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SEP 16 1982

82-384

For: The Commissioners
From: William J. Dircks, Executive Director for Operations
Subject: THREE MILE ISLAND, UNIT 1 (TMI-1) NUREG-0737 ITEMS STATUS

Purpose: To provide the Commission with the status of implementation of NUREG-0737 requirements on TMI-1 and the staff's recommendation for deferral of certain NUREG-0737 requirements on TMI-1.

Discussion: By memorandum dated July 27, 1982, Chairman Palladino requested that the staff address NUREG-0737 requirement deferrals on TMI-1 as outlined in CLI-81-3 indicating that the Commission itself will consider the need for deferral of NUREG-0737 requirements on TMI-1 after hearing staff recommendations. A tabulation of the status of all applicable NUREG-0737 action items is enclosed (Enclosure 1). Included in this tabulation are those items with implementation dates occurring after the licensee's estimated date for plant readiness for restart of February 1, 1983 and those with schedules still to be determined (TBD).

The licensee has indicated that five of the items scheduled by NUREG-0737 for completion prior to the licensee's estimated restart date, need deferral to dates after February 1, 1983. These are identified in Enclosure 1. The staff herein provides its recommendations regarding the licensee's proposed delays.

The licensee has requested deferral of four of the items until March 31, 1983 (or restart whichever is later) and one item until the first refueling after restart, which should occur about March 1984. The staff's evaluation of the deferral of these five items is provided in Enclosures 2 and 3.

The staff has concluded that the licensee has provided adequate justification for schedule delay for four of the five items. For item 11.8.2.2 Plant Shielding Modifications, the licensee needs deferral until the first refueling after restart.

Contact:
R. Jacobs, MRR
Ext. 27471

50-289

8210050506 820916
PDR ADOCK 05000289
P PDR

SURNAME
DATE

The short term modifications for this action item have been completed. The remaining work consists of the installation of remote operators on six Decay Heat Removal (DHR) valves and control panels to facilitate maintaining a recirculation flow path to prevent boron precipitation in the core under certain accident conditions. However, the staff has not completed its review of licensee's justification for interim operation prior to implementation. The staff's evaluation for Item II.B.2.2 is in Enclosure 2.

The remaining four items are: II.B.3, Post Accident Sampling; II.F.1.4, Containment Pressure Monitor; II.F.1.5, Containment Water Level Monitor; and II.F.1.6, Containment Hydrogen Monitor. The licensee has committed to completing these four items by March 31, 1983 or before restart whichever is later, in a letter dated September 7, 1982. These commitment dates represent a modification of his earlier commitment of first refueling after restart. Although the licensee's schedules indicate that these items are expected to be completed prior to January 1983, the licensee is unwilling to commit to this earlier date because of unforeseen problems which may likely develop which could delay implementation beyond the possible restart dates. Since it is unlikely that TMI-1 could be restarted prior to February 1983, plant operation until March 31, 1983 would represent a very short period without these modifications completed. The staff's evaluation for these items is provided in Enclosure 3.

With respect to other items indicated as completed or to be completed before restart in Enclosure 1, the staff will verify their completion before restart authorization.

Recommendations: Recommend that the Commission:

- 1) approve deferral of the implementation dates for NUREG-0737 Items II.B.3, II.F.1.4, II.F.1.5, and II.F.1.6 until March 31, 1983 or before restart, whichever is later;
- 2) withhold approval of the proposed implementation date (first refueling outage following restart) for NUREG-0737 Item II.B.2.2 until the staff has completed its review (approximately October 8, 1982).

(Signed) William J. Dircks

William J. Dircks
Executive Director
for Operations

Enclosures: See Next Page

Enclosures:

1. Status of NUREG-0737 Implementation
2. Evaluation of Item II.B.2.2
3. Evaluation of Items II.B.3, II.F.4, II.F.5 and II.F.6

"Recommendations" section revised in OEDO;
See previous ORC for previous concurrences.

ORAB
LOlshan
9/3/82

ELD
JScinto
9/8/82

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SURNAME ▶	RJacobs/cf	JStolz	GLainas	DEisenhut	ECase	HDenton	WJDircks
DATE ▶	9/8/82	9/8/82	9/8/82	9/9/82	9/9/82	9/9/82	9/15/82

The short term modifications for this action item have been completed. The remaining work consists of the installation of remote operators on six Decay Heat Removal (DHR) valves and control panels to facilitate maintaining a recirculation flow path to prevent boron precipitation in the core under certain accident conditions. However, the staff has not completed its review of licensee's justification for interim operation prior to implementation. The staff's evaluation for Item II.B.2.2 is in Enclosure 2.

The remaining four items are: II.B.3, Post Accident Sampling; II.F.1.4, Containment Pressure Monitor; II.F.1.5, Containment Water Level Monitor; and II.F.1.6, Containment Hydrogen Monitor. The licensee has committed to completing these four items by March 31, 1983 or before restart whichever is later, in a letter dated September 7, 1982. These commitment dates represent a modification of his earlier commitment of first refueling after restart. Although the licensee's schedules indicate that these items are expected to be completed prior to January 1983, the licensee is unwilling to commit to this earlier date because of unforeseen problems which may likely develop which could delay implementation beyond the possible restart dates. Since it is unlikely that TMI-1 could be restarted prior to February 1983, plant operation until March 31, 1983 would represent a very short period without these modifications completed. The staff's evaluation for these items is provided in Enclosure 3.

With respect to other items indicated as completed or to be completed before restart in Enclosure 1, the staff will verify their completion before restart authorization.

Recommendations:

The staff recommends that the Commission approve deferral of the implementation dates for NUREG-0737 Items II.B.3, II.F.1.4, II.F.1.5, and II.F.1.6 until March 31, 1983 or before restart whichever is later; withhold approval of the proposed implementation date (first refueling outage following restart) for NUREG-0737 Item II.B.2.2 until the staff has completed its review.

William J. Dircks, Executive Director
for Operations

Enclosures:

- 1. Status of NUREG-0737 Implementation
- 2. Evaluation of Item II.B.2.2
- 3. Evaluation of Items II.B.3, II.F.4, II.F.5 and II.F.6

See previous white for concurrences

ORAB
LOlshan
9/3/82

QELD
JScinto*see note
9/8/82

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SURNAME	RJacobs;cf	JStolz*	GLainas*	DEisenhut	ECase	HDenton	WDircks
DATE	9/ /82	9/8/82	9/8/82	9/9/82	9/9/82	9/9/82	9/ /82

The short term modifications for this action item have been completed. The remaining work consists of the installation of remote operators on six Decay Heat Removal (DHR) valves and control panels to facilitate maintaining a recirculation flow path to prevent boron precipitation in the core under certain accident conditions. However, the staff still needs to review this item regarding acceptable compensatory measures that may be proposed by the licensee during interim operation prior to implementation. The staff's evaluation for Item II.B.2.2 is in Enclosure 2.

The remaining four items are: II.B.3, Post Accident Sampling; II.F.1.4, Containment Pressure Monitor; II.F.1.5, Containment Water Level Monitor; and II.F.1.6, Containment Hydrogen Monitor. The licensee has committed to completing these four items by March 31, 1983 or before restart whichever is later, in a letter dated September 3, 1982. These commitment dates represent a modification of his earlier commitment of first refueling after restart. Although the licensee's schedules indicate that these items are expected to be completed prior to January 1983, the licensee is unwilling to commit to this earlier date because of unforeseen problems which may likely develop which could delay implementation beyond the possible restart dates. Since it is unlikely that TMI-1 could be restarted prior to February 1983, plant operation until March 31, 1983 would represent a very short period without these modifications completed. The staff's evaluation for these items is provided in Enclosure 3.

With respect to other items indicated as completed or to be completed before restart in Enclosure 1, the staff will verify their completion before restart authorization.

Recommendations:

The staff recommends that the Commission approve deferral of the implementation dates for NUREG-0737 Items II.B.3, II.F.1.4, II.F.1.5, and II.F.1.6 until March 31, 1983 or before restart whichever is later; withhold approval of the proposed implementation date (first refueling outage following restart) for NUREG-0737 Item II.B.2.2 until the staff has completed its review of this item regarding acceptable compensatory measures that may be proposed by the licensee.

William J. Dircks, Executive Director
for Operations

Enclosures:

1. Status of NUREG-0737 Implementation
2. Evaluation of Item II.B.2.2
3. Evaluation of Items II.B.3, II.F.4, II.F.5 and II.F.6

ORAB	OELD
LOlshan * JScinto *see note	
9/3 /82	9/8 /82

*See previous white for concurrences.

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SURNAME	R.Jacobs;cf *	JStolz	Glainas	DEisenhut	ECase	H.Denton	WDircks
DATE	9/7/82	9/1/82	9/8/82	9/ /82	9/ /82	9/ /82	9/ /82

The short term modifications for this action item have been completed. The remaining work consists of the installation of remote operators on six Decay Heat Removal (DHR) valves and control panels to facilitate maintaining a recirculation flow path to prevent boron precipitation in the core under certain accident conditions. The staff's evaluation for Item II.B.2.2 is in Enclosure 2.

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With respect to other items indicated as completed or to be completed before restart in Enclosure 1, the staff will verify their completion before restart authorization.

Recommendations:

The staff recommends that the Commission 1) approve deferral of the implementation date for NUREG-0737 Item II.B.2.2 until the first refueling outage following restart and 2) approve deferral of the implementation dates for NUREG-0737 Items II.B.3, II.F.1.4, II.F.1.5, and II.F.1.6 until March 31, 1983 or before restart whichever is later.

William J. Dircks, Executive Director
for Operations

Enclosures:

1. Status of NUREG-0737 Implementation
2. Evaluation of Item II.B.2.2
3. Evaluation of Items II.B.3, II.F.4, II.F.5 and II.F.6

ORAB	OELD
LOlshan*	
9/3/82	9/ /82

*See previous white for concurrences

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DATE	9/7/82	9/3/82	9/ /82	9/ /82	9/ /82	9/ /82	9/ /82

The short term modifications for this action item have been completed. The remaining work consists of the installation of remote operators on six Decay Heat Removal (DHR) valves and control panels to facilitate maintaining a recirculation flow path to prevent boron precipitation in the core under certain accident conditions. The staff's evaluation for Item II.B.2.2 is in Enclosure 2.

The remaining four items are: II.B.3, Post Accident Sampling; II.F.1.4, Containment Pressure Monitor; II.F.1.5, Containment Water Level Monitor; and II.F.1.6, Containment Hydrogen Monitor. The licensee has committed to completing these four items by March 31, 1983 or restart whichever is later, in a letter dated September 3, 1982. These commitment dates represent a modification of his earlier commitment of first refueling after restart. Although the licensee's schedules indicate that these items are expected to be completed prior to January 1983, the licensee is unwilling to commit to this earlier date because of unforeseen problems which may likely develop which could delay implementation beyond the possible restart dates. Since it is unlikely that TMI-1 could be restarted prior to February 1983, plant operation until March 31, 1983 would represent a very short period without these modifications completed. If any work is needed after the plant would otherwise be ready and approved for restart, the licensee would complete the necessary work during a special shutdown before March 31, 1983. The staff's evaluation for these items is provided in Enclosure 3.

With respect to other items indicated as completed or to be completed before restart in Enclosure 1, the staff will verify their completion before restart authorization.

Recommendations:

The staff recommends that the Commission 1) approve deferral of the implementation date for NUREG-0737 Item II.B.2.2 until the first refueling outage following restart and 2) approve deferral of the implementation dates for NUREG-0737 Items II.B.3, II.F.1.4, II.F.1.5, and II.F.1.6 until March 31, 1983 or restart whichever is later.

William J. Dircks, Executive Director
for Operations

Enclosures:

- 1. Status of NUREG-0737 Implementation
- 2. Evaluation of Item II.B.2.2
- 3. Evaluation of Items II.B.3, II.F.4, II.F.5 and II.F.6

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DATE ▶	9/3/82	9/3/82	9/ /82	9/ /82	9/ /82	9/ /82	9/ /82

Docket No. 50-289

MEMORANDUM FOR: Chairman Palladino
FROM: William J. Dircks, Executive Director
for Operations
SUBJECT: TMI-1 RESTART CERTIFICATION

Your memorandum of July 27, 1982 requested that we address NUREG-0737 requirement deferrals on TMI-1 as outlined in the Commission's March 23, 1981 Order (CLI-81-3). The staff is obtaining additional information from the licensee regarding current schedules for implementation of presently incomplete NUREG-0737 action items and the licensee's justification for deferral until after restart for any items that are now scheduled by NUREG-0737 for completion prior to the licensee's estimated restart date. The staff expects to be able to brief the Commission on its recommendations regarding deferral of implementation dates for NUREG-0737 items at TMI-1 in late September 1982.

William J. Dircks
Executive Director
for Operations

cc: Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
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		PFine	File w/inc. &
FROM:	William J. Dircks, Executive Director		ticket-ORB#4
	for Operations		MLGarver(EDO-12158)

SUBJECT: TMI-1 RESTART CERTIFICATION

Your memorandum of July 27, 1982 requested that we address NUREG-0737 requirement deferrals on TMI-1 as outlined in the Commission's March 23, 1981 Order (CLI-81-3). The staff ~~will obtain~~ ^{is obtain} additional information from the licensee regarding current schedules for implementation of presently incomplete NUREG-0737 action items and the licensee's justification for deferral until after start for any items that are now scheduled by NUREG-0737 for completion prior to the licensee's estimated restart date. The staff expects to be able to brief the Commission on its recommendations regarding deferral of implementation dates for NUREG-0737 items at TMI-1 in late September 1982.

William J. Dircks, Executive Director
for Operations

cc:
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
OGC
OPE
ODIA
OI

*See previous white for concurrences.

OFFICE	OR:DL	C-ORB#4:DL	AD:OR:DL	OEID	D:DL	D:NRR	EDO
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		PPAS	ticket - ORB#4

MEMORANDUM FOR: Chairman Palladino

FROM: William J. Dircks, Executive Director
for Operations

SUBJECT: TMI-1 RESTART CERTIFICATION

Your memorandum of July 27, 1982 requested that we address NUREG-0737 requirement deferrals on TMI-1 as outlined in the Commission's March 23, 1981 Order (CLI-81-3). CLI-81-3 indicates that the Commission itself will consider the need for granting deferral for NUREG-0737 requirements on TMI-1 in reaching its decisions on immediate effectiveness and ultimate review of the Board's decision. CLI-81-3 also noted that such deferral would only be granted after hearing staff recommendations. The staff will immediately ask the Licensee to provide its current schedule for implementation of presently incomplete NUREG-0737 action items and its justification for deferral until after restart of any items that are now scheduled by NUREG-0737 for completion prior to Licensee's estimated restart date but that will not be completed by that time. The staff expects to be able to brief the Commission on its recommendations regarding deferral of implementation dates for NUREG-0737 action items at TMI-1 in late September.

William J. Dircks, Executive Director
for Operations

cc:
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
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*See previous white for concurrence

Changes on this version of reply concurred by DELO

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DATE	8/ /82	8/17/82	8/13/82	8/17/82	8/ /82	8/ /82	8/ /82