 TARGET DATE - Ongoing

- 13.1 ACTIVITY - Probabilistic analysis - staff studies
- 13.2 OBJECTIVE - Analyze range of alternative outcomes of various TMI events
- 13.3 TARGET DATE - Completed - 13 separate studies issued

- 14.1 ACTIVITY - Research Contract - Post-licensing Studies
- 14.2 OBJECTIVE - Assess socio-economic impacts
- 14.3 TARGET DATE - 9/79

- 15.1 ACTIVITY - Core damage assessment
- 15.2 OBJECTIVE - Determine when and if core became uncovered, duration, and assess resulting core damage
- 15.3 TARGET DATE - Was to be completed June 1

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- 16.1 ACTIVITY-Input TMI-2 characteristics in TRAC at Los Alamos and calculate transient
- 16.2 OBJECTIVE - Perform calculations

- 17.1 ACTIVITY-Preliminary requalification requirements for TMI-2
- 17.2 OBJECTIVE - NRC must evaluate need for new decontamination procedures, assessment of overall damage, handling of damaged fuels, removal and replacement of components, etc.
- 17.3 TARGET DATE - Completed

- 18.1 ACTIVITY - Potential methods of venting gas bubble from PWR coolant system
- 18.2 OBJECTIVE - Prepare test plan to evaluate potential methods
- 18.3 TARGET DATE - Planned - end of July

- 19.1 ACTIVITY - Study instrumentation to indicate reactor vessel water level in PWR's
- 19.2 OBJECTIVE - Identify and recommend instrumentation to provide accurate indication
- 19.3 TARGET DATE - Completed

- 20.1 ACTIVITY - Determination of coolant water availability by location during accident
- 20.2 OBJECTIVE - Accurately calculate thermalhydraulic phenomena
- 20.3 TARGET DATE - End of August

- 21.1 ACTIVITY - Calculate compressibility of steam/noncondensable gas mixtures
- 21.2 OBJECTIVE - Evaluate effect of vapor condensation on compressibility
- 21.3 TARGET DATE - Was to be completed

- 22.1 ACTIVITY - Backup review of natural circulation cooling
- 22.2 OBJECTIVE - Determine circulation rates for various plant configurations
- 22.3 TARGET DATE - Completed

- 23.1 ACTIVITY - TMI mockup and small break tests - semiscale
- 23.2 OBJECTIVE - Simulate first 3 hours of transient in scaled experiment, then complete series of small break tests
- 23.3 TARGET DATE - First phase complete - second phase 12/79

- 24.1 ACTIVITY - Assess hydrogen evolution from impile level damage obtained in experiments
- 24.2 OBJECTIVE - Determine how much H₂ was generated from prior PBF tests in which fuel rods ruptured and Clad oxidized
- 24.3 TARGET DATE - Completed

- 25.1 ACTIVITY - TMI hydrogen problems
- 25.2 OBJECTIVE - Prepare draft scope for hydrogen investigation program. Review TMI scenario as applied to hydrogen generation and release
- 25.3 TARGET DATE - First phase complete - second due mid-July

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E. Standards Development

- 1.1 ACTIVITY Population and maximum individual dose assessment
- 1.2 OBJECTIVE - Determine dose and potential population health effects.
HEW report issued, with NRC and EPA approval.

D. Executive Legal Director

- 1.1 ACTIVITY - Determination of Extraordinary Nuclear Occurrences
- 1.2 OBJECTIVE - Inform commissioners of need for ENO determination
- 1.3 TARGET DATE - Commission has under review

II. ACRS Activities

Copies of the transcripts of the following portions of 1979 Nuclear Regulatory Commissions' Advisory Committee on Reactor Safeguards (ACRS) technical meetings as follows:

- 1.1 SCHEDULED TIME: Thursday, February 8 from 9:15 to 10:15 AM
- 1.2 SUBJECT: The committee will meet with the Director of the Office of Nuclear Reactor Regulation to hear a report on the degree to which the NRC staff considers low-probability, high consequence accidents in the licensing process

- 2.1 SCHEDULED TIME: Friday, February 9 from 1:00 to 3:45 PM
- 2.2 SUBJECT: The committee will meet with representatives of the NRC staff to discuss recent operating experience and licensing actions, including NRC activities related to the capability of nuclear power plants to shut down and remove decay heat.

- 3.1 SCHEDULED TIME: Friday February 9 from 3:45 to 5:30 PM
- 3.2 SUBJECT: The committee will meet in open executive session to hear and discuss subcommittee reports on emergency core cooling systems, Licensee Event Reports and anticipated transients (abnormal conditions) followed by failure of the reactor shutdown systems as required. The events are postulated but not expected to occur during the lifetime of the plant.

- 4.1 SCHEDULED TIME: Thursday, March 8 from 1:15 to 6:15 PM
- 4.2 SUBJECT: The committee will meet with representatives of the NRC staff to discuss proposed corrective action to resolve anticipated transients (abnormal conditions) which are followed by failure of the reactor shutdown systems as required. The events are postulated but not expected to occur during the lifetime of the plant.

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- 5.1 SCHEDULED TIME: Friday, March 9 from 8:30 to 10:00 AM
5.2 SUBJECT: The committee will meet in open executive session to discuss the role and responsibilities of the ACRS in the NRC regulatory process.
- 6.1 SCHEDULED TIME: Thursday, April 5 from 4:30 to 6:30 PM
6.2 SUBJECT: The committee will meet with members of the NRC staff to discuss alternative plant modifications to resolve anticipate transients (abnormal conditions) followed by failure of the reactor shutdown systems as required. The events are postulated but not expected to occur during the lifetime of the plant.
- 7.1 SCHEDULED TIME: Saturday, April 7 from 8:30 to 10:30 AM
7.2 SUBJECT: The committee will meet in open executive session to discuss proposed reports on Palo Verde, Sequoyah and proposed resolution of anticipated transients.
- 8.1 SCHEDULED TIME: Saturday, April 7 from 11:30 AM to 4:00 PM
8.2 SUBJECT: The Committee will meet in open executive session to continue preparation of reports on Palo Verde, Sequoyah and anticipated transients.
- 9.1 SCHEDULED TIME: Monday, April 16 from 8:30 to 11:30 AM
9.2 SUBJECT: The committee will meet with members of the NRC staff to discuss its evaluation of replies to an NRC bulletin to other operators of B&W reactors directing them to perform a series of specific reviews and actions.
- 10.1 SCHEDULED TIME: Monday, April 16 from 11:30 AM to 1:30 PM
10.2 SUBJECT: The committee will meet in open executive session to discuss ACRS reports regarding the current status of the Three Mile Island Nuclear Station.
- 11.1 SCHEDULED TIME: Monday April 16 from 2:30 to 5:30 PM
11.2 SUBJECT: The committee will meet with representatives of the nuclear industry to discuss actions proposed with respect to nuclear stations that use B&W reactors.
- 12.1 SCHEDULED TIME: Monday April 16 from 5:30 to 7:30 PM
12.2 SUBJECT: The committee will meet with members of the NRC staff to discuss the status of the Three Mile Island nuclear station and interim actions taken or planned to adequately protect the public health and safety.
- 13.1 SCHEDULED TIME: Monday, April 16 from 7:30 PM to 8:30 PM
13.2 SUBJECT: The committee will meet in open executive session to discuss its proposed recommendations to the NRC regarding modifications to B&W reactors and the Three Mile Island station.
- 14.1 SCHEDULED TIME: Tuesday, April 17 from 3:30 to 4:00 PM
14.2 SUBJECT: The committee will discuss future activities regarding evaluation of the Three Mile Island accident.

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- 15.1 SCHEDULED TIME: Thursday, June 14 from 8:30 to 11:30 AM
15.2 SUBJECT: The committee will meet to discuss a report of the committee chairman regarding ACRS activities and a report on the status of Three Mile Island and implications of the accident.

- 16.1 SCHEDULED TIME: Thursday, June 14 from 11:30 AM to 1:00 PM
16.2 SUBJECT: The committee will meet with members of the NRC staff to discuss the evaluation of licensee replies to bulletins from the NRC's Office of Inspection and Enforcement regarding operational errors and system misalignments identified during the accident; NRC orders to operators of Babcock and Wilcox nuclear reactors; and NRC staff action in response to ACRS recommendations resulting from the accident.

- 17.1 SCHEDULED TIME: Thursday, June 14 from 5:30 to 6:30 PM
17.2 SUBJECT: The committee will discuss reports related to nuclear reactor safety, including proposed revisions to NRC Regulatory Guides, the use of probabilistic assessment by the NRC and return to operation of the Fort St. Vrain nuclear reactor in Colorado.

- 18.1 SCHEDULED TIME: Friday, June 15 from 8:30 to 11:30 AM
18.2 SUBJECT: The committee will meet with representatives of Metropolitan Edison to discuss the accident at Three Mile Island, activities following the accident and the current status of the plant.

- 19.1 SCHEDULED TIME: Friday, June 15 from 5:30 to 6:30 PM
19.2 SUBJECT: The committee will meet to discuss proposed ACRS recommendations on TMI; implications of the TMI accident on the design of nuclear facilities and the proposed power level increase for Millstone 2.

- 20.1 SCHEDULED TIME: Saturday, June 16 from 8:30 AM to 4:00 PM
20.2 SUBJECT: The committee will continue discussions on TMI and Millstone 2 as well as proposed reports on a request for a construction permit for the Palo Verde 4 and 5 nuclear power plants in Arizona and the two unit Sequoyah nuclear station in Tennessee.

- 21.2 SCHEDULED TIME: Friday, July 13 from 1:30 to 6:30 PM
21.2 SUBJECT: Committee discussions will include the views of its members regarding the basic causes contributing to the Three Mile Island accident and a proposed report regarding the ACRS evaluation of licensee Event Reports resulting from the operation of nuclear power plants.

- 22.1 SCHEDULED TIME: Saturday, July 14 from 8:30 AM to 4:00 PM
22.2 SUBJECT: The committee will discuss proposed comments and recommendations regarding the implications of the Three Mile Island accident and the proposed piling design change at the Bally station.

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- 23.1 SCHEDULED TIME: Wednesday, August 8
- 23.2 SUBJECT: Detailed analysis of NRR, utility capabilities, and NRC's role regarding the technical qualifications and management structure of users by Harold Denton.
- 24.1 Any report regarding an ACR: evaluation of Licensee Event Reports resulting from the operation of nuclear power plants.
- 25.1 The mid-July report to the NRC by the ACRS primarily to the NRC safety-research budget request for FY-80 (supplemental) and FY-81, but which includes discussion of TMI.

III. TMI-2 Lessons Learned Task Force

NUREG-0578 contains the recommendations for short-term actions or commitments that received a two-thirds majority vote of the TMI-2 Lessons Learned Task Force members present.

1. CFUR requests that information describing the title, description and discussion of the items considered by the Task Force which did not receive a two-thirds majority.
2. CFUR requests that the vote count on all items considered by the Task Force be supplied.

In NUREG-0578, it is stated that:

"Several licensing issues raised by TMI-2 are being examined by other groups within the Commission's staff in coordination with the Lessons Learned Task Force. These are operator training and licensing (OLB), licensee technical qualifications (QAB), instrumentation to follow the course of an accident (SD) and emergency preparedness (EDO, Task Force)."

3. CFUR requests all interim reports as well as final reports, if available, concerning these issues be supplied.

IV. President's Commission

1. CFUR requests that all interim reports as well as the final report, when available, made by and/or to the President's Commission be supplied.
2. CFUR requests that all transcripts of the Presidential Commission's hearings be supplied.

V. NRC Special Inquiry

CFUR requests that all interim reports as well as the final report, when available, made by and/or to the Special Inquiry directed by Mr. Mitchell Rogovin be supplied.

VI. Lewis Report

Provide working papers used by the Lewis Committee to formulate opinions expressed in NUREG/CR-0400, "Risk Assessment Review Group Report to the U.S. Nuclear Regulatory Commission."

VII. Science Applications, Inc.

Scenarios on possible accidents are being prepared by Science Applications, Inc., under subcontract to Sandia Laboratories, an NRC contractor. Draft of the first scenario is now complete and should be ready for publication as an "interim scenario" in November. CFUR requests that a copy of the "interim scenario" be made available at the earliest time possible.

VIII. WASH Reports

1. Please provide a copy of WASH 1283, "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants."
2. Please provide a copy of WASH 1300, "Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants."
3. Please provide a copy of WASH 1284, "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants."

IX. ATWS

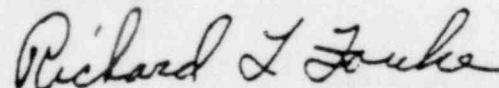
Please provide a copy of NUREG-0460, Vols. 1, 2, and 3.

X. NRC Inspection and Enforcement Communications

Please include CFUR's name on distribution list for all communications between the NRC I & E division and the applicant, TUGCO, etc.

Please do not wait to send requested items all at once but forward them as they become available, either in whole or in part. If you have any questions or desire a discussion or clarification of the requested items, please contact us.

Sincerely,



Richard L. Fouke

ccs: Applicant, Other Intervenors

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

OCT 4 1979

Richard L. Fouke
Citizens for Fair Utility
Regulation (CFUR)
1668-B Carter Drive
Arlington, TX 76010

In the Matter of Texas Utilities Generating Company, et al,
(Comanche Peak Steam Electric Station, Units 1 and 2)
Docket Nos. 50-445 and 50-446

Dear Mr. Fouke:

I am writing in response to your letter dated August 25, 1979, and received at NRC on September 7, 1979, which requests information pursuant to our conversation of July 17, 1979. The conversation you refer to took place at the meeting held by the parties on July 17, 1979, to discuss the contentions proposed by CFUR in this proceeding. In connection with our discussion of these contentions, the Staff offered to consider, on an informal basis, requests by CFUR for NRC documents related to the specific issues raised by CFUR in this proceeding. A preliminary review of your request of July 17, 1979, indicates that your request is beyond the scope of our offer. You request not only documents, but information from a number of different sources, one of which (the President's Commission investigating the accident at Three Mile Island, Unit 2) is outside NRC. In addition, some of this information does not appear to relate to the specific issues raised by the contentions of CFUR. It will take us considerable time to fully evaluate your request. However, based on our preliminary review of your request, we have determined that we can furnish you with certain documents covered by your request, as discussed below, under the headings contained in your letter.

I. "NRC Staff In-House Projects."

You state that CFUR has determined that the NRC Staff initiated a number of projects related to the Three Mile Island accident and request all interim and final reports for thirty-two projects enumerated under this category. We are currently reviewing our records to identify and obtain the reports, if any, issued with respect to these projects. A preliminary review has identified certain reports on the NRC Staff In-House projects which you list under subcategories in Category I.

With respect to subcategory A. "Inspection and Enforcement," you request the report of the "IE Investigation." I have obtained and enclosed a copy of the report (NUREG-0600) entitled "Investigation

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Richard L. Fouke

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Into the March 28, 1979, Three Mile Island Accident," which was issued by the NRC Office of Inspection and Enforcement in August 1979.

Under Category E. "Standards Development," you refer to a report of the Department of Health, Education and Welfare (HEW) on population and maximum individual dose assessment. I presume that you are referring to NUREG-0558, "Population Dose and Health Impact of the Accident at Three Mile Island Nuclear Station, issued in May 1979. This report, which I am enclosing, contains preliminary estimates prepared by the Ad Hoc Interagency Dose Assessment Group, consisting of NRC, the Environmental Protection Agency, and HEW.

In the category entitled "Executive Legal Director," you refer to the activity as "Determination of Extraordinary Nuclear Occurrences." As you indicate, the Commission has this determination under review. In Federal Register notices published on July 23 (44 Fed. Reg. 43128), and September 7, 1979 (44 Fed. Reg. 52391), copies of which are enclosed, the Commission stated that pursuant to the Atomic Energy Act of 1954, as amended, the Commission is initiating a determination as to whether the accident at Three Mile Island (TMI) constitutes an extraordinary nuclear occurrence. The notice of September 7 provides that submittals of public comments, along with other information assembled by the Commission from its own and other sources, will be considered by a panel comprised of principal Commission staff. According to this notice, the panel intends to complete its work and report to the Commission as soon as possible after the panel has had an opportunity to review any information relevant to its review presented in the report of the Presidential Commission investigating the TMI-2 accident. At the time the panel reports to the Commission, it intends to publish its report in the Federal Register for public comments. To my knowledge, this report has not yet been published, but when published, I will provide you with a copy.

II. "ACRS Activities"

You request copies of the transcripts of portions of numerous 1979 meetings of the Advisory Committee On Reactor Safeguards (ACRS). Staff counsel does not have copies of the transcripts of these meetings. Copies may be obtained, at a cost of 8¢/page from the NRC's Public Document Room (PDR) in Washington. You should direct your request to:

Lynn Scattolini
Public Document Room
Nuclear Regulatory Commission
Washington, D.C. 20555

Richard L. Fouke

III. "TMI-2 Lessons Learned Task Force"

You request information relating to the items considered by the TMI-2 Lessons Learned Task Force, such as vote counts on all items considered by the Task Force and information describing the title, description and discussion of the items considered by the Task Force which did not receive a two-thirds majority vote of the Task Force. I am currently trying to determine whether such information exists, and if so, whether it can be furnished to you. I have obtained a copy of NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," issued in July 1979, which is enclosed.

V. "NRC Special Inquiry"

I am not aware of any reports, interim or final, which have been issued by the NRC Special Inquiry. When such reports are available, I will provide them to you.

It is not certain that I can provide you with all of the information requested under the remainder of the sources listed in your request (VI. "Lewis Committee," in which you request the working papers of the Committee; VII. "Science Applications" in which you request a copy of the "interim scenario" which your state Science Applications, Inc. prepared under subcontract to Sandia Laboratories, an NRC contractor, and VIII. "WASH Reports"). I have obtained a copy of NUREG-0460, "Anticipated Transients Without Scram for Light Water Reactors," which you ask for in Category IX. I have contacted the NRC Office of Inspection & Enforcement (I&E) regarding your request in Category X. that I&E include CFUR on the distribution list for all communications between I&E and the Applicant, Texas Utilities Generating Co., et al. The Region IV office of I&E advised me that it is not I&E policy to include intervenors on such distribution lists. According to Region IV, the Comanche Peak Local Public Document Room (LPDR) in Glen Rose contains copies of I&E documents relating to Comanche Peak, such as information notices, bulletins, investigation reports, inspection reports, and other correspondence between I&E and the Applicant relating to enforcement. Thus, it appears that copies of the types of documents covered by your request in Category X. are available to you at the LPDR. If specific documents which you would like to obtain are not available in the LPDR, please contact me so I can attempt to obtain them for you.

I will contact you again upon completion of our evaluation of your request for information. At that time, I will advise you whether any of the

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Richard L. Fouke

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information specified in your request which is not presently available may be provided to you.

Sincerely,

Marjorie B. Ulman
Counsel for NRC Staff

Enclosures:

1. NUREG-0600
2. NUREG-0558
3. Federal Register Notices
dated July 23 and
September 7, 1979
4. NUREG-0578
5. NUREG-0460

cc w/o enclosures: Service List