



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MEMORANDUM FOR: Chairman Palladino

FROM: William J. Dircks
Executive Director for Operations

SUBJECT: PROGRAM TO REVALIDATE NRC STAFF POSITION SUPPORTING
TMI-1 RESTART IN LIGHT OF MANAGEMENT INTEGRITY

On April 18, 1983, the staff filed its comments on the analysis of the GPU V. B&W transcript as it affects the TMI-1 Restart hearing. In that filing, we stated that the staff is initiating actions to revalidate the staff position, supporting TMI-1 restart, on the management integrity issue. Your memorandum of April 22, 1983, requested an explanation of revalidation and details of this effort.

In the staff's comments on the immediate effectiveness of the Licensing Board's partial initial decisions (PIDs) on management and cheating issues, the staff stated its position that those PIDs removed the management concerns which formed part of the basis for the Commission's immediately effective shutdown order for TMI-1. The open issue of the Hartman allegations concerning the falsification of leak rate data could possibly affect the staff's position on management integrity. Because the Department of Justice (DOJ) investigation into this matter is not yet complete, and, by agreement with DOJ, further NRC investigation is not appropriate at this time, the staff is taking interim actions to ensure that this one open issue does not affect the validity of the staff's position on management integrity. Thus, by stating that the staff is taking actions to "revalidate" the NRC staff position on management integrity, the staff means that the actions it is taking are designed to ensure that, should TMI-1 be permitted to restart before completion of the DOJ investigation into the Hartman allegations, the above-stated staff position on management integrity would remain valid.

This revalidation effort consists of an inspection and review program, jointly developed by NRR and Region I, as outlined in the enclosure. This inspection and review effort is now underway and we anticipate completion by May 6, 1983. We do not plan to conduct any interviews with TMI-1 personnel unless we have obtained clearance for such interviews from the Department of Justice.

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This activity may have an effect on other NRR review efforts. In particular, it may have an impact on the Salem Task Force review and on the Human Factors Program Plan expedited schedules. In addition, staff personnel involved in this revalidation program will also be providing input for the staff's answer to the recent motion by the Aamodts to reopen the TMI-1 restart proceeding.

Jack W. Rose for
William J. Dircks
Executive Director for Operations

Enclosure: as stated

cc: Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
SECY
OPE
OGC

ENCLOSURE

INSPECTION AND REVIEW PROGRAM OUTLINE TMI RESTART MANAGEMENT INTEGRITY ISSUE

1. NRR and Region I will conduct a combined review to evaluate the effectiveness of GPU actions to ensure adherence to procedures since issuance of the staff's evaluation (NUREG-0680, Supplement 1, November 1980). This review will include the following:
 - a. Review the TMI-1 Conduct of Operations Manual for clarity of its intended purpose in establishing rules for adherence to procedures. (Region I)
 - b. Review the training program for new employees and the re-qualification program for existing employees, both licensed and non-licensed, for emphasis on adherence to procedures in both safety and non-safety areas. (Region I)
 - c. Review the Operational Quality Assurance program for emphasis on procedure adherence. (Region I)
 - d. Review the TMI-1 audit program as it relates to verification of compliance with procedures. (Region I)
 - e. Review the disciplinary measures taken by the licensee to enforce its policy of adhering to procedures. (Region I)
2. Review of existing personnel at TMI-1 and in the GPU corporate management and support structure vis a vis their positions prior to the TMI-2 accident. (NRR)
3. Evaluate the effectiveness of actions taken at TMI-1 to enhance safe plant operation in accordance with the lessons learned as a result of the TMI-2 accident, including:
 - a. Evaluate the role/responsibility and effectiveness of the Shift Technical Advisor for review of procedures and operator adherence to procedures. (NRR)
 - b. Evaluate the role/responsibility and effectiveness of the Independent Safety Engineering Group (for TMI-1, the Independent On-Site Safety Review Group, IOSRG) for review of procedures and personnel adherence to procedures. (NRR)
 - c. Evaluate the role/responsibility and effectiveness of the individuals/groups assigned responsibility for independent review of plant procedures and facility adherence to procedures. (NRR)
4. Review past inspection reports, Licensee Event Reports, SALP reports and INPO evaluations for insight regarding procedure adherence and management issues since above cited staff's safety evaluation, November 1980.