

KEY POINTS FROM MEETING WITH
ALLAN SCHULTZ 10-25-79

1. We should have a better understanding (and discussion in the report) of the NRC mode authorization process.
2. Davis-Besse went commercial in stages under unique Ohio law.
3. We should identify (by name, test number?) the seven tests deleted by GPU and have someone (Ron Haines) evaluate the significance of those tests.
(Mitch Rogovin agrees)
4. We should learn how many other self-imposed tests were built into the program and whether they were performed. (Phone call to Ron Toole?)
5. Unit acceptance tests is generally run after commercial operation.
6. As example of PUC-NRC conflict -- Vermont Yankee voluntary shutdown per NRC request, challenge before Vt.PSC.
7. Three stages of tests:
 - NRC required tests (safety)-
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 - Vendor tests (contractual)-
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 - Utility tests
(operational effic.)
8. SCHULTZ TO PROVIDE analysis done in Davis-Besse proceeding re: utility practice in declaring plant commercial.
9. The full power generator trip test is a test of all systems and it could be argued is adequate for personal review. (Later Schultz agreed that tests leading to that point could be important if a deficiency worked for just the full power trip test but would fail the next time stressed.)
10. Schultz is familiar with provisions of PJM K, since Delmarva is a client. He will review.
11. The GPU memoranda "don't look too bad" to Schultz. He noted that TMI-2 operated at full (97%) power for four days before the generator trip test. (Cf: Dieckamp statement re: desire to operate at power for a "significant" period of time.) Beyond this, Schultz said it is difficult to articulate how long full power generation should be mandated by the NRC.
12. Its Schultz's experience that utilities get certificate of completion. He is puzzled by the UE&C - Catalytic shift and the responsibilities.

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13. Schultz asked if the test in which the RCP seals were damaged was repeated. We should learn this.
14. Commercial operation was referenced in the JCP&L letter to Lonergan simply to provide leverage in eventual law suit.
15. Schultz thought little of the Lonergan issue. Whether the problem with those valves occurred in 1977, 1978 or 1979, Schultz said the planning would be the same -- c*path is logical and proper approach.
16. Signing-off on CORB per telcon "is not good procedure" but is probably good management.
17. Statistical survey of test schedules would be difficult because each plant is unique.
18. To examine whether there was rush should examine overtime records. I said I would review UE&C, Catalytic records now in our possession. Schultz postulated NRC requirements re: allowable amounts of OT in specific areas.
19. As a defensive measure, we should get the OT records for the GPUS Test Engineers. (Ask Diaz?)
20. We should also get the OT records for the Met-Ed CROs for the period September - December, 1978. (Diaz, too)
21. Against possible attacks, we should follow-up on:
 - a) Seelinger memo
 - b) Philadelphia Inquirer reported problems
 - c) Blakeman telcon memo
22. Theory on NRC regulatory standards:
If an additional measure which would improve safety is expensive and would be challenged before regulatory commissions, the NRC requirements constitute both the minimum and maximum standards of safety. If the additional change is minor and no one would challenge a utility decision to upgrade, the NRC requirements constitute the minimum standards of safety.
23. We agreed that our next meeting (sometime in November) will be of a "moot court" nature; Schultz will challenge our positions.
24. His conclusions from this trip are that we are on the right path and have not missed any major areas.
25. He said he would call after analyzing the material we gave him with further points.