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MEMORANDUM FOR: A. Bert Davis, Regional Administrator
FROM: H. J. Miller, Director, Division of Reactor Safety
SUBJECT: MEETING WITH IDNS ON ASME MOU IMPLEMENTATION

On September 8, 1990, Duane Danielson, John Jacobson, Kavin Ward, Mark Ring and I met with Roy Wight and members of his staff at the facilities of the Illinois Department of Nuclear Safety (IDNS) in Springfield. The purpose of the meeting was to discuss specific plans for implementing the IDNS/NRC memorandum of understanding on the ASME Code which provides a mechanism for the State to participate in NRC inspections. The meeting provided an opportunity to learn more about IDNS current and planned activities in the reactor safety area, to describe our inspections, and to meet IDNS staff members who will be involved in implementing the MOU.

The following summarizes the major points of discussion and other highlights of the meeting.

1. Roy Wight described the various functions of his organization, the Office of Nuclear Facility Safety. Beyond its extensive emergency response responsibilities, it has three distinct groups that are involved in reactor safety and "accident prevention" activities as they describe it. These are: the resident engineer group, the ASME Code compliance section and the reactor safety section. The latter two groups are likely to be most directly involved in ASME MOU implementation.
2. There are slots for three individuals in the ASME compliance area. Two individuals are onboard now working principally on regulation development; they are also very active in the ASME Code committee work. They are somewhat limited in how many inspections they can be involved in at the present time.
3. The reactor safety section has seven positions including experts in PRA, thermal-hydraulics and reactor operations (former SRO). This group has already been actively involved in reviewing licensee event reports and licensing amendments. For example, the group has been conducting an extensive study of a tech spec amendment request by Byron to eliminate a requirement for system venting following maintenance. They have developed a sophisticated, finite-element fluid dynamics model of the system to evaluate the potential effects voids in the system may have if a pump is started without venting. They had some preliminary results but would not release them as they were predecisional.

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Other issues that the group has been involved in include: IPEs, containment venting, station blackout, reactor risk study and decommissioning. Mr. Wight said that while much of this has been generic activity (such as commenting on NRC NUREGs and rules), they have also had contact with licensees on selected issues. Mr. Wight said they may do some "jawboning" of licensees with respect to their positions on such issues as containment venting.

4. They gave us a demonstration of their emergency response center (REAC) capabilities including its real time, continuous monitoring of reactor safety parameters at all Illinois plants. To support this activity, the State has controlled copies on hand of all P&IDs, C&IDs and arrangement drawings for each plant in the State. IDNS said efforts to make this emergency response center operational are pretty much complete, freeing their staff to spend more time on the "accident prevention" side of things.
5. We confirmed with Roy Wight agreement to start implementation of the MOU on a small scale, focusing on ISI inspections which are closest to the traditional ASME concerns for pressure vessel and piping integrity. Kevin Ward, John Jacobson and Duane Danielson described in some detail the nature and scope of NRC routine ISI and related reactive inspections.
6. Specific plans for involvement by IDNS in two inspections (Quad Cities in October and Braidwood in early 1991) were agreed to. IDNS is to be an observer in these first inspections. We stressed the need for flexibility given frequently changing licensee outage schedules (inspection changes on sometimes only a day's notice). They said they can accommodate this, understanding the need to observe actual work in progress during an outage.
7. We discussed briefly NRC's position on pending IDNS ASME regulations.

They provided us with copies of current Fire Marshal rules that have been on the books and applicable to nuclear plants for many years, and which have virtually all of the same provisions that proposed IDNS rules have (e.g., inspection certificates, impoundment of failed equipment, etc.). Therefore,

I described to Wight and IDNS lawyers how NRC's purview extends to "non-safety related" equipment. As with many, this was a point of confusion for them. I explained the "important-to-safety/safety-related" distinction and the NRC's position regarding the FSAR and associated licensing documents being "contracts" with licensees on reactor safety even for things labeled "non-safety related".

From these discussions,



(IDNS noted that, while they have not been successful in putting in place the regulations that are intended to govern their ASME activities, there is no gap in the ASME framework in Illinois since an MOU between the Fire Marshal and IDNS has the Fire Marshal continuing to be responsible until the IDNS rules are finalized.)

8. I expressed the Region's feeling of responsibility about being the NRC's central point of contact with the IDNS on reactor safety issues. I assured IDNS that this did not mean we felt that they should not be dealing directly with NRR and other offices on generic matters (such as rulemaking) as all States and citizens do. I did say, however, we felt they should address all Illinois plant-specific issues through the Region. Mr. Wight was non-committal on this especially as it relates to licensing actions.

(In this connection, I was careful to point out we did not want to preclude informal conversations and discussion with NRR and other offices that we recognized may take place.)

As you are aware, [REDACTED]

[REDACTED] If you have any questions on this matter, I can respond at your convenience.

ORIGINAL SIGNED BY HUBERT J. MILLER

H. J. Miller, Director
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