

APR 1 1981



MEMORANDUM FOR: Commissioner Ahearne
FROM: William J. Dircks
Executive Director for Operations
SUBJECT: TMI ACTION PLAN COMMENTS

As requested by the Commission, public comments on the "NRC Action Plan Developed as a Result of the TMI-2 Accident," NUREG-0660, were solicited by a Federal Register Notice published on July 30, 1980 (45FR50613). The comment period which was extended to permit comments on the modifications included in NUREG-0737, "Clarification of TMI Action Plan Requirements" ended on December 24, 1980.

Comments, which are enclosed, were received from four utilities and an "independent public safety monitoring organization." These comments have been distributed to the NRC divisions responsible for developing or implementing the Action Plan items with the request that these comments be considered in the development of requirements derived from the Action Plan. Full consideration of these comments will be accomplished and no revision of NUREG-0660 based on these comments is contemplated.

(Signed) T. A. Rehm

for William J. Dircks
Executive Director
for Operations

Enclosures: Five Sets of
Comments on NUREG-0660

cc: Chairman Hendrie
Commissioner Gilinsky
Commissioner Bradford
OPE
OGC
SECY

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Docket # 50-213
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Paul Vineyard

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SURNAME	WMinners:bg	TEMurley	VStello	RBMinogue	EGCase	HRDenton	WJDircks
DATE	3/24/81	3/5/81	3/ /81	3/ /81	3/20/81	3/24/81	4/1/81

NUCLEAR REGULATORY COMMISSION



P.O. BOX 370
HARTFORD, CONNECTICUT 06101
(203) 566-5911

DOCKET NUMBER

PROPOSED RULE

①
PR miss notice
PR NRC action Plan
45 FR 50613

October 28, 1980

Docket Nos. 50-213
50-245
50-336

B10112

Secretary of the Commission
ATTN: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References:
- (1) W. G. Council Letter to H. R. Denton Dated August 15, 1980.
 - (2) W. G. Council Letter to H. R. Denton Dated July 24, 1980.
 - (3) W. G. Council Letter to D. G. Eisenhut Dated September 12, 1980.
 - (4) W. G. Council Letter to D. G. Eisenhut Dated June 10, 1980.
 - (5) W. G. Council Letter to D. G. Eisenhut Dated October 1, 1980.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station Unit Nos. 1 and 2
Comments on TMI Action Plan, NUREG-0660

On July 30, 1980, the Commission solicited comments on the document entitled "NRC Action Plan Developed as a Result of the TMI-2 Accident", NUREG-0660, via Federal Register notice. On behalf of the Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO), Northeast Utilities Service Company (NUSCO) hereby offers the following comments on NUREG-0660.

General Comments

NUSCO does not agree that all of the items in NUREG-0660 are TMI Lessons Learned. A significant number of the items had previously been reviewed and resolved by the NRC and the licensees. Presenting these previously examined items in the TMI Action Plan document serves only to draw public attention to the NRC's "revitalized effort" of assuring public safety. NUSCO has deemed this approach to be misleading, inappropriate, and in fact counterproductive to attaining the mutual goal of both the NRC and the licensees, safe nuclear power. This approach could, in fact, have the opposite effect by tying up manpower on unimportant mandated items, thus leaving fewer resources for evaluation of the day to day anomalies which is likely to be more of a factor in assuring safe, reliable operation.

NUSCO contends that the necessary resources estimated by the NRC to implement these

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requirements have been grossly underestimated. Specifically, NRC estimates installation costs of the Reactor Coolant System Head Vent (NUREG-0660 Item II.B.1) to be approximately \$100,000/operating plant. Reactor Coolant System Head Vents have been installed at the Haddam Neck Plant and at Millstone Unit No. 2 with costs running well in excess of \$1,000,000/plant. NUSCO recommends that a realistic economic cost-benefit analysis be used by NRC as justification for future NUREG requirements rather than NRC's attempt to gain public confidence. Additional specific and detailed resource information can be made available for NRC review if necessary.

Item Specific Comments

1) I.A.2 B5 NRC Action - Plant Drills

The long term concept of plant drills involving actual plant maneuvers initiated by the NRC has no place in the commercial nuclear power industry. Such maneuvers have the potential to cause unwanted and unnecessary challenges to the plant safety systems which could in fact decrease their reliability when actuation is necessary and thus decrease overall plant safety. Required simulator training provides the required hands on training not available on an operating unit. Concerning the NRC requirement of an NRC inspector actually initiating the drill, NUSCO maintains that the NRC certainly has the right to observe or request that specific drills be run; however, the responsibility of initiating the drill should remain with the licensee, who has the ultimate responsibility for safe efficient plant operation.

2) I.A.2 B6(3) NRC Action - Long-term Upgrading of Training and Qualifications

The basis of the operator requalification program is to emphasize, reinforce and teach changes to operations, systems, and procedures.

Since emphasis is placed in these areas in CYAPCO's and NNECO's training program, it is imperative that the proposed examinations are in some way coordinated with the training staff. Without this important interrelation, the value of requalification testing will not be demonstrable. The lack of coordination will also place an extra burden on the operator.

3) I.A.2 C2 Licensee Action - Administration of Training Programs

In Reference (1), CYAPCO and NNECO took exception to the requirement that certain licensee training personnel be qualified/certified to Senior Reactor Operator level.

4) I.E. B5 NRC Action - Nuclear Plant Reliability Data System

The NRC conclusion that the system is inadequate because licensee participation is voluntary, is unfounded. Limited participation by CYAPCO and NNECO has led to significant system-wide improvements in reliability.

5) I.E. B6 NRC Action - Reporting Requirements

NUSCO fully supports a reanalysis of reporting requirements by the NRC. The most significant problem with the current reporting system is the requirement to report even insignificant items. Modifications of the requirements in this vein are needed.

6) I.F. B NRC Action - Quality Assurance

The conclusion reached in the area of Quality Assurance by the NRC as a result of TMI-2 may not be indicative of an industry-wide shortfall.

Differences in interpretation of criteria from plant to plant which have been approved by the NRC may lead to the conclusion that an inadequacy of requirements exist. However, the current QA criteria is basically adequate and a detailed review by the NRC to prove this point is recommended prior to promulgation of any additional criteria.

7) I.F. B2(1) and B2(2) NRC Action - Quality Assurance

Paragraphs B2(1) and B2(2) appear to be contradictory. Paragraph B2(1) requires the QA organization to be independent of the organization performing the task. Paragraph B2(2) requires the QA organization to be in the review and approval path for procedures. QA can review procedures but will completely lose its independence if also required to approve these procedures.

8) I.F. B2(6) Quality Assurance

NRC's conclusion that inadequate staffing in the area of QA exists throughout the industry is completely unfounded.

9) II.C B1 NRC Action - Interim Reliability Evaluation Program

The program description found in NUREG-0660 provides for a reasonable and beneficial reliability evaluation. Subsequent NRC correspondence concerning this program, however, does not resemble the program presented in NUREG-0660. Further clarification of NUSCO's position on this item can be found in Reference (2) and (3).

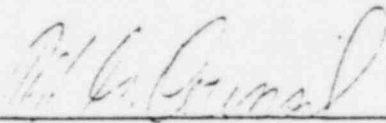
10) II.C B4 NRC Action - Reliability Engineering

CYAPCO/NNECO is in agreement that the use of reliability engineering techniques can complement the multi-disciplinary engineering approach in nuclear power plant design. For those utilities who have already developed such an organization approach in the designing and backfitting of nuclear power plants, the promulgation of specific program criteria would be counterproductive.

Additional comments on NUREG-0660 items resulting from previous NRC mandates can be found in References (4) and (5). We trust these comments will be considered in updating NUREG-0660.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY
NORTHEAST UTILITIES SERVICE COMPANY



W. G. Council
Senior Vice President

PUBLIC
SERVICE
INDIANA

S. W. Shields
Senior Vice President -
Nuclear Division

DOCKET NUMBER
RECORDED FILE

(2)
PK
misc notes
NRC action plan
45FR50613



October 28, 1980

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
S. W. Shields

RSW:gb

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

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 understating 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.



CONSUMERS
POWER
COMPANY

DOCKET NUMBER
EXPOSED FILE

(3)
misc notice
PR NRC action plan
45 FR 50613

Terence J. Sullivan
Manager, Safety & Licensing
Midland Project

General Offices: 1945 West Parkhill Road, Jackson, Michigan 49201 • (517) 788-2972

October 31, 1980

Secretary of the Commission
Att Docketing and Service Branch
US Nuclear Regulatory Commission
Washington, DC 20555



MIDLAND PROJECT
REQUESTS FOR COMMENTS ON THE NRC ACTION PLAN
NUREG-0660 (45 FR 50613) DATED JULY 30, 1980
FILE: 0965.1.9 SERIAL: 9850

On July 30, 1980, the Nuclear Regulatory Commission published a notice (45 FR 50613) requesting comments on NUREG-0660, NRC Action Plan, which is the NRC's regulatory response to the accident at Three Mile Island Unit 2. Consumers Power Company has reviewed this notice along with NUREG-0660.

Consumers Power Company has actively contributed to the industry appraisal of the NRC Action Plan through participation in various working groups of the Atomic Industrial Forum (AIF). Our comments on the scope, priorities and impact of the Action Plan are, therefore, represented by those views previously provided to the NRC by AIF.


We continue to believe that the following assessment and objectives, are crucial to a balanced approach in maintaining and, as necessary, improving plant safety:

- o The large number of requirements proposed by the NRC should be continually screened by a responsible selection process and prioritized. This allows an orderly approach to overall safety;
- o Clear functional objectives and bounding statements should be completed on each item that is made a regulatory requirement;
- o A realistic "backfitting" policy should be developed for both operating plants and plants under construction that recognizes the type and special circumstances of each plant, takes into account measures already underway, and recognizes that it is not necessary, and can be detrimental, to perform all actions immediately or to implement all these before granting operating licenses.

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Approved: *11/5/80*

We thank the NRC for this opportunity to provide our recommendations and ask that we be included in subsequent reviews as the NRC develops and refines this Action Plan.



Terence J. Sullivan
Safety and Licensing Manager

TJS/RLT/pg

CC DMBudzik
RJCooke, Resident Inspector
DPHoffman
CJMaynard
DBMiller

DOCKET NUMBER
PROPOSED RULE

PR *raise notice*
NRC action plan
45 FR 50613



(4)



THE NUCLEAR REGULATORY COMMISSION
Summertown, Tennessee 38483

December 9, 1980

Mr. Samuel Chilk
Secretary
U.S. Nuclear Regulatory Commission
1717 H St. NW
Washington, D.C. 20555

Dear Mr. Chilk,

Enclosed are the comments of The Nuclear Regulatory Commission on NUREG-0660, NRC Action Plan Developed as a Result of the TMI-2 Accident.

Sincerely,

Albert Bates

Albert Bates
Director
Office of Nuclear Reactor Regulation

Acknowledged by, and... *12/16/80*

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THE NUCLEAR REGULATORY COMMISSION
Summertown, Tennessee 38463

COMMENT ON NUREG-0660

NRC ACTION PLAN

December 9, 1980

POOR ORIGINAL

The Nuclear Regulatory Commission (NRC) is an independent public safety monitoring organization headquartered in Summertown, Tennessee.

The Action Plan has identified both short and long-term actions to address the problem of hydrogen formation and combustion in degraded core conditions. This comment will be confined to this part of the Action Plan (II-B).

The accident at Three Mile Island resulted in the formation of a large volume of hydrogen which detonated within the containment, causing pressure on the containment shell to exceed monitoring capability of 28 psi. 10 CFR 50.44 provides that reactor operators need not consider the effects of hydrogen explosions of this magnitude, and thus a number of reactor designs include containment shells much weaker than TMI Unit-2. The Westinghouse ice-condenser containments at Donald C. Cook Units 1 and 2 and Sequoyah Unit 1 might not withstand the effects of a metal-water reaction 30% less severe than actually occurred at TMI. The licensees have initiated a hydrogen control program involving diesel glow plugs which are capable of burning significant concentrations of hydrogen before uncontrolled combustion, but are not without dangerous collateral effects, such as ignition of ice condenser foam insulation.

The Action Plan provides for the inerting of BWR Mark I and Mark II containment structures, and NRC has already notified these licensees of the new requirement. The Action Plan should go farther and require inerting of Mark III and PWR ice containments, as well as any future small or reduced-strength containment designs. This is the minimum precaution required for safe operation.

If inerting of Mark III and ice condenser containments is not feasible, the operating plants with these designs should be shut down until alternate solutions to the hydrogen problem are developed. Glow plugs are not an acceptable alternate solution. Underground cavity containment reserve capacity shows some promise. Additional work by USNRC may find other suitable retrofits.

Because public health and safety is endangered by continued operation of plants which would not be able to demonstrate containment integrity in the event of accidents less severe than Three Mile Island, the Nuclear Regulatory Commission (USNRC) has no justification under the Atomic Energy Act for permitting full-power operation of any of these units.

No new construction licenses or limited work authorizations should be allowed for plants having reduced-strength or small containments.

Respectfully submitted,

Albert Bates

Albert Bates

Director of Nuclear Reactor Regulation

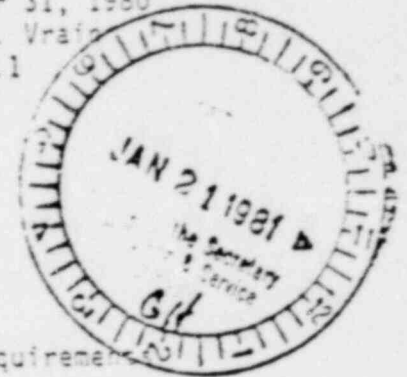
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Public Service Company of Colorado

December 31, 1980
Fort St. Vrain
Unit No. 1
P-80443

DOCKET NUMBER *PR notice*
PROPOSED RULE *PR i:PC Action Plan*
45 FR 50613



Dr. John F. Ahearne, Chairman
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: TMI Action Plan Requirements

Dear Dr. Ahearne:

As you are no doubt aware, we, along with many other utilities, have been struggling to meet the many post-TMI requirements with the struggle being complicated by a myriad of requirements, complicated further by the fact that many of these requirements have been subject to changes in criterion. Having the only HTGR in the country, our problems have been compounded by trying to interpret requirements issued on the basis of water reactor technology and trying to apply these requirements to gas cooled technology. We continue to experience considerable difficulty in our approach to the various requirements in that most of the TMI review teams are unfamiliar with the HTGR concept.

We are continuing our efforts, but we have recently experienced one problem that is of extreme concern. Item I.A.3.1 of NUREG 0737 includes a requirement for the use of simulators, by October 1, 1981, in the operator training program. On December 10, 1980, we met with members of the NRR staff (Special Projects Division and OLB) to discuss this requirement as it pertains to Fort St. Vrain.

Our position is as follows:

1. Fort St. Vrain is a one-of-a-kind reactor and there are no simulators, either generic or plant specific that are available for use in our operator training program.
2. Use of any existing simulators developed for LWR technology would be of little value in our operator training program.
3. Development of a plant specific simulator for Fort St. Vrain is not economically feasible and even if it were feasible such a simulator could not be developed by October 1, 1981. Imposition of simulator training requirements on a small unique reactor, that is not even remotely similar to any other reactor, appears to be an unreasonable requirement.

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~~transmitted by wire~~

Handwritten date: 1/21/81

POOR ORIGINAL

4. Although operator training in terms of appropriate operator action in mitigating the consequences of accidents is important, it should be noted that the HTGR is more forgiving in terms of time required for immediate operator action. We feel that our operators could receive adequate training without the use of simulators.
5. Recognizing the intent of simulator training we are prepared to upgrade our operator training program to concentrate more heavily on transient response and hands-on experience as a substitute for simulator training.

We were informed by the NRR staff at the December 10, 1980, meeting that the requirement for simulator training was presently being placed in a proposed regulation and would be issued for comment as a proposed change to 10CFR50.55.

We recognize that we will be given the opportunity to comment on the proposed revision to 10CFR50.55, but we also recognize that it is much more difficult to get a proposed ruling change made after it is issued than perhaps it might be to obtain consideration prior to its issuance.

On this basis we are appealing to the Commission that appropriate consideration be given to Fort St. Vrain prior to the issuance of the proposed regulation. Your consideration in exempting Fort St. Vrain from the simulator training requirements is greatly appreciated. If you should have any questions or require any additional information, please contact Mr. Don Warembourg, Manager of Nuclear Production, (303) 571-7436.

Sincerely yours,

R. F. Walker

R. F. Walker
President

RFW/alk

POOR ORIGINAL

FROM: Comm. Abearce		ACTION CONTROL		DATES		CONTROL NO. 10299	
		COMPL DEADLINE		4-7-51		DATE OF DOCUMENT	
		ACKNOWLEDGMENT				3-19-51	
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		FILE LOCATION		D-3-1/11		<input checked="" type="checkbox"/> EXECUTIVE DIRECTOR	
DESCRIPTION <input type="checkbox"/> LETTER <input checked="" type="checkbox"/> MEMO <input type="checkbox"/> REPORT <input type="checkbox"/> OTHER		SPECIAL INSTRUCTIONS OR REMARKS					
Request summary of public comments on Action Plan		<p>PRIORITY</p> <p>Treat as a simple request: either summary of comments, and a statement as to what is next.</p> <p><i>666</i></p>					
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						LEGAL NOTIFICATION RECOMMENDED <input type="checkbox"/> YES <input type="checkbox"/> NO	

NRC FORM 032
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EXECUTIVE DIRECTOR FOR OPERATIONS

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PRINCIPAL CORRESPONDENCE CONTROL

POOR ORIGINAL