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OCT 31 1980

MEMORANDUM FOR: W. T. Russell, Acting Chief
 Systematic Evaluation Programs Branch
 Division of Licensing

THRU: J. P. Knight, Assistant Director
 for Components and Structures Engineering
 Division of Engineering

FROM: G. E. Lear, Chief
 Hydrologic and Geotechnical Engineering Branch
 Division of Engineering

SUBJECT: TECHNICAL ASSISTANCE TO SEP

Reference your memorandum of October 10, 1980, same subject. Our comments on the SEP review schedule and topic assignments follow.

- a. We were told by Dennis Allison at an earlier meeting that topic III-3.B "Structural and Other Consequences of Failure of Underdrain Systems" had also been assigned to the Hydrologic Engineering Section. It is not listed in Enclosure 1 to your memorandum. Please clarify.
- b. The uniform sequential review schedule, allowing only 1 or 2 months between each plant, does not appear to be realistic. Some sites may require 6 months or more to review (Yankee Rowe required over one year) while others may be completed in a month or less. We expect to meet the review schedule for Palisades but based on our current manpower commitments, the rest of the schedule appears to be wishful thinking.
- c. Site visits to Oyster Creek and possibly Millstone 1 should be scheduled prior to the upcoming snow season to allow topic completion by the scheduled spring date. Also, since site visits require a minimum of 2 weeks lead time for review and assimilation of available data and to develop question lists, arrangements should be made now by the PMs and technical staff.
- d. While recognizing your change of concept for rescheduling work, the delay of the Yankee Rowe review is not consistent with our recommendations in the Yankee Rowe Draft Flood Study transmitted to Dennis Crutchfield by our June 9, 1980 memorandum. The grace period was to be used for resolution, not aging, of the problems associated with the potential failure of Harriman Dam and induced flooding of the plant. The report also recommended coordination with FERC (licensing responsibility for the dam) and FEMA and an early meeting to discuss the problem and possible interagency action. We are unaware to date if this coordination has been initiated. The above points identify the apparent lack of coordination with and feedback to the reviewer.

Handwritten notes: "10/10/80" and "Lear's SEP"

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- e. We are not aware of any established procedure for transmitting information between SEP review specialities. For example, the design basis flood level, determined by the Hydrologic reviewer, will be furnished to the structural and system reviewers. This coordination must be done before topic completion to allow the reviewers time to complete their analyses and, as necessary, furnish feedback to the hydrologic reviewer. We have generally transmitted such information on a buck slip from the hydrologic reviewer to the other topic reviewers. Any feedback on identified issues has been transmitted informally by word of mouth but it is usually necessary to solicit the feedback. We recommend that uniform and controlled procedures be established for communication between topic reviewers. Periodic technical meetings scheduled by your branch may reduce this problem.
- f. The 3 to 4 months time between topic due date and SER issue date may not be sufficient to allow proper coordination and feedback between topic reviewer as discussed above. For example, Topic II-3.8 may provide flood levels to foundation or structural reviewers for analyses of a sea wall or slope. If the analyses show failures, then additional hydrologic analyses may be required to evaluate the new scenario.
- g. It should be recognized that the proposed completion schedule will require some duplication of time and effort for the hydrologic reviewer since some of the "later" plants are already partially reviewed and will have to be put "on the shelf" in order to complete higher priority plants. This practice will result in an inevitable loss of time for refamiliarization when the work is restarted at a later date.
- h. We recommend that periodic meetings be scheduled for all SEP reviewers as a means of resolving some of these potential problems and keeping them apprised of current developments in the program.

Original signed by

George E. Lear, Chief
 Hydrologic and Geotechnical
 Engineering Branch
 Division of Engineering

cc: R. Vollmer
 J. Knight
 G. Lains
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