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JAN 2 1980

MEMORANDUM FOR: Roger J. Mattson, TMI-2 Action Plan Steering Group

FROM: C. J. Heltemes, Jr., Interim Director, Office for
Analysis and Evaluation of Operational Data

SUBJECT: TASK ACTION PLAN - SECTION 1E - REQUIREMENTS
FOR NTOL'S AND OR'S

As requested in your memorandum dated December 21, 1979, Section 1E was reviewed for requirements for NTOL's and OR's. Two items were identified which appear to meet the criteria. These are discussed individually below.

1) Section 1.E.B.1 Licensee Onsite Evaluation Capacity

While this item meets the criteria and should continue to be reflected in Section 1E, the base requirements are really established in other sections of NUREG-0660; i.e., as part of the Onsite Safety Engineering Group (Task 1.B.3) and/or the Shift Technical Advisor (Task 1.A.1). Thus, Section 1.E.B.1 reflects other requirements, and in itself does not impose separate nor additional requirements. As a result, it should not be separately listed as a requirement for NTOL's or OR's.

I intend to revise the description of 1.E.B.1 to conform with that developed for 1.B.3 and 1.A.1. However, I believe that the requirements for NTOL's should be for licensees to commit, prior to fuel load OL, to have an operating experience capability in place and effectively functioning prior to initiation of power operations.

2) Section 1.E.B.2 Licensee Dissemination of Operating Experience

This item reflects a requirement of NUREG-0585 for licensees to review their administrative procedures to assure that the lessons from operating experience reports are conveyed to the reactor operators and other affected operations personnel.

This item seems implicit to some degree in a number of other tasks; e.g., 1.A.2.B.1, 1.A.2.B.2, 1.A.2.B.6, 1.B.1.B.1, and 1.B.1.B.2. However, these other tasks do not explicitly state the specific requirements of 1.E.B.2. Thus, it is presented below as an additional requirement (this, however, should be verified/confirmed by the steering group).

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- a) (Description as in NUREG-0660, item 1.E.C.2a, page 1E-9.)
- b) Criteria for the first NTOL can be issued by NRR by February 1, 1980.
Subsequent verification by I&E.
Resources: NRR - 0.1 man-year
I&E - (included in other tasks; e.g., 1.A.2.B.2.A
and 1.A.2.B.6)
- c) Requirement should be that NTOL applicants commit, prior to fuel load OL,
to have revised procedures implemented prior to power operations.
- d) OR plants by September, 1980.

Please let me know if you need additional information or clarification on the above.

/s/

C. J. Heltemes, Jr., Interim Director
Office for Analysis and Evaluation of
Operational Data

cc: J. O'Reilly, I&E
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