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U.S. NUCLEAR REG. COMM.
ADVISORY COMMITTEE ON
REACTOR SAFEGUARDS

Mr. John McKinley
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: NRC Actions Plans Developed as a Result of the TMI-2 Accident,
Draft 3, March 5, 1980.

Dear John:

The action plan discussed during April 1-2, 1980, ACRS meeting summarizes the results of NRC Staff analysis of the recommendations by various official bodies and by the NRC's staff. I believe that in general NRC staff has done a monumental job and the proposed items merit incorporation in NRC operating plan as shown in the Action Plan.

There are a few items I wish to comment upon and offer some suggestions.

I.C.7 NSSS Vendor Review

ACRS letter of March 11, 1980 recommended that AE or the AE Component of Operating Utility be required to review the low-power and power-ascension test and emergency procedures. Discussion at April 1, 1980 meeting restated this requirement. This item of action plan should indicate that AE's participation in the process of generating such procedures is mandatory. Item I.C.9 may for practical purposes imply AE's participation, but it does not state so explicitly.

The new incentive on basing operating procedures on symptoms observed in the system (regardless of the sequence that led to the current system state) is commendable and should result in clarity and volumetric reduction of Procedures.

It is suggested, however, that Procedures be placed on the computer for rapid display as needed. This could be the predecessor of Disturbance Analysis Systems.

I.D Control Room Design

It is recognized that Staff places emphasis on Safety Parameter Display Console for plant status vector monitoring. This is an improvement over the existing status monitoring instrumentation. The Action Plan should, however, make it clear to the industry that the Criteria for licensing real-time Computer Systems for Nuclear Power Plant Control are being developed and that NRC will not impede the use of such systems. I.D.5 indicates that LOFT Project is upgrading its compability in that direction and I.D.D.-Other Actions

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recognizes the existence of such systems at Halden Reactor Project and promises to monitor the installation of such system at Grafenrheinfeld PWR in West Germany (for the purpose of developing a regulatory position). I.D.D.2 recognizes EPRI/DOE efforts in performing studies on Disturbance Analysis and Surveillance Systems.

I believe all of the above are positive steps in the right direction. Action Plan should, however, encourage industry to adapt Disturbance Analysis Systems by assuring that it will provide environment where such systems can be licensed.

II.C Reliability Engineering and Risk Assessment

This item adequately addresses the subject indicated. However, there is no discussion of hazards analyses (unless such analyses are covered under the steps required to reach a ultimate risk assessment for a given accident sequence).

III.C Public Information

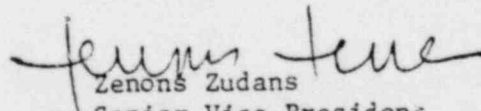
Since the NRC is prohibited by law to advocate nuclear power, public information programs will be of limited value. The planned issuance of NUREG-series of reports will serve only a limited segment of population. Repackaging of such NUREG-series for different public segments should be done by some agency, institute or a dedicated "Center on Nuclear Affairs," in particular since many of the issues are on emotional and not on the technical level.

On potential resources for reprogramming from current FY-80 plan to fund approved TMI action tasks, I would like to recommend that the following should not be discontinued:

DSS - Buckling Behavior of Steel Containments, B6568.

Current ASME design criteria are not suitable to the containment structures, hence, design margins are not uniform for all designs, and are not known quantitatively.

Very truly yours,


Zenons Zudans
Senior Vice President
Engineering

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cc: Mr. H. Etherington
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