

ENCLOSURE
SAFETY EVALUATION REPORTS
FOR ITEMS CONTAINED IN NUREG-0634
OUTSIDE OF THE CONTENT OF THE
COMMISSION'S ORDERS OF AUGUST 9, 1979 AND MARCH 6, 1980
REQUIRED BY RESTART (OCTOBER 1981)

B104240 041

I.D.1 CONTROL ROOM DESIGN

Position

Perform a preliminary assessment of the control room to identify significant human factors deficiencies and instrumentation problems and establish a schedule approved by the NRC for correcting deficiencies.

Discussion and Evaluation

The Discussion Evaluation and Conclusion is addressed in NUREG-0752, "Control Room Design Review Report for TMI-1" Supplement No. 1 thereto.

Item I.C.7 NSSS VENDOR REVIEW OF PROCEDURES

This item was identified in NUREG-0660, but was not required for operating reactors, and specific requirements do not appear in NUREG-0737. However, the staff will require NSSS vendor review of: (1) the special low power test program, (2) the proposed power ascension program after restart, and (3) the emergency procedures.

Discussion and Evaluation

By letter dated April 14, 1981 (LL 111), Met Ed responded to Item I.C.7. In regard to special low power and power ascension procedures, Met Ed has committed to approach the restart of TMI-1 in a manner similar to the initial startup program. For the original startup of TMI-1, a Test Working Group (TWG) was formed. The purpose of the TWG was to review the startup procedures for special low power and power ascension tests. B&W was represented on the TWG and the B&W TWG member provided B&W input to the review of the procedures including, as appropriate, comments from the B&W home office. Met Ed intends to use the TWG concept again for TMI-1 restart and has reestablished the TWG. B&W will again be represented on the TWG.

In addition to the above, Met Ed established a program with B&W in March 1980 for B&W to review and comment on selected TMI-1 emergency procedures where their input would be meaningful. This emergency procedure review program will be an ongoing program until TMI-1 is restarted. To date Met Ed has received and is considering comments on all procedures which have been reviewed by B&W.

Based on the above, we conclude that Met Ed has committed to the requirements of Item I.C.7, "NSSS Vendor Review of Procedures," and therefore is in conformance with this item. However, we will require an audit of the procedures in these programs prior to restart by the Office of Inspection and Enforcement.

I.C.8 PILOT MONITORING OF SELECTED EMERGENCY PROCEDURES FOR NEAR-TERM OPERATING LICENSING APPLICANTS

Position

Correct emergency procedures, as necessary, based on the NRC audit of selected plant emergency operating procedures (e.g., small-break LOCA, loss of feedwater, restart of engineered safety features following a loss of ac power, steam line break, or steam generator tube rupture).

Discussion and Evaluation

Item I.C.8 is not a requirement of licensees of operating reactors but has been considered a prerequisite for TMI-1 restart. As a result of the Commission's order (CLI-81-3) issued March 23, 1982 indicating that TMI-1 should be grouped with reactors that have received operating licenses, we have reevaluated the need to apply Item I.C.8 to TMI-1. As reported in NUREG-0680 and its supplements, the staff has reviewed 35 plant operating procedures, including 10 emergency procedures. The licensee has revised or initiated revision requests, for procedures which had undergone a second staff review. The staff will verify that these subsequent revisions incorporate staff review comments prior to restart. In addition, in accordance with Item I.C.7 of NUREG-0694, the vendor is also reviewing emergency procedures to ensure technical adequacy. Therefore, requiring an additional staff review of a few selected emergency procedures has been judged to provide no significant improvement to safety.

Conclusion

Based on the above evaluation, the staff has concluded that no further effort is required under this item.

I.G.1 TRAINING DURING LOW POWER TESTING (NUREG-0694)

Position

Define and commit to a special low power testing program approved by NRC to be conducted at power levels no greater than 5% for the purposes of providing meaningful technical information beyond that obtained in the normal startup test program and to provide supplemental training.

Discussion and Evaluation

Although this item is not a requirement for operating reactors, the staff has concluded that a special low power test program similar to those being proposed by NTOL applicants should be performed during the restart program. A special low power test program of this scope has not yet been performed at a facility using a B&W nuclear steam supply system (NSSS). Therefore, this position is based on the need to provide the TMI-1 operators with experience in operating under simulated emergency conditions, to validate certain operating procedures and to verify the performance of the NSSS under conditions of natural circulation. The staff requires that Metropolitan Edison submit, for our review, a special low power test program with appropriate analyses. The licensee has agreed to provide such a program as part of their restart test program. We have provided guidance to the licensee regarding the objectives of the test program. The test program, after acceptance by the staff, should be carried out by the licensee and the results of the tests submitted to the NRC.

In its letter of February 28, 1981 to Mr. Reid of the Office of Nuclear Reactor Regulation, the licensee stated that it plans to provide a copy of the Restart Test Specification which includes the low power testing program by May 1, 1981. It is also stated that appropriate safety evaluations, procedures and sufficient supporting information will be provided.

The staff will review the licensee's Restart Test Specification to assure that these objectives will be met and will review the supporting analyses to verify that the operations specified can be carried out safely. The staff will require that the program and procedures be prepared and approved prior to startup. Based on the licensee's commitment to provide the special low power test program and supporting analyses, we conclude that the licensee is in conformance with Item I.G.1 of NUREG-0694.