



**PUBLIC
SERVICE
INDIANA**

S. W. Shields
Senior Vice President -
Nuclear Division

DOCKET NUMBER
REGULATED RULE

②
misc notice
NRC action plan
45FR50613



October 28, 1980

NOV 17 PM 12 21
REGISTRATION
SERVICES UNIT

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Sir:

In the Federal Register of July 30, 1980 (45 FR 50613) the Nuclear Regulatory Commission (NRC) staff solicited comments on the document NUREG 0660, "NRC Action Plan as a Result of the TMI-2 Accident."

Attached are comments from Public Service Company of Indiana, Inc. (PSI). Note that for the most part we have tried to hold the comments specific to the document; PSI will continue to comment on the activities themselves through the appropriate comment mechanisms (e.g., NUREG 0696, "Functional Criteria for Emergency Response Facilities," was individually commented on by PSI).

We would be pleased to discuss our comments as you wish.

Sincerely,

S. W. Shields

RSW:gb

Acknowledged by card... 11/5/80...

IDR-5
Action
Plan

011210267

GENERAL COMMENTS

- 1) We understand that the "Action Plan" is a living document (i.e., it does not represent a fixed list of activities/schedules), but instead is expected to change as activities are better examined. PSI concurs with this concept.

We also suggest that this may be an appropriate time for an update. There has been considerable refinement of some tasks, and this update would assist the industry in understanding some of the activities.

- 2) Some of the activities in the "Action Plan" will require licensees to shut down for extended periods in order to perform modifications. Examples of this would include the installation of Reactor Coolant System vents, inadequate core cooling instrumentation, and control room modifications. Rather than specifying exact dates by which the installations are required, PSI suggests that schedules should recognize the advantages of maximizing power plant availability by consideration of individual plant refueling schedules.

SPECIFIC COMMENTS

I.A.2.1 Immediate Upgrading of Operator and Senior Operator Training and Qualifications

Shift Supervisors should have the qualifications of completion of appropriate courses in engineering and scientific subjects as well as related subjects such as technical writing, oral communication, supervision and decision making. However, an Engineering Degree should not be a blanket qualification for a shift supervisor. An Engineering Degree should not be a requirement for the job of Shift Supervisor.

PSI concurs that the highest level corporate official responsible for plant operation should be responsible for the fitness of proposed operators; however, the ability to delegate particular administrative routines (e.g., signing certifications of operator fitness) should exist.

I.A.2.2 Training and Qualifications of Operations Personnel

This section refers to a "position task analysis" whereby the tasks performed in each position are first defined, and the required training and qualifications are determined based upon the task definitions. PSI concurs that a generic task analysis, if appropriate, could be done by INPO. Note that, in some organizations, this function may be fulfilled by position descriptions already in place.

I.B.2.3 and I.B.2.4 Regional Evaluations and Overview of Licensee Performance

It is not apparent how these activities integrate with the existing efforts of the Performance Assessment Branch (PAB) and Systematic Assessment and Licensing Performance (SALP) group programs. Additional reviews, (e.g., PAB, SALP, INPO, and other existing regional inspection programs) would not appear to materially improve plant operations, and in fact, may be redundant. Due to the blue-ribbon nature and charter of INPO, plus its high level of operationally-experienced personnel, it appears appropriate to rely on the licensee self-audit programs (internal Quality Assurance programs), overseen by both the INPO review program and the regional and non-regional NRC Inspection and Enforcement programs.

I.C.7 NSSS Vendor Review of Procedures

PSI's comments on the Safety Parameter Display System (SPDS) were previously transmitted to the NRC via letter (S. W. Shields to S. J. Chilk), dated October 6, 1980. Basically, PSI concurs that something like the SPDS is appropriate in concept. However, we suggest that some newer plants may already have or are planning equivalent sorts of systems. Individual, control room

specific evaluations should be used to determine what is additionally needed.

Also, PSI suggests that there might be some benefit to physically deleting item I.D.2 from the Action Plan, and reinserting its function into items I.D.1 and III.A.1.2 ("Upgrade Licensee Emergency Support Facilities").

II.A.1 Siting Policy Reformulation

Reference PSI's comments on the advance notice of rulemaking for specific comments concerning this activity (transmitted to the Commission via letter, S. W. Shields to S. J. Chilk, dated September 29, 1980).

Also, note that NUREG 0660 states that the "NRC will establish through rulemaking, (1)... (2)... (3)...." PSI understands the intent of this activity to be consideration of items (1), (2), and (3), through rulemaking, and that the items actually might not be included in an actual revision to the siting policies. We suggest that the "Action Plan" be revised to reflect this distinction.

II.B.1 Reactor Coolant System Vents

It should be added that Reactor Coolant System Vent Block Valves should also have position indication displayed in the control room.

II.F.2 Identification of and Recovery from Conditions Leading to Inadequate Core Cooling

We understand that the required installation date for one of the devices described in this section, mainly, the "unambiguous" indicator of inadequate core cooling, has recently been set at January 1, 1982. PSI has two concerns here. First, we are not convinced that a truly "unambiguous" indicator can be developed in the time frame given, whether it consists of one instrument, or a computer derivation from several. Secondly, it does not make sense to schedule design and installation to take place before development has been performed. PSI suggests that the Action Plan be accordingly revised.

II.J.1.4 Assign Resident Inspectors to Reactor Vendors and Architect-Engineers

PSI believes that assignment of resident inspectors to architect-engineers will not increase the safety of nuclear power plants. This should be dropped from the Action Plan.

III.A.1.3 Maintain Supplies of Thyroid-Blocking Agent (Potassium Iodide)

It is our understanding that Sandia's study indicated that distribution of potassium iodide to the public near an ongoing reactor incident would not be warranted. This section of the Action Plan should so indicate. (Also see general comments #3).

III.A.3.1 NRC Role in Responding to Nuclear Emergencies

We understand that an NRC emergency plan document is in preparation. This section of the Action Plan should be revised to so indicate.

III.D.2.2 Radioiodine, Carbon-14, and Tritium Pathway Dose Analysis

PSI notes that, at the TMI-2 accident, significantly smaller quantities of iodine escaped to the atmosphere than presently-used assumptions would have indicated (by a factor of $10^5 - 10^6$). Obviously, if this represents what could be expected of other accidents, our perception of risk to the public would warrant change. Likewise, several items in the Action Plan would be reassessed. PSI suggests that the potential impact of this task warrants a higher priority than given in the Action Plan ("Initiate NRC work in FY82, or later").

IV.A Strengthen Enforcement Policy

PSI will comment on the enforcement policy published in Federal Register.