

Louise Bradford, Chairperson
Three Mile Island Alert, Inc.
315 Peffer St.
Harrisburg, PA 17102

December 17, 1981

Commissioner Palladino, Chairman
Commissioner Bradford
Commissioner Gilinsky
Commissioner Abearne
Commissioner Roberts

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Commissioners:

Re: Scheduled December 21, 1981 Public and Closed Staff Briefings
on TMI-1 Restart, and Public Discussion on Information Flow
During the TMI-2 Accident

As a party to the TMI-1 restart proceedings, (Metropolitan Edison Company, Three Mile Island Nuclear Station Unit 1, Docket No. 50-289), and as representative of a large segment of the population surrounding TMI, TMIA strenuously objects to the above-referenced Staff briefings and demand that they be immediately cancelled.

We are appalled that the Commission finds it acceptable to solicit ex parte comments of this nature from one party to the restart proceedings, without fully advising the other parties what contentions and proposals will be discussed, and without affording all parties a full opportunity to cross-examine these witnesses on the record of the proceedings to establish the propriety and correctness of their conclusions. Procedural due process requires at a minimum reasonable notice and a reasonable opportunity to be heard. A general discussion and presentation of views by one party certainly does not constitute due process as contemplated by the Atomic Energy Act, the Administrative Procedures Act, or the Constitution. Further, such a procedure violates on its face the NRC rules prohibiting ex parte communication, 10 CFR 2.780, as well as the principle that any evidence presented in a case before an administrative agency be received only during a public hearing, on the record. Seacoast Anti-Pollution League v. Costle, 572 F.2d 372, cert. den. 96 S.Ct. 92 (1978).

We note that on August 20, 1981, the Commission broke its promise to the intervenors and to the people in this area to immediately review the merits of the ASLB restart decision. This rule change greatly exacerbated the distrust with which TMIA and area residents had already come to view the Commission's decisional process on restart. However, we accepted the Commission's decision and are pursuing the time consuming administrative appeal route. Eventually, the record of the case will reach the Commissioners for review, but this clearly will take quite some time. For the Commissioners now to request to be "briefed" by one party on the

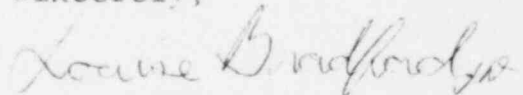
merits of certain if not all aspects of the case, such party's credibility itself being an issue in the case, not only before the Appeal Board has reached its decision, but while the ASLB still has jurisdiction over the case, is extremely prejudicial to the other parties, frustrates the appeal procedure which we are forced to pursue, and continues to place the integrity of this process in doubt.

In fact, the ASLB still has before it motions to reopen the record, as well as issues on exam cheating and the integrity of the examination process to decide. Obviously, any ex parte statements to the Commissioners by the Staff on any of these matters would be grossly violative of the parties' due process rights. In addition, the scheduled briefing on information flow concerns a subject which was litigated before the ASLB, including the issue of Mr. Stello's own view of the conclusions drawn in NUREG-0760. No party to the restart proceedings has ever been granted the opportunity to question Mr. Stello on this matter. Clearly, our rights to a full and fair administrative appeal will be severely prejudiced, unless we are given a full opportunity to cross-examine Mr. Stello on the testimony he gives the Commissioners.

As if it were not bad enough that the Commission has scheduled public ex parte briefings, it has also scheduled a third briefing, closed not only to the public at large, but to the parties as well. This is an egregious violation of our rights as a party to the proceedings and can only serve to anger and frustrate the area residents. NRC policy clearly supports public hearings, and we strenuously object to such secret meetings.

Thus, we demand that these meetings be cancelled, and that if the Commission is to receive any evidence in the TMI-1 restart proceedings, it do so only in the context of a full and fair public hearing with reasonable notice to all the parties. Anything less must not be permitted.

Sincerely,



Louise Bradford, TMIA

COMMISSION BRIEFING
ON
TMI-1
STATUS

DECEMBER 21, 1981



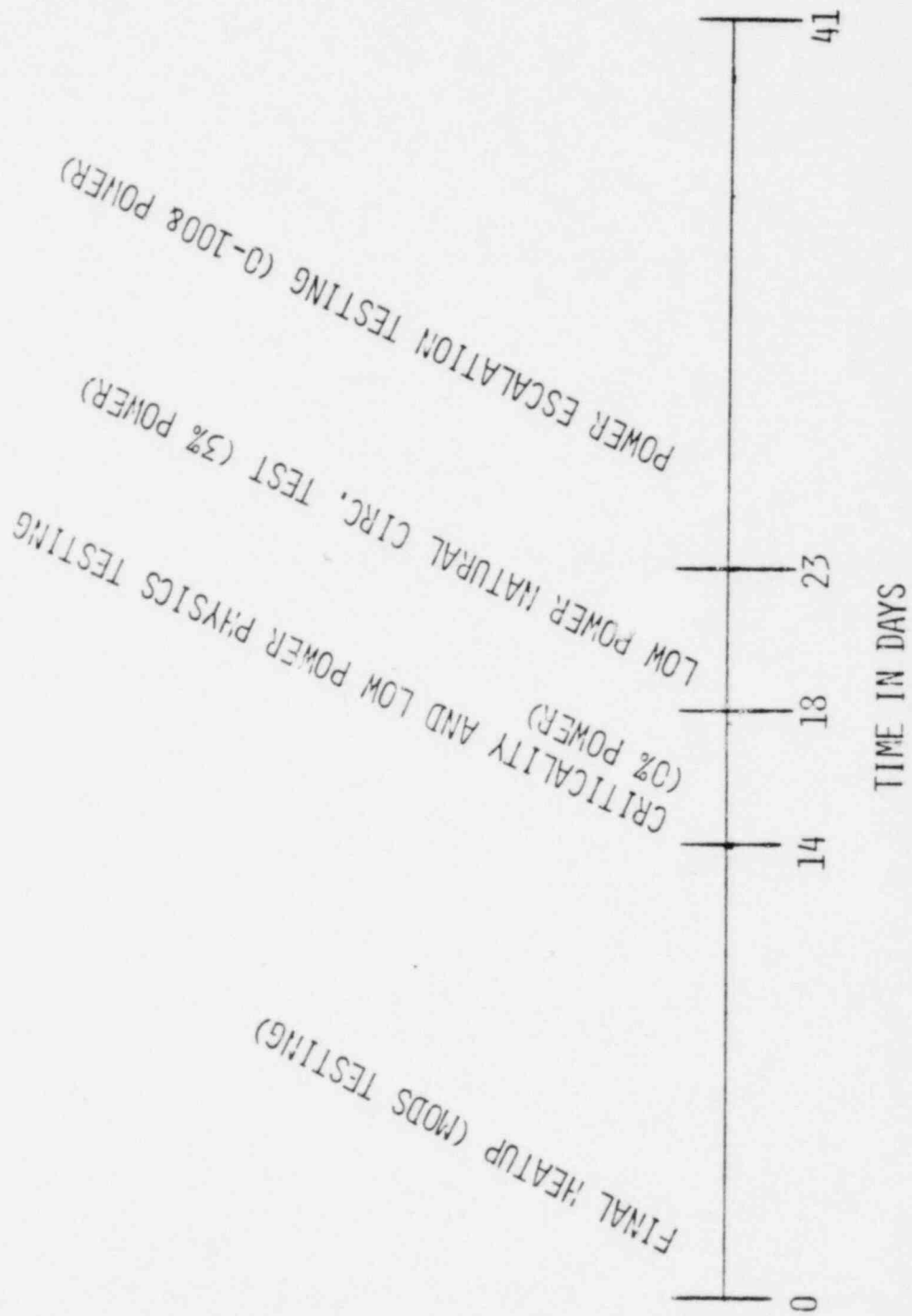
R. JACOBS
DL/IRR
12/21/81

~~DOPE~~
8201190115

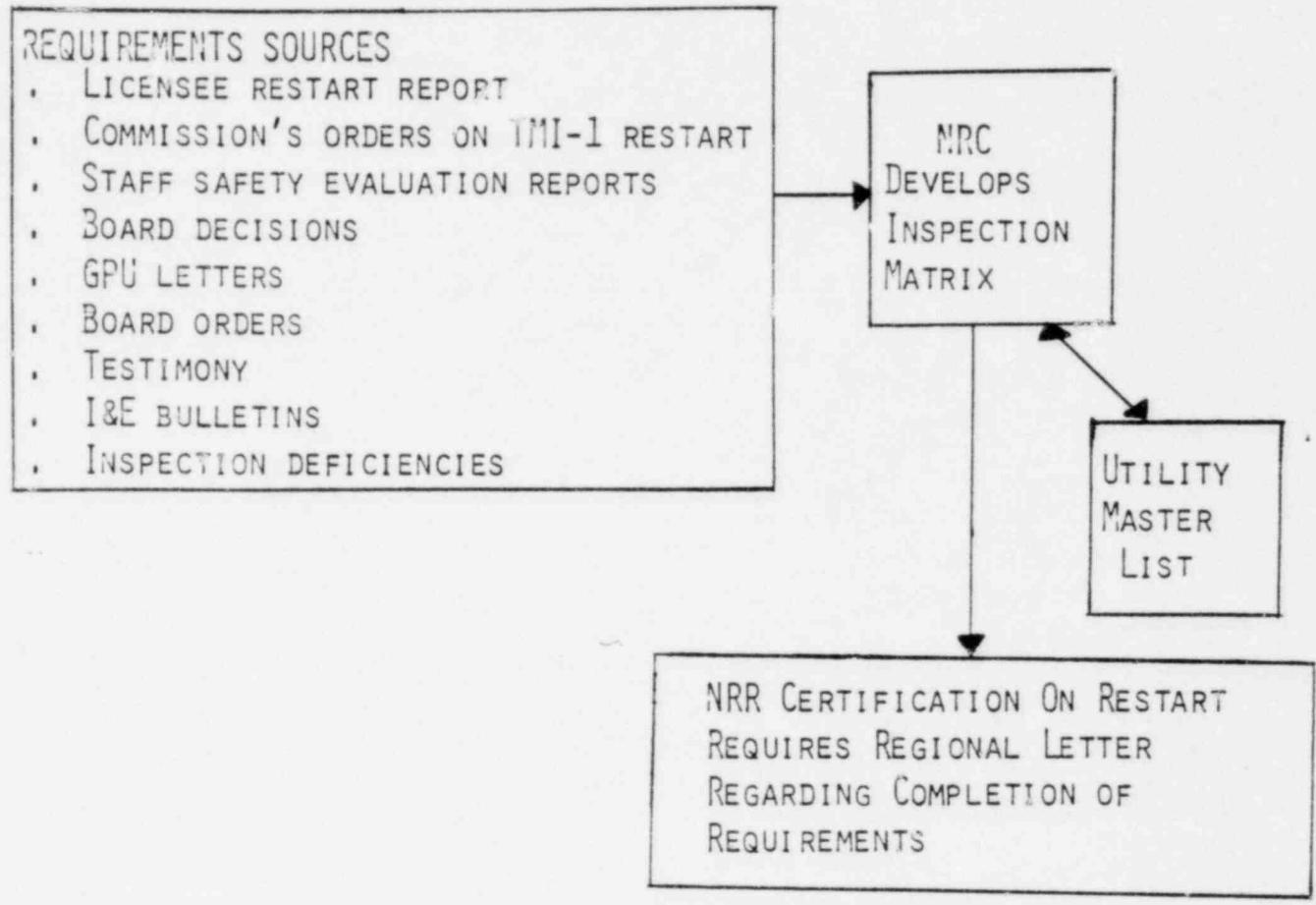
OUTLINE

- RESTART SEQUENCE
- STAFF CERTIFICATION APPROACH
- OPERATOR TRAINING
- MAJOR RESTART MODIFICATIONS
- NUREG-0737 IMPLEMENTATION STATUS
- REACTOR WATER LEVEL INSTRUMENTATION
- STEAM GENERATOR PROBLEMS/SCHEDULE
- GOVERNOR THORNBURGH POSITION
- PLANT STATUS/SCHEDULE

RESTART SEQUENCE



PLAN FOR CERTIFYING COMPLETION OF TMI-1
RESTART REQUIREMENTS



OPERATOR STAFFING REQUIREMENTS

NEW OLS

- 2 SENIOR REACTOR OPERATORS (SROs)
- 2 REACTOR OPERATORS (ROs)

PRESENT OPERATING REACTORS

- 1 SRO
- 2 ROs

STAFF POSITION IN HEARING ON TMI-1 RESTART

- 2 SROs - 1 LICENSED
 1 TRAINED, LICENSED AS RO
- 2 ROs

MANAGEMENT PID STAFFING REQUIREMENTS AT RESTART

- 1 SHIFT SUPERVISOR SRO LICENSED
- 1 SHIFT FOREMAN SRO TRAINED, RO LICENSED
- 2 CONTROL ROOM OPERATORS RO LICENSED
- ATTEMPT TO MAINTAIN SIX SHIFT ROTATION WITH NORMAL WATCHSTANDING PERSONNEL
- HIERARCHY OF ACTIONS IF UNABLE TO MAINTAIN 6, 5, OR 4 SHIFTS

TMI-1 RESTART EXAMINATIONSOCTOBER 1981RESULTS BY POSITION HELD

	<u>APPLICANTS</u>	<u>PASSED</u>	<u>FAILED</u>	<u>WITHDRAWN</u>
REACTOR OPERATORS (ROs)	14	9	4	1
SENIOR REACTOR OPERATORS (SROs)	20	10	10	-
<u>POSITION HELD</u>				
SHIFT SUPERVISOR	(6)	(3)	(3)*	-
SHIFT FOREMAN	(4)	(1)	(3)*	-
OPS STAFF, TRG, STAs	(10)	(6)	(4)	-

*1 SHIFT SUPERVISOR AND 1 SHIFT FOREMAN PASSED RO EXAM

TMI-1 SHIFT STAFFING PRIOR TO RESTART

- TECHNICAL SPECIFICATION REQUIREMENTS ARE:

COLD SHUTDOWN - 1 SHIFT SUPERVISOR ON SITE, SRO LICENSED
1 CONTROL ROOM OPERATOR, PO LICENSED
IN CONTROL ROOM

HOT SHUTDOWN - SAME AS COLD SHUTDOWN + 1 ADDITIONAL CONTROL ROOM OPERATOR, RO LICENSED

- LICENSEE HAS 9 RO AND 4 SRO SHIFT PERSONNEL HOLDING LICENSES WHO PASSED ALL PARTS OF OCTOBER 1981 EXAM
- LICENSEE HAS JUSTIFIED AND THE STAFF HAS ACCEPTED USE OF 5 ADDITIONAL LICENSED OPERATORS WHO FAILED A PART OF THE OCTOBER EXAM. THESE INDIVIDUALS WILL BE USED FOR COLD SHUTDOWN OPERATIONS UNTIL RELICENSED.
- LICENSEE PLANS TO CONTINUE THE SIX SHIFT ROTATION SCHEME PRESENTLY USED

MAJOR RESTART MODIFICATIONS

I. NRC REQUIRED MODIFICATIONS

• AUGUST 9 ORDER/NUREG-0737 (34 SPECIFIC ITEMS)

	<u>REMAINING EFFORT</u>	<u>GPU SCHEDULED COMPLETION</u>
- CONTAINMENT ISOLATION DIVERSITY	TESTING	1/82
- ANTICIPATORY REACTOR TRIP	TESTING	1/82
- PORV/SV VALVE POSITION INDICATION	PLANT ACCEPTANCE	12/81
- TMI-1 AND 2 SEPARATION	2 WKS. OF CONSTRUCTION	2/82
- PRESSURIZER HEATERS EMERGENCY POWER	TESTING	1/82
- PORV/RX TRIP SETPOINTS	TESTING	1/82
- NOBLE GAS MONITORS	INSTALL & TEST	2/82
- AFW AUTOMATIC INITIATION	TESTING	1/82
- INADEQUATE CORE COOLING	TESTING	1/82

• OTHER NRC REQUIREMENTS (10 SPECIFIC ITEMS)

- MASONRY BLOCK WALLS IEB 80-11	IN CONSTRUCTION UNTIL 1/4/82	2/82
- PIPE SUPPORTS IEB 79-02/79-14	483/573 COMPLETE	2/82
- CATWALK SEISMIC CAPACITY	IN CONSTRUCTION UNTIL 1/82	2/82
- INTEGRATED CONTROL SYSTEM IEB 79-27	TESTING	2/82
- SECURITY	IN CONSTRUCTION UNTIL 1/82	2/82

MAJOR RESTART MODIFICATIONS

II. LICENSEE INITIATED MODIFICATIONS (36 SPECIFIC ITEMS)

	<u>GPU SCHEDULED COMPLETION</u>
INTEGRATED CONTROL SYSTEM	
CONTROL ROOM DESIGN	
DECAY HEAT PUMPS	ALL
COMPUTER	1/82
REACTOR COOLANT PUMP CIRCUITRY	
CONTAINMENT COOLING	
IE BUS LOADING	
H ₂ RECOMBINERS	

NUREG-0737 ITEMS DUE
1/1/80 - 5/30/80

10

(L² CATEGORY A)

TMI-1 STATUS

I.A.1.1.1	STA ON DUTY	COMPLETE
I.A.1.2	SHIFT SUPER DUTIES	
I.C.1.1	SB LOCA PROCEDURES	
I.C.2	SHIFT/RELIEF T/O PROCEDURES	
I.C.3	SHIFT SUPER RESPONSIBILITIES	
I.C.4	CONTROL ROOM ACCESS	
II.B.2.1	SHIELDING REVIEW	
II.B.3.1	ACCIDENT SAMPLING	
II.D.1.1	RV/SV TEST PROGRAM	
II.D.3.1	VALVE POS INDIC	SER ISSUED, MOD NEAR COMPLETION
II.E.1.2.1A	AFW INIT - CONT GRADE	SER ISSUED, MOD NEAR COMPLETION
II.E.1.2.2A	AFW FLOW - CONT GRADE	COMPLETE
II.E.3.1	EMER PWR FOR HEATERS	SER ISSUED, MOD NEAR COMPLETION
II.E.4.1.1	DED H ₂ PENET DESIGN	COMPLETE
II.E.4.2.1-4	DIVERSE ISO SIGNALS	SER ISSUED, MOD NEAR COMPLETION
II.F.2.1	SUB COOL METER	SER ISSUED, MOD NEAR COMPLETION
II.G.1	UPGRADE POWER TO PORV & LVL INSTR.	COMPLETE
III.A.1.1	EMERG PLAN - SHORT TERM	
III.A.1.2.1	INTERIM FACILITIES	
III.D.1.1	PRIM COOLANT LEAKAGE	
III.D.3.3.1	I DETECTION - SHORT TERM	

NUREG-0737 ITEMS SCHEDULED
THROUGH 6/30/81, EXCLUDING STILL ITEMS

<u>ITEM</u>	<u>TITLE</u>	<u>TMI-1 STATUS</u>	
I.A.1.1.3	STA TRAINED TO CAT B	COMPLETE	
I.A.1.1.4	STA LONG TERM PROGRAM	↓	
I.A.1.3	SHIFT MANNING (OVERTIME LIMITS)		
I.A.2.1.1	SRO EXPERIENCE		
I.A.2.1.2	SRO BE RO 1 YEAR		
I.A.2.1.3	THREE MO TRNG ON SHIFT		
I.A.2.1.4	MODIFY TNG PROGRAM		
I.A.2.3	INSTR COMPL SRO TNG		
I.A.3.1.1	SCOPE OF LIC EXAMS		
I.A.3.1.2	PASSING GRADE		
I.C.1.2.A	ICC GUIDELINES		GUIDELINES UNDER REVIEW
I.C.1.3.A	ACC & TRANSIENT GUIDELINES	COMPLETE	
I.C.5	FEEDBACK OPER EXP,	↓	
I.C.6	PERFORMANCE OF OP, ACT,		
II.E.4.2	CONT. ISOLATION PRESSURE SETPOINT		
II.E.4.2.6	CONT. PURGE VALVES		
II.K.1	IE BULLETINS		
II.K.2.9	FMEA ON ICS		
II.K.2.11	OPER TNG. & DRILLING		
II.K.2.14	LIFT FREQ. PORV/SV		
II.K.2.15	SLUG FLOW		
II.K.2.16	RCP SEAL DAMAGE		
II.K.2.20	SYS RESPONSE TO SB LOCA	GENERIC B&W REPT. UNDER REVIEW	
II.K.3.2	PORV FAILURES	COMPLETE	
II.K.3.3	PORV/SV CHALLENGES	GENERIC B&W REPT. UNDER REVIEW	
II.K.3.7	PORV OPEN PROB,	COMPLETE	
II.K.3.10	ANTICIP TRIP	↓	
II.K.3.17	ECCS OUTAGES		
II.K.3.30	SB LOCA SCHEDULE		
III.A.1.2.2	EMER. FACILITIES DESIGN		
III.A.2.1	EMER. PREP.		
III.D.3.3	RADIOIODINE MON.		
III.D.3.4	CONT. RM. HABIT. REVIEW		
			LICENSEE SUBMITTAL UNDER REVIEW

NUREG-0737 ITEMS SCHEDULED

7/1/81 - 12/31/81

TMI-1 STATUS

I.A.3.1	SIMULATOR EXAMS	COMPLETE
II.B.1.2.1	FINAL DESIGN OF RCS VENTS	LICENSEE SUBMITTAL UNDER REVIEW
II.B.4	TRNG. FOR MITIGATING CORE DAMAGE	COMPLETE
II.E.1.1	SHORT TERM AUX FW SYSTEM EVAL.	COMPLETE
II.E.1.2.1.B	AFW SAFETY GRADE INITIATION (SHUTDOWN REQ'D)	NUREG-0680 SUPP. 3 PERMITTED DEFERRAL TO 1ST REFUELING AFTER RESTART
II.E.1.2.2.c	AFW SAFETY GRADE FLOW INDICATION	SER ISSUED, MOD NEAR COMPLETION
II.E.4.1.2	INSTALL DEDICATED H ₂ PENETRATION	COMPLETE
II.E.4.2.5.B	MODIFY CONT. PRESSURE SETPT.	COMPLETE
II.E.4.2.7	RADIATION SIGNAL ON PURGE VALVES	COMPLETE
II.K.2.10	SAFETY GRADE TRIP	COMPLETE
II.K.3.1.1.A	PORV ISO DESIGN (IF REQUIRED)	NOT YET REQUIRED
II.K.3.5.A	AUTO TRIP OF RCP'S (IF REQUIRED)	NOT YET REQUIRED

NUREG-0737 ITEMS SCHEDULED FOR 1982

13

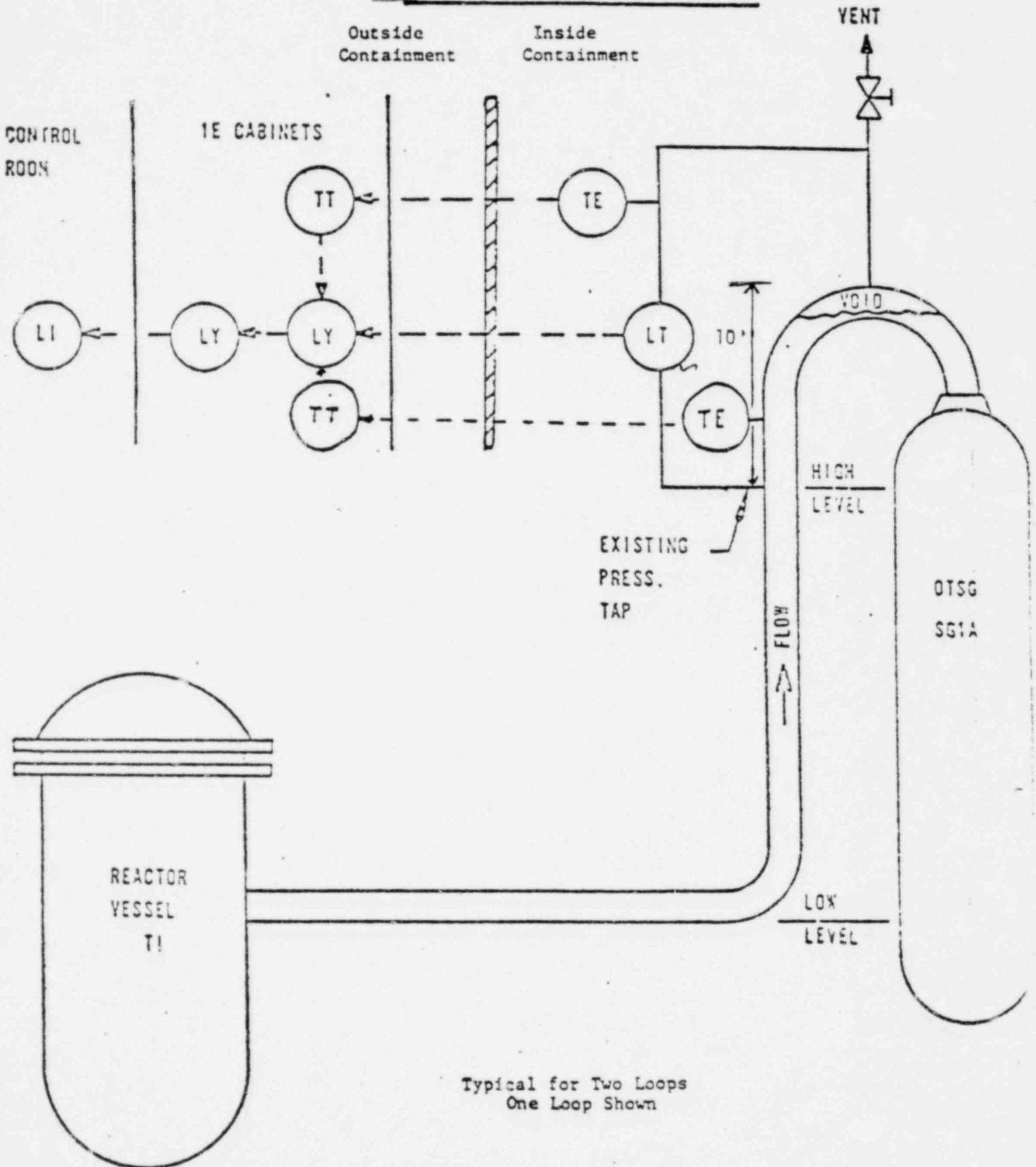
		NUREG-0737 SCHEDULE	TMI-1 COMMITMENT
I.A.1.3.2	MIN SHIFT CREW	7/1/82	7/1/82
I.C.1.2B	ICC PROCEDURES	1ST REFUEL AFTER 1/1/82	1ST REFUEL AFTER RESTART
I.C.1.3B	TRANS & ACC PROCEDURES	1ST REFUEL AFTER 1/1/82	1ST REFUEL AFTER RESTART
II.B.1	RCS VENTS INSTALLED*	7/1/82	7/1/82 ⁽¹⁾
II.B.2.2	SHIELDING MODS*	1/1/82	(1)
II.B.2.3	EQUIP QUAL*	6/30/82	6/30/82 ⁽¹⁾
II.B.3.2	UPGRADE ACC SAMPLING*	1/1/82	(2) 1ST REFUEL AFTER RESTART
II.D.1.2A	RV & SV TESTING	4/1/82	EPRI PROGRAM
II.D.1.2B	PLANT SPECIFIC REPORT	7/1/82	EPRI PROGRAM
II.D.1.3	DK VALVE TESTING	7/1/82	EPRI PROGRAM
II.E.1.1.2	AFM EVAL - LONG TERM MODS*	1/1/82	1ST REFUELING AFTER RESTART
II.F.1.1	NOBLE GAS MONITOR*	1/1/82	5% POWER
II.F.1.2	IODINE/PART MONITOR*	1/1/82	5% POWER
II.F.1.3	CONT RAD MONITOR*	1/1/82	5% POWER
II.F.1.4	CONT PRESS MONITOR*	1/1/82	(2) 1ST REFUELING AFTER RESTART
II.F.1.5	CONT H ₂ O LEVEL*	1/1/82	(2) 1ST REFUELING AFTER RESTART
II.F.1.6	CONT HYDROGEN*	1/1/82	(2) 1ST REFUELING AFTER RESTART
II.F.2.3	ICC INST*	1/1/82	1ST REFUELING AFTER RESTART
II.K.3.1B	PORV ISOL INSTALLED (IF REQUIRED)	1ST REFUEL 6 MOS. AFTER STAFF APP, DESIGN	NOT YET REQUIRED
II.K.3.5B	RCP AUTO TRIP MOD (IF REQUIRED)	TBD	NOT YET REQUIRED
II.K.3.30B	SB LOCA MODEL	1/1/82	10 MOS. AFTER STAFF ACCEPTANCE OF PROGRAM

*MAY REQUIRE PLANT SHUTDOWN

(1) PARTIAL BY RESTART, ADDT'L RELIEF REQUEST EXPECTED

(2) FUNCTIONAL CAPABILITY EXISTS; WILL NOT MEET ALL NUREG-0737 CRITERIA

ICC HOT LEG LEVEL INSTRUMENT SYSTEM



Typical for Two Loops
One Loop Shown

STEAM GENERATOR-CHRONOLOGY/SCHEDULE

A. LICENSEE'S ACTIONS AND SCHEDULED PLANS TO DATE

- 21 NOV 81 - PRIMARY TO SECONDARY LEAK DETERMINED IN THE 'B' OTSG
- 4 DEC 81 - INITIAL N₂ BUBBLE TEST DETERMINED 38 LEAKING TUBES
IN 'B' OTSG AND 85 LEAKING TUBES IN 'A' OTSG
 - ESTABLISHMENT OF OTSG TUBE LEAK TASK FORCE
- 5 DEC 81 - EDDY CURRENT TESTING ON 'B' OTSG
- 6-11 DEC 81 - SECOND N₂ BUBBLE ON 'A' AND 'B' OTSG, 6 ADDT'L
LEAKING TUBES IN 'B' OTSG
- 12 DEC 81 - EDDY CURRENT TESTING OF 800 TUBES IN EACH OTSG STARTED
- 19 DEC 81 - FIRST TUBE REMOVAL SCHEDULED

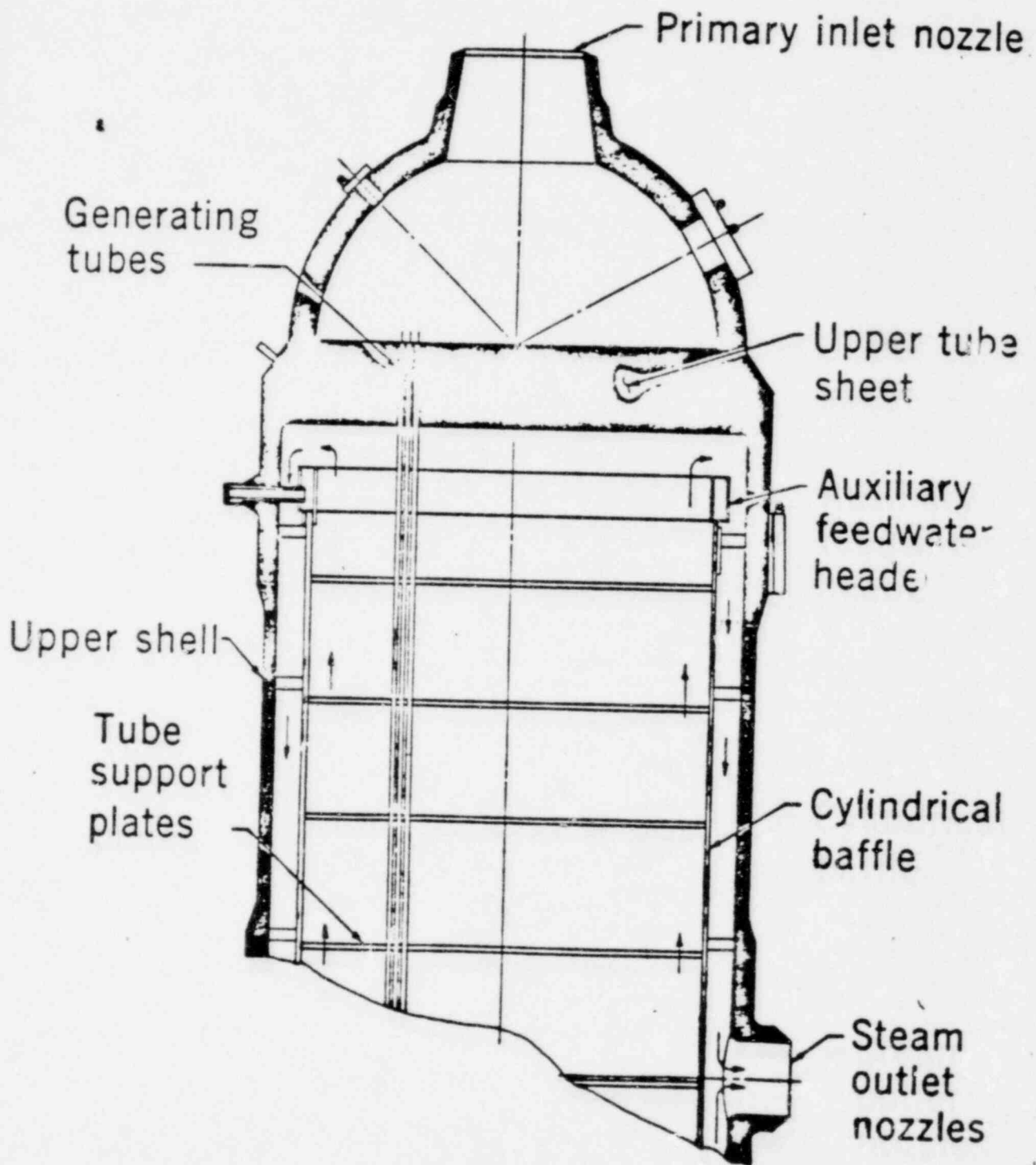
B. ITEMS IN PROGRESS

- DETERMINING FINAL EDDY CURRENT PROGRAM
- COLLECTING OTSG OPERATING HISTORY
- TUBE REMOVAL CANDIDATES WILL BE FIBEROPTIC/VIDEO INSPECTED
AND METALLURGICALLY TESTED
- MODE OF FAILURE WILL BE IDENTIFIED
- REPAIRS WILL BE MADE AS NECESSARY

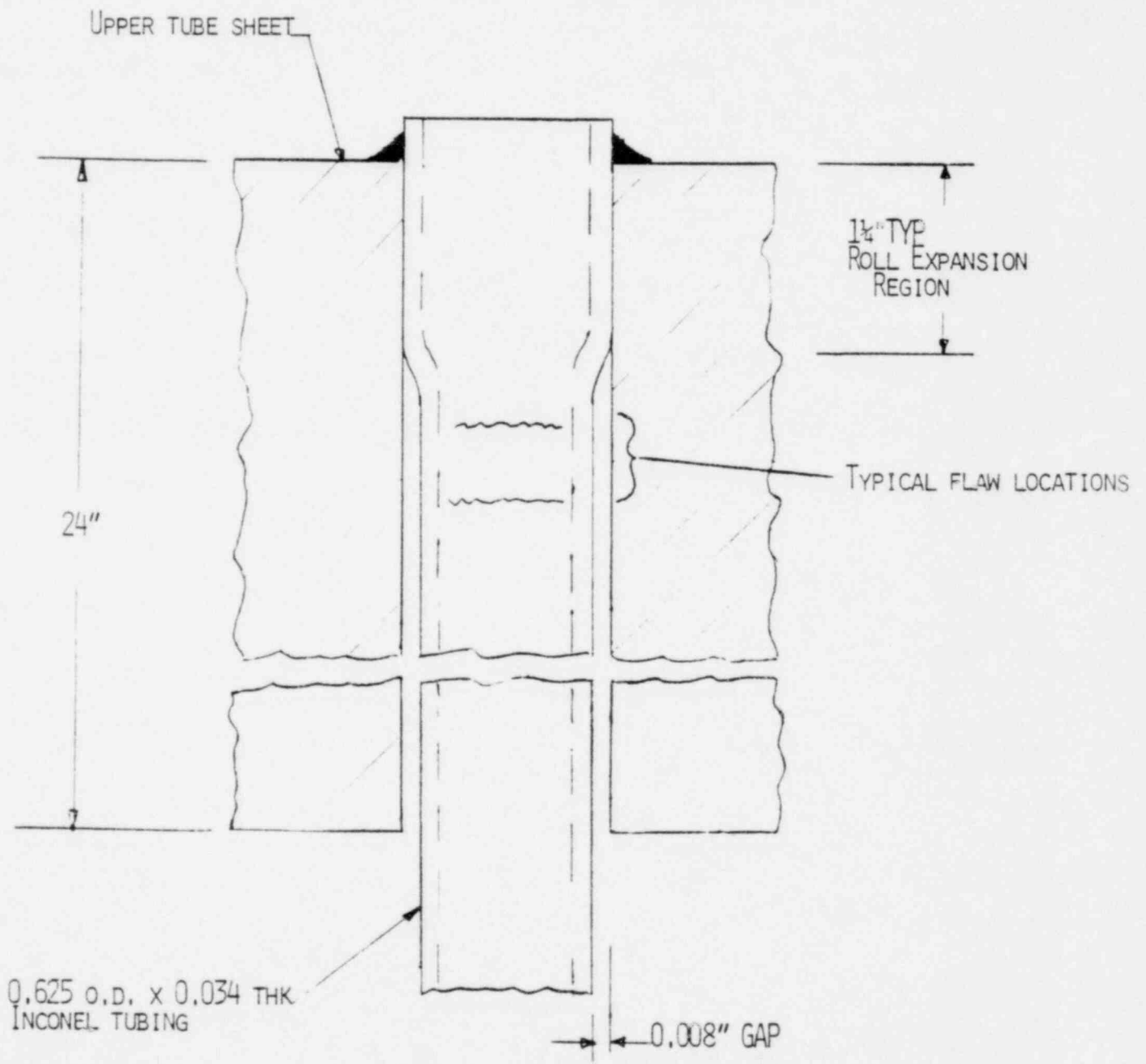
AT LEAST 2 MONTHS NEEDED TO CORRECT PROBLEM*

*UNTIL FAILURE MODE DETERMINED AND EXTENT OF DEGRADATION OF OTHER
TUBES IS KNOWN, A GOOD ESTIMATE OF COMPLETION CANNOT BE MADE

ONCE-THROUGH STEAM GENERATOR



TYPICAL FLAW LOCATIONS
IN UPPER TUBESHEET REGION



IN GOVERNOR THORNBURG'S LETTER TO THE COMMISSION CHAIRMAN DATED
NOVEMBER 20, 1981, GOVERNOR STATED INTENT TO SUPPORT RESTART OF TMI-1
IF TWO CONDITIONS ARE MET:

- "(1) DEVELOPMENT OF A CONSENSUS FOR A REALISTIC PLAN FOR UNIT 2 DECONTAMINATION
- (2) RECEIPT OF ADEQUATE ASSURANCE THAT UNIT 1 CAN BE OPERATED SAFELY"

PLANT STATUS/SCHEDULE● LICENSEE PROJECTED DATES

- FINAL HOT FUNCTIONAL TESTING 1/15/82
- CRITICALITY 2/1/82

● STAFF PRELIMINARY ESTIMATES

- FINAL HOT FUNCTIONAL TESTING FEBRUARY 1982
- CRITICALITY MARCH 1982
- STEAM GENERATOR PROBLEM
NOT FACTORED INTO ESTIMATE
- OVERALL LISTING OF ALL ITEMS
REQUIRED FOR RESTART STILL
UNDER REVIEW

TRANSMITTAL TO:

Document Control Desk,
016 Phillips

ADVANCED COPY TO:

The Public Document Room

DATE:

1/4/82

cc: OPS File

From: SECY OPS Branch

C&R (Natalie)

Attached are copies of a Commission meeting transcript/s/ and related meeting document/s/. They are being forwarded for entry on the Daily Accession List and placement in the Public Document Room. No other distribution is requested or required. Existing DCS identification numbers are listed on the individual documents wherever known.

Meeting Title:

Staff Briefing on TMI-1 Restart

MEETING DATE:

Open
Closed

ITEM DESCRIPTION:

Copies
Advanced
To PDR:

DCS COPIES:
(1 of each Checked)

Original Document
May be Dup*
Duplicate Copy*

1. Transcript

1

1

2. Letter, L. Bradford

1

1

to the Commission, 12/17/81

3. Viewgraphs

1

1

4. _____

5. _____



*Verify if in DCS, and change to "PDR available."

(PDR is advanced one of each document, two of each SECY paper.)