

NOTE

FOR: Obj 1 file

RE: CLOSED VALVES

SOURCE: Bob Bernero's lecture on 5-25

Apparently one of the major problems at TMI was that valves leading from the 2ndary ^{emergency} system pumps were closed. This was done pursuant to TMI operating procedures in order to test the electrical pumps (located on either side of steam pump). This procedure was in violation of license requirements which provide that those valves are to remain open while the reactor is operating.

*Emergency
Feedwater
Pumps to
OTSG*

Bob Bernero said this feature "got through" the system. That system does not provide for NRC review and approval of all plant operating procedures. It provides for an audit of those procedures and license requirements. It would (and apparently was) assumed that a plant operator would not violate license requirements simply to follow his internal operating procedures but that is what happened. Once a license is granted, the utility is required (by license) to establish a plant safety committee; but that does not prevent the kind of inconsistency discussed above.

Bernero said the only time the NRC might see these operating procedures (other than spot audits) is when I&E tests an operator. It might then pull the operating procedures and test if the

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operator knows them by memory.

However, as Bill Parler pointed out, the I&E personnel testing the operator are probably not qualified to analyze the operating procedure itself. They are simply interested in the question of whether the operator knows the procedure--not its quality.

Bernero said to change this auditing procedure (that is, to have the NRC review and approve each operating procedure) would double the licensing process (presumably in time, money and manpower) just for the operating procedure. Not to mention construction, etc. Basically this goes to the heart of the NRC licensing philosophy--the applicant/licensee is primarily responsible for the safe operation of the plant. That responsibility for safety never transfers to the NRC.

evans