



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

June 28, 1979

MEMORANDUM FOR: William Parler, Task Leader 1, Group 1
FROM: Wayne D. Lanning, Group 1
SUBJECT: REVIEW OF OUTSTANDING ITEMS FOR TMI-2 LICENSE
(DPR-73, 2/8/78)

A review of the referenced license, license amendments, and letters to the licensee to determine if there were any licensee conditions which were outstanding has been completed. After considerable expenditure of time, I did not find any. The enclosures contain items to be completed at refueling.

The following questions occurred to during this review:

1. Based on the number of incomplete items identified in the license and the attachment, is this typical for all licensees?
2. Certification of completed items appearing in the license is acknowledged by the NRC through license amendments. In the attachment to the license, certification is by letter from NRC staff. What are the criteria for listing outstanding items in the license and attachment, and why is the method of certification different? The answer may be that changes to the Technical Specifications require amendments. Also, the procedures in DPM and DOR appear to be different for removing license conditions. Why was the transfer of TMI-2 so late from DPM to DOR?
3. Some of the outstanding items are radiological safety related. Should these items be outstanding at the time of license issuance?
4. A cursory review of the Technical Specifications indicates that they are vague and subject to various interpretations. Has there been a lack of enforcement due to the wording of the Technical Specifications? The LERs indicate several examples where operating errors have occurred due to misinterpretation by operators and technicians.
5. Approval of procedures (testing and operational) is performed by IE. Should the licensing staff review these in conjunction with their review of the system design?
6. There are a number of outstanding items which were delayed until the first outage for refueling. Some of these are back-fit requirements based on results of generic reviews (e.g., fire). The question is related to the timing of implementing back-fitting

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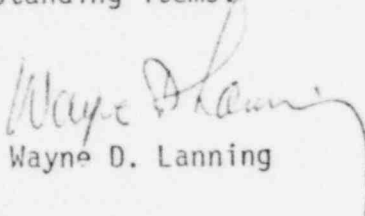
June 28, 1979

requirements and if they should be implemented prior to issuance of the license. This is related to RRRC charter and actions. (Action item for one of these identified in Review of Amendments memo Note to Group 2).

7. There were a number of license requirements which required the licensee to submit analyses of various things to NRC. IE inspectors do not document their actions with regard to these items. Should IE explicitly address these items in their inspection reports?

If you consider these questions relevant to our review, I would pursue them during the analyses phase of our task.

When Tom Cox compiles a list of outstanding items identified in the SER, I will compare them to the License outstanding items.


Wayne D. Lanning

Enclosures:

1. List of Incomplete License Items

Enclosure 1

List of Incomplete License Items

License Letter

Prior to startup following the first regularly scheduled refueling outage, Metropolitan Edison Company shall do the following:

1. Provide a second level of voltage protection for the onsite power system.
2. Modify the system design to automatically prevent load shedding of the emergency buses once the onsite sources are supplying power to all sequenced loads on the emergency buses. The load shedding feature shall have the capability of being automatically reinstated if the onsite source supply breakers are tripped.
3. Provide recommended Technical Specifications for items (1) and (2) above, including test requirements to demonstrate the full functional operability and independence of the onsite power sources.
4. Install an environmental temperature monitoring system to assure that the environment at the location of Class IE equipment in buildings outside containment is maintained within the temperature range for which the equipment is designed to operate.
5. Submit appropriate descriptions and analyses and modify the secondary (main steam and feedwater) systems so that the consequences of a spontaneous break anywhere in a secondary system line will be mitigated only by safety grade equipment, with nonsafety grade equipment permitted to serve as a backup for the assumed single failure of safety grade equipment. For those portions of the secondary systems where a break might be caused by a seismic event, Metropolitan Edison Company shall modify the systems so that accident consequences will be mitigated only by seismic Category I components after assuming single failure in any seismic Category I component.
6. Submit and implement a response time testing program for the protection systems.
7. Modify the reactor coolant pressure boundary overpressure protection system to satisfy Commission requirements regarding credit for operator action, single failure criteria, testability, seismic design and IEEE 279 criteria, and effect on reliability of other safety systems.
8. Complete modifications necessary to achieve the capability of safely shutting down the plant independent of cabling and equipment in the cable spreading room, and add either of the following:

- a. a manually operated fixed water system in the cable spreading room, or
 - b. fire retardant insulation around each cable tray in the cable spreading room not readily accessible to a manual fire hose stream, so that no fire would be expected to affect redundant safety trains.
9. For all fire doors, provide electrical fire door supervision with time-delayed alarms in a constantly manned area, or lock the doors closed, or provide acceptable hold-open features designed to close in the event of a fire for identified doors.

The following must be completed prior to startup following the first regularly scheduled refueling outage:

1. Provide redundant automatic safety grade Makeup Tank isolation valves (MU-V-12) actuated by an Engineered Safety Features signal.
2. Replace the charcoal in the filters in the following systems so that the requirements of the indicated Appendix A Technical Specifications will be met.

<u>System</u>	<u>Technical Specification</u>
Hydrogen Purge Air Cleanup	4.6.4.3.b.2 and 4.6.4.3.c
Control Room Emergency Air Cleanup	4.7.7.1.c.2 and 4.7.7.1.d
Fuel Handling Building Air Cleanup	4.9.12.b.2 and 4.9.12.c

Pending such charcoal replacement, Metropolitan Edison Company shall be exempted from compliance with the above Technical Specifications.

3. Provide an automatic water suppression system in each diesel generator room basement.