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March 7, 1980

Chairman Ahearne
Commissioner Bradford
Commissioner Kennedy
Commissioner Glinsky
Commissioner Hendrie
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

Gentlemen:

NRC-TO-SITE DATA LINKS

In the February 11, 1980, issue of Inside NRC, it was stated that Chairman Ahearne and Commissioner Hendrie opposed the Staff's recommendations that NRC have "the capability to direct licensee actions from the incident response center". I concur wholeheartedly with this position.

If nothing else is learned from Three Mile Island, one thing should be obvious. The further away from the site decisions are made and conclusions are drawn, the more likely they are to be wrong. Even with a multimillion dollar data link system, a desk jockey in Bethesda cannot be as informed and knowledgeable as a licensed operator who has dealt with the quirks of the system. An example of this intimate understanding occurred at Point Beach Nuclear Plant a couple of weeks ago. When the Unit 2 condenser air ejector radiation monitor started increasing, the Manager was able to determine that the leakage was greater than 500 gpd without a detailed analysis. His judgment was based upon his knowledge of the primary coolant activity of Unit 2 versus Unit 1 and how the Unit 1 air ejector monitor has responded to leaks of different sizes over the years.

The transmission of certain key parameters to the NRC may be of interest so the Staff can make intelligent comments to the press; but the list should not exceed 30 to 50 variables. If 300 to 500 parameters are transmitted, there will be too many detailed, plant-specific items which a person who does not work with the instruments, equipment and piping and instrument diagrams every day can conceivably comprehend. The method this noncoupled, unlicensed individual would try to instantaneously learn the plant would be by continuous requests for more information from the already overstressed and harrassed workers.

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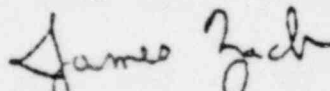
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The NRC is mandating the following items:

1. The Shift Supervisor will have fewer administrative duties so he can devote more time to plant operation.
2. The licensed operators will be required to have higher grades to pass examinations.
3. Instrumentation such as reactor vessel level, subcooling meter, sump level, higher range radiation monitors, auxiliary feed flow indication, effluent radiation monitors, etc.
4. A Technical Advisor to aid the Shift Supervisor in the evaluation and assessment of the incident.
5. Quicker communications to the NRC with a hot line.
6. Revised emergency planning.
7. A review of the control room design.
8. A technical support center with staffing to aid not only the Shift Supervisor, but also the Technical Advisor.
9. Additional systems such as head vent, improved sampling capability, automatic auxiliary feedwater flow.
10. Improved emergency operating procedures.
11. A resident inspector(s) from the NRC who supposedly is qualified to help the technical support center people, helping the Technical Advisor, helping the Shift Supervisor.

I think it's time for the Commission to take the bull by the horns and put a stop to the proliferation of "hangers-on". It appears as if everyone is off beating their own drum and using TMI as an excuse to push through pet projects. The Commission should weigh the next step very carefully because in my mind it is a quantum step. Before allowing the Staff in Bethesda to direct plant operation, one better consider the people's technical talent and ability to logically act in a crisis. The reports^{of} the Kemeny Commission and the Rogovin team did not lead me to believe the Staff is competent.

Very truly yours,


James J. Zach