



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 14 1983

MEMORANDUM FOR: William J. Dircks  
Executive Director for Operations

FROM: Victor Stello, Jr., Chairman  
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NUMBER 33

The Committee to Review Generic Requirements met on Wednesday, March 9, 1983 from 1-5 p.m. A list of attendees is enclosed.

1. J. Malero (RES) presented for Committee review the proposed rule 10 CFR 53, "Criteria and Procedures for Determining the Adequacy of Spent Nuclear Fuel Storage Capacity." The proposed rule would implement the NRC responsibilities under Section 135(g) of the Nuclear Waste Policy Act of 1982, which directs the NRC to establish procedures and criteria for determining whether a person owning and operating a civilian nuclear power reactor cannot reasonably provide adequate spent nuclear fuel storage capacity. Certain NRC determinations are necessary before the Secretary of the Department of Energy may enter into contractual agreements with the persons owning or operating spent nuclear fuel to provide interim Federal storage capacity for limited amounts of spent nuclear fuel.

The Committee recommended that the rule be forwarded expeditiously to the Commission with the following suggested changes:

- (a) The responsibility for making the initial determination should be changed from the Director of the Office of Nuclear Reactor Regulation to the Executive Director for Operations. The proposed role of the Commission under Part 53.28 would remain unchanged. The reason for designating the EDO to make the initial determination is that NMSS, IE and Regional Offices will need to be involved in the decision as well as NRR. The RES representatives stated they were removing from Part 53.28(b) the phrase, "...to determine if the Director has abused his discretion."
- (b) The Committee recommended that the language in proposed Part 53.30(b) be modified to provide that, for purposes of this rule, if a utility requests a full core reserve storage capability at each licensed site as needed for continued orderly operation of each reactor on the site, the Commission would find such a request acceptable. The Committee's concern is that the proposed language implied that for certain cases the Commission may find such a request unacceptable. The Committee concluded that such a determination could be made in advance and need not be decided in each case. Some members expressed doubts that an adequate basis could be developed to support this determination in the short time

available. The Committee offered no specific language changes but suggested that RES work with ELD and NRR to develop suitable language.

2. T. Speis (NRR) presented for Committee review the proposed resolution of Unresolved Safety Issue A-1, Water Hammer. The Committee was requested to recommend issuance for public comment proposed revisions to the following Standard Review Plans:

- ° SRP 5.4.6, Reactor Core Isolation Cooling System (BWR), Rev. 3.
- ° SRP 5.4.7, Residual Heat Removal (RHR) System, Rev. 3.
- ° SRP 6.3, Emergency Core Cooling System, Rev. 2.
- ° SRP 9.2.1, Station Service Water System, Rev. 3
- ° SRP 9.2.2, Reactor Auxiliary Cooling Water System, Rev. 2.
- ° SRP 10.3, Main Steam Supply System, Rev. 3.
- ° SRP 10.4.7, Condensate and Feedwater System, Rev. 3.

The revised Standard Review Plans would be used only for review of new applications for construction permits for custom plants and standard plants docketed after the issuance of the Standard Review Plan revisions.

In addition, the supporting technical information document, NUREG-0927 "Evaluation of Water Hammer Experience in Nuclear Power Plants" would also be released for comment. T. Speis stated that the comments received will be evaluated and addressed prior to returning to the Committee with final changes to make the Standard Review Plan revisions effective.

T. Speis stated that the staff had completed its technical evaluation of Unresolved Safety Issue A-1 and concluded that this safety issue is not as significant as previously hypothesized. This conclusion was based on reported water hammer occurrences and associated damage, technical evaluations by NRC contractors, and the staff's current evaluation of the issue. He noted that, for the most part, damage due to water hammer has been confined to pipe supports, snubbers, and equipment mounting structures.

The Committee inquired as to how water hammer was being dealt with in the review of operating applications. The Committee was informed that the current review of water hammer issues was essentially as outlined in the proposed Standard Review Plan revisions. However, it was also noted that except for a few operating plants, most of the proposed hardware fixes had already been installed in operating plants or incorporated

into existing plant designs. The Committee was concerned that issuance of the SRP revisions in their present form would suggest that we are not requiring these modifications on current operating license applications when in fact it is part of the staff's current review practice. Since the proposed SRP revisions will simply codify current staff review practice, the Committee recommended that when the proposed SPR revisions are issued for comment either some accompanying explanation should be provided to state how these changes relate to previous and current review practice, or the SRP implementation sections should be modified to state that this is current review practice (if such is the case).

The Committee noted that when the SRP revisions are issued they will be among the first new requirements for future standard plant applications. The Committee reiterated its recommendation from Meeting No. 27 (December 8, 1982,) that NRR and RES develop a plan to assure that all new requirements such as these be coordinated with the plan described in SECY-82-1B, "Proposed Commission Policy Statement on Severe Accidents and Related Views on Nuclear Reactor Regulation."

The Committee also noted that operating procedures were cited as a means for prevention or mitigation of water hammer and inquired whether such procedures were reviewed to assure that they would not create other more serious safety problems. The Committee was assured that this is part of the current staff review practice.

The Committee recommended that the SRP revisions and NUREG-0927 be released for public comment, as proposed, provided that its comments on implementation are addressed.

3. M. Jamgochian (RES) briefed the Committee on the proposed amendment to 10 CFR 50, Appendix E - "Frequency of Emergency Preparedness Exercises." The proposed rulemaking does not change the licensees' requirements to conduct annual emergency preparedness exercises, but only provides flexibility to the existing regulations governing the frequency and extent of participation by State and local governments in the emergency preparedness exercises. The proposed rulemaking is a potential relaxation of the currently required annual full participation (licensee, State and local governments) exercises. The proposed rule change provides that if all elements in the emergency plan are performed in a satisfactory manner during the annual exercise, FEMA may find that another exercise with State and local governmental participation is not needed for 2 years.

RES made the following points in the briefing:

- (a) The impetus for the proposed rule change came from the State and local Governments and was supported by FEMA.
- (b) There would not be a significant safety impact if the proposed rule change were implemented.

- (c) There were no significant cost impacts to NRC licensees but the rule could result in a savings to State and local agencies of about \$200,000 per exercise.

Based on this information, the Committee concluded that it need not formally review the proposed rule. However, the Committee offered three suggestions for RES:

- (a) The Commission paper should include a discussion of recent experience with emergency preparedness exercises.
- (b) The Commission paper should make clear that this amendment is needed to conform with proposed FEMA regulation changes.
- (c) The public costs and benefits that would be associated with having a greater flexibility in the frequency of emergency preparedness exercises would have to be established by the lead agency FEMA.

Original signed by  
Victor Stello

Victor Stello, Jr., Chairman  
Committee to Review Generic  
Requirements

Enclosure:  
List of Attendees

cc: Commission (5)  
Office Directors  
Regional Administrators  
CRGR Members  
G. Cunningham

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ATTENDANCE RECORD FOR  
CRGR MEETING #33  
March 9, 1983

CRGR MEMBERS

Vic Stello  
Ed Jordan  
Dick Cunningham  
Joe Scinto  
Denny Ross  
Bob Purple (for D. Eisenhut)

OTHERS

Tom Murley  
Tom Cox  
Bill Kane  
Walt Schwink  
Carl Schulten  
Jim Blaylock  
Steve Stern  
Jane Mapes  
Linda Gilbert  
John Austin  
Vicki Harding  
Jerry Carter  
Mark Williams  
Mal Ernst  
John Roberts  
Jim Malaro  
Frank Pagano  
Bill Olmstead  
Mat Taylor  
B. Singh  
N. Anderson  
Karl Kniel  
Frank Schroeder  
T. Speis  
Al Serkiz  
Michael Martin  
C. Graves