

UNITED STATES NUCLÉAR REGULATORY COMMISSION ADVISORY COMMITTEE ON REACTOR SAFEGUARDS WASHINGTON, D. C. 20555

July 8, 1982

William J. Dircks Executive Director for Operations

Attn: T. Rehm

Subj: 265TH ACRS MEETING ACTIONS, RECOMMENDATIONS, AND REQUESTS

Based on discussions regarding methods for improved implementation and followup of ACRS recommendations, the Committee agreed that a summary of Actions, Agreements, Assignments, and Requests made during each full Committee meeting will be sent to the NRC Staff following each meeting.

Attached in response to this agreement is a list of the requests made at the 265th ACRS Meeting, May 6-8, 1982. This list has the concurrence of the ACRS Chairman and designated ACRS members as will all future items provided for follow up purposes.

Those items in the list "Actions, Agreements, Assignments, and Requests" dated May 17, 1982, that do not deal with requests made of the NRC Staff or that are not pertinent to NRC Staff activities have not been included in this follow-up list.

R. F. Fraley

Executive Director

cc: C. Michelson, AEOD

H. Denton, NRR

R. B. Minogue, RES

R. DeYoung, I&E

J. G. Davis, NMSS

E. Case, NRR

ACRS Members

attachments:

As stated

ACTIONS, RECOMMENDATIONS, AND REQUESTS 265TH ACRS MEETING, MAY 6-8, 1982

ACRS Report on the Wolf Creek Generating Station, Unit No. 1

- 1. The Committee prepared a report to the Commissioners of its review of the Wolf Creek Generating Station Unit 1 recommending, if due consideration is given to the recommendations in the body of the report, and subject to satisfactory completion of construction, staffing, training, and preoperational testing, the granting of an operating license for power levels up to 3425 Mwt. Recommendations/comments in the body of the report addressed:
 - . Assurance that state and local agencies are qualified to respond to possible emergency situations.
 - The need for building a strong in-house capability for analyzing and understanding the nuclear-thermal-hydraulic behavior and systems performance.
 - Retention of "experienced operator consultants" until the operating organization has developed an experience base involving operational duties of importance to public safety.
 - Assignment of SRO Candidates and others in the operations staff to extended tours of service at operating nuclear power plants to the extent practical.
 - . The level of training proposed to have SROs acquire the training and background required for an STA.
 - Investigation of vital aspects of the ultimate heat sink and associated systems to determine that they have seismic margins sufficient to provide an appropriate level of resistance to a lower-probability higher-level earthquake.

ACRS Report on the Systematic Evaluation Program, Phase II, and its Application to the Palisades Plant

- NAR 2. The Committee prepared a report to the Commissioners of its review of the Systematic Evaluation Program, Phase II, as it has been applied to the Palisades Plant. The ACRS has concluded the following:
 - a. The SEP has been carried out in such a manner that the stated objectives have been achieved for the most part for the Palisades Plant and should be achieved for the remaining plants in Phase II of the program.

- b. The actions taken thus far by the NRC Staff in its SEP assessment of the Palisades Plant are acceptable.
- c. The ACRS will defer its review of the FTOL for the Palisades Plant until the NRC Staff has completed its actions on the remaining SEP topics and the USI and TMI items.

Recommendations/comments in the body of the report addressed:

- . Management performance and capability should continue to be monitored in relation to the operational history and record of regulatory compliance of the Palisades Plant.
- . PRAs will be useful and highly desirable as inputs to the Integrated Plant Safety Assessment portion of the SEP.
- Topical SEP evaluations should be published or otherwise made more generally available and not just made available in the Public Document Room.
 - W. Kerr did not participate in the review of the Palisades Plant.

ACRS Report on Emergency Response Capabilities at Nuclear Power Plants

- 3. The Committee prepared a report to the Commissioners regarding the subject matter of SECY-82-111, "Requirements for Emergency Response Capability," considered at ACRS subcommittee meetings on January 5, March 17, and May 5, 1982. The members endorsed the program with exceptions noted below:
 - A negotiated, detailed agreement regarding general improvements to be incorporated in each specific plant as a set of requirements for that particular plant will place a heavy burden of responsibility on NRC Project Managers which should be constantly monitored by NRC management.
 - The priority for implementation of new Emergency Operating Procedures and the Safety Parameter Display System (SPDS) should proceed as the Staff suggests.
 - . Implementation of the SPDS should not be forced at a rate which will preclude its orderly development.
 - Appropriate standards should be developed by the NRC Staff in cooperation with industry regarding some specification of reliability for the SPDS.

. The ACRS is skeptical regarding the need for the comprehensive analysis of control room information management systems called for in NUREG-0700, Guidelines for Control Room Design Reviews, unless priorities are assigned to concentrate on guidelines for emphasizing important risk reduction.

Rulemaking on Environmental Qualification of Electric Equipment

- 4. The Committee prepared a report to the Commissioners of its review of the proposed final rule, Environmental Qualification of Electric Equipment for Nuclear Power Plants, and recommended approval of the rule subject to consideration of several comments.
 - Deferment of the seismic response and cold shutdown requirements fragments the qualification
 - . Revision and issuance of revision 1 of Regulatory Guide 1.89, Environmental Qualification of Electric Equipment Important to Safety for Light-Water-Cooled Nuclear Power Plants, should be given priority because it will help industry to understand and implement equipment qualification under the proposed rule
 - Demonstration of the practicality and value of current qualification reviews in reducing public risk using "DOR Guidelines" and NUREG-0588 would be prudent.

Control of Occupational exposures

The Committee approved a memorandum to the EDO regarding applicant and licensee radiation protection programs and implementation of the ALARA criterion urging attention to the reduction of operational exposures to methods for the removal of radionuclide deposits if preventive measures are not successful, and to the minimization of the failure and subsequent need for the repair and/or replacement of major plant components.

ACRS Report of Ad Hoc Subcommittee on Foundation Problems and Remedial Actions at Midland Plant Units 1 and 2

6. The Committee approved a memorandum from the ACRS Executive Director to the EDO regarding the matter of soils-related structural settlement problems at the Midland Plant Units 1 and 2 site.

The ACRS recommended:

a. That the Midland Plant Subcommittee review the adequacy of the seismic input criteria and the SSKS and their relation to the proposed permanent site dewatering as a means of reducing the probability of liquefaction due to an earthquake.

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- b. That, subject to a finding by the Midland Plant Subcommittee regarding the adequacy of the seismic input criteria, the ACRS recognize the adequacy of the NRC Staff's efforts as outlined in this report and consider the proposed remedial measures as a matter that can and should be resolved in a manner satisfactory to the NRC Staff.
- c. That the EDO be informed at this time that the ACRS has found the Staff's approach to be acceptable.

Proposed Rule on Insider Sabotage

7. C. Mark advised the Committee that he had, as Chairman of the ACRS Safeguards and Security Subcommittee, reviewed the "Insider Package" [Proposed NRC rules regarding Access Authorization, Search Requirements, and Miscellaneous Safeguards Matters (Access Controls, Vital Area Designation, etc.)] (see Attachment 1) to determine if review by the full Committee is appropriate and concluded that ACRS action is not warranted at this time. He concluded that a Subcommittee briefing by the NRC is therefore unnecessary, but does wish to be kept informed of further developments regarding this subject.

Wolf Creek Control Room Automatic Isolation

NRR 8. D. W. Moeller asked the NRC Staff whether a reactor operator in the Wolf Creek control room could override the control room isolation valves which block the air inlets in the event of smoke detection in order to clean the smoke from the control room atmosphere. G. Rathbun of Kansas Gas and Electric Co. offered to respond to this matter at a later date.

NRC Staff Position on Inspection of Hafnium Control Rods

NPR 9. P. G. Shewmon questioned the Staff on its position regarding inservice inspection of hafnium control rods at Wolf Creek and, in particular, whether this visual inspection is on the critical path for the plant outage. G. E. Edison offered to respond regarding the definition and objectives of the visual inspection procedures.

Liquid Effluent Offsite Doses

10. D. W. Moeller pointed out certain inconsistencies in Table 11.4 on page 11-5 of the SER for the Wolf Creek Generating Station Unit 1 concerning liquid effluent dose design objectives for the plant and the site, radioiodines and other radionuclide releases to the atmosphere, and the activity release rate for I-133. J. B. Hopkins, NRC Project Manager for Wolf Creek, offered to examine the apparent discrepancies in the SER table and respond at a later date.



UNITED STATES NUCLEAR REGULATORY COMMISSION ADVISORY COMMITTEE ON REACTOR SAFEGUARDS WASHINGTON, D. C. 20555

May 12, 1982

Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Dircks:

Subject: CONTROL OF OCCUPATIONAL EXPOSURES

Recent operating license reviews indicate that most applicants and licensees are directing proper attention to assuring that their stations will have an adequate radiation protection program and that the ALARA criterion will be implemented. If occupational exposures are to be held to a minimum, however, attention must also be directed to the prevention of the transport and buildup of radionuclide concentrations within the primary cooling system, to methods for the removal of radionuclide deposits if preventive measures are not successful, and to the minimization of the failure and subsequent need for the repair and/or replacement of major plant components.

Although we have written to you in the past (see memorandum from R. F. Fraley dated December 16, 1981, Subject: Occupational Exposures at Palo Verde Nuclear Generating Station and Other System 80 Plants) we do not believe that the response has been adequate. The Committee urges that the NRC Staff recognize these aspects of the radiation protection problem and encourage nuclear power plant operators to direct appropriate consideration to them in their overall plans for the control of occupational exposures.

Sincerely,

P. Shewmon Chairman

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