

NUCLEAR REGULATORY COMMISSION

ORIGINAL

COMMISSION MEETING

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In the Matter of: PUBLIC MEETING  
BRIEFING ON ACTION PLAN -  
ITEMS DUE IN JANUARY 1981

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AT: Washington, D. C.

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BRIEFING ON ACTION PLAN - ITEMS DUE IN JANUARY 1981  
PUBLIC MEETING

Nuclear Regulatory Commission  
Room 1130  
1717 H Street, N. W.  
Washington, D. C.  
Thursday, January 15, 1981

The Commission met, pursuant to notice, at  
10:20 a.m.

BEFORE:

JOHN F. AHEARNE, Chairman of the Commission  
VICTOR GILINSKY, Commissioner  
PETER A. BRADFORD, Commissioner

STAFF PRESENT:

L. BICKWIT  
J. HOYLE  
J. OLSHINSKI  
H. DENTON  
W. DIRCKS  
D. EISENHUT  
J. SNIEZEK  
H. BERKSON

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## P R O C E E D I N G S

1  
2 CHAIRMAN AHEARNE: This morning the Commission  
3 that has struggled to get here and managed to make it ---

4 COMMISSIONER BRADFORD: Probably not as hard as  
5 the staff.

6 CHAIRMAN AHEARNE: Oh, yes, quite true. The staff  
7 not only struggled but made it. We are here to hear a  
8 briefing on some aspects of the Action Plan. Commissioner  
9 Bradford had pointed out that there were a number of items  
10 whose due dates were this month, January '81, and had  
11 requested a status report on where we stand with respect to  
12 those items.

13 Bill.

14 MR. DIRCKS: Darrell will be presenting the status  
15 report. It is concentrated of course on those items that  
16 were due and are due in January '81, those items from  
17 NUREG 0737. We can also discuss some of the other  
18 initiatives we have underway as far as keeping track of the  
19 status of the Action Plan and Harold and other staff members  
20 are prepared to do that. I assume Darrell should pick up on  
21 the Action Plan items themselves and then we can get further  
22 into the subject.

23 Harold, did you have anything?

24 MR. DENTON: No, other than to introduce Don  
25 Olshinski who is actually performing the NRR part of the



1 reviews and is with us and Jim Sniezek who will discuss the  
2 I&E role in reviewing implementation of some of the  
3 requirements. Darrell will begin the presentation.

4 MR. EISENHUT: Thank you.

5 (First slide.)

6 The first part is just sort of a reminder.

7 Remember that the approach we are on is when we issued NUREG  
8 0737, which is a document that sort of consolidated all of  
9 the requirements that have been issued to date in response  
10 to those approved items in the Action Plan, we issued them  
11 for operating reactors and for OL applications. OLs are  
12 sort of on a case-by-case basis. So here we are  
13 concentrating on operating reactors.

14 The main approach there was we issued a letter  
15 dated October 31 which actually went out at the very  
16 beginning of November. It required utilities to respond in  
17 45 days from their receipt and they would give us their  
18 commitment is what it asked for on all of these items.

19 Our thinking, you will recall, was that this is  
20 sort of the first step. We would take those submittals,  
21 look at them, develop sort of a case-specific package plant  
22 by plant so we could issue either confirmatory orders,  
23 show-cause orders or some vehicle to make a strictly  
24 enforceable, clearly understood approach on each plant.

25 This is really sort of a status report today. The

1 slide says "Information Received as of January 9th." We  
2 have actually been updating it a little as information is  
3 coming in.

4 These reports have been starting to come in from  
5 utilities over the last week or two. You will see as we go  
6 through there are many feet in terms of piles of reports and  
7 details. So we have been unable at this time to give a  
8 complete concise briefing. We have done a preliminary  
9 review.

10 CHAIRMAN AHEARNE: When we say 45 days, is that 45  
11 calendar days or 45 work days?

12 MR. EISENHUT: It is usually 45 calendar days from  
13 the date of the letter. That means that that is the day  
14 that generally they have to send it in. We have one case  
15 which you will see in a minute where a utility said he sent  
16 us his response on January the 5th and we still haven't seen  
17 it.

18 CHAIRMAN AHEARNE: But that wouldn't be 45 days  
19 from ---

20 MR. EISENHUT: It was the date from which he  
21 received the letter which means it varies.

22 CHAIRMAN AHEARNE: Do we license somebody in a  
23 foreign country?

24 MR. EISENHUT: We license people on the West Coast  
25 and quite often it takes a couple of weeks.

1 (Laughter.)

2 This is something we have run into quite often and  
3 that is why I kind of like to always go to 45 days because I  
4 know then there is a good chance you will see things in 60,  
5 70 or 80 days.

6 CHAIRMAN AHEARNE: I see.

7 MR. EISENHUT: If you say 60 days you won't have a  
8 package until 90 days because of both ends of the exercise.

9 But this we made very specific. It was from  
10 receipt of the letter to give them clearly each 45 days. As  
11 I said, this is sort of a moving target. We have been  
12 updating it daily.

13 We have received 65 of the responses by our count  
14 today. We expect 70 responses. Five responses either are  
15 incomplete or they told us they are going to be coming in at  
16 a later time.

17 The next slide breaks this down a little bit.

18 (Slide.)

19 When I conceived this slide it was a lot rougher  
20 than it was. It was split a lot more. Since then most of  
21 the plants have ended up at the top. The ones that have  
22 submitted a report that we have received and we have done a  
23 preliminary check on it are the ones at the top. There are  
24 five units at the bottom that we have not yet received their  
25 submittal and these are the dates they anticipated they

1 would be sending the document.

2 CHAIRMAN AHEARNE: Just out of curiosity the title  
3 is "Submittals Incomplete" but what you just said is they  
4 haven't submitted.

5 MR. EISENHUT: In some cases they have told us by  
6 letter that these things are coming a little later or we are  
7 going to be late and it is a combination. I didn't go down  
8 each one individually. Really the reason I didn't is I made  
9 the observation that the five plants that are still  
10 outstanding -- Farley 1 is down right now for a refueling  
11 and will be down for a number of weeks. Farley 2 of course  
12 is a plant with a low-power license. I don't believe they  
13 have loaded fuel yet. Indian Point is down because of their  
14 event and will be for a number of months. San Onofre 1 is  
15 down for steam generator repairs. They have been down for a  
16 number of months and will be down for many more months, and  
17 of course TMI-1. So these plants are all shut down.

18 COMMISSIONER BRADFORD: Darrell, just out of  
19 curiosity why would Farley 2 not have loaded fuel yet?

20 MR. EISENHUT: It has been four or five months at  
21 least since we issued the low-power license. They ran into  
22 a number of mechanical difficulties doing things in the  
23 plant such as pipe hangers, et cetera. I don't have a good  
24 answer. I have asked the staff to go back to Farley, back  
25 to actually the utility and get us sort of an itemized

1 breakdown of where the five months went.

2           The other thing it may look like is that it was  
3 too early of an estimate. The plant estimated it would be  
4 ready for fuel loading at some date and it just isn't there.

5           MR. DENTON: When I was there with Jim O'Reilly  
6 every indication was that they were cleaning it up and  
7 within 30 days they would be ready.

8           COMMISSIONER BRADFORD: That was when, Harold?

9           MR. DENTON: That was late summer. Apparently  
10 after our visit there further results came in on pipe  
11 hangers and stresses and anchor bolts and they continually  
12 have had to revise the piping support system. That is the  
13 only cause I know of that is still delaying that.

14          MR. EISENHUT: That is the only one I have  
15 specifically heard of.

16          MR. DENTON: It has apparently turned into a very  
17 major effort to relocate hangers and resupport pipes and  
18 that sort of thing. Apparently when you put in one hanger  
19 you have to go back and recalculate and see if it has  
20 changed the vibrational modes of the pipe and that leads to  
21 one more.

22          COMMISSIONER BRADFORD: I should think they would  
23 be having similar problems in Unit 1 but this isn't the time  
24 to discuss that.

25               (Slide.)

1           MR. EISENHUT: The next slide gives a breakdown of  
2 some items that are due to be addressed. These are ten  
3 items of a total of 32 that utilities had to do something by  
4 1/1/81. Now, when I say had to do something, some of them  
5 are the cases where they had to put something actually in  
6 the plant, either a procedure or a piece of hardware. Those  
7 are the ones that we have asked I&E to verify that in fact  
8 something had been done by 1/1/81.

9           The other family of items are those where the  
10 staff had asked the licensees to submit us a report  
11 evaluating something.

12           Now, these ten items, and I will just mention them  
13 briefly, every one of these items first was a post  
14 implementation item. That is, this is an item where we  
15 asked a utility to put something in place by 1/1/81. It was  
16 a part of the October 31 letter where we said we required  
17 these pieces of information and I will just sort of mention  
18 what they are. They are a little bit cryptic.

19           The shift technical adviser, the first one, is a  
20 little bit of a hybrid because there are really three things  
21 required by January 1, '81. The three things were the  
22 training program had to be implemented, degreed engineers  
23 had to be on shift and the third thing required was that the  
24 utility had to submit to us his report on how he wants to  
25 use STAs in the long term.

1           You see two of them on here because two of them  
2 are being items that we have asked I&E to verify. In a  
3 minute I will get to the next slide where the other  
4 remaining items picked up where NRR will be reviewing the  
5 report. This is a carryover item from the short-term  
6 lessons learned. That is the L<sup>2</sup> Category B. You will  
7 recall back over a year ago there were some of these items.

8           Shift manning is also a hybrid. The requirement  
9 that had to actually be in place by November the 1st  
10 according to 0737 was that overtime had to be limited to  
11 administrative procedures that had to be in place by  
12 November the 1st, 1980. So that item is picked up here  
13 because there are two or three of these items that were  
14 required by late '81. So this is implementation by 1/1/81.  
15 I have cleaned up everthing up to this point.

16           CHAIRMAN AHEARNE: '80.

17           MR. EISENHUT: I am sorry, yes, you are right.

18           The next item is the RO and SRO training program  
19 which you all recall has a number of pieces, the kind where  
20 the SRO had to have a year's experience and an RO had to  
21 have a year's experience before he could become an SRO,  
22 requirements for three months' training on shift, et cetera.

23           The only piece we asked here for I&E to verify was  
24 that they did in fact have a training program in place, that  
25 is they modified their training program to pick it up to



1 speed. That actually was an August the 1st, 1980  
2 requirement. The rest of those items under that particular  
3 item will show up on the next slide.

4 I think after this they get considerably simpler.  
5 I.C.5 is an item where we required that the utility have in  
6 place a procedure to account for a feedback of operating  
7 experience that occurs both in his own facility and in other  
8 facilities back into the operating staff.

9 Similary I.C.6 was a requirement where the  
10 licensee have a procedure in place to verify correct  
11 performance of all operating activities at his facility.

12 Going on down the line II.E.2.(5a) subpart was a  
13 containment pressure setpoint. What was required at this  
14 time was that he had identified the minimum pressure  
15 setpoint that he could have in his containment to isolate  
16 the containment. He had to identify that by 1/1/81 so that  
17 he could have it implemented by 7/1/81. So that was sort of  
18 a frontrunner to something to be implemented in July.

19 The next one was the containment purge valves. He  
20 had to have adopted the interim procedure of either closing  
21 the valves or going to the interim procedure which you will  
22 recall said I think it was 90 hours per year maximum purging  
23 time. Again he had to have that procedure in place by  
24 1/1/81.

25 The next item, the PID controller, is a



1 proportional integral derivative controller. What it really  
2 means is the pressure differential that would automatically  
3 before open the PORV. We told them that they had to have a  
4 hardware fix in place that would override the automatic  
5 opening feature of the PORV. It is not a safety feature in  
6 the first place. We didn't want them opening on this PID  
7 controller. It just relates to Westinghouse plants or  
8 plants with this Westinghouse controller. That is the only  
9 hardware fix in this listing. The hardware fix was required  
10 to be in place and have a report showing they did it and the  
11 date actually was December 1, 1980.

12           The next item, RCIC sunction, relates to the BWR.  
13 They had to have a procedure implemented. The RCIC normally  
14 takes suction when it starts sucking from the condensate  
15 storage tank. When the condensate storage tank level goes  
16 low we want an automatic switchover to the suppression  
17 pool. Before they have the automatic switchover they have  
18 to have a procedure implemented which shows that they can do  
19 it manually. That had to be in place by 1/1/81.

20           The last item required that the plant have a  
21 better capability of in-plant radiation monitoring of iodine  
22 cartridges basically. This was one of the other short-term  
23 lessons learned. They had to have the capability to remove  
24 the cartridge and take it somewhere and measure the iodine.  
25 So we asked I&E to verify the status of that item.

1           Now, these are the ten items that we felt amenable  
2 really to I&E verification of these dates of the 32 items  
3 that were required by 1/1/81. We asked I&E to go back and,  
4 even given it is a very limited period of time since 1/1/81,  
5 run sort of a preliminary check of how well they are doing.

6           I will turn it over to Jim Sniezek at this time  
7 who will give us sort of a summary of where they are.

8           MR. SNIEZEK: We went out primarily last week and  
9 the first couple of days of this week and we covered all the  
10 plants with the following exceptions: Dresden 1, Three Mile  
11 Island, Humboldt Bay, Indian Point 1 and Millstone 1 and 2.

12           CHAIRMAN AHEARNE: Indian Point 1?

13           MR. SNIEZEK: Yes. We did not do anything with  
14 Indian Point . It is sort of Darrell's exception list that  
15 we didn't cover.

16           CHAIRMAN AHEARNE: Just as an aside are we  
17 requiring any changes to be made to Indian Point 1?

18           (Laughter.)

19           MR. EISENHUT: All I say is I am not.

20           (Laughter.)

21           MR. SNIEZEK: The only operating licenses are  
22 Millstone 1 and 2 which we have not covered yet. When I  
23 talk to percent completion here I don't want to infer that  
24 I&E has done independent verification of the adequacy of  
25 the change at this time. I will be talking a little bit

1 later about our plans to do independent verification of  
2 adequacy of what was accomplished.

3 Some of the items here we have already verified at  
4 some of the plants independently. Others are based on  
5 discussions with utilities and just walks through the  
6 plant. It is our best information as we sit here as of  
7 about Tuesday of this week.

8 (Slide.)

9 Starting out with the shift technical adviser  
10 training program we found that 85 percent of the licensees  
11 had it in place as of the time of our check.

12 As far as degreed engineers for shift technical  
13 advisers 88 percent had it in place.

14 CHAIRMAN AHEARNE: Let's just take the first one  
15 and we can use that as an illustrative example perhaps. You  
16 said, Jim, when you started out you cautioned us on how to  
17 interpret this. So how should we interpret it that an I&E,  
18 I guess in most cases or in many cases, resident inspector  
19 has verified that there is some sort of a document that says  
20 that there is a shift technical adviser training program?

21 MR. SNIEZEK: That is correct. He would have  
22 either put his eyes on it, reviewed it himself or through  
23 discussions with the utility at the site level have  
24 determined that it exists, but we have not necessarily  
25 independently verified it at all plants for technical

1 adequacy as of this time.

2 CHAIRMAN AHEARNE: So that there is no sense here  
3 that the program meets any of the guidelines that we might  
4 have put down on what should be in that program?

5 MR. SNIEZEK: That is correct.

6 CHAIRMAN AHEARNE: Now, does I&E intend to do that?

7 MR. SNIEZEK: Yes. We do intend to do that for  
8 all of these items.

9 CHAIRMAN AHEARNE: With a schedule?

10 MR. SNIEZEK: Yes. I was going to talk about that.

11 CHAIRMAN AHEARNE: Let me ask another question.  
12 We have a list here of received and reviewed plants. I am  
13 not sure what percentage you have, but if the five are  
14 allowed I guess it is something like 92 percent of the  
15 plants have been received and review.

16 MR. SNIEZEK: That is right.

17 CHAIRMAN AHEARNE: Now, 85 percent of the plants  
18 have a program.

19 MR. SNIEZEK: Let me back up a little first. On  
20 the 90-plus reports that have been received and reviewed, I  
21 want to caution you again on the review. This stack of  
22 paper you will see in a minute is some 1,300 reports. By  
23 review we have skimmed through to see what this commitment  
24 looks like.

25 CHAIRMAN AHEARNE: You have verified that the

1 report has been received.

2 MR. SNIEZEK: Basically that is about it.

3 CHAIRMAN AHEARNE: At the moment you are not ready  
4 to say whether there is a discrepancy between ---

5 MR. SNIEZEK: No.

6 MR. DENTON: Let me try to add a bit to that. In  
7 our review of these 92 percent of the reports we have  
8 received we have tabulated whether or not they take  
9 exception with either the position itself or the schedule.  
10 On that first item our review as you will find later in the  
11 presentation shows at least one applicant disagrees with  
12 what we are asking him to do and 16 disagree with the  
13 schedule that we have laid on him. Our review of the  
14 material was to see whether or not they accepted it and  
15 committed to it as described or not.

16 CHAIRMAN AHEARNE: So that eventually this first  
17 cycle through that I&E is doing is a method of verifying  
18 that for those that say "yes, they have" you can verify that  
19 indeed they have?

20 MR. SNIEZEK: That is right. In one of my slides  
21 I talk about some of the general reasons why it is not all a  
22 hundred percent.

23 Shift overtime limits, 76 percent are completed.

24 Licensed operator training, 96 percent.

25 Feedback operating experience, 89 percent.

1 (Slide.)

2 The verification of the performance of operating  
3 activities, 64 percent. This gets into the double valve  
4 line-up area.

5 Containment pressure setpoint analysis, 70 percent.

6 The containment purge valves, the reset logic  
7 being changed, 91 percent.

8 The PID controller, 100 percent accomplished.

9 The reactor core isolation cooling suction valve  
10 alignment, 95 percent complete.

11 In-plant radiation monitors, the iodine  
12 monitoring, 92 percent.

13 (Slide.)

14 Now reasons not completed. The first two reasons  
15 are that the licensee took exception or requested a  
16 deviation from the technical requirement. The second main  
17 reason would be insufficient time or personnel resources and  
18 therefore they requested an extension of the time frame.

19 Now, under that we found four subsets under the  
20 first two reasons. Either they had an interim fix in place  
21 and a final resolution was being scheduled or implementing  
22 procedures were pending final approval or personnel  
23 shortages and bargaining unit agreements, and that  
24 especially comes up in the overtime limitations.

25 CHAIRMAN AHEARNE: In what sense?

1 MR. SNIEZEK: In that they may have to bargain  
2 with the union as far as the working hours on overtime  
3 limitations. That showed up mostly in item I.A.1.3, the  
4 shift overtime limits.

5 Existing procedures or plant features were found  
6 to be adequate in the view of the licensee.

7 These were the types of reasons primarily stated  
8 in the letters that went to NRR that requested exceptions or  
9 extensions as far as a time frame.

10 As far as L&E actions, we do intend to  
11 independently verify the adequacy of the licensee's actions  
12 for all these items.

13 I wanted to mention here that right now we have  
14 five basic procedures out for our field use.

15 COMMISSIONER BRADFORD: Don't move that slide for  
16 just a minute.

17 MR. SNIEZEK: Go back to slide 3, please.

18 COMMISSIONER BRADFORD: If the last item isn't the  
19 same as the first one then doesn't it mean that in fact the  
20 item is complete?

21 MR. SNIEZEK: They would have come in their  
22 submittal saying that our procedures are adequate and  
23 therefore we don't intend to do anything, but we have not  
24 yet verified this.

25 COMMISSIONER BRADFORD: Oh, I see.



1           CHAIRMAN AHEARNE: The last four are subsets of  
2 the first two.

3           MR. SNIEZEK: Those are the basic reasons why they  
4 request exceptions.

5           COMMISSIONER BRADFORD: Now, what happens if we  
6 wind up disagreeing with the basis for their exception?

7           MR. SNIEZEK: Darrell, were you going to get into  
8 the plant specific ---

9           MR. EISENHUT: If we could hold that slide just  
10 for one second.

11          MR. DENTON: This has been a voluntary compliance  
12 program up to here. In other words, it didn't carry any  
13 enforceable means with it. Based on our review of whatever  
14 exceptions they take either technical or schedule we intend  
15 to issue follow-up enforcement instruments, orders or  
16 whatever would be appropriate where we disagree with them.

17          COMMISSIONER BRADFORD: I see. So at the moment  
18 there is no enforcement action involved in their having  
19 missed the deadline?

20          MR. EISENHUT: That is right.

21          MR. DENTON: I think what it did accomplish is  
22 about 90 percent voluntary compliance. We will eventually  
23 get into the issues where they disagree with us for one  
24 reason or another which we will straighten out case by case.

25               (Slide.)



1           MR. SNIEZEK: We have five inspection procedures  
2 on the street now for inspectors to use and all the items  
3 that we verified will be covered by inspection procedures so  
4 our inspectors have some guidance on scope and depth as far  
5 as the inspection effort.

6           I just list these to show very quickly the areas  
7 that are covered. We have a specific one for OL applicants  
8 that before they get a license we go through and make sure  
9 everything can be verified by I&E.

10           Then we break it up into another procedure  
11 specifically addressing procedure and staff requirements,  
12 another one which covers hardware changes, another one for  
13 the health physics and emergency planning and we have one  
14 specifically for the B&W orders.

15           (Slide.)

16           MR. DENTON: I might add that I think this is  
17 consistent with what we told the Commission we were going to  
18 do following the duplication that resulted a year ago when  
19 both NRR and I&E visited the plants to ascertain compliance.

20           CHAIRMAN AHEARNE: With a lack of understanding of  
21 what each was accomplishing.

22           MR. DENTON: Yes. So this time it is clearly I&E  
23 that is going to follow up and enforce those things which  
24 they either voluntarily comply with or are ordered to do.  
25 We will review the paperwork back here and issue the

1 appropriate orders as necessary.

2 COMMISSIONER BRADFORD: Is there a mechanism for  
3 situations in which I&E has any doubt about whether the  
4 intention that NRR had in writing the requirement has been  
5 met?

6 MR. EISENHUT: What we have done is, and I don't  
7 remember when any more, a few weeks ago I sent around sort  
8 of an implementation plan and we went through item by item  
9 first delineating what the item was, who was going to be  
10 doing it and we have got several people working back and  
11 forth where I&E has identified a vocal point. My vocal  
12 point is John Olshinski who is the Branch Chief of the  
13 Operating Reactor Assessment Branch.

14 We are working very closely on these to be sure  
15 that we have clearly defined not only who is doing what but  
16 also what it is that you are supposed to be doing.

17 MR. DENTON: When 0737 should speak for itself,  
18 but I guess if any questions come up we have got good  
19 channels between the two offices of who to go to to ask what  
20 the intent was.

21 CHAIRMAN AHEARNE: I think at the moment, Harold,  
22 we are still substantially far away from where NRC documents  
23 are so clear that they speak for themselves. I think we  
24 always ought to have provision for dialogue to improve  
25 understanding.

1           MR. SNIEZEK: There is no question about that. If  
2 I have a question I got to Darrell Eisenhut and then we get  
3 to the bottom of what questions we get from the field.

4           If I can just mention the inspection factors ---

5           CHAIRMAN AHEARNE: Before you start that just to  
6 follow up a little more on Peter's question, if you have a  
7 problem you go to Darrell.

8           MR. SNIEZEK: If they have a problem they come to  
9 me, if they have any questions. In our writing of what we  
10 want them to do they may not understand what we say either.  
11 So it is not just from NRR.

12          CHAIRMAN AHEARNE: No, I can understand that. I  
13 think the question is you have got directives out. They are  
14 supposed to follow up on what NRR laid on as a requirement  
15 through this document. Your field teams, have you asked or  
16 do you have a process by which all of them are pretty  
17 confident they have the same interpretation of what was  
18 meant to be done?

19          (Commissioner Gilinsky entered the room at  
20 10:40 a.m.)

21          MR. SNIEZEK: Let me tell you what we did. At the  
22 resident inspector meetings that we hold about every two  
23 months the people that wrote the temporary instructions went  
24 out and discussed them with the resident inspectors at those  
25 meetings in all five regional offices.

I believe we are confident that the people know  
and especially after Nine Mile Point they understand that if

1 there is any question in their mind to raise that question  
2 and we will get the answer.

3 I want to talk a little bit more about how we do  
4 our actual inspection. Basically we rely on several  
5 things. It is the licensee letters where they make a  
6 commitment and commit to do something. We usually  
7 incorporate those as references in our procedures that our  
8 inspectors use. We also rely on our inspectors' technical  
9 judgment on some areas where they are capable of making  
10 technical decision. We rely on references to NUREG 0737,  
11 0696 on emergency preparedness, et cetera. We incorporate  
12 those into our guidance to our inspectors.

13 The general approach that we take in the  
14 inspection is to verify that the program or the modification  
15 that the licensee has committed to is in fact implemented or  
16 in place.

17 We look at the procedures for technical adequacy.  
18 Will they do the job they are supposed to. It is not just  
19 that a procedure exists, but is it technically adequate. We  
20 look at the modification package. How is the design work  
21 done? Was it done adequately? Is there adequate testing  
22 after the modification is performed? If the modification is  
23 performed and therefore a new operating or surveillance  
24 procedure is required because of that has it been  
25 developed? Have the operators been trained in that

1 procedure?

2           Those are the key elements as far as what we look  
3 at. Now, you can always get into the question of how much  
4 is enough when you are doing that inspection and to a large  
5 extent we rely on the technical judgment of our inspectors.  
6 When does he stop inspecting? We give them the basic scope  
7 but he always has the latitude that if he feels he has to go  
8 deeper to satisfy himself he can go deeper in his inspection  
9 effort.

10           Another thing that we have got a concern over is  
11 how do we know what is done at what time by all the  
12 licensees and how do we keep track of it? Because of that  
13 we have developed a tracking system, a computerized tracking  
14 system with input right from the regional offices. We have  
15 got the trial running in two regions right now and our goal  
16 is that within two to three months after a licensee's  
17 commitment date we will have completely independently  
18 verified that the change is in place, the action has been  
19 taken and have it entered into a computer tracking system  
20 which will tie it back to the I&E inspection report which  
21 addresses that item.

22           So that for the long term we can always go back  
23 and find where we verified that the item has been  
24 independently verified by I&E. We feel that that is very  
25 important in this effort to be able to answer questions and

1 to satisfy ourselves that everything has been accomplished  
2 at all of the operating reactors. I believe we mentioned  
3 that in the letter that came back to you, that tracking  
4 system that we are putting in place.

5 COMMISSIONER BRADFORD: Once you have verified  
6 that everything has been accomplished, supposing you go back  
7 in six months or a year and discovery that it isn't being  
8 done any more?

9 MR. SNIEZEK: At that time, because of the way it  
10 is going to be approached on an individual plant basis,  
11 which I think Darrell is going to talk about, we would have  
12 an opportunity at that time to take enforcement action.

13 COMMISSIONER BRADFORD: But, let's see, the  
14 compliance will have been voluntary.

15 MR. SNIEZEK: No.

16 MR. EISENHUT: No.

17 MR. SNIEZEK: This is the next step. Up to now it  
18 has been voluntary. That was as far as I was going to go as  
19 far as our verification. If there are no other questions of  
20 me I will turn it back over to Darrell and he can talk to it.

21 MR. EISENHUT: I think I can answer your question  
22 in just a minute.

23 (Slide.)

24 This is just a summary listing and I appreciate it  
25 sort of gives you a display before you. These are requested

1 exceptions in the exception terms. Certainly none have been  
2 granted yet. This is a listing of all 32 items where we  
3 identified something had to be done by January 1st, '82.  
4 Out of the 32 items 27 of the 32 required that reports be  
5 submitted to the NRC.

6 If you will go down you will notice in the middle  
7 of the page there where it starts II.F.2, all of the  
8 II.F.2's are items from the B&W orders. All of the items  
9 II.K.3 are items that came out of the B&O Task Force of last  
10 year.

11 COMMISSIONER GILINSKY: Did you mean '82 or '81?  
12 You said something had to be completed by '82.

13 MR. EISENHUT: That was a mistake. It is January  
14 1st, 1981. This is the 1/1/81 list. I have only  
15 concentrated for today on these 32 items because these are  
16 the 32 items where they had been asked to do something by  
17 right now.

18 COMMISSIONER GILINSKY: What was the first  
19 requirement?

20 MR. EISENHUT: The STA item?

21 COMMISSIONER GILINSKY: Yes. What was it that  
22 needed to be done by 1/1/81?

23 MR. EISENHUT: There were three things that had to  
24 be done by 1/1/81. First they had to have degreed STAs on  
25 shift. The second thing they had to do was they had to have



1 a training program implemented by 1/1/81. The third thing  
2 they had to do was they had to submit a report to us laying  
3 out their long-term programs of how they propose using STAs,  
4 if they do, in the long term or whether they want just years  
5 from now to have just more ROs and more SROs.

6 COMMISSIONER GILINSKY: It is really the report in  
7 the training program and then they have to have an STA ---

8 MR. EISENHUT: They had to have an STA by 1/1/80.  
9 He had to be fully trained by 1/1/81.

10 COMMISSIONER GILINSKY: I see.

11 MR. EISENHUT: There was an interim milestone  
12 which said that by January 1st, 1981, they had to have a  
13 degree, they had to have the equivalent of so much training,  
14 et cetera.

15 COMMISSIONER GILINSKY: If you don't mind just  
16 pursuing this one item. Do you see this as a long-term  
17 approach or is this a kind of an interim fix to try to get  
18 book learning into the control room?

19 MR. DENTON: I have always seen it as a short-term  
20 stop-gap measure until we could revise the SRO requirements  
21 and bring people in that had that kind of training. We  
22 haven't yet firmed up yet on what the SRO's role would be.  
23 I lean toward making the SRO have all the qualifications  
24 that an STA would have. There is lag time in the system and  
25 some utilities are heading that way and we have asked them



1 to identify the ones who do intend to have an SRO program  
2 such that the SRO would meet all that. We haven't quite  
3 laid it out in a formal requirement yet.

4 CHAIRMAN AHEARNE: At the moment the STA is still  
5 strictly an adviser.

6 MR. DENTON: That is right.

7 MR. EISENHUT: That is correct.

8 CHAIRMAN AHEARNE: Eventually then what you are  
9 hoping to do is to build that level of technical competence  
10 into someone who is actually in a supervisory position.

11 MR. DENTON: That is right.

12 COMMISSIONER GILINSKY: He is an adviser not  
13 necessarily because that is a desirable state of affairs but  
14 it is just what he had to put up with in effect.

15 MR. DENTON: We didn't want a man without a  
16 license at that time. There will be another Commission  
17 paper coming down or is being prepared that defines our  
18 long-term objectives in the RO and SRO area.

19 MR. DIRCKS: We are trying to work out some sort  
20 of a concept where we will look at the control room  
21 personnel as a source of talent as part of a career ladder.  
22 So that the SRO could be looked upon as a possible future  
23 candidate for more supervisory positions in the utility  
24 system itself, the nuclear system itself. I think all this  
25 is at the beginning stages and we are feeling our way in

1 this process.

2 COMMISSIONER GILINSKY: That is another aspect.

3 MR. EISENHUT: All of these things were tied  
4 together and we felt we just weren't ready to take a  
5 position in 0737. So what we wanted to do was get the  
6 thinking and the benefits of all the thinking from the  
7 industry so we required them to submit a report which  
8 explains their plans and their approaches to this problem.  
9 We had sent them the draft INPO training program that was  
10 laid out and gave them a bunch of options.

11 MR. DENTON: We had first defined this requirement  
12 a year ago in our short-term lessons learned.. This is one  
13 that was the second phase from the original short-term  
14 lessons learned.

15 COMMISSIONER GILINSKY: This is basically a  
16 stop-gap. That is how we feel about it and I think we ought  
17 to make that clear that the preferred approach is to have  
18 that competence that is now obtained through the shift  
19 technical adviser actually embedded in the command chain in  
20 the control room.

21 MR. DENTON: I think there are some proposed rule  
22 changes that go that way.

23 MR. EISENHUT: The actual write-up specifically  
24 made reference to that by saying right in the very beginning  
25 the need for an STA position may be eliminated when we go to

1 the upgrading program of the SRO and RO. It is really a  
2 package.

3 MR. OLSHINSKI: There were actually two pieces and  
4 I wanted to add the one more. There was the training  
5 capability or the engineering expertise for the STA that was  
6 a concern there. That was one reason for the original  
7 requirement.

8 Another was concern whether there would be enough  
9 time, if the present operators in the control room had  
10 enough time to step back and make this analysis capability.  
11 When the requirement was originally issued it was intended  
12 to provide that engineering expertise and to provide a  
13 person that had the time to step back and look at the  
14 overall situation.

15 So in order for that requirement to be eliminated  
16 the thought was that we would upgrade ROs and SROs and get  
17 that expertise. The additional part of it is to improve the  
18 man-machine interface in the control room so that in fact  
19 the operators would have the time to be able to perform that  
20 function.

21 MR. DENTON: And possibly even the level of  
22 manning.

23 COMMISSIONER GILINSKY: Well, it sounds like you  
24 want to increase the level of manning so the man in charge  
25 can say you think about this for a few minutes.

1           MR. EISENHUT: There is a restriction that says  
2 the STA cannot manipulate controls in the control room. We  
3 wanted him sort of in the set-back mode so he can identify  
4 that the PCRV is open because too often people can get very  
5 involved if they are all running around trying to diagnose  
6 the situation.

7           So John's only point is there is the other side of  
8 the coin that Steve is trying to factor into this package.  
9 There is a benefit to have a very knowledgeable and ideally  
10 very well trained academically and experienced SRO and a  
11 person who has operated the plant in a capacity of not  
12 actually trying to manipulate the controls.

13           CHAIRMAN AHEARNE: You probably would be better  
14 off if you had him as sort of a chief SRO.

15           MR. EISENHUT: That is right. That is ultimately.

16           COMMISSIONER GILINSK : It seems to me you don't  
17 want to put these artificial restrictions in. It is up to  
18 the man in charge. If he wants someone to step aside and  
19 think about a problem he ought to be able to do that.

20           MR. EISENHUT: Well, I agree with you. That is  
21 another piece of the argument that people have been  
22 presenting that I just wanted to make here also.

23           What we asked for was this report that explains  
24 their program and their thinking about it from each  
25

1 utility. Now a number of these are that kind of a thing.  
2 Twenty-seven of the 32 required some kind of a report. I  
3 pointed out that most of the things done on this chart are  
4 more of an analysis.

5 CHAIRMAN AHEARNE: For example, if I were to look  
6 at II.F.2, is that 20 plants?

7 MR. EISENHUT: These are the number of plants.  
8 The whole slide is geared towards the number of plants  
9 requesting exceptions. Twenty plants wanted to argue with  
10 us about our technical position on inadequate core cooling  
11 instrumentation. Twenty-three plants wanted to talk to us  
12 about the schedule for doing that.

13 Now, quite often they are interwoven. All we have  
14 tried to do right now is take a first cut through their one  
15 report which is their overall report on 0737 and make a cut  
16 at what their exceptions are.

17 CHAIRMAN AHEARNE: And you aren't yet, as Harold  
18 mentioned, at all prepared to say which ones you intend to  
19 agree with and which ones you don't?

20 MR. EISENHUT: Oh, no, not at all. In fact, of  
21 the 27 reports here there is something like 1,300 reports  
22 total. I haven't, so to speak, given those to all the  
23 technical divisions and said here are 50 of these and I need  
24 your position on it because we still right now still getting  
25 them in and trying to sort them and making copies, et

1 cetera, the administrative things.

2           This slide and the slides that follow, which I  
3 won't go through, are really sort of my working slides. We  
4 did it this way because we will ever get to the point on the  
5 next step, which I will mention in a minute, you need to  
6 know what the situation is plant by plant and this is a  
7 cross-cut of these same items.

8           I mention again these are only the items that have  
9 dates of 1/1/81. There are also three or four items which  
10 have dates coming down the road in the future, probably five  
11 or six, that have dates like March or April requirements.  
12 Then the next set is the July 1, '81, requirements of which  
13 there are about 25. Those are the items where they put in  
14 the big hardware fixes. I say big in the sense that they  
15 required plant shutdowns, safety grade aux feedwater  
16 initiations and safety grade aux feedwater flow indications,  
17 things that require shutdowns of the plant.

18           What our approach is and what we are proposing  
19 right now is since the piece we have before us, the  
20 1/1/81's, is quite a large task for us to go through and lay  
21 out whatever our requirements are, what we would be  
22 proposing is to make this into something that is clearly  
23 understood by everyone that these are the requirements and  
24 that this is what everyone has to do. We are trying to go  
25 through all these and develop plant specific either

1 confirmatory orders or orders to the plant saying to do  
2 things if their dates are too far in the future.

3           What we will be trying to do is pick up all items  
4 between January 1st and June 30th in the first cut. I will  
5 pick up those out in March and April at this time also.  
6 Then we would try to go to the next iteration maybe perhaps  
7 in a month or two on the July 1 dates of where there is  
8 another very large package of things that have to be done.  
9 A very large number of those July 1 reports are also the  
10 report that supersedes the actual hardware being put in  
11 place. For example, reactor coolant system vent reports are  
12 due July the 1st.

13           The report is due July the 1st so it can be  
14 implemented -- and I think that item is a year later -- but  
15 the report has to be submitted, reviewed and approved by the  
16 NRC on some of those items. Now, that puts the NRC in the  
17 critical path.

18           MR. DENTON: This is a big resource problem and we  
19 have had to shift some people around. We think within about  
20 six weeks we can work through this list of exceptions and  
21 issue the appropriate order either confirming what they have  
22 agreed to do voluntarily or ordering what we think is  
23 necessary to work through this entire list for that group of  
24 items that Darrel has mentioned. Then we will proceed to a  
25 longer-term list.



1           MR. EISENHUT: Just from an administrative  
2 standpoint 32 plus another half dozen, with any more than 40  
3 items it just becomes a nightmare to try to put together an  
4 actual package.

5           MR. DENTON: I think in six weeks we can put out  
6 enforceable packages for all requirements through June 30th  
7 of this year.

8           MR. EISENHUT: For six months of the year.

9           MR. DENTON: And do it on a tailored  
10 plant-by-plant basis if they do have good cause for why this  
11 requirement doesn't fit their plant for some reason.

12          CHAIRMAN AHEARNE: Let's say looking a little bit  
13 further ahead I imagine you would propose this same kind of  
14 a cycle for the major hardware fixes coming up, wouldn't you?

15          MR. EISENHUT: That is right.

16          CHAIRMAN AHEARNE: But suppose that a licensee has  
17 disagreed or takes exception, you conclude that the licensee  
18 is wrong, you issue an order and then the licensee says no.  
19 Are we potentially under the regime where he would have an  
20 option to insist on a hearing?

21          MR. BICKWIT: Yes, he would have that option.

22          MR. EISENHUT: It would carry the standard  
23 provision I would imagine.

24          MR. DENTON: Well I guess then it would depend on  
25 how strongly we felt about it. Even if he is entitled to a



1 hearing if we felt the plant could be operated safely  
2 without that in there we would have recourse to another kind  
3 of action.

4 MR. BICKWIT: Yes, but he is entitled to a hearing  
5 in any event. It is just a question of whether it is before  
6 or after the fact.

7 MR. EISENHUT: I would also think that even on the  
8 July 1 items since they are quite important and are the ones  
9 that have to be actually implemented by July the 1st in the  
10 sense of hardware we would be trying to move early enough so  
11 that utilities know ahead of time that we are going to be  
12 taking that firm action regarding July 1 so that some  
13 utilities may elect in their spring outages to put in the  
14 fixes to make sure they are in in time.

15 The rest of the slides, as I mentioned, are just  
16 sort of a cross-cut. I tried to make this more of a working  
17 document that we could use at the same time. It is just a  
18 cross-cut plant by plant and it is of these items on all 70  
19 plants we are dealing with.

20 There is a notation up in the corner which points  
21 out -- the "T" -- which states that he is disagreeing with  
22 our technical position and the "S" is he is requesting a  
23 different schedule change. An asterisk in the title on the  
24 title item just cross-cuts back to the ten items we talked  
25 about before that I&E is looking at.

1           In addition, I&E will likely be helping us  
2 actually do some of the review of some of the other  
3 submittals, that is some of the report submittals. If  
4 something can be done at a plant a lot easier than it can at  
5 headquarters we are working with I&E. There are a few items  
6 where they may be able to help us out.

7           MR. SNIEZEK: Let me clarify a point here. We are  
8 going to do more independent verification than just the ones  
9 you see an asterisk by. These were just for the purposes of  
10 this briefing today.

11           MR. EISENHUT: Yes, that is right, certainly. I&E  
12 will be in fact looking at them all. The ten is just  
13 cross-reference to those.

14           That is really all we had planned to say. As  
15 Harold said, we are shooting for having everything issued in  
16 like six weeks which would mean that we would be coming back  
17 to the Commission probably in like four weeks depending upon  
18 the Commission's choosings. We would expect to use the same  
19 approach we did on the short-term lessons learned.

20           In this case since there is no hardware problems  
21 in the first six months of concern here except the one, and  
22 it appears to be already implemented on all plants, we  
23 wouldn't have to go through the loop of the need for power  
24 considerations on the first wave of them at least.

25           CHAIRMAN AHEARNE: How much of a response have you

1 had from licensees saying they don't understand what we have  
2 asked?

3 MR. EISENHUT: I think that is what a lot of these  
4 technical items are. A lot of those technical position  
5 deviations I think will go away. Even the first one knowing  
6 the interest in the STA I want and looked at how could  
7 someone possibly disagree with an STA position. I think you  
8 could categorize that one as either a scheduler problem or a  
9 technical problem. We broke one of them out and it appears  
10 that he still wants to argue about needing to have them at  
11 this period of time.

12 Let me give you one other example which is the RO  
13 qualifications. I believe that technical position items are  
14 really items where a licensee states that he can't have his  
15 ROs to have one year's experience prior to going to an SRC  
16 and he argues it is not needed at this time. I could argue  
17 that is a scheduler problem or a technical problem. I think  
18 with plant specific tailoring that a number of these will  
19 disappear. They will become scheduler unique.

20 I anticipate schedulers are going to be a little  
21 harder where utilities just say I am up against a real  
22 problem and I don't have the staff and we will just have to  
23 make some hard decisions.

24 CHAIRMAN AHEARNE: Bill, who is in overall charge  
25 of the Action Plan implementation? Is there anyone either

1 individual or group?

2 MR. DIRCKS: The basic coordinating group is in  
3 Darrell's operation. He relies on John to coordinate it  
4 with I&E.

5 CHAIRMAN AHEARNE: I guess what I am asking is  
6 that is there any either one individual or an identified  
7 couple of individuals who have the responsibility to keep  
8 track of this large set of requirements as they come forth?

9 MR. DIRCKS: We don't have anyone solely. We  
10 don't have anyone outside of, say, the line organizations  
11 for this purpose. We do have a Management Planning Analysis  
12 Office.

13 CHAIRMAN AHEARNE: I guess what we are saying is  
14 that these have then flowed into subsets of requirements  
15 which are now viewed within the offices as part of their  
16 normal requirements.

17 MR. EISENHUT: Well, there is one other thing on  
18 top of that, too, just on the implementations, all of these  
19 implementations. MPA does track them for us and we have a  
20 computerized tracking system.

21 CHAIRMAN AHEARNE: You do have a tracking system?

22 MR. EISENHUT: Oh, yes, because otherwise it is  
23 just an insurmountable problem.

24 CHAIRMAN AHEARNE: So that if at some stage at any  
25 given period we were to ask give us a summary now as of this

1 time of the total status that some days later or in a week  
2 or so you would be able to come in and say all right, here  
3 it is?

4 MR. EISENHUT: Right.

5 MR. DENTON: That is right. Within NRR we have  
6 broken them into two categories. They are either the  
7 implementation items, which Darrell has described today, or  
8 they are the developmental ones where there is still work to  
9 be done by the staff. That work is spread among varying  
10 divisions. I have made Tom Murley's division responsible  
11 for the scheduling following all the ones where there are  
12 developmental items just to give you a snapshot.

13 There are about 40 Action Plan items requiring  
14 further staff definition of positions, production of reports  
15 and studies and analyses and so forth. We are looking at  
16 those to see how well we are doing with regard to schedules  
17 and all the data is not in yet, but it looks like we are on  
18 schedule on about 75 percent of those 40 items.

19 CHAIRMAN AHEARNE: Does this tracking system  
20 manage to also keep track of when a modification is made in  
21 one of these?

22 MR. DENTON: Let me ask Harold Berkson who is  
23 following this tracking system if he can answer that.

24 MR. BERKSON: Quarterly the tracking system is  
25 being updated and each quarterly report does have

1 accommodation for indicating when a modification has been  
2 made and scheduling has been changed or a goal has been  
3 altered.

4 CHAIRMAN AHEARNE: I would imagine at some point,  
5 whether it occurs this year or next year, there will be a  
6 number of people who will want to take a retrospective look  
7 at how has the agency implemented the Action Plan.

8 MR. DIRCKS: I think for that look we have the MPA  
9 data system.

10 CHAIRMAN AHEARNE: As Darrell points out, any one  
11 individual requirement gets some modifications as it goes  
12 along. A memo from I&E may come in and say we have been  
13 examining this and we have found these kinds of problems.  
14 NRR may then say all right, you clarify those problems and  
15 here is an additional piece of paper that either modifies or  
16 adjusts or explains or expands. The tracking system is  
17 going to have to try in some way to keep following all that  
18 otherwise we are going to look back and say, gee, how did  
19 this happen from that. We were building something that was  
20 round and it turned out to be a cube.

21 MR. EISENHUT: Yes, and there are really two other  
22 things also that go right along with that. When we put  
23 together 0737 I looked at it, you know, it was getting so  
24 complicated for even me to keep track of what was going on  
25 and I knew the industry didn't know.



1 Jim just reminded me that I had asked the staff  
2 some time ago to think about how do I keep up with this  
3 living document because I already have probably ten letters  
4 from the technical staff in my office that they want to send  
5 to all licensees. Some even revise things that are in the  
6 0737. So it presents us the problem of how are we going to  
7 keep track on these and, just as Harold mentioned, there are  
8 40 more under development.

9 MR. DENTON: What our plan was for some time would  
10 be that, at least within NRR, that the Division of Safety  
11 Technology would undertake the role that the old RQC used to  
12 do and that any changes would be reviewed within a holistic  
13 viewpoint of cost effectiveness, we would go out for public  
14 comment and we adopt it only after a considered scope with  
15 public comment. So we have got to get back in the mode of  
16 doing that rather than just tagging new requirements somehow  
17 onto the Action Plan as an afterthought. It has been a  
18 convenient place for people to put things up to now but I  
19 think we are returning to a stability mode.

20 MR. DIRCKS: There are Action Plan items in every  
21 office now I think in the agency. I don't know whether MSS  
22 picked up any or not, but that is the role of the MPA data  
23 system which is to pick up these items, where they are in  
24 the agency, what are the dates when they are going to be  
25 implemented and identify where the slips have occurred.



1           MR. DENTON: I think your concept of having in one  
2 place though a history of how the Action Plan was  
3 implemented is very good and we will be sure we can  
4 implement that.

5           CHAIRMAN AHEARNE: Vic?

6           (No response.)

7           CHAIRMAN AHEARNE: Peter?

8           COMMISSIONER BRADFORD: Let's see. As I look at  
9 the matrix you have prepared on specific plants and specific  
10 requirements, some plants seem to be having a lot more  
11 trouble than others. I wonder could we just run through  
12 some of the ones that really stand out? Would you be in a  
13 position to give some indication why they seem to be having  
14 so much more difficulty?

15          MR. DENTON: I think it would be somewhat  
16 premature in that I haven't focused at all on this. This is  
17 just a project manager's categorization from reading  
18 material, unless John or Darrell have gotten into the  
19 details.

20          MR. EISENHUT: Well, it depends on our specific  
21 question. On some of them we can.

22          COMMISSIONER BRADFORD: Well, for example, on the  
23 first page Big Rock Point I suppose one could take a guess  
24 at, but Calvert Cliffs or Davis Besse or Duane Arnold, they  
25 just seem to be having a lot more trouble than, say, the

1 average.

2 MR. EISENHUT: We really can't specifically going  
3 down each plant. You can make an observation on a couple of  
4 these, though. Let's go back to the first place to, let's  
5 say, Browns Ferry. You will notice there are an awful lot  
6 of scheduler or technical problems. A number of those are  
7 generic technical positions where the BWRs got together in  
8 an owners group and have given us a report back saying that  
9 here is some item that you wanted to put in from the  
10 bulletins and orders exercise and we don't think it is  
11 appropriate. Even on one they went so far as to say they  
12 think our requirement was contrary to safety.

13 So any BWR that adopted that it would show up of  
14 course in the listing. That is why you see it on Duane  
15 Arnold 2.

16 CHAIRMAN AHEARNE: David Besse's look like they  
17 are all "S's".

18 MR. EISENHUT: David Besse's are all schedulers.

19 MR. DENTON: I found only one plant in this list  
20 that had indication no exception -- or I guess two -- no  
21 exception requested.

22 COMMISSIONER BRADFORD: Vermont Yankee and what  
23 was the other, Harold?

24 MR. DENTON: LaCrosse.

25 MR. EISENHUT: There is even a note of caution on

1 that. I made the observation to the staff when I saw this  
2 that said Vermont Yankee made no exceptions, that  
3 historically Vermont Yankee quite often wants to argue with  
4 our positions. So I have asked them to go back and relook  
5 at that submittal.

6 (Laughter.)

7 I find it difficult that any utility comes in  
8 completely clean on all 32 items.

9 CHAIRMAN AHEARNE: Well, we will go back and ask  
10 them do you really mean that you want to ---

11 MR. EISENHUT: I just want to read the submittal  
12 first.

13 (Laughter.)

14 COMMISSIONER BRADFORD: What is the difference  
15 between Vermont Yankee where it explicitly says no  
16 exceptions and San Onofre where there just aren't any noted?

17 MR. EISENHUT: San Onofre is one of those where we  
18 haven't gotten the submittal yet.

19 COMMISSIONER BRADFORD: I see.

20 CHAIRMAN AHEARNE: Farley's are also listed that  
21 way.

22 MR. EISENHUT: In fact -- John, let's see, I think  
23 my list I am working from has updated their list already.  
24 Are there stars out to the side?

25 MR. OLSHINSKI: There are some stars out to the

1 side listed on the plants and we had sent an earlier list  
2 down last Monday, earlier this week, and these are the  
3 updates since then as the stars indicate.

4 MR. EISENHUT: So we are trying to go to the  
5 moving target. It is just really hard to say what the "S's"  
6 really mean.

7 CHAIRMAN AHEARNE: Until you have had a chance to  
8 go through it.

9 MR. EISENHUT: I have seen a lot of utilities  
10 where a plant may be shut down and he says I want relief on  
11 these 15 items but I will have them all done before I start  
12 up on January 15th. In my mind that is a nothing. So it is  
13 hard to separate the nothings from the significant ones  
14 until we really take a look at them.

15 COMMISSIONER BRADFORD: If I had had the wit to  
16 ask last August what you thought this matrix would look like  
17 in January is this roughly the way you think it would have  
18 turned out or better or worse?

19 MR. DENTON: Well, it looked about like this when  
20 we did the short-term lessons learned. You remember we were  
21 in about the same position a year ago with someone objecting  
22 to every requirement but no requirement that everyone  
23 objected to.

24 I had hoped that it would turn out somewhat  
25 cleaner than it did, frankly. They seemed to be mainly

1 schedule more than technical. There are a few items if you  
2 look at this particular slide were up to 20 are technical  
3 objections. Where it is down to just one or two I don't  
4 think they present us any real problem in dealing with it.  
5 They may have good reasons in a couple of cases why it  
6 wouldn't fit them.

7 CHAIRMAN AHEARNE: Many times this morning you  
8 have mentioned that it is very preliminary and you haven't  
9 gone through it in detail. What would be a time when you  
10 would be able to give us the evaluation?

11 MR. DENTON: Six weeks from now roughly. We will  
12 need often to meet with these licensees or have telephone  
13 conversations with them if they are taking major exceptions  
14 before we could understand their position or straighten it  
15 out.

16 COMMISSIONER BRADFORD: That in fact was exactly  
17 the question I had in mind asking. I think it would be  
18 useful to schedule a session that would give us a feel for  
19 what this looks like when they move it out.

20 CHAIRMAN AHEARNE: I would particularly be  
21 interested in doing that prior to the 19th of February.

22 (Laughter.)

23 COMMISSIONER BRADFORD: I can't get six weeks into  
24 that period of time.

25 CHAIRMAN AHEARNE: No, but while Harold was saying

1 six weeks Darrell said four, and I would prefer to choose  
2 the four.

3 (Laughter.)

4 MR. EISENHUT: Well, my target is four because I  
5 know it takes me a couple of weeks to issue these orders  
6 afterwards.

7 MR. DENTON: As I mentioned to the Commission, we  
8 are going to have one project manager per plant to read  
9 these.

10 MR. EISENHUT: It is a real consideration of what  
11 else occurs during this period of time.

12 CHAIRMAN AHEARNE: Of course.

13 Peter?

14 COMMISSIONER BRADFORD: I think we have covered  
15 everything that I had in mind other than things that I think  
16 we will just have to wait until we have harder information.

17 CHAIRMAN AHEARNE: All right. Thank you very much.

18 Whereupon, at 11:25 p.m., the public meeting  
19 concluded.,

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NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the

in the matter of: Public Meeting - Briefing on Action Plan - Items Due

in January 1981  
Date of Proceeding: January 15, 1981

Docket Number: \_\_\_\_\_

Place of Proceeding: Washington, D. C.

were held as herein appears, and that this is the original transcript thereof for the file of the Commission.

Mary C. Simons

Official Reporter (Typed)

*Mary C. Simons*

Official Reporter (Signature)