COMMISSIONER LEWIS: Mr. Floyd, I'd like to go back to before the accident. According to Richard Hartfield, Director of the NRC's Management and Program Analysis Office, Unit 2 has had 50 percent more reportable occurrences than the nation ide average for nuclear reactors. That was before Unit 2 went on line and went commercial. What does that say to you about the readiness of Unit 2 to go into operation?

MR. FLOYD: I need to know if he is quoting the national average for nuclear reactors today, or if he is quoting the national average for reactors in their first year before commercial operation. It could make a great big difference to how I respond to your question as to which average he is comparing us to.

COMMISSIONER LEWIS: He is comparing you to the first year of operation for all nuclear reactors.

MR. FLOYD: Okay. This is not quite a fair comparison becuase we were in a test program during that year and not in our first year of operation.

But assuming it were a fair comparison: The number of reportable occurrences that a station has or a unit has is some kind of an index to what kind of an operation is being run. When you look behind just the number and at the consequences of what was wrong, the two occurrences might be much more important than 10 or 20.

There are many things which I have to put myself on

COUNTS TOTAL

FT SE VEGIN-AU01 28 30 BEAUGI VALLEY 1 66 H.B. (COBINSO) 30 HODDAN WEEK 33 B.V. -2----2 HUMBOURT DAY Biology Point - 48 (ND ANTO, ME) -35 Browns Fay 1-33 Brussica 1 - 94 2 78 -33 Forusy - 1 8-7 KEENAUNKS -CAUAMA - 1 LACROSSE LITERICAL MANNEY ALLOS Car. Curs 1 5/ no CVIRDE MID LAND I Cayson Rin -96 MILLSMONE 1 -31 DC Cook 2 - 65 PONTICIFIED . NINEMIN BUT - 41 Berson 1 - 125 Derson 1 - 28 Ocarer 1 -25 3 -25 3 -23 2 -53 Durin Arvar- 36 HASKH 1 - 90 FITEPARNICK . 109 OYSMACRE - 35 FT. COLHOUN - 46 PAL POOR ORIGINAL PEACH BOTTON 2 - V FREM. Yourse -34 - 23 2 mm 1 / PILGAIN 1 WATERFORD 3 POINT LAW 1 WARS BAR 1 -20 WPPSS-2 PRIAIRIE SLAWS ? Yarre lan 2100-1 QUALCINIS 1 CARHO SECO -22 -10 -80 Grand TOPPL SAUST 1 3115 SAN OHOME 1 STABROOK. STRUOAH SILDREHM SOUTHTURAS & LUCIR Sungl-SUSQUEIMAL-1001 Du-Tuking Pr 3-15 415 POOR ORIGINAL

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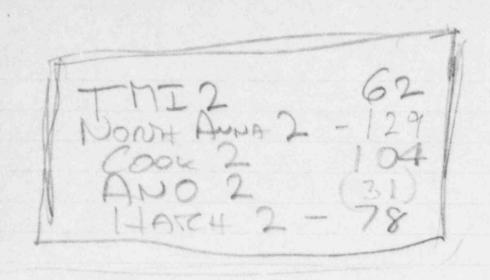
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POOR ORIGINAL

PUPES GRITTINE OL 10 1978 TMI 2 - 2/878 NAM 7 - 1/26/77 HAXH2-6/13/78 COOK 20-212/23/17/28 PLANS GOING CRITICA, N78 WA.1 d/s/78 TMI2 3/28/78 7/9/78 HATCH 2 3/10/78 Cook 2 12/5/78 AU02 POOR ORIGINAL



POOR ORIGINAL

Question II. How many incidents or events have occurred at TMI-2 before the accident?

Answer

During the period from license issuance (February 8, 1978) through March 30, 1979 a total of 69 licensee events were reported to the Nuclear Regulatory Commission. These included the following causes and types of reports.

CAUSE TITLE*	NUMBER OF REPORTS					
	14 Day**	30 Day**	Total			
Component Failure Defective Procedures Design/Fabrication Errors External Cause Other Personnel Error	0 2 9 0 . 1 6	13 8 13 0 8	13 10 22 0 9			
Total	18	51	69 ·			

^{*}These causes are defined on pages 13-15 of the enclosed NUREG-0161, Instructions For Preparation of Data Entry Sheets for Licensee Even* Report (LER) File.

Question . How does the frequency and type of event compare with other facilities?

Answer

During 1978 there were 1765 licensee events reported to the NRC by the 42 pressurized water reactors that had operating licenses during that period. The TMI-2 reports are included in this table and a copy of the printout of all events reported by TMI-2 is attached.

^{**}The 1 day and 30 day reports are described on pages 1.16-3 through 1.16-5 of Regulatory Guide 1.16 (Revision 4, August 1975). Copy attached.

CAUSE TITLE

NUMBER OF REPORTS

	14 Day	30 Day	Total
Component Failure	72	847	919
Defective Procedures	25	58	83
Design/Fabrication Error External Cause	70	105 18	175 21
Other	38	212	250
Personnel Error	83	234	317
Total	291	1474	1765

The following table lists the number of reports submitted by TMI-2 during this period.

CAUSE TITLE	NUMBER OF REPORTS				
	14 Day	30 Day	Total		
Component Failure Defective Procedures Design/Fabrication Error	0 2 9	13 5 11	13 7 20		
External Error Other Personnel Error	1 6	6 7	7		
Total	18	42	60		

Additional data listed below shows the number of licensee events reported by two unit sites for the first year after initial criticality for the second unit at the site and for the first unit during the same time period.

Plant	Time Period	Component Failure	Defective Procedures	Design/Fabrication E	External Cause	Other	Personnel Error	Totals
TMI-1 TMI-2	3/28/78 - 3/28/79 3/28/78 - 3/28/79	9 13	1 5	3 14	0 0	5 10	4 10	22 52
Calvert Cliffs-1 Calvert Cliffs-2	12/01/76 - 12/01/77 12/01/76 - 12/01/77	43 67	8	4 6	1	38 14	14 12	108 101
D. C. Cook-1 D. C. Cook-2	03/10/78 - 03/10/79 03/10/78 - 03/10/79	22 39	5 5	19	0	12 21	17 28	64 113

The following data provide a breakdown of the licensee events reported by each of the other Babcock & Wilcox (B&W) facilities during the one year period immediately following license issuance. This will provide some correlation between the events experienced at TMI-2 and other B&W facilities for somewhat similar periods of operation.

Facility	Component Failure	Defective Procedure	Design/ Fabrication Error	External	Other	Personnel	Total	
Other B&W Faci	lities -	One Yea	r Period	Immedia	tely Fol	lowing	License	Issuance
Arkansas 1	4	2	3	19	21	2	51	
Crystal River	34	7	7	3	35	16	102	
Davis Besse	51	14	18	4	21	22	130	
Oconee 1	11	7	4	0	1	11	34	
Oconee 2	7	6	1	0	2	9	25	
Oconee 3	12	2	. 7	0	0	12	33	
Rancho Seco	9	5	4	1	0	11	30	
TMI-1	27	- 18	20	5	5	11	86	
B&W Average	19.4	7.6	8.0	6.4	14.1	11.	7_ 61.	1

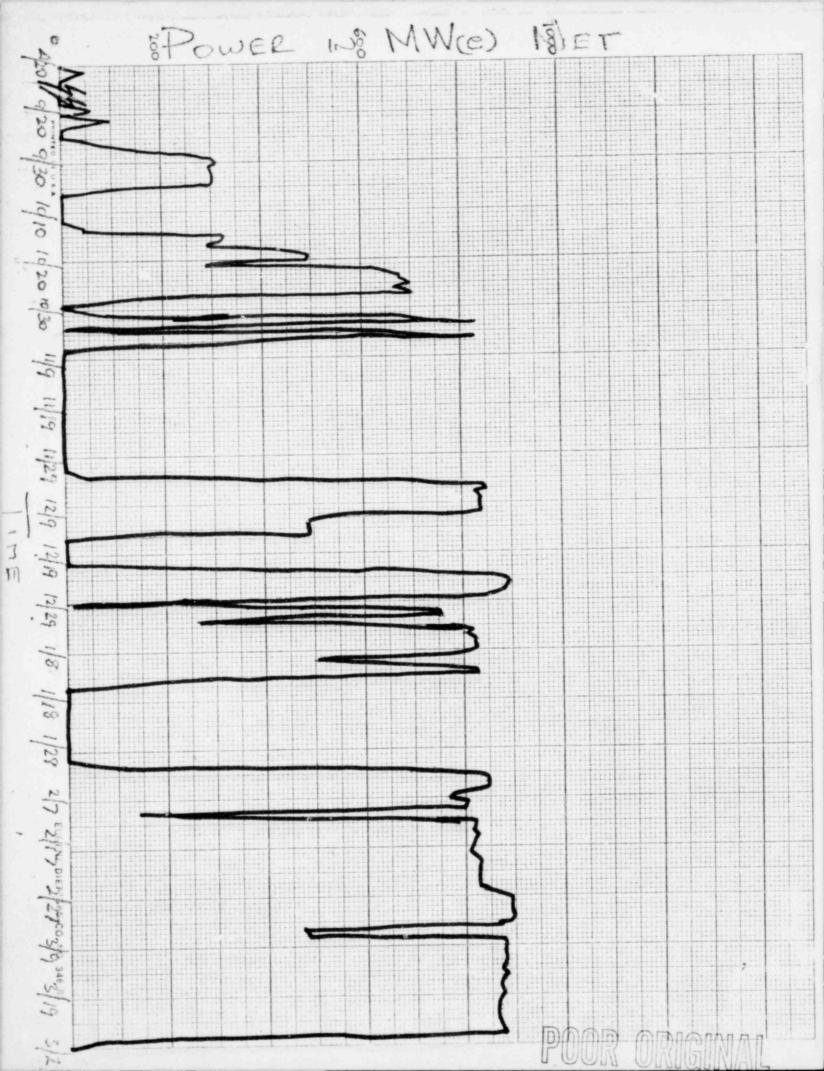
Care should be exercised in comparing these data, since some of these facilities do not have the more complex systems and components utilized in newer facilities. In addition, the significance of individual LERs varies.

Question . What guidelines does the Commission have to determine when the frequency of incidents constitute a problem?

Answer

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Though the Commission has identified the types of incidents licensees are to report, reviews the information reported, and takes action as it deems appropriate, the Commission at the present time does not have specific guidelines to determine when the frequency of a liven type of reported incident constitutes a problem. Engineering judgments, applied by knowledgeable people on an ad hoc basis, have been used to initiate actions to reduce the frequency of events causing safety concerns. The recurrent of some events has, for example, led to the identification of generic safety issues. The resolution of these issues has resulted in changes in the licensing and review process, as well as in plant modifications and in technical specification changes, yielding safer operations. This process for reviewing and analyzing licensee event reports is now being reviewed to establish more formal and systematic evaluation procedures. A copy of SECY 79 371 is attached for your information, however, this document has not received Commission approval yet. Improvements should lead to earlier discovery and correction of potential safety problems.



TYMPINO

Comprision of Ligure Event Reports 一一一 10 25 39 Personnel Error Detective Procedures Design/Fahrecher External Course Component Follow CAUSE THE other

Define in NURBER-0161

* Penied of 4/1/74 to 3/18/19 3 Pend of 91,0/74 to 3/27/19 A ...

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Table 2

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5	External Course	5	THL	,		0
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5	_ Other	3	111		11	2
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	造	主	Doonee - 3		9/10/74 - 3/	127/79
ToN			14 day		30 day	
50	Compount Failure	11	WH HIM	31	WHY THI HIT HI	IWI
14	Detertine Procedure	7	LH II	71	HII	
9	Design / Februation	6	IMI	3 11	1	
0	15x ternal Comerce	0				
24	Personnel Error	14 M	IMIMI	8 4	11/11	
8	other		15		#118	
105						