

Central F

APR 4 1980

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

MEMORANDUM FOR: Distribution

FROM: William F. Kane, Acting Chief
Standardization Branch, DPM

THRU: Denwood F. Ross, Jr., Acting Director
Division of Project Management

SUBJECT: REQUEST FOR REVIEW OF PROPOSED TMI-2-RELATED
REQUIREMENTS FOR NTCP APPLICANTS

The TMI-2 Action Plan sets forth proposed requirements stemming from the TMI-2 accident to be addressed by licensees of operating plants and applicants with plants under construction. Except for a few instances, the Action Plan does not address requirements to be addressed by near-term construction permit (NTCP) applicants, i.e., those applicants with pending construction permit applications. Construction permit applications are currently pending for six plants - Pilgrim 2, Perkins 1-3, Allens Creek 1, Pebble Springs 1 & 2, Black Fox 1 & 2 and Skagit 1 & 2.

In an effort to establish for Commission consideration proposed requirements to be addressed by NTCP applicants, we have established within the Standardization Branch a group composed of selected individuals who had served on the Lessons Learned and Bulletins & Orders Task Forces and the NRC Special Inquiry Group. The proposed requirements, which are based on Draft 3 of the TMI-2 Action Plan, are to be reviewed by the NRC staff and the ACRS, and will be presented to the Commission for its consideration in the form of a Commission Paper.

The group has proposed a number of categories of requirements to be assigned to the action items of Draft 3 of the TMI-2 Action Plan. These requirement categories are described in Enclosure 1. The group has also assigned a requirement category to each of the action items of Draft 3 of the TMI-2 Action Plan. These assignments are presented in Enclosure 2. Enclosure 2 is based on Table 1 of the TMI-2 Action Plan and includes Tables C.1, C.2 and C.3 of Appendix C to the Action Plan which describe Action Items II.K.1, II.K.2, and II.K.3, respectively.

In order to assist us in our efforts to establish proposed requirements, the NTCP applicants - Boston Edison Company, Duke Power Company, Houston Lighting and Power Company, Portland General Electric Company, Public Service Company of Oklahoma, and Puget Sound Power and Light Company - have formed the NTCP Applicants Group (Applicants Group). On March 19, 1980, we met with representatives of the Applicants Group to discuss our plans for establishing proposed requirements to be addressed by NTCP applicants.

OFFICE →									
SURNAME →									
DATE →									

3006040451

*FDK-5
TMI*

At our request, the Applicants Group formed a Working Group to undertake an effort in parallel with ours to propose requirements based on Draft 3 of the TMI-2 Action Plan to be addressed by the NTCP applicants. On March 28, 1980, we met with the Working Group to evaluate the progress made up to that time. During the meeting, we compared our requirement category assignments for each of the action items with those of the Working Group. Although several differences in requirement category assignments were identified, the Working Group's requirement category assignments were not substantially different from ours. For those action items for which differences in requirement category assignments were identified, we and the Working Group discussed the bases for our respective assignments and agreed to reevaluate our respective requirement category assignments in light of the others' bases.

On April 2, 1980, we met again with the Applicants Group to discuss the progress made up to that time. As a result of this meeting, as well as our previous meeting with the Working Group, we made several changes to our proposed requirement category assignments. These changes have already been reflected in Enclosure 2.

We are scheduled to discuss our proposed requirements with the TMI-2 Accident Implications ACRS Subcommittee at its April 9, 1980 meeting. We plan to discuss our proposed requirements with the ACRS Full Committee at its May meeting and hope to receive a letter from the ACRS in mid-May. We also plan to present our proposed requirements to the Commission for its consideration in the form of a Commission Paper in late-May or early-June.

In order for us to have the benefit of your comments prior to the April 9, 1980 ACRS Subcommittee Meeting, we request that you provide us with your comments by noon, Tuesday, April 8, 1980. If you would like any discussion or further information concerning this matter, please contact me immediately.

Original signed by?

William F. Kane, Acting Chief
Standardization Branch
Division of Project Management

Enclosures:

As stated

Distribution:

- R. Mattson R. Purple
- D. Eisenhut R. Denise
- S. Hanauer B. Grimes
- R. Vollmer J. Scinto

OFFICE →	NRR-5B	NEZ-5B	DPM-D			
SURNAME →	C. Thomas	W. Kane	DFRoss			
DATE →	4/4/80	4/9/80	4/4/80			

CATEGORIES OF ACTION PLAN
REQUIREMENTS FOR CP PLANTS

<u>Category</u>	<u>Criteria for Category</u>
1. Not Applicable	<p>The requirement is not applicable to CP applications for any of the following reasons:</p> <ul style="list-style-type: none"> (a) It can only be addressed in the OL application or by licensees (b) It is not directed to utilities (c) It does not apply to plants of the type now undergoing CP review (d) It has been (or will be) superseded by a more restrictive requirement in the Action Plan (e) It has already been completed
2. Commitment Required to Implement Requirement Prior to OL	<p>The requirement is applicable to CP applicants and is sufficiently clear that differences of opinion between the staff and the CP applicants, as to the nature of the commitment, are highly unlikely to occur and there is reasonable assurance that the commitment will be implemented properly prior to the OL.</p>
3. Commitment Required to Complete Certain Studies Prior to a Specified Date in Advance of the FSAR and to Implement Any Requirements Resulting from Those Studies Prior to the OL	<p>The requirement is applicable to CP applicants and requires the submittal of certain information in advance of the FSAR, such that the staff can determine whether a facility should be required to meet a certain requirement.</p>
4. Commitment Required to Implement Requirements Prior to OL and a General Explanation of How the Commitment will be met	<p>The requirement is applicable to CP applicants but is such that a commitment alone is not sufficient to provide the staff reasonable assurance that the requirement will be implemented properly prior to the OL. Therefore, a general discussion of how the requirement will be met is required.</p>
5. Detailed Explanation of How Requirement will be Implemented is Required Prior to Issuance of the CP	<p>The requirement is applicable to CP applicants but is such that a detailed explanation of how the requirement will be implemented is required prior to the CP in order to give the staff reasonable assurance that the requirement will be implemented properly. The detailed information required would be at a level consistent with the CP stage of review.</p>