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NUCLEAR REGULATORY COMMISSION

ORIGINAL

COMMISSION MEETING

In the Matter of:

YEAR END PROGRAM Review

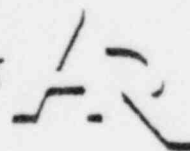
~~BRIEFING ON THE IMPLEMENTATION OF
1982 POLICY AND PLANNING GUIDANCE~~

(WITH VIEWGRAPHS)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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YEAR END PROGRAM Review

~~BRIEFING ON THE IMPLEMENTATION OF
1982 POLICY AND PLANNING GUIDANCE~~

- - -

Room 1130
1717 H Street, N.W.
Washington, D.C.
Thursday, October 28, 1982

The Commission met, pursuant to notice, at
10:04 a.m., NUNZIO PALLADINO, Chairman, presiding.

- COMMISSIONERS PRESENT:
- NUNZIO PALLADINO, Chairman
- JOHN AHEARNE
- VICTOR GILINSKY
- THOMAS ROBERTS
- JAMES K. ASSELSTINE

- STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:
- MARTIN MALSCH, Office of General Counsel
- WILLIAM DIRCKS, Executive Director
for Operations
- JOHN E. ZERBE, OPE
- HAROLD DENTON, NRR
- RICHARD VOLLMER, NRR
- JOHN DAVIS, NMSS
- DENNY ROSS, RES

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P R O C E E D I N G S

1
2 CHAIRMAN PALLADINO: Good morning, ladies and
3 gentlemen. The Commission meets this morning to receive
4 a briefing on the results of programs conducted to
5 implement the Commission's 1982 Policy and Planning
6 Guidance. The major focus of the meeting will be review
7 of the program accomplishments, potential problems
8 highlighted in the final quarterly PPG performance
9 reports we received on October 27th.

10 In addition, I've asked the EDO to address
11 some additional topics that I proposed in a memorandum
12 dated October 12th.

13 This morning's presentation will not include a
14 report of the resource expenditures. I understand that
15 information will be available in a month or so and will
16 be forwarded at that time for Commission review.

17 Unless any of my fellow Commissioners have
18 opening remarks, I propose turning the meeting over to
19 Mr. Dircks.

20 MR. DIRCKS: We have a lot of material to
21 cover this morning. I thought what I'd try to do is hit
22 the highlights of the various charts. And if you don't
23 have any questions, we'll just push right along. There
24 are quite a few charts to cover.

25 COMMISSIONER GILINSKY: Would you tell us what

1 the relationship of the vugraphs is to the material that
2 we've got? I think there are some in one package that
3 isn't in the other, and some in the other that isn't in
4 the first. This isn't just an abstract of material that
5 was sent?

6 MR. DIRCKS: That is more of an abstract, I
7 believe. The vugraphs are an abstract of the October
8 22nd memo.

9 VOICE: Plus the additional information the
10 Chairman had requested.

11 MR. DIRCKS: Okay. The additional topics that
12 the Chairman asked to discuss include the EDO program
13 guidance, the status of regionalization, efforts to
14 improve utility ability to diagnose and deal with
15 off-normal conditions, enforcement actions and policy,
16 impact of applicant construction to completion date
17 changes, prioritization of generic issues, forward
18 coordinating new and existing requirements, reassessment
19 of the source term issue, use of PRA, design at Indian
20 Point, PRA research programs, a little bit on the
21 safety-safeguards interface.

22 The EDO program guidance draft was issued on
23 April 20th for use in the '83-'85 budget formulation.
24 Based on a Commission decision, the final edition of
25 that guidance was issued on September 20th, 1982. I

1 will outline some of the pertinent aspects of the
2 guidance for '83 as we go through the fourth quarter
3 report.

4 If I could have the first slide, please. The
5 first one is the systematic evaluation program. Again,
6 this is covered in the PPG. It is also covered in the
7 EDO program guidance.

8 I think the important issues are that we are
9 basically winding down on phase two. Some 852 topic
10 reviews were conducted under phase two. Topic reviews
11 for six plants were completed in SEP phase two.

12 COMMISSIONER GILINSKY: Remind me again, phase
13 two covers which plants?

14 MR. DIRCKS: The 11 oldest plants.

15 COMMISSIONER GILINSKY: And what was phase
16 one?

17 MR. DIRCKS: It was the development of the
18 procedure, I guess.

19 MR. DENTON: I have forgotten what phase one
20 -- it did involve the plants themselves. And the 11
21 were picked to include the ones that had provisional
22 operating licenses, plus a few other old ones.

23 MR. DIRCKS: We plan to complete phase two in
24 FY '83. Now, we will have -- no, there's only ten on
25 here, I'm sorry. Eleven was in the original batch.

1 COMMISSIONER AHEARNE: Does anybody remember?

2 MR. DIRCKS: We'll get that information. It
3 was back way in the beginning.

4 We will have that paper to the Commission in
5 November '82 on the experience to date. Early in '83,
6 we'll have a recommendation which will consist of
7 explorations and options on phase three.

8 COMMISSIONER GILINSKY: Are Palisades and
9 Ginna completed at this point?

10 MR. DENTON: We have sent you a complete
11 evaluation. We've gotten ACRS comments on those.
12 They're not quite complete and they don't necessarily
13 include the latest USI, or unresolved safety issue,
14 incorporation. But we have completed what the SEP
15 program was intended to do in those areas.

16 COMMISSIONER GILINSKY: I must say, I have not
17 myself seen them. Have both of those been sent to the
18 Commission?

19 MR. DENTON: Yes. And we have just sent in a
20 third one, the Oyster Creek one. And we're meeting this
21 month with the ACRS on all three that are near the top,
22 Oyster Creek, Millstone, and Dresden.

23 COMMISSIONER GILINSKY: What is the basic
24 conclusion that comes out of the first two or three
25 reviews?

1 MR. DENTON: We plan to brief you on that in
2 another time frame. We also will come down and give
3 that.

4 MR. DIRCKS: We'd like to pull that all
5 together. You've been getting individual packages.
6 What we would like to do is pull it all together in one
7 sort of analysis, so that you can see what we have
8 learned, what we haven't learned, what are the lessons
9 to be learned from this whole exercise.

10 COMMISSIONER GILINSKY: It's going to be a
11 one-sentence version?

12 MR. DENTON: I am hesitant to do it. We
13 solicited comments from a wide spectrum of people.
14 We're waiting for ACRS meetings on the boiler.

15 COMMISSIONER AHEARNE: Let me give you a
16 one-sentence conclusion and you can tell me if it's
17 correct. At least from the first two I've read, it
18 seems to me your conclusion was that you have found
19 places where the Licensee has to make some modifications
20 and changes, but that none of those are so expensive or
21 difficult to make that it is likely the Licensees won't
22 object.

23 MR. DENTON: That was the case with the first
24 two. In Oyster Creek there are some objections from the
25 Licensee.

1 COMMISSIONER AHEARNE: I said the first two.

2 MR. DENTON: I think it has been a worthwhile
3 program. I deliberately didn't want to prejudge it
4 until we got the ACRS advice on the next three, because
5 we've only gotten their views on two of them and that
6 would give us a sample of five. And when we have those
7 results, we should be able to characterize them.

8 COMMISSIONER GILINSKY: You must have some
9 views of your own.

10 MR. DENTON: I think it has been a worthwhile
11 program. We have identified a number of areas in which
12 plant safety could be improved, and once it was pointed
13 out to the Licensee they voluntarily agreed and made
14 those changes. It has cost them perhaps on the average
15 of \$20 million. A lot of that has been seismic
16 upgrading, because that is an area in which they weren't
17 using today's standards.

18 We found surprisingly few areas in the basic
19 reactor system designs. It's been largely details that
20 have been upgraded.

21 COMMISSIONER GILINSKY: Are you going to say
22 something about phase three now?

23 MR. DIRCKS: All I can say about phase three
24 is, one, it will hinge on, what we give to you in
25 November, on sort of an analysis of what we have learned

1 out of phase two. And then in early '83 we'll have a
2 set of proposals for phase three, whenever that might
3 be.

4 COMMISSIONER GILINSKY: So we're not doing
5 anything yet.

6 MR. DIRCKS: We're not doing anything.

7 MR. DENTON: One other point I make is, for
8 seven of these we do need to look forward to hearings on
9 these to convert the provisional operating license to a
10 full term license. This is in support of that task,
11 which will certainly get rolling in '83.

12 COMMISSIONER AHEARNE: Let me ask you a
13 question about the last one. That is, I gather, San
14 Onofre 1?

15 MR. DENTON: Yes.

16 COMMISSIONER AHEARNE: Given the problems that
17 have come up with San Onofre 1, has that essentially
18 left the SEP portion of it untouched?

19 MR. DENTON: Not untouched. We are still
20 going with completing the SEP on San Onofre 1, and we'll
21 look at what what requires us to do the modifications
22 before it goes into operation.

23 COMMISSIONER AHEARNE: This seems to be -- the
24 reason I say "untouched" is that this schedule looks
25 about the same as the schedule six or seven months ago

9
1 for San Onofre.

2 MR. DENTON: I think the intent is to resolve
3 all the issues, including the ones that have come up
4 lately, and still meet these schedules.

5 COMMISSIONER AHEARNE: That's surprising.

6 COMMISSIONER GILINSKY: Let me ask you, should
7 that be Dresden 2, or was Dresden 1 in this program?

8 MR. DENTON: That is Dresden 2.

9 COMMISSIONER AHEARNE: Dresden 1 may have been
10 the eleventh.

11 MR. DIRCKS: The next chart covers the
12 IREP/NREP topic. Again, this was an issue covered in
13 the Policy Planning Guidance regarding the use of PRA,
14 the use of quantitative risk assessment, and directing
15 our attention to using PRA techniques where the data
16 warrants. It is also covered in the EDO program
17 guidance.

18 We are to submit a plan for phase three in
19 NREP in November '82, and that of course I just
20 covered. We'll have the proposal to you in early '83.
21 And we are also directed to evaluate the potential to
22 use PRA in the interim program.

23 COMMISSIONER GILINSKY: The NREP program
24 hasn't started yet as far as its application to plans,
25 as far as the ways of possibly handling it?

1 MR. DIRCKS: NREP is to systematize and codify
2 the methodology, so that the Licensees can do the
3 evaluation.

4 COMMISSIONER GILINSKY: If we decide we want
5 them to do that.

6 COMMISSIONER AHEAPNE: This says you have
7 selected.

8 MR. DENTON: It says we have completed the
9 methodology.

10 COMMISSIONER AHEARNE: It says you have
11 selected the procedures.

12 MR. DENTON: Yes.

13 COMMISSIONER AHEARNE: So you have decided
14 what you're going to do?

15 MR. DENTON: No. We have in draft -- we met
16 the schedule for producing an NREP procedure guide.

17 COMMISSIONER AHEARNE: I'm just reading the
18 line that says, "NRR selection of NREP procedures." It
19 says "completed".

20 MR. DENTON: It's slightly out of sequence
21 with the SEP program. It is to be combined with what we
22 recommend for SEP phase three in the NREP, and we'll
23 cover that at the same briefing.

24 MR. DIRCKS: I think NRR has developed some
25 procedures. A set of procedures are being developed

1 that NRR can, I guess, as an office can accept. Whether
2 those procedures will be moved along and accepted by the
3 agency --

4 COMMISSIONER AHEARNE: Is "selection" not the
5 right term?

6 MR. DENTON: What we do have is an NREP
7 guide. That is what we have. We have decided to
8 postpone the recommendation of a formal NREP program
9 until we have been able to integrate it with whatever we
10 do in the next phase of SEP.

11 COMMISSIONER AHEARNE: Then what is that first
12 bullet under "NREP Implementation", that first item?

13 MR. DENTON: I guess that is where we hoped to
14 be and didn't get there, and we deferred that until the
15 next.

16 COMMISSIONER AHEARNE: Well, my chart, the
17 same as the one up there, says that something was
18 completed.

19 MR. DIRCKS: I think as far as NRR is
20 concerned, the procedures guide has been pulled
21 together.

22 COMMISSIONER AHEARNE: I thought that was the
23 bullet up under "NREP". What is the difference, then,
24 between the last item under "NREP", "Complete final
25 procedures", and the first item under "NREP

1 Implementation", "NRR selection of NREP procedures"? Is
2 there any difference?

3 MR. DIRCKS: Let me have it again? What are
4 you referring to?

5 COMMISSIONER AHEARNE: This chart, the one
6 that is up there. Look at the last item under "NREP".
7 It says, "Complete final procedures".

8 MR. DENTON: I think -- let me try to explain
9 that.

10 COMMISSIONER AHEARNE: I'm trying to tall to
11 Bill. It says "Complete final procedures", and you look
12 under the first item under "NREP Implementation", "NRR
13 selection of NREP procedures". The question is, is
14 there anything different between those two.

15 MR. DIRCKS: Offhand, I would say there's
16 probably nothing. I guess what they're trying to say is
17 you've got to have the procedures before you start the
18 implementation.

19 MR. DENTON: The people who work or who
20 produce the procedures guide, the previous bullet, were
21 prepared to go forward with an NREP program, and have
22 done internal work to be prepared. And we decided to
23 hold any motion on NREP until we had this SEP are
24 completed, and we will try to combine them. So they may
25 well have procedures that they would recommend that we

1 implement.

2 Put I have chosen to freeze any program until
3 we get the SEP activity completed.

4 COMMISSIONER GILINSKY: What is the thought
5 about how this would be implemented? Would it be a
6 requirement? Is that what you have in mind, that each
7 plant perform such an analysis?

8 MR. DIRCKS: And it would only deal with
9 systems aspects. The first three SEP programs that we
10 worked on, we did not have a PRA on those plants.
11 Neither Palisades, Ginna, nor Oyster Creek do we have a
12 PRA.

13 So once we got down the list of sticking
14 points where we thought there were major differences
15 between the design and the dates, we had to infer from
16 other PRA's what the safety significance of that was.

17 COMMISSIONER GILINSKY: Well, are you thinking
18 in terms of a rule required?

19 MR. DIRCKS: If you recall, when we started
20 talking about SEP phase three we said, let's pull it all
21 together. We'd have the engineering evaluation, which
22 is a traditional SEP program. We would have the
23 probabilistic element thrown in there, so that we would
24 have a total package. The SEP phase three was going to
25 be a package.

1 COMMISSIONER GILINSKY: What is the basis on
2 which plants participate in the SEP program? Are they
3 compelled to do that? They were, weren't they?

4 MR. DIRCKS: They were, and I think that was
5 the concept in SEP phase three. There would be plants
6 designated that would participate in the reviews. If
7 you recall, the SEP phase three was the staggered
8 program going over about seven years, so there would be
9 blocks of plants taken in each one of those seven
10 years.

11 COMMISSIONER GILINSKY: And what have we
12 learned from the IREP program, which I guess at this
13 point is the Crystal River study?

14 CHAIRMAN PALLADINO: I gather the IREP program
15 was to develop procedures for the NREP.

16 COMMISSIONER AHEARNE: If there was a lefthand
17 FY '81 back here, you would assume the scheduled IREP
18 dates substantially back there.

19 MR. DIRCKS: IREP was to sort of run through a
20 number of plants. NREP was to learn from the experience
21 and develop the methodology. I think that is it in
22 simple terms.

23 COMMISSIONER AHEARNE: But IREP ended up
24 slipping.

25 COMMISSIONER GILINSKY: So far we have just

1 completed the Crystal River study.

2 MR. ROSS: Some of the other reports. This
3 triangle, it says "Phase two, issue final reports," is
4 the triangle for the last report. In fact, some of
5 these other four have already been published. I don't
6 have the individual publish dates.

7 COMMISSIONER AHEARNE: The final reports?

8 MR. ROSS: Yes. And you're right, there have
9 been substantial slips, for reasons not worth going into
10 at this time.

11 COMMISSIONER GILINSKY: What would you say has
12 come out of that program? How would you assess our
13 experience?

14 MR. ROSS: I think it is identified more on
15 the front end ways that significant core melt initiators
16 could be identified and could be subject to fix, either
17 by hardware changes or things like in-service inspection
18 of interfacing chuck valves. I don't think it revealed
19 reactor safety stuff of consequence, nor was it intended
20 to.

21 I think the next line down, the procedures
22 guide, was also -- major portions of it were just lifted
23 verbatim and put in the NREP guide. It also helped
24 develop the NREP procedures guide by learning while they
25 were doing it.

1 So I think in both areas, in doing
2 plant-specific core melt sequence information and
3 forerunner for NREP, would be the two major things that
4 came out of it.

5 COMMISSIONER GILINSKY: I gather you think it
6 was a good idea?

7 MR. ROSS: Oh, yes.

8 COMMISSIONER GILINSKY: To carry out the
9 study?

10 MR. ROSS: Yes.

11 MR. DIRCKS: You mentioned NREP before. What
12 are we going to do with it. I think one of the things
13 we have talked about is what is happening out there.
14 Many Licensees are doing PRA's, and whether or not we
15 have a mandatory SEP phase three, I think it is
16 important that we do give some guidance as to what a PRA
17 from our standpoint should be.

18 COMMISSIONER AHEARNE: My sense from going to
19 several of these meetings is that industry initially was
20 somewhat skeptical, but then by the end it turned around
21 and much of the industry was now fairly enthusiastic,
22 sufficiently so that it looked like they were moving in
23 and doing a lot of this stuff themselves, for whatever
24 reasons. And in fact, in some cases it looked like they
25 were clearly taking on the knowledge faster than we

1 were, so that by the time the suit ended they were
2 certainly equal, if not greater, supporters of getting
3 these procedures down.

4 MR. DENTON: There's one more effort probably
5 worth mentioning that we talked about here, and that was
6 the effort with the American Nuclear Society and the
7 IEEE, in order to get them to pull together as a
8 professional society a compendium of PRA methods.
9 They've done that and they published a draft in '81. We
10 understand the final draft may be out in the near
11 future.

12 It is really a compendium of all kinds of
13 methods. IREP actually published a draft guide in April
14 of this year, and in writing our NREP guide we have
15 relied heavily on both the professional society
16 compendium and the lessons from the initial IREP, and we
17 cite those in some places in the NREP guide, which is
18 one that we would say was written more from a regulatory
19 perspective and could be used if we want to have someone
20 doing PRA on core melt in the future.

21 CHAIRMAN PALLADINO: On the last line where
22 you talk about NREP implementation, you talk about
23 beginning implementing the SEP phase three/NREP. Is
24 there going to be a plan developed or is there a plan
25 developed that highlights what we're going to do in the

1 combined SEP/NREP?

2 MR. DIRCKS: Yes. That would be part of this
3 package of proposals that we would be making to the
4 Commission in early '83, that would talk about where we
5 want to go with the SEP program and how it would phase
6 in with the NREP efforts.

7 CHAIRMAN PALLADINO: Have we seen the final
8 procedures for NREP, or you haven't really selected
9 them?

10 MR. DENTON: I haven't proposed them yet. I
11 have asked for comments on what the next phase ought to
12 be from industry and from a number of former ACRS
13 members and NRC employees, and that will be part of our
14 recommendation to Bill, a consideration of all the
15 outside comments that we get.

16 CHAIRMAN PALLADINO: But a plan will be
17 proposed to the Commission?

18 MR. DENTON: Yes.

19 COMMISSIONER GILINSKY: Jack, are you looking
20 at the reports we're getting from the SEP programs?

21 MR. ZERBE: We have been looking at them.

22 COMMISSIONER GILINSKY: Are you going to do
23 anything with them?

24 MR. ZERBE: With the Staff?

25 COMMISSIONER GILINSKY: Have you developed any

1 thoughts on them, or can you give us any advice?

2 VOICE: We are like you. We're reading them
3 like you are, and maybe he means that.

4 (Commissioner Roberts leaves the room.)

5 CHAIRMAN PALLADINO: I think your question
6 indicates we would expect some feedback from OPE on the
7 results of your reading.

8 MR. DIRCKS: The next slide, 3, discusses the
9 -- it's in line with the request that you made, Mr.
10 Chairman, concerning the improvement of the ability of
11 utility personnel to diagnose and deal with off-normal
12 conditions. This is a summary chart.

13 I think I want to highlight the fact that we
14 are beyond in the submission of the human factors
15 program plan. That has been a very complicated issue.
16 But we have not been inactive on the subject. There
17 have been a number of meetings.

18 We are heavily involved with the ACRS, with
19 the August meeting with the ACRS Subcommittee. There
20 was a September 10th meeting with the full Committee of
21 the ACRS. There was a meeting on October 4 and 7 with
22 INPO. There has been an October 28th meeting with the
23 ACRS, today, a Subcommittee meeting today. And then
24 we'll be meeting with the full Committee of the ACRS on
25 November 5th.

1 I think we were all very much impressed with
2 the complexity of the thing and the amount of resources
3 and activities in the agency that is involved with the
4 issue of human factors. I have set up a group within
5 the agency to try to pull it all together, that will be
6 meeting quarterly on it. Then I'll be meeting directly
7 with them, similar to the Waste Management Review Group
8 that we have had, and try to get some cross-cutting and
9 some more central direction in the human factors area.

10 COMMISSIONER GILINSKY: Have we managed to get
11 any people that have commercial experience in that
12 area? That was one of the problems a while back, and I
13 realize it is not so easy to get people like that.

14 MR. DENTON: Do you mean commercial or do you
15 mean Human Factors Society professionals?

16 COMMISSIONER GILINSKY: Commercial reactor
17 operators that run commercial plants or worked in
18 control rooms.

19 MR. DENTON: I think the field has had some
20 success in recruiting operator examiners out of Chicago,
21 for example, who do have this. We have not had very
22 much success in Washington doing that. We have managed
23 to recruit, though, from the human factors side a number
24 of well qualified professionals.

25 COMMISSIONER AHEARNE: Let me ask you a

1 question on the requalification examinations. You say
2 they are planned for about 20 percent of all RC's and
3 SRO's in fiscal '83. Who will be doing the
4 requalifying?

5 MR. DENTON: Either the region or
6 headquarters. It depends on whether we regionalize that
7 function or not.

8 COMMISSIONER AHEARNE: What I'm more
9 specifically asking is, is it going to be by NRC people
10 or NRC contractors?

11 MR. DENTON: More probably by contractor
12 people, in that they are by far doing the most
13 examinations now. We have got a package on that to go
14 to Cooper soon, that would discuss the format, content
15 of the exam, and that kind of thing.

16 One interesting fact that I learned,
17 apparently the turnover rate among RO's and SRO's in the
18 last couple of years has been, maybe, if you take that
19 two-year interval, almost 30 percent. There has been
20 quite a turnover, anyway. And the people out there,
21 then, about a third of them if these numbers are right,
22 or more, have taken the new type of exam, even though we
23 have not yet kicked off the requalification exam, just
24 the natural turnover, RO's moving to SRO positions or
25 operators changing who the work for from one facility to

1 another.

2 COMMISSIONER AHEARNE: What is the current --
3 say, during this past year on requalifying exams, who
4 gave those requalifying exams?

5 MR. DENTON: We haven't given requalification
6 exams yet.

7 COMMISSIONER AHEARNE: There have been no
8 requalification exams yet?

9 MR. DENTON: I don't think so.

10 COMMISSIONER AHEARNE: No licenses have
11 expired?.

12 MR. DENTON: Licenses are issued, but not in
13 the sense of a new kind of exam. We do have people who
14 need to have their licenses renewed, and they could be
15 granted either using a contractor or our Staff.

16 COMMISSIONER AHEARNE: Currently, though, the
17 Operating Licenses Branch does go through qualification
18 exams?

19 MR. DENTON: We haven't changed our approach
20 to requalification exams yet. So whatever we were
21 accepting last year at this time, we are accepting
22 today.

23 COMMISSIONER GILINSKY: I thought those were
24 done by the utility.

25 MR. DENTON: That's right. They've all been

1 done by the utility, and the program for requalification
2 is not yet right, but people are being -- we are
3 renewing licenses, because they come up for renewal.
4 And I have been authorizing continual renewal until we
5 can get approval for a new program.

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1 COMMISSIONER AHEARNE: So during this past
2 year licenses that were renewed, did those people go
3 through any kind of examination?

4 MR. DENTON: I don't know.

5 COMMISSIONER GILINSKY: The utility
6 examination.

7 MR. DENTON: There was the utility
8 requalification exam. I think we right now have about
9 100 people waiting for us to renew, which are timely
10 renewals. What we are trying to develop is an approved
11 plan for requalification. Up until we get that
12 approved, we are going the old way, letting the utility
13 requalify.

14 COMMISSIONER AHEARNE: The utility requalifies
15 them the old way. Do we do any kind of an audit check
16 on that?

17 MR. DENTON: I don't know. I didn't look into
18 that. The intent is --

19 COMMISSIONER GILINSKY: Let me ask a related
20 question. Have we done anything about upgrading the
21 utility examinations?

22 MR. DENTON: Well, yes. But let me go back to
23 the point I just made. About a third of the operators
24 or more are new, anyway. Then we have got this INPO
25 task action program going, training progress. A lot of

1 that is going on.

2 But while that is going on, operators'
3 licenses are coming due for renewal and they're either
4 treated when it's time for renewal or they are renewed.
5 And my inclination is to go ahead and renew them, but
6 not have them just sit.

7 COMMISSIONER GILINSKY: I know they are
8 getting renewed and the utilities giving the exams. But
9 have the utility exams been upgraded over the last few
10 years?

11 MR. DENTON: Oh, I think they certainly are.

12 COMMISSIONER GILINSKY: Do we have anything to
13 do with that?

14 COMMISSIONER AHEARNE: Is it a utility exam or
15 is it an exam that we have approved?

16 MR. DENTON: It's a utility exam.

17 COMMISSIONER AHEARNE: Do we have any review
18 under the current system? Do we have any review of the
19 requalification, either a review of the exam or audit
20 some of the requalifying exams?

21 MR. DENTON: Well, I don't know that detail.
22 If you look on the chart, you notice that we will be
23 certifying facility instructors in '83, and we will be
24 making visits to the sites.

25 COMMISSIONER AHEARNE: I understand that.

1 MR. DENTON: I just don't know that and I
2 don't have the people down here that can answer that.

3 COMMISSIONER AHEARNE: The reason I ask is,
4 this is their year-end program review, so I'm trying to
5 ask what has happened in the year.

6 MR. DENTON: We'll have to supply that.

7 COMMISSIONER AHEARNE: Could you?

8 MR. DIRCKS: Yes.

9 COMMISSIONER GILINSKY: How would you go about
10 picking the 20 percent?

11 MR. DENTON: That's one trip a year to the
12 plant, and who happens to be off working shifts at that
13 time that we can schedule to be there. So it is not a
14 random selection of 20 percent. The intent is to get to
15 the site, every site, once a year, and with a five-shift
16 operation there'd be one shift that you could give an
17 examination to.

18 COMMISSIONER GILINSKY: Would the utility be
19 scheduling who takes the exam?

20 MR. DENTON: We would be picking the time, and
21 it would just be coincidental who is on shift work that
22 week. But I don't think the 20 percent is that
23 important any more, if you look at the turnover rate.
24 It is not that these people are. And in fact, since I'm
25 quoting the numbers prepared for '81, by the time '82 is

1 over fully half of these operators in the country will
2 have had the post-TMI exam.

3 COMMISSIONER AHEARNE: I will put this on for
4 later reference. I will point out to you that if the
5 turnover rate is that high, then the argument that we
6 can't upgrade the requirements to become an operator
7 because it will have such a significant impact on all of
8 those operators that are out there begins to get
9 substantially weaker.

10 MR. DENTON: And I never made that argument.

11 COMMISSIONER AHEARNE: I was using the
12 opportunity to whoever might make that.

13 CHAIRMAN PALLADINO: Harold, do I understand
14 the new requalification exams will be under the auspices
15 of NRC, either by NRC personnel or contractor?

16 MR. DENTON: Yes. What it is intended to be
17 is a much shorter exam than the longer exam we give to
18 initial operators. It will be focused more on
19 operations, but we do intend to go through the --

20 CHAIRMAN PALLADINO: It will be an NRC exam?

21 MR. DENTON: It will be an NRC exam, and we
22 will give it to whoever has not had it. And how we
23 interrelate giving these exams to the people who
24 recently have been licensed -- I don't think we should
25 re-examine someone who just got his license last year

1 under essentially the same framework. So we'll try to
2 pick out the people who have not been licensed under the
3 post-TMI type framework. But that will be a part of the
4 considerations coming up.

5 COMMISSIONER AHEARNE: Let me ask another
6 question on that chart. You have another one, implement
7 second SRO on all shifts by January '83. Could you
8 refresh my memory. When you say "implement", does that
9 mean this is the date by which all utilities will be
10 there, or do you mean that you will be publishing a
11 rule?

12 MR. DENTON: Remember, we went out for public
13 comments on a rule requiring this, and a lot of public
14 comments are back on just this point, about how to treat
15 the second SRO and whether they can make that date or
16 not. So what we really mean there is to come back with
17 a recommendation on a final rule.

18 COMMISSIONER AHEARNE: So this really is
19 getting back to the Commission on a recommendation with
20 regard to it, and it could be you may well come back and
21 recommend not.

22 MR. DENTON: That's right.

23 COMMISSIONER GILINSKY: When will you be
24 coming back?

25 MR. DENTON: January '83. It is whatever was

1 normally scheduled for that issue. I understand there
2 has been a lot of public comment on the second SRO.

3 COMMISSIONER AHEARNE: Do you have under way
4 any kind -- in addition to receiving public comments,
5 have you been doing any kind of analysis to address the
6 question of whether or not a second SRO is needed?

7 MR. DENTON: That is one of the elements that
8 are in the Research task analysis effort. It goes more
9 to staffing, whereas the INPO staff analysis, for
10 example, that is on that chart goes more to training.
11 But one of the areas we asked Research to look into in
12 their task analysis is, what about staffing. Other than
13 that, we don't have any research.

14 COMMISSIONER AHEARNE: Will research be
15 completed on that in order to meet this date, coming in
16 with a recommendation in January?

17 MR. ROSS: No, it will not be. As Harold said
18 -- I'm reading out of the general program plan -- the
19 numbers and types of control room operators required
20 with requisite skills and knowledge is one of the tasks
21 of the job task analysis. But the scheduled length is
22 17 months and I think the start date was January this
23 year. So we're talking about June or July '83.

24 COMMISSIONER AHEARNE: I think therefore I can
25 guess what your recommendation will be.

1 MR. DIRCKS: I think a lot of it is
2 experience. We were talking about it the other day. We
3 have to go back on what happened at TMI, where the
4 senior operator was in the plant and not reached for ten
5 minutes, and those were a pretty important ten minutes.

6 COMMISSIONER GILINSKY: Now, what is the
7 status of our requirements right now? Does the senior
8 reactor operator have to be in the control room?

9 MR. DENTON: If you take the new plants, we
10 have made that as a license condition and so that tends
11 to get there. Many of the existing plants were able to
12 meet this date, even though we didn't have a final rule
13 on it.

14 But you remember, we at one time were trying
15 to adopt an earlier date. I think it was June. And it
16 was not a Commission rule, and there were some plants
17 wanting to be exempted, and so forth. So we have this
18 proposed rule and that is what they're commenting on.
19 So I would suspect maybe 70 percent of the plants or
20 maybe some such number are meeting this today, and there
21 is a debate about whether they'll have to meet it at
22 some time certain.

23 COMMISSIONER GILINSKY: In other words, 30
24 percent of the plants do not have to have an SRO present
25 at all times?

1 MR. DENTON: Roughly something like that. I
2 think half of them met the original contemplated date of
3 the rule this year, and then many of them proposed to
4 come into compliance as they were able to get people
5 qualified.

6 MR. DIRCKS: The next chart is on
7 enforcement. It gives you a year-end collection figure
8 and our proposed figure. We talked about \$2.2 million
9 for 37 civil penalty actions, and then we broke it down
10 into the various categories.

11 CHAIRMAN PALLADINO: Where did the proposed
12 number come from?

13 MR. VOLLMER: That is what we proposed.

14 COMMISSIONER AHEARNE: We've made an estimate
15 of all the income we're going to get.

16 MR. DIRCKS: We don't get this income. This
17 income goes to Treasury.

18 COMMISSIONER AHEARNE: I understand.

19 MR. DIRCKS: The fees will flow in as a budget
20 asset according to OMB, and the license fees.

21 COMMISSIONER AHEARNE: Do you include the
22 enforcement penalties in that total range of dollars
23 that you have estimated we can acquire? There's a fee
24 system?

25 MR. DIRCKS: No.

1 COMMISSIONER AHEARNE: When OMB has said and
2 Congress has said, you can count on getting a certain
3 amount of money, are enforcement fees included in that?

4 MR. DIRCKS: No.

5 COMMISSIONER AHEARNE: That's just sheer
6 gravy. This helps reduce the national deficit.

7 (Commissioner Roberts returned to the room.)

8 MR. DIRCKS: The enforcement policy. We are
9 going through a set of reviews on that. We will have,
10 at least to me, by April 1st a set of recommendations
11 for --

12 COMMISSIONER AHEARNE: By April 2nd.

13 MR. DIRCKS: By April 2nd.

14 As backup, I guess we could go through some of
15 the items, but I don't know how much you want to get
16 into in enforcement policy.

17 The next chart is on operating license
18 reviews.

19 COMMISSIONER GILINSKY: Let me ask you, on
20 that point on enforcement, where do we stand getting
21 lawyers into the various regions?

22 MR. DIRCKS: I think at this time we almost
23 have lawyers out there, don't we?

24 MR. VOLLMER: We have three out now and the
25 others are being recruited heavily.

1 COMMISSIONER AHEARNE: It's on one of your
2 charts.

3 VOICE: Right now we have one regional counsel
4 in Region III, we've selected a counsel in Region II,
5 we're about ready to select a counsel for Region IV, and
6 Region I is coming very closely. So very closely we'll
7 have counsel for the regions.

8 MR. DIRCKS: This chart basically breaks down
9 the table according to the October '81 level schedule,
10 the September '82 Bevill schedule, and the actual date.

11 COMMISSIONER AHEARNE: Could you explain what
12 is the reason that the estimate was so far off?

13 MR. DENTON: The short answer is, the
14 licensees didn't complete their plants on the
15 anticipated date.

16 COMMISSIONER AHEARNE: Whose anticipated
17 date?

18 MR. DENTON: It seems like we have been
19 through this before.

20 COMMISSIONER AHEARNE: Well, there are a
21 number of people who don't understand this.

22 CHAIRMAN PALLADINO: Well, the Bevill reports
23 were required to give it on the utility's estimated
24 date, and that is what this has shown.

25 COMMISSIONER AHEARNE: I think we encouraged

1 it to be on the utility's estimated date.

2 CHAIRMAN PALLADINO: You were here, but I
3 thought we had directed --

4 COMMISSIONER GILINSKY: We directed it be
5 included.

6 COMMISSIONER AHEARNE: We didn't require that
7 be the only date.

8 COMMISSIONER GILINSKY: It is proper to
9 include it, but it is something to key the rest of it.

10 COMMISSIONER AHEARNE: Well, this says this is
11 our estimate, and there were two estimates at any one of
12 those times.

13 CHAIRMAN PALLADINO: Where does it say it's
14 ours?

15 COMMISSIONER AHEARNE: This is operating
16 license reviews, and we are now indicating --

17 COMMISSIONER GILINSKY: This is the estimate
18 we presented to the House Appropriations Committee.

19 COMMISSIONER AHEARNE: We keep presenting the
20 utility estimate as the estimate.

21 COMMISSIONER GILINSKY: Knowing full well
22 these estimates are inaccurate.

23 COMMISSIONER AHEARNE: And I think this
24 clearly shows that. So here we end up having a chart,
25 and this is showing the EDO comes in, and this is

1 supposed to show how the NRC has performed, and it
2 shows, look at how far off we were. We weren't far off.
3 We were that far off of an estimate we knew was wrong
4 when we made it.

5 MR. DENTON: I think as far as the Staff
6 products go, I think you should note that we reduced the
7 SER's right on schedule and we have allowed time for
8 hearings.

9 COMMISSIONER AHEARNE: No. That is the
10 implication.

11 CHAIRMAN PALLADINO: That is why I was asking
12 that question.

13 COMMISSIONER AHEARNE: This is now sort of a
14 boomerang coming back and hitting us. When we threw it
15 out, we knew that those estimates were poor.

16 MR. DENTON: I look at it the other way, that
17 since Mr. Bevill no longer asks for reports for this on
18 a monthly basis, he's satisfied we're not causing any
19 delays.

20 COMMISSIONER GILINSKY: These reports have a
21 life of their own and they cause a great deal of trouble
22 and they cause us a great deal of trouble along the
23 way.

24 COMMISSIONER AHEARNE: That's right.

25 COMMISSIONER GILINSKY: And we ought not to be

1 putting out reports that we think are wrong. It is one
2 thing to include the column with utility estimates. I
3 think it ought to be included. But it's another thing
4 for the agency to pretend as if it believes these
5 estimates, and that's what we've been doing.

6 CHAIRMAN PALLADINO: The point I was trying to
7 make is, we should identify these as utility estimates,
8 because otherwise it is misleading.

9 COMMISSIONER AHEARNE: But you see, the
10 utility doesn't estimate the Commission decisions. We
11 estimate a Commission decision.

12 COMMISSIONER GILINSKY: And we're going to run
13 into the same problem next year. The estimates are
14 unrealistic.

15 MR. DIRCKS: Well, to get back to the charts,
16 I think we have left it -- we haven't discussed
17 construction dates in here. I think it might be helpful
18 to remind you what plants comprise the difference
19 between the 15 and 2.

20 CHAIRMAN PALLADINO: I can't hear you, Bill.

21 MR. DIRCKS: If you want to go down the list
22 to look at the differences between the 15 and 2, or the
23 11 and 2, we can go into that. There are plants such as
24 LaSalle that came up and went back again. We have other
25 plants in that same category, if you care to go into

1 that.

2 CHAIRMAN PALLADINO: The point I was trying to
3 make in calling this to our attention is the fact that
4 when we -- I believe in looking at the '81 Beville
5 report, this was based on -- I'll say it -- what the
6 utility was saying with regard to completion, and that
7 was what was driving this tall column, when in truth
8 their actual completion dates were driving the small
9 column. And this is misleading to that extent.

10 MR. DENTON: I think you would have been able
11 to make decisions on the schedule now, after plants have
12 been completed and work was done, and the fact that you
13 didn't make it is solely related to the fact that they
14 were not able to complete the plant.

15 COMMISSIONER GILINSKY: There are two things
16 wrong with this: One, it gives people a misleading idea
17 of what is going on. The other thing that is wrong with
18 it is that it misdirects resources of the agency. We
19 get later things like unresolved safety issues or things
20 like that, and we are breaking our neck to meet
21 unrealistic schedules and not doing other things.

22 I mean, it's bound to be the case. You can't
23 do two things at one time.

24 MR. DENTON: I actually put in a little bit
25 less work last week than was scheduled because of OL's.

1 So I did not devote any manpower last year. I put in
2 somewhat less than you had authorized for operating
3 reactors.

4 COMMISSIONER GILINSKY: I frankly don't think
5 we're doing Mr. Bevill any favor presenting estimates
6 that are keyed to the utility estimates. Again, it's
7 proper to include the utility estimates, but for us as
8 an agency to say, yes, that's the right estimate, it
9 misleads everyone.

10 MR. DENTON: Of the 28 that were scheduled, 5
11 are in the next two years, '82, '83 time frame. We did
12 issue five, two full power, three low power. There are
13 14 still scheduled in '83. Two of them are not
14 scheduled. That is Diablo 1 and 2. And then there are
15 seven which have slipped beyond '83.

16 COMMISSIONER GILINSKY: What is the total
17 number? There are the 3 that are left over from this
18 year, plus 14, you say? We are talking about full
19 power?

20 MR. DENTON: Yes.

21 COMMISSIONER GILINSKY: You think 17 or so is
22 a realistic number for our next year? I don't think it
23 is. I think it'll be half of that.

24 MR. DENTON: Well, we've established Mr.
25 Barry's office, an independent estimator of dates, and

1 he is the official keeper and perhaps he would like to
2 answer that.

3 CHAIPMAN PALLADINO: Are you going to the next
4 chart?

5 COMMISSIONER GILINSKY: Well now, as Harold
6 was going on --

7 CHAIRMAN PALLADINO: Well, could I make my
8 point on the first chart. Would you make a notation, so
9 that this is not misunderstood, that that is the chart
10 for '82, and you want '83.

11 MR. DENTON: We've talked about this for many
12 years, how to schedule and allocate resources. But as
13 far as the allocation of the resources for the past
14 year, which was done in accordance with the Licensees'
15 construction date, we did not expand any more than
16 allocated.

17 COMMISSIONER AHEARNE: You had just finished
18 making a point, Harold, that the NRC now does have
19 someone to do the estimates. Is this column which is
20 labeled "Commission Decision" based upon the estimates
21 from that office?

22 MR. DENTON: They were based upon what was --
23 the factual situation is what was in the Bevill report,
24 in the September Bevill report, and at that time they
25 were construction dates of the utilities. And the

1 intent was, as I understand the Commission's intent, it
2 was in the future to, any time there was a suspicion a
3 construction date was really out of kilter with reality,
4 we would start noting that and try to get the utility to
5 be more realistic. And that effort has started.

6 COMMISSIONER AHEARNE: Well, why, Bill, I
7 guess, are you showing us this as the FY '83 plan? Why
8 are you showing us a table which is based upon what you
9 have just finished telling us is unrealistic
10 information?

11 We just finished looking at the previous
12 chart, which shows that when you get to the Commission
13 decision on power operation, it's unrealistic. Now we
14 come back here for the operating license reviews for the
15 '83 plan and you're using the same data that is
16 unrealistic. I don't understand.

17 MR. DIRCKS: I'm not sure it's unrealistic.

18 COMMISSIONER GILINSKY: Well, I look at Zimmer
19 1 schedule date, the first quarter of fiscal '83.
20 There's no way in the world that plant's going to be
21 ready in the first quarter of fiscal '83.

22 MR. DENTON: I don't think that is the plan.

23 COMMISSIONER GILINSKY: It says so.

24 CHAIRMAN PALLADINO: Well, what I'm going to
25 say is this. Rather than dwell on it, I think what's

1 been identified is that we are -- we certainly can't
2 call it a plan, based on the utility completion dates.
3 Maybe you want to show what they are and show what we
4 think they would be.

5 MR. DENTON: Well, down at the bottom it says
6 it was mainly based on what we reported to Congress.

7 COMMISSIONER AHEARNE: That certainly is true,
8 Harold, and I can read that and I understand that. But
9 this is supposed to be -- it says it is the plan. It
10 isn't a summary of the Bevill report. It is a plan.
11 And when it is presented this way, it has to be this is
12 our best estimate, because you're coming in and saying,
13 here is the plan.

14 CHAIRMAN PALLADINO: Well, let's take note of
15 that and go on.

16 MR. DIRCKS: In looking at another plan, the
17 Clinch River breeder reactor.

18 CHAIRMAN PALLADINO: It didn't say "plan".

19 MR. DIRCKS: It didn't say "plan" on the other
20 one, either.

21 COMMISSIONER AHEARNE: Bill, I have a question
22 on this. This chart reminds me of Otis Pike. But
23 putting that aside, you have here -- you have scheduled
24 the issuance of the LWA-2. Do you mean this is a
25 forecast?

1 MR. DIRCKS: I am sure we mean a proposal, a
2 proposed proposal for Commission decision.

3 COMMISSIONER AHEARNE: You mean this is a
4 forecast. You don't schedule the issuance.

5 MR. DIRCKS: No, we don't. I am sure when we
6 talk about that sort of thing, "Issue LWA-2," that is a
7 decision date.

8 MR. DENTON: There are a couple of points I'd
9 like to make about this one. We are scheduled to issue
10 the environmental supplement. It's at the printer's now
11 and will be delivered to the Board Monday. That will
12 allow the hearing to commence a few months later.

13 Secondly, both the program office director and
14 his deputy have been selected for promotion to higher
15 positions and we're going through the selection process
16 to replace them.

17 COMMISSIONER GILINSKY: This is in the NRC or
18 DOE?

19 CHAIRMAN PALLADINO: It's tomorrow afternoon's
20 management meeting.

21 MR. DIRCKS: I think we jumped the gun here.

22 MR. DENTON: I'm sorry about that.

23 COMMISSIONER GILINSKY: That's all right.
24 I'll just think about Otis Pike.

25 CHAIRMAN PALLADINO: Any other points on

1 this?

2 MR. DENTON: No.

3 CHAIRMAN PALLADINO: All right, why don't we

4 go on.

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1 COMMISSIONER GILINSKY: Let me ask you about
2 CRGR. How are we developing the criteria on which that
3 review is based? Are we taking over LWR criteria,
4 developing criteria? Are we doing it? Who approves it?

5 MR. DENTON: I think you had raised this once
6 before with me, and I said I would get ACRS review
7 approval and come back to the Commission. We've had 20
8 subcommittee meetings so far with the ACRS on criteria,
9 but I think they're meeting this coming week on the
10 criteria. We gave them a set of proposed criteria. We
11 have a set of criteria that were developed the first
12 time around in this review that we derived from the
13 light-water criteria, but they never quite got
14 formalized within the agency. So we polished those up,
15 sent those to the ACRS and said here are the criteria
16 we've proposed.

17 COMMISSIONER GILINSKY: What's the criterion
18 like? Is it a page, a report?

19 MR. DENTON: Like the general design criteria.

20 COMMISSIONER GILINSKY: So it's like a
21 paragraph or several sentences.

22 MR. DENTON: Yes. We're trying to get
23 agreement with the ACRS on the general design criteria
24 for the light-water reactor, and my intent is to send
25 them down to the Commission once we've obtained

1 reasonable consensus with the ACRS.

2 COMMISSIONER GILINSKY: Send down the breeder
3 criteria?

4 MR. DENTON: Yes. Because that will form the
5 basis for our going ahead.

6 COMMISSIONER GILINSKY: Do you look them
7 over. Do you approve them?

8 MR. DENTON: Yes.

9 CHAIRMAN PALLADINO: When you say you're going
10 to send these to the Commission after they've gone
11 through ACRS, does it come to the Commission for
12 approval or for information?

13 MR. DENTON: I don't think we've decided
14 that. Since it's a hearing I've got to find out how to
15 quite handle that issue. I think it can be at your
16 discretion.

17 COMMISSIONER AHEARNE: Do they have to enter
18 into a regulation?

19 MR. DENTON: We don't propose to do that.
20 That would be our internal adoption of the existing
21 criteria, and they would be subject to adjudication.

22 COMMISSIONER AHEARNE: So the criteria
23 themselves you would see as being open to argument in
24 the hearing.

25 MR. DENTON: I would best defer to counsel,

1 but I haven't touched that issue in some time. I think
2 that's the way I did it, sort of thought it last time.

3 COMMISSIONER GILINSKY: Well, if they're not
4 regulations, they're subject to adjudication.

5 MR. DENTON: Yes. That is why my thought was
6 not to send them down for approval because then we're
7 getting out in front of the process.

8 COMMISSIONER AHEARNE: I guess it's a meaning
9 that the CRGR does not have an established set of
10 criteria as far as the hearing is concerned.

11 MR. DENTON: They have the light-water
12 criteria and then what people think an analogous set
13 would be.

14 CHAIRMAN PALLADINO: But you're going to
15 provide them with a better thought out set.

16 MR. DENTON: We have a proposed set. We will
17 have a set in our safety evaluation that says here is
18 what we've adopted them to mean where they obviously are
19 appropriate for this type of reactor.

20 COMMISSIONER GILINSKY: Did you approve them
21 before -- your office -- before they went to the ACRS?

22 MR. DENTON: No. I looked at them, but I
23 really didn't go through a formal approval at that
24 time. I wanted to wait and see how the ACRS review goes
25 with them.

1 COMMISSIONER GILINSKY: Well, I hadn't thought
2 about this, but the fact that the criteria themselves
3 are subject to adjudication makes the scope of this
4 hearing broader than most other hearings.

5 CHAIRMAN PALLADINO: Shall we go on?

6 MR. DIRCKS: The next one is the unresolved
7 safety issues. The Commission had identified a total of
8 25 USIs. Technical resolutions for 12 of these have
9 been completed prior to the end of fiscal 82.

10 CHAIRMAN PALLADINO: We're through with fiscal
11 82. Are we done with these?

12 MR. DIRCKS: The technical resolution has
13 been. Do you want to get into that? I think more in
14 terms of the plans, the program plan, seven more will be
15 --

16 COMMISSIONER GILINSKY: You say technical
17 resolution. What then happens to these? That means the
18 NRC has a solution to this problem which it regards as
19 acceptable and would seek to do what with it?

20 MR. DENTON: The technical resolution is
21 transmitted to the utility to which it applies, and we
22 begin the process of reviewing that plant against that
23 criteria.

24 CHAIRMAN PALLADINO: Do you impose these
25 resolutions on them, or how do you proceed? Do you

1 impose it on them? Do they come back and say we're
2 going to do this and confront them by order?

3 MR. DENTON: I think there's been a variety of
4 those.

5 COMMISSIONER AHEARNE: In some cases the
6 resolution was that --

7 MR. DENTON: That no change was necessary.

8 COMMISSIONER AHEARNE: I thought we had in a
9 previous discussion on USIs reached a conclusion that
10 you would start showing implementation.

11 MR. DENTON: That will be in the new ones that
12 will come through, and we will now start going through
13 the committee review requirements and try and cover
14 benefits and costs and schedules and those kinds of
15 things. So I think they will be more formalized in that
16 sense than they were in the past.

17 COMMISSIONER AHEARNE: So you would expect
18 that some future chart like this would end up also
19 having an addition to a technical resolution.

20 CHAIRMAN PALLADINO: Are you doing this on a
21 plant-for-plant basis? In some cases you might have a
22 common date, but others may not.

23 COMMISSIONER GILINSKY: Who oversees that
24 process? Does the manager? There was someone assigned
25 to each one of these. Does he continue?

1 MR. DENTON: Yes.

2 COMMISSIONER GILINSKY: Does he continue to
3 follow the implementation of the solution in each one of
4 the various plants?

5 MR. DENTON: In most cases not. He generally
6 completes his role and reassigned another USI as a
7 resolution, and then it passes within the normal staff
8 review. Review is done by whichever branch normally
9 handles this particular area.

10 COMMISSIONER GILINSKY: Is it the
11 responsibility of the project manager for that plant?

12 MR. DENTON: The project manager of each plant
13 deals with that, develops a schedule for the
14 resolution. That is reviewed by the appropriate --

15 COMMISSIONER GILINSKY: How do you track that
16 process?

17 MR. DENTON: We have a program to do that.
18 Let me ask Jess if he remembers the acronym.

19 COMMISSIONER GILINSKY: That's not important.
20 But how do you in fact track it?

21 MR. DENTON: The same way we track all
22 licensing actions now. We have a system that identifies
23 all issues that we need to resolve between licensees and
24 ourselves, and that includes ones where they have
25 requested changes or where we are requesting changes.

1 COMMISSIONER GILINSKY: Well, for example, a
2 year from now could you look at A-6 and find out how
3 many plants have complied with our solution?

4 MR. DENTON: Yes.

5 COMMISSIONER GILINSKY: And how many have not?

6 MR. DENTON: (Nods in the affirmative.)

7 MR. DIRCKS: Then I guess the next few charts,
8 9 and 10, take the unresolved safety issues and lay out
9 a schedule for them. I don't know which ones you might
10 want to mention. Of course, there's the steam generator
11 tube integrity issues.

12 CHAIRMAN PALLADINO: Shutdown decay heat
13 removal is a requirement, A-45. I didn't mean to jump
14 to that one, but it seemed like a long way .r.

15 MR. DENTON: We've had so much trouble with
16 that issue that we decided to try to put it to bed once
17 and for all, and it involves looking at a large sample,
18 perhaps 10 existing plants, in detail and the adequacy
19 of their decay heat removal systems. All the systems
20 differ so much we thought we would take a big bite, get
21 Sandia to do PRAs on the system, look at the adequacy,
22 come up with whether or not they think any changes are
23 needed to be made.

24 Otherwise, there's been a lot of prior history
25 on that issue as to whether the situation was really

1 adequate or not; so we thought we'd try to resolve it.

2 COMMISSIONER AHEARNE: Would you be looking at
3 cold shutdown?

4 MR. DENTON: I am sure we are. I don't
5 remember the details.

6 A-11 on the first page, CRGR has approved a
7 resolution. I think there's perhaps another one or two
8 that they're looking at right now.

9 Of course, pressurized thermal shock, A-49, is
10 one we put a lot of effort into.

11 COMMISSIONER GILINSKY: Let me take you back.
12 When you say technical resolutions for 12 have been
13 completed, do they have to go through the CRGR or have
14 they been through the CRGR?

15 MR. DENTON: Probably many of the eight may
16 have been resolved before CRGR was fully operational.
17 But from here on out like A-11 when I say it's got a
18 technical resolution, it has been approved in the CRGR.

19 COMMISSIONER AHEARNE: So CRGR review has to
20 come before you say technical resolution.

21 MR. DENTON: Yes. It comes twice actually.
22 They review it before we go out before comment, and they
23 review it when we come back for the final.

24 COMMISSIONER AHEARNE: Well, let me see then.
25 CRGR then is not going to look at implementation or are

1 you saying in the future you're going to have
2 implementation within the technical resolution?

3 MR. DENTON: I think that general
4 implementation plan would be something we would look
5 at. It may not be by the exact plants, but the way to
6 go at it, priority. And then remember, we're going to
7 schedule implementation in the future more
8 plant-by-plant within the framework of what is important.

9 COMMISSIONER AHEARNE: I was trying to see
10 where the CRGR review existed, and I thought it came
11 after technical resolution number 4 implementation. Are
12 you saying, though, that CRGR only looks at this once,
13 and it is prior to technical resolution?

14 MR. DENTON: No. They look at it when we
15 first develop a proposed solution and we're going out
16 for public comment, so they look at it at that time.
17 And then once we have gotten a public comment and come
18 back for our final position, they look at it at that
19 time. And it is at that time we would put it into
20 there, look at some general motives for implementation.
21 But then the exact implementation on it would be worked
22 out in our new way of working with utilities to pick a
23 date that makes sense.

24 COMMISSIONER AHEARNE: So after what you've
25 labeled technical resolution, you do not see CRGR

1 getting involved again.

2 MR. DENTON: That's right.

3 COMMISSIONER GILINSKY: Now, when you have a
4 solution that you are ready to go out to the public to
5 obtain public comment on, is that something you have
6 approved?

7 MR. DENTON: Yes.

8 COMMISSIONER GILINSKY: So you approve the
9 solution to every one of these USIs as director.

10 MR. DENTON: Yes. This area is headed by
11 Steve Hanauer. But he comes back with a solution on
12 thermal shock, and he is the advocate for various
13 meetings, and then I transmit it to CRGRr saying here's
14 NRR's position on this matter.

15 COMMISSIONER AHEARNE: You transmit it to who?

16 MR. DIRCKS: It's call "Cougar," I believe.

17 CHAIRMAN PALLADINO: Well, I still want to go
18 back to A-45. It seems to me the shutdown heat
19 requirement is something that ought to be settled as
20 early as possible.

21 Tell me again why it goes on in '85. Is that
22 a resolution? This is a requirement you're setting
23 forth.

24 MR. DENTON: It is a program that is almost
25 more like research: to hire a contractor, to visit a

1 number of plants and pick out the amount of the plants
2 and the scope of the effort, and to do the kind of looks
3 that we needed to decide these issues about whether we
4 need additional decay heat removal systems or not. And
5 then you get in detail those systems.

6 There's been a lot of debate in the agency.
7 Maybe Denny could help me on some of this history as to
8 whether we need to lay on new requirements or not. This
9 was intended to provide a vehicle to answer that
10 question.

11 CHAIRMAN PALLADINO: Well, what I gathered,
12 Harold, is this is a plant-by-plant review for all
13 plants.

14 MR. DENTON: No. About a dozen plants. We
15 try to pick representative types.

16 CHAIRMAN PALLADINO: I see. What are you
17 going to do? Based on that are you going to set forth
18 requirements on other plants?

19 MR. DENTON: Yes.

20 CHAIRMAN PALLADINO: And the reason this takes
21 time is because -- could we put more resources on it and
22 get it done in a shorter time?

23 MR. DENTON: We must be able to. It is quite
24 a ways out. I don't know today why.

25 COMMISSIONER GILINSKY: Let me ask you today

1 what constrains the schedules? Are they
2 manpower-constrained or are there intrinsic times that
3 are more or less manpower dependent?

4 MR. DENTON: Well, I'm trying in the future
5 not to take more than three years for the inception of
6 USI to its technical resolution. That is a working
7 guide. But if you took something like emergency
8 containment sump performance, A-43, I have just sent
9 that one over to the CRGR. That involved quite a bit of
10 research done in various labs around the country about
11 pumps, whether or not they would air-bind. It required
12 a look at a number of plants, what type of insulation
13 they had, was it fiberglass, metallic, how much
14 fiberglass did it take to clog the pumps. So that one
15 took a couple of years, as I recall.

16 We administered the research program. Then we
17 took the results and are writing a position, a proposed
18 position that backs off in some areas from existing
19 requirements and adds some others. And in order to put
20 those issues to bed these tend to be very difficult
21 plans. They tend to take a long time, and it usually
22 requires additional actual research rather than
23 analysis. I understand the research program for A-43
24 was perhaps a million dollars.

25 MR. ROSS: That's my understanding.

1 COMMISSIONER GILINSKY: What is the
2 significance of some of these not having a final TR
3 scheduled?

4 MR. DENTON: That is a task action plan. That
5 means we've not been able to come to agreement on
6 exactly what the scope of that effort should be. And it
7 is very important to get everyone on board on these task
8 action plans, including the ACRS, so that when we do
9 launch a program that we can satisfy people when the
10 results come back.

11 CHAIRMAN PALLADINO: All right. Do you want
12 to go on, Bill?

13 MR. DIRCKS: The next one is generic safety
14 issues. We discussed that one before the Commission.

15 COMMISSIONER GILINSKY: This is the next
16 category down?

17 MR. DIRCKS: Yes. This is the next category
18 down. The Commission said to come back with some sort
19 of ranking of these in terms of a priority. They have
20 been collecting over a number of years. Some have not
21 been worked on because it was such a very low priority.
22 There was a mixture of items in there -- safety issues,
23 environmental issues, and other types of issues.

24 COMMISSIONER GILINSKY: Do they cover safety
25 and relief valves? I just wondered what your thoughts

1 were about your state of our knowledge about performance
2 of safety and relief valves.

3 MR. DENTON: There's been a recent finding
4 called to our attention by some licensees that they are
5 not lifting at the designed set points, and that
6 prompted a big look between I&E and myself.

7 One of these many issues does deal with the
8 need for further testing and validations.

9 COMMISSICNER GILINSKY: That's what I'm
10 getting at, the question of testing of valves. I guess
11 I hadn't realized until recently how little testing of
12 these valves there had been.

13 CHAIRMAN PALLADINO: I remember in 1948 saying
14 almost exactly the same thing. For a while I had
15 valves, including safety relief valves, down at Oak
16 Ridge. We seem not to have made a great deal of
17 progress since then.

18 COMMISSIONER AHEARNE: Is anything useful
19 coming out of the operating valve study?

20 MR. DENTON: I think very useful. There's
21 been quite a bit of data out of that program.

22 COMMISSIONER GILINSKY: The thing I realized
23 for the first time recently is the fact that the uplift
24 tests of the safety valves were the first occasions for
25 the fullscale testing of those valves ever.

1 MR. DENTON: I think that is the program we
2 are relying on. I don't think there's any in-house
3 research at all.

4 COMMISSIONER GILINSKY: The question I'm
5 asking, is that amount of testing sufficient, because
6 each valve got tested a few times.

7 MR. DENTON: We approved the --

8 COMMISSIONER GILINSKY: And not over the full
9 range of conditions.

10 MR. DENTON: We agreed with the scope of the
11 valve program when it was first set off as adequately
12 resolving that issue. Now there's been a lot learned on
13 those tests, and it has changed those presumptions.

14 COMMISSIONER GILINSKY: I wonder if you could
15 come back to us on that subject, because I think that is
16 an interesting subject.

17 MR. DENTON: On the prioritization, I did want
18 to mention we did complete the prioritization of all the
19 NRR items Bill asked us to undertake; and we are doing
20 it for all of the items that were in other offices, and
21 you might be interested in some preliminary results. We
22 intend to get ACRS review of prioritization and then get
23 recommendations on the list. But of the 75 that got
24 detailed attention yet we were not able to exclude for
25 some other reason, we ranked 15 of them as high

1 priority, 30 as medium, 11 as low, and we are
2 recommending dropping 19.

3 COMMISSIONER AHEARNE: When you end up ranking
4 high, medium and low, is that equivalent to high are the
5 ones you put resources on, medium if you have extra
6 resources, and low, you don't?

7 MR. DENTON: I think that is just the way I
8 see it, yes.

9 So for the first time we have tried to treat
10 all these issues in a consistent manner looking at their
11 contribution to risk reduction to solve the problem and
12 what it would cost in terms of dollars and public
13 exposure and getting a consistent analysis issue by
14 issue.

15 Now, whether we can get agreement of all
16 parties because there are a lot of favorite issues in
17 this.

18 MR. DIRCKS: And there had been sort of a
19 tacit ranking even before this. There were certain
20 generic issues I think that were around for a number of
21 years, and resources were not being devoted to them at
22 all. I think that was a recognition that they were of
23 such low priority that researches just weren't available.

24 CHAIRMAN PALLADINO: Are you saying now that
25 at least 15 high category -- the 15 in the high category

1 are going to get resources?

2 MR. DIRCKS: Yes. And we're saying that at
3 least in the very low category, the 19 in the low
4 priority issues, we'll be coming in with recommendations
5 that since they haven't been worked on and they are such
6 low priority, why carry the any longer.

7 The next issue is the operating reactor
8 licensing actions. This we had clear guidance from the
9 TPG to do something about this issue and to show some
10 reluctance. I followed that up with a program guidance,
11 and that status today, as you can see through some of
12 these charts, is that NRR has completed 107 percent of
13 its plan. They plan 2,544 actions versus an actual
14 2,717. So there we've accomplished more than the plan.
15 The backlog has been significantly reduced, which I
16 think is an achievement, because the backlogs in the
17 history of the NRC have been --

18 COMMISSIONER AHEARNE: Is that what you
19 labeled "inventory?"

20 MR. DIRCKS: That's the inventory. That has
21 been reduced from 1,583 actions to 3,531.

22 COMMISSIONER AHEARNE: I just wanted you to
23 know I always mistrust a chart that approaches zero
24 because I have no idea what you would view as an
25 acceptable level. As I recall, at one point I thought,

1 Harold, you had some rule of thumb, so many actions per
2 plant would be an acceptable level. And I forget
3 whether that was on the order of 10 or 15.

4 MR. DENTON: That is what I thought would flow
5 naturally from a reasonable work schedule. You always
6 have perhaps that many in house working on them.

7 COMMISSIONER AHEARNE: And depending on how
8 you counted plans, but there should be somewhere around
9 1500, I guess, a line which would be your acceptable
10 level.

11 CHAIRMAN FALLADINO: How did you get 1500?

12 COMMISSIONER AHEARNE: Ten to 15 per plant,
13 and it depends on how you count plans.

14 MR. DIRCKS: At any rate, I think what we had
15 the past few years was unacceptable, and I think we're
16 trying to work down, whatever that acceptable number
17 is. We haven't approached it yet.

18 COMMISSIONER AHEARNE: So if you do review
19 that and if you suppress zero, then you find that chart
20 is down here.

21 MR. DIRCKS: Any other questions on that one?
22 I might as well move down to -- this is just a brief
23 status chart following up on the guidance that you gave
24 us, Mr. Chairman, to come in to talk about what we have
25 done in terms of establishing some sort of a system for

1 the coordination of existing and new requirements.

2 I don't want to read that chart to you.

3 Again, I think the important thing is that we have some

4 sort of an integrated tracking system, which we do

5 have. We've had an OIA report on that. And I think we

6 have to go back and satisfy them that we do have a

7 systems requirement.

8 The operating reactors licensing action

9 tracking system will be completed -- the phase 1 system

10 will be at least completed by January '83.

11 Harold, do you have anything on that issue?

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1 The next chart is the regionalization diagram,
2 and there we have two summary charts. I mentioned the
3 operating reactor licensing actions being taken for the
4 regions. We have slipped a little bit there. We have
5 actually transferred 364. We had planned to transfer
6 532.

7 I think the answer there is, the regional
8 administrators are beginning to find out this is not all
9 gravy, and there are complicated issues out there, and
10 they have been selective in what they are taking.

11 CHAIRMAN PALLADINO: You have been selective
12 or they have been selective?

13 MR. DIRCKS: It is selectivity on both sides,
14 but they haven't rushed into it. They are beginning to
15 realize not everything is a bed of roses.

16 COMMISSIONER AHEARNE: Are you saying that the
17 primary reason the number is down is because NRR has
18 offered and the regions have said no?

19 MR. DIRCKS: If I had to generalize, I would
20 say the offers have been made and the regions are being
21 somewhat selective. Harold, you may get into that.

22 MR. DENTON: We have been trying to get ones
23 they could do with the kinds of skills that are out
24 there now, so there has been some back and forth with
25 each region on what their priorities were, whether or

1 not they had higher priority goals. The program is
2 starting to run now, and regions are beginning to send
3 in -- For example, Ron Haines told me one of the ones he
4 had agreed to took 350 man hours, and he was concerned I
5 was going to give him more like that. So there is a bit
6 of learning experience as to how to do it.

7 We have had all of the regional people who
8 would be responsible for these actions and for training
9 sessions, and we have our technical staff and the region
10 staff go over what the criteria are and how you do it
11 and transfer the files, but I think it takes a bit of
12 time for the regions to learn the ropes and feel
13 comfortable with some of this activity.

14 MR. DIRCKS: Building up their capabilities.

15 COMMISSIONER AHEARNE: But you are saying that
16 the regions are not asking for more than they are
17 getting.

18 MR. DENTON: No, not at all.

19 COMMISSIONER AHEARNE: Other than people.

20 MR. DENTON: Other than people.

21 COMMISSIONER ASSELSTINE: To what extent is
22 that constraint a factor in taking over these
23 assignments in the sense that they don't have the
24 people?

25 MR. DIRCKS: I think part of it is people and

1 skills. The second point is reactor operator
2 licensing. Here, I think it is very amenable to
3 regionalization, to putting it out in the regions.
4 Harold has finalized an MOU for regionalizing this
5 program.

6 COMMISSIONER AHEARNE: Does regionalizing that
7 program end up meaning that the contracts are run from
8 the regions instead of from headquarters, if most of the
9 work is done by contractors?

10 MR. DENTON: It won't mean that in the early
11 stages. We thought we had best keep the present
12 consultants. Since we have three big labs going, we
13 would run the contract from here. But as time goes on,
14 it would certainly evolve that way, but at the moment,
15 it seemed easiest to just hire up the 75 contractor
16 examiners from headquarters and let them work the
17 field.

18 The only region that is really actually doing
19 the licensing to date is Region III. Region II is in
20 the throes of staffing out and assuming some of this
21 activity.

22 MR. DIRCKS: Materials licensing has been out
23 in the regions for some time. John Davis has formalized
24 it into a delegation of authority. John, do you have
25 any?

1 MR. DAVIS: Well, the Denver office has now
2 been established, and the -- licensing is in the process
3 of being delegated to the Dallas office. The staff
4 itself has been somewhat separated, although they are at
5 Silver Spring, and then going out is -- some aspect of
6 their convenience. We expect to be fully operational
7 about May, but it is May, but most of the technical work
8 is still done back at Silver Spring.

9 MR. DIRCKS: I might mention that the Fort
10 Saint Frain reactor has been transferred over to Region
11 IV.

12 MR. DENTON: It hasn't quite been
13 transferred.

14 MR. DIRCKS: It is in the process.

15 COMMISSIONER GILINSKY: From?

16 MR. DIRCKS: From headquarters.

17 MR. DENTON: I think they have selected the
18 project manager for the task, and John and I have
19 negotiated the transfer, and the intent is that he and I
20 would meet and go over which ones might be done back
21 here and wrap that up and which ones they might assume.
22 We anticipate completing it some time in the next 30
23 days.

24 COMMISSIONER GILINSKY: This would be the
25 first reactor to fall in this category?

1 MR. DENTON: And then we would no longer have
2 a project manager for Fort Saint Frain, nor would we
3 have files back here.

4 CHAIRMAN PALLADINO: Have what?

5 MR. DENTON: Files, so we would not maintain
6 duplicate sets of amendments and activities. So in
7 effect the responsibility to follow the day to day
8 operations transfers to the region, and their response
9 to 206 petitions and other activities would be at Region
10 I, and they would consult back here with us on certain
11 identified actions.

12 COMMISSIONER GILINSKY: How did you pick that
13 one?

14 MR. DENTON: Because it was one in which there
15 was not a lot of interaction among the staff anyway,
16 being that it was a specialized machine, tended to be
17 handled by a few specialists. So, we thought that would
18 be a good one to do that on. And we might as well
19 concentrate between the resident inspector -- the
20 project manager and the resident inspector on the
21 project expertise.

22 COMMISSIONER AHEARNE: Can I go back to Number
23 2 for a minute? Something Harold said in there puzzled
24 me. You said that contractor licensing examiners will
25 be selected from headquarters. So, if I get it

1 correctly, Regions II and III will be doing part of the
2 reactor operator licensing in their regions, but
3 headquarters will also be doing part of it.

4 MR. DENTON: No, no. They would have
5 responsibility in Region III for doing it all. We just
6 handle the contract, to keep the resources there. I
7 don't think there's any dispute between the regions.

8 COMMISSIONER AHEARNE: So you are saying you
9 would be handling the administrative details of the
10 contract, but the contract hired examiners would be
11 working for the region.

12 MR. DENTON: That's right. There is no intent
13 to do that back here.

14 COMMISSIONER AHEARNE: Fine.

15 MR. DIRCKS: The fourth point is the proposed
16 civil penalties actions. Under agreement, regional
17 administrators are authorized to sign correspondence
18 which NRC proposes several penalties on reactor
19 licensees after compliance and approval here at
20 headquarters.

21 COMMISSIONER GILINSKY: The decision is made
22 here.

23 MR. DIRCKS: Yes, yes. And it is with a good
24 deal of give and take with the regional administrators.

25 CHAIRMAN PALLADINO: That will happen through

1 some consistency.

2 MR. DIRCKS: Yes.

3 CHAIRMAN PALLADINO: I was going to ask you as
4 a general question what particular attention has been
5 given to assure coordination and some degree of
6 consistency among the regions. Feedback that has been
7 given to me from industry is that they are quite
8 concerned about regionalization, and that it might bring
9 about disparity in the degree of enforcement and the
10 degree of attention to various items.

11 MR. DIRCKS: I think we all realize there is a
12 potential for creating five diverse NRC's out there, and
13 we discussed it with the Commission. We are very
14 conscious of that problem, and we have lots of
15 mechanisms to deal with it. The issue of concurrences
16 and getting approvals from headquarter's offices is very
17 much in effect. There is a conference call done weekly
18 in which members of the three or four program offices
19 here in Washington participate on a weekly basis. We
20 hold quarterly meetings of the regional administrators
21 and the program office directors, usually in each
22 region. We will vary the location of this, so that we
23 have an opportunity to get all of the regional
24 administrators together with the program directors.

25 Any time an issue comes up, if it doesn't come

1 up in a conference call, it is raised in these quarterly
2 meetings, and we try to iron out and make sure that we
3 get some uniformity.

4 COMMISSIONER AHEARNE: Don't the major
5 penalties still have to come back to Dick for review?

6 VOICE: Yes, they come to me.

7 COMMISSIONER AHEARNE: So you are really the
8 point of consistency.

9 VOICE: That's right.

10 MR. DIRCKS: I was talking in general. There
11 was a concern on the part of the industry that there
12 have been lines of communication established between the
13 industry and NRC, and it is dealt with on a national
14 level.

15 CHAIRMAN PALLADINO: I have had a number of
16 industry people express concern about the
17 regionalization, and they said, before you undertook it,
18 why didn't you get comments, and my answer is that,
19 well, this is in the process of evolution. There are
20 some things we have done, and we haven't done other
21 things.

22 COMMISSIONER GILINSKY: It is a dynamic
23 process.

24 CHAIRMAN PALLADINO: And what I finally said
25 is, I think there is value in that comment, and that we

1 should write up a description of our plan, where we
2 intend to go and how we intend to implement it, and
3 actually send it out for public and industry comment.

4 MR. DIRCKS: I can see that. We can certainly
5 put something together. I think the issue that they are
6 concerned about is, if they have a technical issue --
7 now, true, the only complaints I have heard are on the
8 issue of enforcement actions, and that I think we have
9 had in the past. That has varied from region to
10 region.

11 A valid point might be if they have a
12 technical issue that cuts across many reactors, the
13 steam generator problem. They don't want to try to
14 resolve this issue in five different regions. I think
15 that the is the point the Commission has been very
16 conscious of, and you said that is something that stays
17 back at NRR. We do not transfer generic --

18 CHAIRMAN PALLADINO: A lot of that hasn't
19 gotten out, and I think writing it up and sending it out
20 for comment --

21 MR. DIRCKS: We can get something down.

22 VOICE: I might add the real question on
23 enforcement is, where do we go from here? We have a
24 report due to you early next spring, and that is the
25 concern that we do regionalize the entire enforcement

1 concept. They are concerned at that time that it may
2 get out of hand.

3 MR. DIRCKS: I think their concern was that
4 we are really regionalizing the entire enforcement
5 concept, but I think we can allay those fears when we
6 come to you next. The other points, the observation of
7 emergency preparedness, that is an area that we should
8 get out to the regions. We covered the question of
9 legal counsel in the regions. State agreements, we are
10 getting out. Again, I think that is just very logical.

11 COMMISSIONER AHEARNE: This is in addition to
12 a state liaison office?

13 MR. DIRCKS: Yes. We are talking about
14 delegating the agreements to the state's program, but
15 again, assuring that the states, if they have a problem
16 that moves beyond the region, we will maintain an active
17 office here in Washington to deal with the governors and
18 their representatives. We are not cutting off
19 communications at the regional level.

20 Budget activities, I think as a result of the
21 last budget, I have seen that the regions are heavily
22 engaged in budgeteering, and they are not timid about
23 making their resource needs known to us.

24 COMMISSIONER AHEARNE: Is it too early to make
25 any estimate of how you are going to -- how successfully

1 you are going to be on tracking the people estimates for
2 the regions?

3 MR. DIRCKS: We have gone through that
4 exercise on the FTE items, and we have come up with a
5 pretty good record now of tracking where they stand and
6 controlling the FTE's.

7 COMMISSIONER AHEARNE: My question really was
8 on regionalization. Part of your regionalization plan
9 that you had discussed had an increasing number of
10 people in the regions, and I wonder, is it too academic
11 an estimate?

12 MR. DIRCKS: About how well we have done in
13 getting people to the regions? We can give a brief
14 summary of that, I think, now. Pat Norry can -- Do you
15 want to come up here?

16 MR. NORRY: If you are asking about how many we
17 have so far, we have about 20, 25 people who have
18 transferred so far to the regions. Then we have a plan
19 for each region based on their staffing plan and their
20 FTE plan, which will involve hopefully a certain amount
21 of voluntary transfers accompanied by others who wish to
22 go from headquarters, and then some outside hiring.
23 There is a whole plan for the entire agency based on the
24 headquarters and the regional staffing policy.

25 COMMISSIONER AHEARNE: Is it too early to make

1 some kind of estimate?

2 MR. NORRY: It is a little early to tell how
3 some of my new initiatives to attract people to the
4 regions are going to work out. We hope to have a better
5 idea of that in a couple of months.

6 MR. DIRCKS: We have talked it over with the
7 regional administrators, and in fact we have come up
8 with a plan to have each regional administrator with the
9 staff up here in Washington in a recruiting effort
10 describe briefly the office but the regions in which
11 they will be located, the housing conditions, and so
12 on.

13 COMMISSIONER AHEARNE: You have got to let
14 Region III come in first.

15 MR. DIRCKS: We can go on now to the high
16 level waste repository. We had a meeting on this issue,
17 on the technical criteria.

18 COMMISSIONER AHEARNE: I thought we had the
19 final rule. This says the final rule just went to the
20 EDO, and we have not gotten the final rule.

21 MR. DIRCKS: This is the question we had. We
22 sent you down an advanced copy of the final rule. Then
23 we ran into this other issue of the role of EPA and the
24 environmental impact statement. So it is being held.

25 COMMISSIONER AHEARNE: It is waiting for

1 resolution.

2 COMMISSIONER GILINSKY: How is that going to
3 get resolved?

4 CHAIRMAN PALLADINO: We have to vote on it.

5 MR. DIRCKS: You've got five options. One of
6 them is going forward with the rule as is.

7 COMMISSIONER AHEARNE: So that is really the
8 pacing item. Once we --

9 COMMISSIONER GILINSKY: So this is based on
10 one of the options, in effect.

11 COMMISSIONER AHEARNE: Once we vote on that
12 and give you directions --

13 MR. DIRCKS: Then we can send it one way or
14 the other and make any amendments.

15 MR. DAVIS: Depending on what you decide.

16 CHAIRMAN PALLADINO: I think that would be
17 worth looking at pretty early.

18 COMMISSIONER GILINSKY: You skipped over the
19 TMI action plan. It is not in this package. It is in
20 the other package, and I wonder what there is to say
21 about how the various dates are being met. It is on,
22 Page 20 or 21.

23 MR. DIRCKS: This is tied in with our generic
24 issue item on prioritization. We have been sending you
25 down to the red, yellow, green report.

1 COMMISSIONER AHEARNE: Occasionally.

2 MR. DIRCKS: Occasionally. But then we have
3 said, we ought to take a review to see where these items
4 fit into this total priorities picture, and I guess
5 Harold can bring you up to date.

6 COMMISSIONER GILINSKY: Are you still keeping
7 a separate tracking system on these items?

8 MR. DENTON: Until we decide as a result of
9 prioritization to change it, I proposed -- many of these
10 cannot be changed from red because the due date might
11 have been two years ago, and for some reason we didn't
12 get to it or decided not to do it, so the colors have
13 been unchanged for several years, and the intent was to
14 reprioritize the things we are not working on.

15 MR. DIRCKS: That is part of the other.

16 MR. DENTON: The big effort, and then decide
17 which ones are high priority from a safety standpoint,
18 and then get resources to work on those, and maybe
19 decide not to do some of the ones that have been
20 deferred year after year, because we saw higher
21 priorities.

22 CHAIRMAN PALLADINO: Are these the ones that
23 we went over, 15 and 30?

24 MR. DENTON: Yes, many of them.

25 COMMISSIONER GILINSKY: So what does this add

1 up to?

2 MR. DENTON: I think this particular one is
3 about to be out of date. When we adopted the
4 prioritization scheme, it was an early attempt, I think,
5 to follow the action plan as it had been originally laid
6 out with the dates on it. But as time went by, we got
7 more and more skewed from those projected dates, and we
8 focused our resources on things we saw as the highest
9 priority each year.

10 COMMISSIONER GILINSKY: Are the highest
11 priority items here cut up in USI's and generic issues?
12 Or are they separate?

13 MR. DENTON: They are separate. You remember,
14 every six months we were going out and updating the
15 completion on 737 action plan items, but we had gotten
16 many of the TMI action items implemented.

17 COMMISSIONER GILINSKY: Which are the most
18 important items which are not being implemented or with
19 which you are having problems?

20 MR. DENTON: They would be the high priority
21 items in this prioritization that we just mentioned.

22 COMMISSIONER GILINSKY: Could you just give us
23 some examples?

24 MR. DENTON: Apparently our initial shot at it
25 put the following items in high priority: reactor

1 coolant pump seal failures; bulking degradation in power
2 plants, such as the Maine Yankee case; safety related DC
3 power supplies; load combinations; MARK III
4 containments; diesel reliability.

5 COMMISSIONER GILINSKY: Those are not TMI
6 items. MARK III, containments -- oh, I see. MARK III
7 in terms of -- you are not talking about the loads. You
8 are talking about the hydrogen issues.

9 MR. DENTON: The hydrogen issues, and then the
10 action plan items, confirmation of selected transients,
11 systems interaction, container integrity checks,
12 radiation protection plans.

13 COMMISSIONER GILINSKY: And the difficulty
14 with these is what?

15 MR. DENTON: We never had the resources to
16 work on these year by year. We decided we should defer
17 these, and so they all may have been red or yellow since
18 that time. And we tend to work on the ones that we
19 perceive to be the highest priorities.

20 COMMISSIONER GILINSKY: It sounds as though
21 you don't think those are terribly important.

22 MR. DENTON: No, these are the ones we have
23 now decided have the highest priority out of the ones
24 that are not being worked on. Did I say that
25 correctly?

1 VOICE: The ones that have not been resolved.

2 MR. DENTON: We would propose as a result of
3 prioritization to assume a high priority.

4 COMMISSIONER GILINSKY: You view something
5 like water level meters as basically resolved? That is
6 not on that list.

7 MR. DENTON: No, because resources were
8 dedicated to it, and -- are the items that have
9 classified as ones where there was essentially no staff
10 work going on. Reactor water level has had a big effort
11 that we briefed you on a while back, so that didn't get
12 prioritized because it was near resolution, we thought.

13 COMMISSIONER GILINSKY: Well, I didn't mean to
14 make a distinction between things we are working on and
15 things we are not working on. I am interested in the
16 question of which of these items from TMI, if any, are
17 we having particular difficulties with, or have been
18 hanging for a long time.

19 MR. DENTON: Well, I think --

20 MR. DIRCKS: You might want to look at these.
21 These are the items, the 22 items that have been
22 delayed. A lot of them deal with issues like shift
23 manning, administration training, operating, and
24 qualification of personnel, upgrading and training
25 qualifications. These things have been delayed not only

1 because of lack of resources, but because we haven't
2 come down on any resolution. The issue of training and
3 qualifications upgrade --

4 COMMISSIONER GILINSKY: Well, let me ask you,
5 are there any of these that you think are not moving
6 that are particularly important not to be moving,
7 whether we have resources on them or not, that are just
8 not getting solved?

9 MR. DIRCKS: On the TMI action plan?

10 COMMISSIONER GILINSKY: Yes.

11 MR. DENTON: If they were, I would have
12 proposed that they be in this year's budget. I have not
13 done that.

14 COMMISSIONER AHEARNE: No, what Vic is saying,
15 even taking into account those that you do have
16 resources on, so that they are in the budget, is there
17 an item there or are there several items that you are
18 particularly concerned about their resolution?

19 MR. DENTON: None of them come to mind,
20 Commissioner. I would have made a point of it. But one
21 of the reasons for doing this prioritization, which
22 didn't include any TMI action item that we were not
23 working on, that out of that that I would expect that
24 they would identify the ones that maybe I had missed or
25 that we had missed and we should be working on. So out

1 of the 15 or so high priority ones that came out of
2 prioritization are ones we want to look very hard at and
3 be sure there is not one of those that we are not
4 working on.

5 COMMISSIONER GILINSKY: We mentioned the water
6 level meters. What happened, for example, in the high
7 point vents? Are those getting put in?

8 MR. DENTON: High point vents are part of the
9 action item. I think they are.

10 CHAIRMAN PALLADINO: Were they part of your 15
11 items?

12 MR. DENTON: No, because the prioritization
13 was only on items to which we are not committing any
14 resources, so any place we are committing resources,
15 like USI's or water level monitoring, we didn't try to
16 prioritize.

17 CHAIRMAN PALLADINO: I wonder if it might not
18 be helpful if those items of the TMI action plan that
19 are not being actively pursued, whether or not you could
20 identify which of those have been prioritized in a high
21 category.

22 MR. DIRCKS: That is in his generic listing of
23 those items he had not been working on that are picked
24 up in this prioritization.

25 CHAIRMAN PALLADINO: Well, if he can give it

1 to us --

2 VOICE: Do you want to do it now?

3 CHAIRMAN PALLADINO: No. Let's have something
4 in a followup.

5 COMMISSIONER GILINSKY: Another area that is
6 not on your short -- in your view charts is the business
7 of qualifications of equipment.

8 COMMISSIONER AHEARNE: Yes, it is.

9 COMMISSIONER GILINSKY: Oh, it is. All right,
10 fine.

11 CHAIRMAN PALLADINO: Why don't we go on?

12 MR. DIRCKS: The next one is the LOFT project.

13 COMMISSIONER AHEARNE: What is the status of
14 that?

15 MR. DIRCKS: DOE, as you know, has been trying
16 to sponsor a consortium. They had a meeting in Europe
17 about two weeks ago, one and a half weeks ago, and the
18 OECD countries did agree to come in and join that
19 consortium with the United States. We are waiting for
20 the DOE to send us over a proposed agreement. What we
21 would do then is to outline this agreement to the
22 Commission and get it to you for your views.

23 COMMISSIONER AHEARNE: Was the European
24 Community's contribution the amount that was thought to
25 be needed?

1 MR. DIRCKS: It came in under what they
2 thought. There were certain countries that did not want
3 to participate, and they did not come in.

4 COMMISSIONER AHEARNE: As I recall, you sent
5 us a paper earlier which said that unless this was
6 resolved, and I thought it was something like October
7 1st, you were going to have to start going into a
8 closedown.

9 MR. DIRCKS: From our viewpoint, it is
10 resolved, because our viewpoint is, we should join the
11 consortium, because again, what we are looking for is
12 the ground rules that we would keep within the '82 or
13 '83 budget numbers, and then stretch out over '84, '85,
14 '86, use those funds that we would have used to have a
15 decontamination, and then we would be released from any
16 decontamination.

17 COMMISSIONER AHEARNE: But the release that
18 you expect to get from DOE is one in which the facility
19 itself and the responsibility would transfer?

20 MR. DIRCKS: It would transfer to DOE, yes.
21 We would transfer funds, and we would be out of LOFT.
22 We would get essentially the tests we wanted done under
23 this agreement. We would be released from any further
24 obligations.

25 COMMISSIONER AHEARNE: Does that kind of

1 transfer of facility require Congressional approval?

2 MR. DIRCKS: The contacts I think that we have
3 had is that it meets their understandings that were laid
4 out in the conference, the conference deliberations.

5 COMMISSIONER AHEARNE: You are saying it
6 doesn't require --

7 MR. DIRCKS: Our legal people say it is not a
8 reprogramming action, but we should inform the
9 committees, and we will do that.

10 COMMISSIONER AHEARNE: I guess it also has the
11 OMB approval. Is that right?

12 MR. DIRCKS: We will inform OMB. Again, we
13 think we are in line with OMB guidance. There have been
14 some objections in some quarters of OMB toward this, but
15 those objections are more addressed to DOE than to NRC.

16 CHAIRMAN PALLADINO: Bill, did we have an
17 announcement on this consortium? I understand that
18 their announcement was being made. I thought it was
19 being made from Europe.

20 MR. DIRCKS: There are some OECD announcements
21 being made.

22 CHAIRMAN PALLADINO: Do we have a copy of
23 that?

24 MR. DIRCKS: We have a draft, I believe. It
25 will be in the package we are going to send you either

1 today or tomorrow with the DOE details.

2 CHAIRMAN PALLADINO: Because I heard, yes, it
3 is going forward.

4 COMMISSIONER AHEARNE: In your understanding,
5 even though the European Community's contribution will
6 be less than what was originally planned, is it your
7 understanding that our contribution doesn't have to
8 increase?

9 MR. DIRCKS: Our contribution will stay as we
10 have outlined it to the Congress. Now, if there are any
11 changes in that, then we would have problems.

12 CHAIRMAN PALLADINO: Okay.

13 MR. DIRCKS: The next one is the qualification
14 of safety related equipment, and there, we have in the
15 chart various milestones. I must say we are probably as
16 confused as you are on this issue. I think the last
17 time we left this point there were a couple of actions
18 pending before the Commission. It would be good to see
19 how you come out on it. Then we are proceeding along
20 the lines of continuing to review the program plan in
21 coming up with another go at it.

22 COMMISSIONER AHEARNE: Now, you have down here
23 "Delayed pending approval of comprehensive program
24 plan."

25 MR. DIRCKS: Yes.

1 COMMISSIONER AHEARNE: As
2 original proposed comprehensive prog
3 rejected by the Commission and sent
4 work.

5 MR. DIRCKS: You are clear

6 COMMISSIONER AHEARNE: So
7 we are waiting for you to come back

8 MR. DIRCKS: You are right
9 holding up the program plan.

10 COMMISSIONER AHEARNE: Is t
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12 MR. DIRCKS: There is, but
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1 firm rule that sets forth a date.

2 COMMISSIONER GILINSKY: But even with the
3 rule, what is the realistic time?

4 COMMISSIONER AHEARNE: It probably depends on
5 which way we come out on some of the issues that are
6 still under debate. In particular, since some of those
7 issues relate to what do you do about equipment that was
8 in the plant prior to certain dates, that could
9 significantly affect it.

10 MR. DENTON: We were talking about the second
11 outage I think at one time in the rule, and proposed the
12 proposal to staff, and then if the rule is changed to
13 include other issues, it would take a while longer.
14 There is very little equipment in the plant that meets a
15 40 year I envelope type requirement.

16 COMMISSIONER AHEARNE: Do I gather from your
17 answer to Commissioner Gilinsky that you believe a rule
18 is necessary in order to answer that kind of question?

19 MR. DENTON: I think so. What our SER's do is
20 document for each unique plant if it is a two-unit
21 plant, like -- or two, three, maybe that is not a good
22 example, the one under review, but we would issue an
23 SER, and that would compare the criterion of plant
24 equipment in that plant against a certain set of
25 criteria, and that would form then a basis that

1 COMMISSIONER AHEARNE: As I recall, your
2 original proposed comprehensive program plan was
3 rejected by the Commission and sent back for further
4 work.

5 MR. DIRCKS: You are clear on that.

6 COMMISSIONER AHEARNE: So my understanding is,
7 we are waiting for you to come back up.

8 MR. DIRCKS: You are right on that. It is my
9 holding up the program plan.

10 COMMISSIONER AHEARNE: Is there any schedule
11 for that?

12 MR. DIRCKS: There is, but I think if I could
13 go back and supply that for the record.

14 COMMISSIONER GILINSKY: Harold, when do you
15 think all the equipment is going to be qualified?

16 MR. DENTON: We have had our contractor
17 producing the SER's that compare equipment that is
18 actually in the plants against the final rule type
19 requirements, and I think they are finding a very low
20 part of the equipment fully meets all the types of
21 things might be required in an envelope approach, and
22 that it would not be met until some changes are made in
23 this equipment, because the equipment even doesn't meet
24 the full 40 year aging requirement of some particular
25 aspects. So I think it won't be made until you have a

1 firm rule that sets forth a date.

2 COMMISSIONER GILINSKY: But even with the
3 rule, what is the realistic time?

4 COMMISSIONER AHEARNE: It probably depends on
5 which way we come out on some of the issues that are
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20 document for each unique plant if it is a two-unit
21 plant, like -- or two, three, maybe that is not a good
22 example, the one under review, but we would issue an
23 SER, and that would compare the criterion of plant
24 equipment in that plant against a certain set of
25 criteria, and that would form then a basis that

1 inspectors could at some time in the future know what
2 equipment staff does think meet it, and those tests that
3 are required to demonstrate that it meets it, so
4 wherever you make the effective date would be the
5 driving force to having the equipment meet it.

6 CHAIRMAN PALLADINO: All right.

7 MR. DIRCKS: The next chart we have labeled
8 Source Term. That is inextricably linked to the issue
9 of the siting rule and the Commission guidance on that.
10 We thought it would be good to lay out, because we were
11 going on source term, and you said something about that,
12 and then step up to the issue of the siting rule. There
13 are a couple of points on the source term work that I
14 keep mentioning to Denny, and we keep rehearsing these
15 three points.

16 We hope this winter to have some information
17 to you on a source term that would allow you to make
18 some decisions on the emergency planning issue.

19 CHAIRMAN PALLADINO: Will we have enough to
20 make a decision?

21 MR. DIRCKS: For the limited set of decision
22 points we would be proposing to you, we would back it up
23 with information from the research program.

24 The second major issue is the re-evaluation,
25 the total re-evaluation of source term which will be

1 done in mid-calendar year '83. Denny, do you want to
2 elaborate on those few items?

3 MR. ROSS: Well, on the matter of whether we
4 have enough information, as we discussed a couple of
5 weeks ago, we were going to do four plants. Accompanied
6 by that should be a typicality analysis or some analysis
7 as to how they speak for the rest of the population. I
8 think we'll have two choices. We would either conclude
9 that these are surrogate plants and you could use them
10 as a basis for all plant decisions, or we could conclude
11 that the methodology looks interesting, but in order to
12 apply it we might have to either do plant-specific
13 analyses ourselves or tell the industry, if you want to
14 relax your emergency planning zone, here is the way you
15 do the calculation, come back with the answer.

16 We would have either of those options. I
17 think we should wait to see how the work comes out.
18 Also, like with many of these milestones on other
19 topics, the work will accumulate in a linear sense, and
20 we should have the results of the first revised
21 calculation -- I think we gave you a specific schedule a
22 couple of weeks ago -- December and January, December
23 input to the peer review panel, and according to the
24 schedule, January output from the panel.

25 Our intentions were to wait until we had all

1 four. I am referring to a chart you had two weeks ago.

2 COMMISSIONER AHEARNE: I see.

3 MR. ROSS: And our intention was to wait until
4 all four plants are done. Should there be an overriding
5 interest in how the program is coming along, that could
6 be altered very easily.

7 Now, there was additional technical detail on
8 that. We think there are reductions -- there will be
9 reductions in the source term, but I think going into
10 that in this meeting would be too long.

11 CHAIRMAN PALLADINO: We are already a half
12 hour over, so maybe we can take that up another time.

13 MR. DE The next one, we in effect
14 touched on a bit. That was the use of probabilistic
15 risk assesment.

16 COMMISSIONER AHEARNE: One quick question.
17 Denny, when did you think you might have some material
18 that would be useful that we could sit down and talk
19 about?

20 MR. ROSS: Well, February 15th, we would have
21 the first report going through the peer process. I
22 would recommend not looking at it before then. That
23 might be a good milestone.

24 MR. DIRCKS: There is one other milestone I
25 think I will throw in here, since I keep badgering Denny

1 about it. We want to have some information to you in
 2 regard to the potassium iodide question, and that will
 3 be thrown into the hopper. That is probably the first
 4 one we will be getting to the Commission, some guidance,
 5 at least, on the use of potassium iodide related to the
 6 source term work we are doing.

7 The next one is the issue of Indian Point,
 8 Zion, and the general PRA. Denny, can you briefly hit
 9 the highlights on that one?

10 MR. ROSS: I think specifically on the
 11 Zion-Indian Point stuff, that will be Harold's. We are
 12 aiding in that review in an advisory sense, and I think
 13 one of our key staff members has been on loan for a
 14 number of months to help in preparing the testimony on
 15 the generalized first half of the slide, PRA current
 16 use. I think some of the more interesting applications
 17 of that will start showing up, let's say, for Commission
 18 action in connection with the work we are doing with
 19 headquarters on a PRA as a tool for making a backfit
 20 decision for severe accident features.

21 It may be that when you hear headquarters, you
 22 can ask them to go into detail on how they see it. How
 23 we see it is by roughly the summer of '83 to have some
 24 specific analyses on specific plants that say, this
 25 feature of the plant, a filtered containment feature for

1 a Dresden or Quad Cities-like reactor would reduce risk
2 this much, it would cost that much, and on the basis of
3 this type of analysis, the Commission should either
4 require it or not require it or study it some more.

5 I think that is one of the more challenging
6 uses of PRA that we will be coming out with in the next
7 12 months.

8 COMMISSIONER GILINSKY: I hope you have error
9 bands.

10 MR. ROSS: Of course, the Lewis statement will
11 be engraved on every page.

12 COMMISSIONER AHEARNE: There is a variety of
13 them.

14 MR. ROSS: All of them, as the Commission may
15 instruct.

16 COMMISSIONER AHEARNE: Lewis said, make sure
17 that there are error bands, but use your PRA.

18 MR. ROSS: You will see that on the source
19 term, because we will not be able to use all of the
20 calculated source term reduction, because of the
21 important experimental information. It just won't be
22 in, so there will be an uncertainty attributed to that
23 as well.

24 COMMISSIONER GILINSKY: Let me understand
25 you. Sandia is submitting a report on Indian Point.

1 What was the basis of the staff testimony in the
2 hearing, or has the staff testified in the hearing?

3 MR. DENTON: No, we haven't testified on PRA.
4 This is somewhat subject to re-evaluation. I am trying
5 to accelerate the completion of the Sandia review to
6 December.

7 COMMISSIONER AHEARNE: Is that a Sandia review
8 of the licensee report?

9 MR. DENTON: Yes. We had a draft Sandia
10 review. The company submitted its report this spring
11 and the contractor contracted with Sandia to do the
12 probability on core melt and -- will do the consequence
13 side. And they have been doing that. Sandia sent in a
14 draft report on their critique of the company's, and we
15 have made that available to all of the parties, and we
16 had a meeting of all of the parties, and then Sandia, I
17 think, is presently scheduled to resubmit their report
18 in December, and we are filing schedules for the board
19 now.

20 COMMISSIONER AHEARNE: Where does the
21 Brookhaven report fit in?

22 MR. DENTON: It follows a little bit later,
23 because they need some of the Sandia numbers to finish
24 it.

25 COMMISSIONER AHEARNE: So you have -- Sandia

1 will submit a report in January, '83; Brookhaven will
2 then --

3 MR. DENTON: Follow some time later, once they
4 know what the Sandia views are.

5 COMMISSIONER AHEARNE: And then the staff
6 evaluation here, you expect it, say, in three months to
7 evaluate the Sandia report.

8 MR. DENTON: Our present views are better
9 reflected with what we filed with the board. When we
10 set up this scheme, we thought we would be in hearing
11 way before now, and staff was prepared to go to hearing
12 and discuss its views on this topic. Without having
13 this completed now, as the hearing was down toward the
14 end of the year, we will probably be able to have some
15 of these projects by the time the hearing needs them, so
16 we have actually given the board our latest schedule
17 that integrates all of these topics, and we will try to
18 mesh them.

19 COMMISSIONER AHEARNE: So are you saying that
20 your current plan is that your testimony will be based
21 upon staff evaluation of both the Sandia and the
22 Brookhaven report?

23 MR. DENTON: We are prepared to go to hearing
24 any time the board decides with what we have got, and
25 recognizing that we would have to inform the board, and

1 we have worked closely with Brookhaven, so what we
2 intend to talk about are some of the final numbers, so
3 we can start on risk any time the board so desires. And
4 these are the approximate schedules for the consultants
5 finishing their product, perhaps December and February.

6 COMMISSIONER AHEARNE: Is Brookhaven doing a
7 similar report on Zion?

8 MR. DENTON: Brookhaven, I think they are. I
9 think we've got the same setup on Zion that we've got on
10 Sandia -- I mean, that we had on Indian Point, with
11 Sandia doing half and Brookhaven doing half.

12 CHAIRMAN PALLADINO: Shall we go on?

13 MR. DIRCKS: The next slide is a very brief
14 slide on what are we doing about improving the research
15 program and in highlighting the use of research in the
16 regulatory program. We have covered this issue several
17 times with the Commission. I don't know whether you
18 want to go over any more highlights.

19 COMMISSIONER AHEARNE: I guess I would like
20 Denny to comment on what he means by a top down
21 program.

22 MR. ROSS: Well, I think it would be an
23 establishment of priorities, at least at the office
24 director level. One of the things that we hope to get
25 out of the nine range plan we have in the past is to get

1 a broad endorsement from program offices in the first
2 instance, that they would look at the plan and look at
3 the list of topics and agree, yes, that is what needs to
4 be worked on, or the details to be worked out outside of
5 the endorsement process by the appropriate staff.

6 Now, the converse of that, of course, would be
7 to sit back and ask the staff, what are some good ideas
8 to work on next year, and a whole bunch of ideas would
9 come up from that direction, and in actuality it is a
10 combine, but if Harold, for example, had some particular
11 views of a research program that he wants in order to
12 make his licensing role easier, or to make public safety
13 better, I think having his views in the beginning, well
14 before a statement of work is written and he is asked to
15 endorse it or not endorse it, would be tops down. But I
16 believe we have been doing that more or less for two
17 years.

18 COMMISSIONER GILINSKY: I hope what you are
19 saying is, the program is driven by questions that need
20 to be answered, whether that comes from Harold or from
21 your own staff, rather than by existing programs,
22 existing commitments to laboratories, existing machinery
23 that we have out there.

24 MR. DIRCKS: I think that is what -- we are
25 trying to get the regulatory program out in front of the

1 research program.

2 The last issue is the safeguards issue.

3 COMMISSIONER GILINSKY: May I ask a research
4 question that overlaps with the safeguards one? Are you
5 doing anything to help research reactors switch over
6 from high enrichment to low enrichment?

7 MR. ROSS: If we've got any, I don't remember
8 what it is.

9 COMMISSIONER GILINSKY: And why not?

10 MR. ROSS: There was a project we worked on.

11 COMMISSIONER AHEARNE: A related question
12 probably would be a request to Harold. The Commission,
13 I think, has issued a policy statement, and it had been
14 said that we believe everybody overseas ought to do
15 this, and then we went on to say, we will establish
16 policies to have that happen here, and I wonder whether
17 we are doing anything. In fact, I think OPE was
18 supposed to be coming up with a proposal on how to
19 accomplish that.

20 MR. DIRCKS: Well, whatever we are doing, we
21 will come back.

22 COMMISSIONER GILINSKY: Well, if I am can
23 follow that up, one of the arguments people make is that
24 it is difficult to switch over because this raises a
25 safety question, and it gets them in difficulties with

1 this country and in their own country with regulators.
2 That is something that we really can help, and we ought
3 to address that problem. It is an important one.

4 COMMISSIONER AHEARNE: And many times you say
5 we can't look in detail at foreign systems, which is all
6 true, but we certainly know in detail our systems.

7 MR. DENTON: We will get whatever we have.

8 COMMISSIONER AHEARNE: It isn't consistent for
9 us to tell foreign countries they have to go to
10 enrichment where we aren't doing it for ours.

11 Is OPE doing something on this, Jack?

12 VOICE: I asked OPE to do something. I should
13 say we are working on it. I have been talking to people
14 on Harold's staff through Ed Case.

15 MR. DIRCKS: The last issue we have up there
16 is the safeguards rule, the safeguards area.

17 COMMISSIONER AHEARNE: There was a schedule
18 for that, and the schedule on the first two blocks
19 seemed to have been met well, and then the third block
20 had a very big slip.

21 MR. DIRCKS: I think the slip is due to the
22 most recent question we have had about looking at the
23 safety-safeguards interface. The answers, I think, to
24 that question --

25 COMMISSIONER AHEARNE: Essentially, those were

1 put on hold.

2 MR. DIRCKS: Those were put on hold, and as
3 you know, we have established this group to come back to
4 us in February, back to John Davis, and John will get
5 back to me. We have a mixture of regional people on
6 it.

7 CHAIRMAN PALLADINO: What is this group
8 doing?

9 MR. DIRCKS: They had come back, based on many
10 other comments we have received, some from
11 Commissioners, about is there a safety-safeguards
12 interface problem. They are to review what we know
13 about the issue, take a look at where we have come from
14 on this issue, and then come in with a set of proposals
15 to either change the rule -- the rule would probably be
16 the vehicle on which to get some remedies.

17 COMMISSIONER AHEARNE: All the rules.

18 MR. DIRCKS: Yes.

19 COMMISSIONER AHEARNE: Because there were two
20 or three.

21 MR. DIRCKS: Yes.

22 MR. DAVIS: They are combined in a single
23 package, because they do interplay. The basic question
24 on safety-safeguards is control of the insides within
25 the plant, and that is the heart of this particular

1 package.

2 MR. DIRCKS: So it was at the right time that
3 we took a look at this issue.

4 That completes --

5 CHAIRMAN PALLADINO: Could I ask one general
6 question? Are there any items in the PPG that were not
7 started or not going along on a reasonable target?

8 MR. DIRCKS: I think there are about five.
9 Human factors is one we mentioned. Difficulties there.
10 We are behind schedule. We started it, but we are
11 behind schedule. The siting rule is another area in the
12 PPG that we have -- we have let go on siting in order to
13 get to the source term work ahead of it.

14 COMMISSIONER AHEARNE: You are essentially
15 saying, aren't you, that the siting rule is now in
16 series with the source term?

17 MR. DIRCKS: Right, and I think the Commission
18 is addressing that, and the update of the PPG, and will
19 get further information on it. The insider rule which
20 we just discussed, and again, we are trying to get that
21 in some kind of a synchronization with the difficulties
22 that there are -- at the Commission. The high level
23 waste rule, again, we had a schedule slip on that, but
24 again, the issue is going to be addressed by the
25 Commission.

1 The QA packaged, we slipped that one. I think
2 in view of the activities that we have recently gone
3 through, I think we probably pulled that one back
4 somewhat on schedule. We will have a revised schedule
5 to you, because many of those items we got under way
6 while we were developing --

7 CHAIRMAN PALLADINO: You are working on all of
8 these, excepting you put the siting in sequence with the
9 source term.

10 MR. DIRCKS: That's right.

11 CHAIRMAN PALLADINO: Well, it seems like we
12 are making significant progress as time goes on. The
13 question is, are we making significant progress on the
14 things we ought to be? But I think the PPG was intended
15 to make sure we focus on the right policy.

16 Is there anything else?

17 (No response.)

18 CHAIRMAN PALLADINO: All right. Thank you
19 very much. We will stand adjourned.

20 (Whereupon, at 12:17 p.m., the Commission was
21 adjourned.)

22

23

24

25

NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the
COMMISSION MEETING

in the matter of: Briefing on the Implementation of 1982 Policy
and Planning Guidance

Date of Proceeding: October 28, 1982

Docket Number: _____

Place of Proceeding: Washington, D. C.

were held as herein appears, and that this is the original transcript
thereof for the file of the Commission.

ALFRED H. WARD

Official Reporter (Typed)



Official Reporter (Signature)

FY 1982

END OF YEAR PROGRAM REVIEW

OCTOBER 28, 1982

FY 1982
END OF YEAR REVIEW
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No.

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SYSTEMATIC EVALUATION PROGRAM

As of 9/30/82

PLANT	TOPIC REV.			FY 82				FY 83				FY 84
	#	# Comp	% Comp	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Pallsades	90	90	100%		△ ▲ ■		○ ●					
Ginna	92	92	100%		△ ▲ ■		○ ●					
Oyster Creek	83	83	100%			△ ▲ ■		○				
Millstone 1	86	86	100%			▲		□	○			
Big Rock Point	85	81	95%					△ △			□ ○	
Yankee Rowe	89	88	99%					△ △	□ ○			
Dresden 2	88	88	100%			▲		□ ○				
Haddam Neck	90	90	100%					△ △	□ ○			
LaCrosse	83	79	95%					△ △	□ ○			
San Onofre	89	75	84%					△			□ ○	
Program Performance (Topic Technical Reviews Completed)	Quarter (Actual)			94	87	139	96					
	Program to Date (Act)			532	617	757	852					
	Program to Date (Plan)			566	680	816	857	875				
	% of Planned			94%	91%	93%	99%					

Topic Tech. Rev.

Safety Assess. for ACRS

Safety Assess. to EDO/Comm.

Scheduled:



Completed:



MILESTONE DESCRIPTION	FY 82				FY 83				FY 84
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
<u>IREP</u>									
Phase I (Crystal River Study)									
- Issue Final Report		▲							
Phase II (Analysis of 4 additional plants)*									
- Complete draft studies/reports		▲							
- Issue final reports			▲				▲		
IREP Procedures Guide									
- Complete revisions				▲	▲				
<u>NREP</u>									
IEEE Peer Review Conference held	▲								
AWS Peer Review Conference held			▲	▲					
Complete final procedures				▲	▲				
<u>NREP IMPLEMENTATION</u>									
NRR selection of NREP procedures					▲				
Begin implementing of SEP Phase III/NREP					▲		▲		

* Calvert Cliffs 1
Arkansas 1
Browns Ferry 1
Millstone 1

SCHEDULED ▲

SCHEDULED(REVISED) - - - - - ▲

COMPLETED ▲

STATUS OF EFFORTS TO IMPROVE ABILITY OF UTILITY PERSONNEL TO DIAGNOSE AND DEAL WITH OFF-NORMAL CONDITIONS

- o HUMAN FACTORS PROGRAM PLAN SUBMITTED TO EDO ON OCTOBER 15, 1982, INCLUDES: STAFFING AND QUALIFICATIONS, TRAINING, LICENSING EXAMINATIONS, PROCEDURES AND TESTING, AND MAN-MACHINE INTERFACE
- o SECY 82-111 "REQUIREMENTS FOR EMERGENCY RESPONSE CAPABILITY" APPROVED BY COMMISSION ON JULY 20, 1982 PROMULGATES REQUIREMENTS RELATED TO: EMERGENCY OPERATING PROCEDURES, DETAILED CONTROL ROOM DESIGN REVIEWS, SAFETY PARAMETER DISPLAY SYSTEM, AND EMERGENCY RESPONSE FACILITIES
- o REQUALIFICATION EXAMINATIONS PLANNED FOR ABOUT 20 PERCENT OF ALL ROs AND SROs IN FY 1983
- o 50 PERCENT TRAINING FACILITY INSTRUCTORS TO BE CERTIFIED IN FY 1983; REMAINDER IN FY 1984
- o IMPLEMENT SECOND SRO ON ALL SHIFTS BY JANUARY 1983
- o IMPROVE EXAMINATION PROCEDURES
- o INPO IS DEVELOPING A COMPREHENSIVE JOB TASK ANALYSIS WHICH WILL SUPPORT TECHNICAL RESOLUTION OF SEVERAL GENERIC ISSUES RELATED TO HUMAN FACTORS SUCH AS:
 - EXAMINATION DEVELOPMENT AND VALIDATION
 - EMERGENCY PROCEDURE VALIDATION
 - USE OF THE SAFETY PARAMETER DISPLAY SYSTEM
 - COMPREHENSIVE TRAINING CURRICULUM FOR SRO's, RO's, AND MAINTENANCE PERSONNEL
- o NRC WILL WORK WITH INPO TO INCREASE THE CAPABILITIES OF INDUSTRY IN THE AREAS OF TRAINING AND EXAMINING UTILITY PERSONNEL

SUMMARY OF FY 1982 ENFORCEMENT ACTIONS AND STATUS OF THE EVALUATION OF ENFORCEMENT POLICY

o ENFORCEMENT ACTIONS

- PROPOSED PENALTIES OF \$2,233K FOR 37 CIVIL PENALTY ACTIONS
 - \$2,178K FOR 24 POWER REACTOR ACTIONS
 - \$34K FOR 7 MATERIAL LICENSEE ACTIONS
 - \$13K FOR 2 RADIOGRAPHY LICENSEE ACTIONS
 - \$5K FOR 2 RADIOPHARMACEUTICAL ACTIONS
 - \$2K FOR 1 FUEL FACILITY ACTION
 - \$1K FOR 1 NON-POWER REACTOR ACTION
- TOTAL COLLECTIONS OF \$1,600K FOR 37 CIVIL PENALTY ACTIONS
- SIX ENFORCEMENT ORDERS ISSUED
 - 2 FOR POWER REACTORS
 - 1 FOR MATERIAL LICENSEE
 - 2 FOR RADIOGRAPHY LICENSEES
 - 1 FOR GENERAL LICENSEE

o ENFORCEMENT POLICY

- IE, IN COORDINATION WITH THE REGIONS, WILL PROVIDE TO THE EDO BY APRIL 1, 1983 RECOMMENDATIONS FOR REVISING, AS APPROPRIATE, THE ENFORCEMENT POLICY.
- (1) SOLICIT INFORMATION FROM NRC OFFICES (INCLUDING THE REGIONS), INDUSTRY GROUPS AND OTHERS REGARDING:
 - A) IMPACT OF THE POLICY IMPLEMENTATION ON PLANT SAFETY
 - B) PERCEIVED FAIRNESS, UNIFORMITY AND CONSISTENCY OF POLICY IMPLEMENTATION
 - C) ANY NECESSARY CHANGES TO THE POLICY AND
 - D) NEED TO FURTHER REGIONALIZE ENFORCEMENT ACTIVITIES
- (2) DEVELOP STATISTICS ON ENFORCEMENT ACTIONS TAKEN SINCE MARCH 1982, AND
- (3) SUMMARIZE THE RESULTS OF THIS ANALYSIS AND DEVELOP RECOMMENDATIONS

OPERATING LICENSE REVIEWS

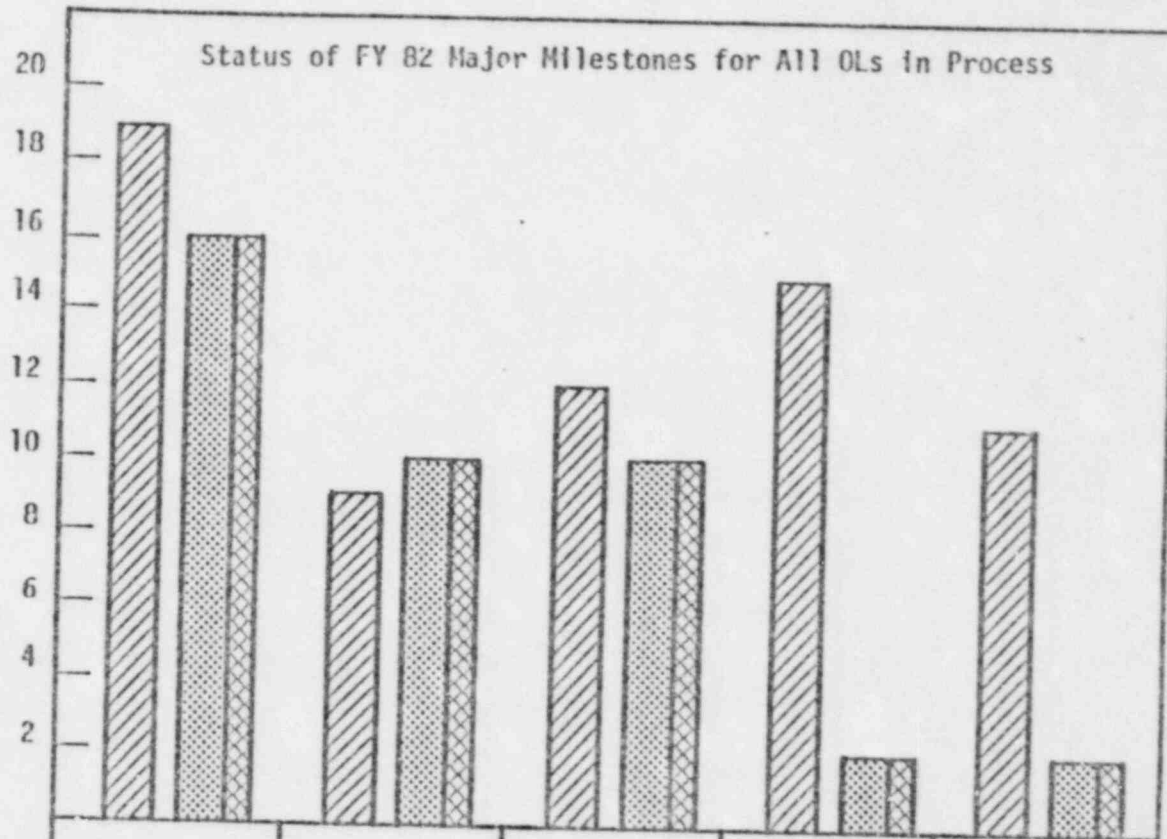
As of 9/30/82

Number of Milestones

10/81 Bevill


9/82 Bevill


Actual

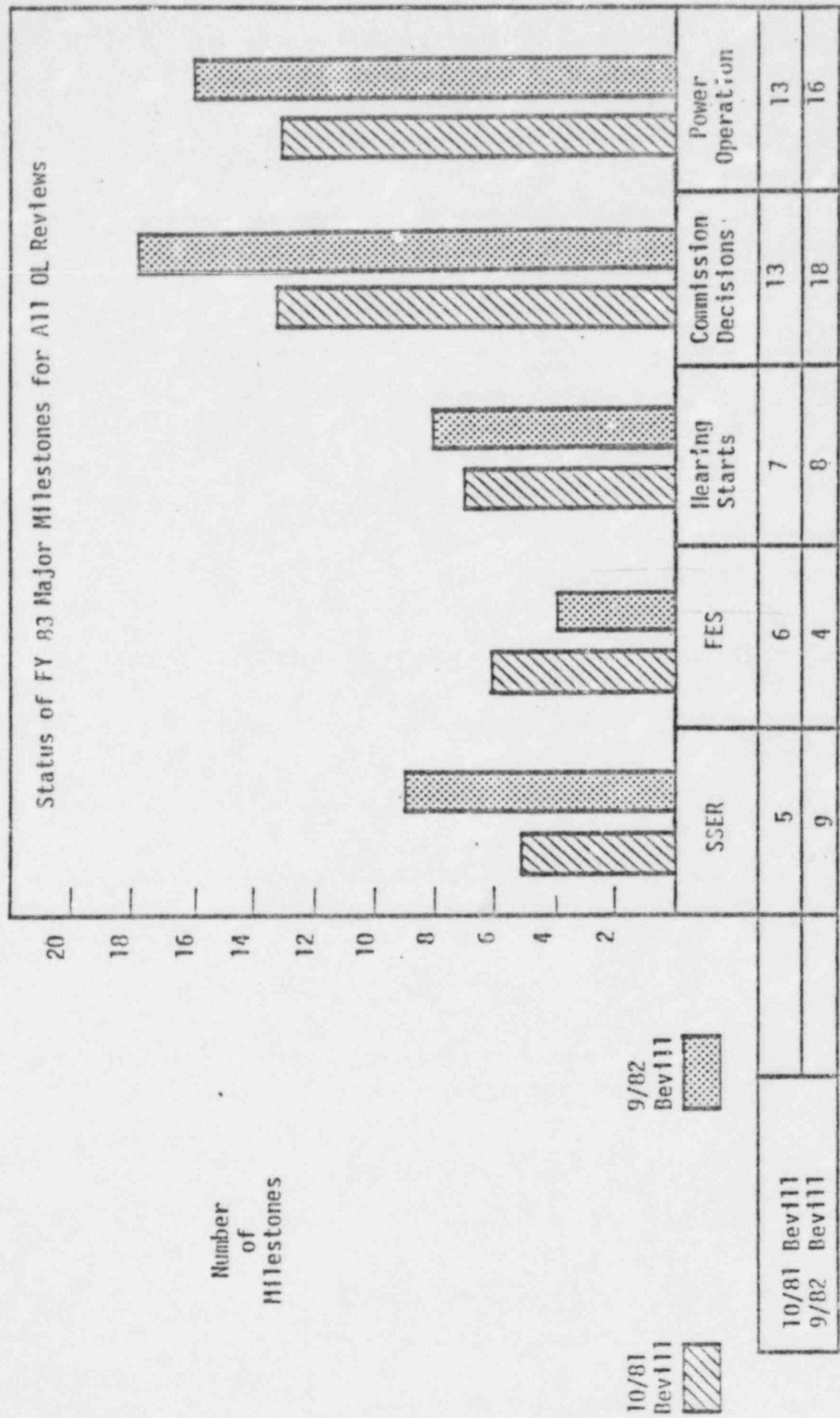
		SSER	FES	Hearing Starts	Commission Decisions ^{1/}	Power Operation ^{1/}
October 81 Bevill Schedule	Tot FY 82	19	9	12	15	11
	YTD	19	9	12	15	11
September 82 Bevill Schedule	Tot FY 82	16	10	10	2	2
	YTD	16	10	10	2 ^{2/}	2 ^{2/}
Actual	YTD	16	10	10	2 ^{2/}	2 ^{2/}

^{1/}Commission Decision: Commission decision on whether to grant an OL with or without conditions. Power Operation: When a licensee has the authority (including conditional) and ability to achieve 100% rated power output. Occurs only after a licensee has completed construction, and the Commission has granted a license. Power operation begins on the date of construction completion or the date of Commission decision, whichever is later.

^{2/}Excludes operating licenses restricted to 5% power (Grand Gulf 1, Summer 1, and Susquehanna 1).

OPERATING LICENSE REVIEWS -- FY 1983 PLAN

As of 9/30/82



	10/81 Bev111	9/82 Bev111
SSER	5	9
FES	6	4
Hearing Starts	7	8
Commission Decisions	13	18
Power Operation	13	16

MILESTONE DESCRIPTION	FY 82				FY 83				FY 84
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Receive Acceptable Update to PSAR & ER	△								
Complete Site Suitability Portion of LWA				△					
Issue Draft SER				△ △					
Begin Environmental Portion of LWA Hearing					△				
Issue FES Supplement					△				
Issue SER						△			
Begin Safety Portion of LWA Hearing							△		
Begin Safety Hearing								△	
Issue LWA-2								△	
Commission CP Decision									△

SCHEDULED △

SCHEDULED(REVISED) - - - - △

COMPLETED ▲

UNRESOLVED SAFETY ISSUES (USIs)

- o THE COMMISSION HAS IDENTIFIED A TOTAL OF 25 USIs BECAUSE OF THEIR HIGH PRIORITY AMONG THE GENERIC ISSUES.
- o THE TECHNICAL RESOLUTIONS FOR 12 USIs HAVE BEEN COMPLETED PRIOR TO END OF FY 1982
 - A-2 ASYMMETRIC BLOWDOWN LOADS
 - A-6 MARK I SHORT TERM PROGRAM
 - A-7 MARK I LONG TERM PROGRAM
 - A-8 MARK II CONTAINMENT POOL DYNAMIC LOADS
 - A-9 ANTICIPATED TRANSIENTS WITHOUT SCRAM
 - A-10 BOILING WATER REACTOR NOZZLE CRACKING
 - A-24 QUALIFICATION OF CLASS IE SAFETY RELATED EQUIPMENT
 - A-26 REACTOR VESSEL PRESSURE TRANSIENT PROTECTION
 - A-31 RESIDUAL HEAT REMOVAL
 - A-36 CONTROL OF HEAVY LOADS NEAR SPENT FUEL
 - A-39 SRV POOL DYNAMIC LOADS
 - A-42 PIPE CRACKS IN BOILING REACTORS
- o THE TECHNICAL RESOLUTION FOR 4 USIs PLANNED IN FY 1983

Schedule

Number	Description	Planned Event	FY 82				FY 83				FY 84
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
A-43	Containment Emergency Sump Performance	Draft TR for comment				△	△				
		Final TR							△	△	
A-44	Station Blackout	Draft TR for comment						△	△		
		Final TR									△
A-45	Shutdown Decay Heat Require- ments	Task Action Plan	△			△					
		Final TR									
A-46	Seismic Quali- cation of Equipment in Operating Plants	Task Action Plan	△			△					
		Draft TR							△		
		Final TR								△	
A-47	Safety Implica- tions of Control Systems	Task Action Plan		△			△				
		Final TR (not scheduled)									
A-48	Hydrogen Control Measures and Effects of Hydro- gen Burns on Safety Equip.	Task Action Plan		△			△				
A-49	Pressurized Thermal Shock	Commission Paper recommending approval of this as a USI	△								
		Draft Task Action Plan within 3 months after Commission approval of USI			△						
		Draft TR for comment								△	△
		Final TR									

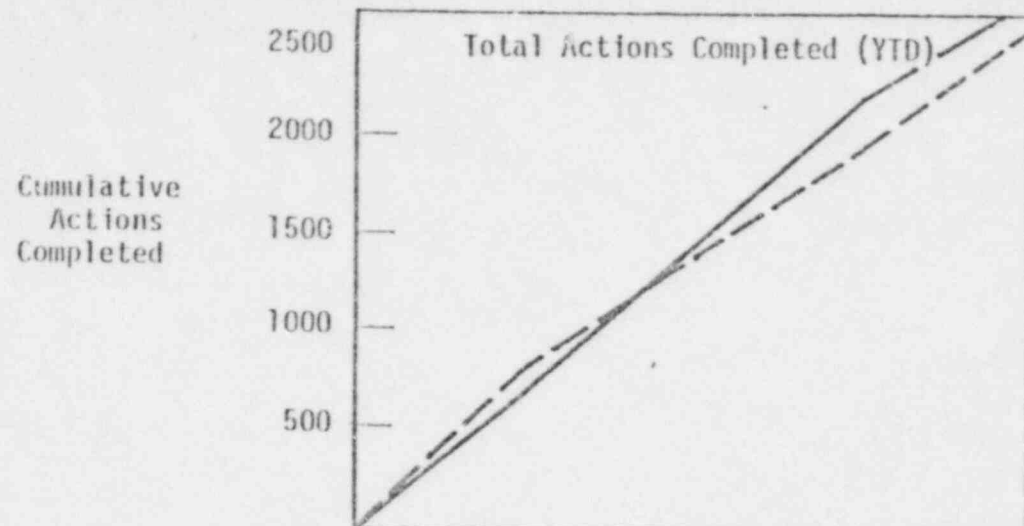
SCHEDULED △

SCHEDULED (REVISED) ---△

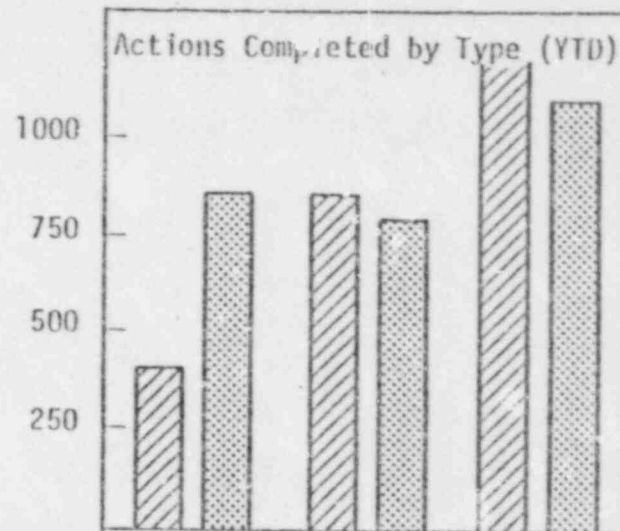
COMPLETE ▲

RESULTS OF EFFORT TO ESTABLISH PRIORITIES FOR UNRESOLVED SAFETY ISSUES, GENERIC ISSUES AND TMI PLAN ITEMS

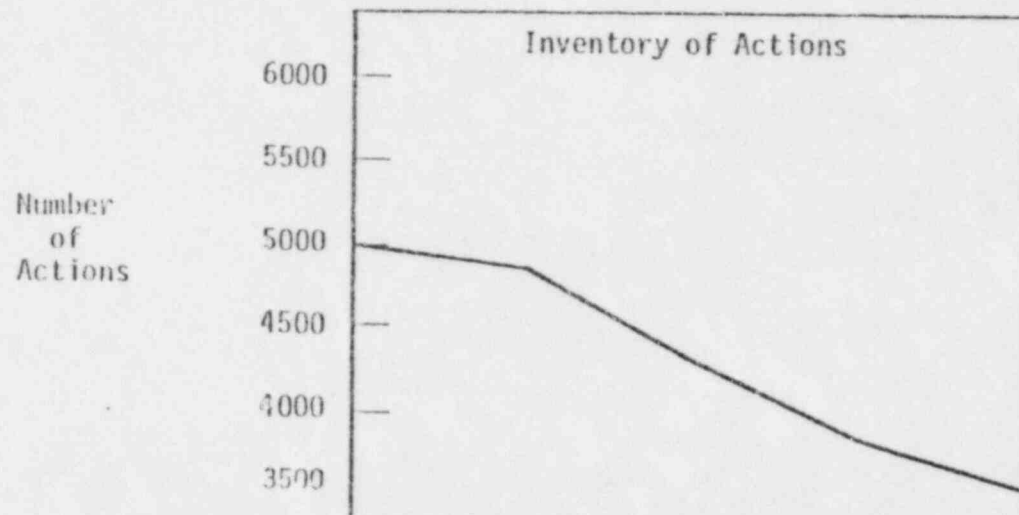
- o PRELIMINARY RANKING OF NRR GENERIC SAFETY ISSUES (GSIs) INCLUDING NRR LEAD TMI RELATED ISSUES COMPLETED IN MARCH 1982
- o FINAL PRIORITIZATION OF NRR GSIs INCLUDING NRR LEAD TMI RELATED ISSUES SUBMITTED TO DIRECTOR OF NRR IN SEPTEMBER 1982
- o NRR TO SUBMIT NRR GSIs TO ACRS IN NOVEMBER 1982
- o SUBSEQUENTLY, SUBMIT TO THE EDO
 - FINAL PRIORITIZATION OF NRR GSIs INCLUDING NRR LEAD TMI ISSUES
 - IDENTIFICATION OF GSIs WHICH CAN BE ELIMINATED BECAUSE OF MARGINAL REGULATORY IMPORTANCE
 - RECOMMENDED PROCEDURES AND CRITERIA FOR ADDING NEW ISSUES
- o FINAL PRIORITIZATION OF ALL GSIs INCLUDING NON-NRR LEAD TMI RELATED ISSUES TO BE SUBMITTED TO EDO IN JANUARY 1983
- o NRR SUBMIT INTEGRATED SCHEDULE FOR RESOLVING ALL PRIORITIZED GSIs TO EDO BY MARCH 1, 1983



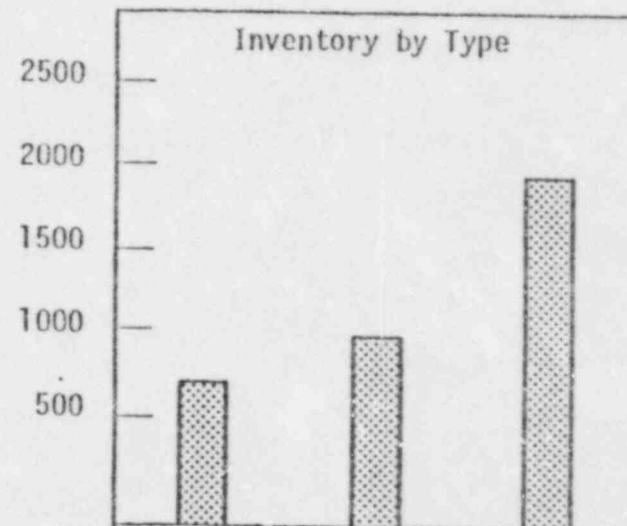
		Q1	Q2	Q3	Q4
Action Completed	Quarter	679	788	723	527
	YTD	679	1,467	2,190	2,717
Planned Completion	YTD	789	1,374	1,902	2,544
	% of Planned	86%	107%	115%	107%



Type	Actual	Planned
Plant Specific	852	404
Multi-Plant	792	850
NUREG 0737	1,073	1,290
	211%	93%



	Q1	Q2	Q3	Q4
Inventory	4,861	4,303	3,853	3,531



Type	Actual	Planned
Plant Specific	684	967
Multi-Plant	967	1,880

Actual

Plan

PROGRESS ON DEVELOPMENT OF MANAGEMENT SYSTEM FOR COORDINATION OF EXISTING AND NEW REQUIREMENTS

- o NRR, IN CONJUNCTION WITH IE AND REGIONS, WILL WORK WITH OWNERS' GROUPS AND LICENSEES TO ESTABLISH ENFORCEABLE IMPLEMENTATION SCHEDULES FOR EXISTING REQUIREMENTS FOR EACH OPERATING FACILITY, WITH INITIAL SCHEDULES DEVELOPED BY JUNE 1983
- o NEW REQUIREMENTS AS REVIEWED BY CRGR AND APPROVED BY EDO WILL BE INTEGRATED INTO THE INITIAL SCHEDULES TO ENABLE IMPLEMENTATION OF HIGHER PRIORITY REQUIREMENTS AHEAD OF EXISTING REQUIREMENTS OF LOWER PRIORITY
- o VERY LOW PRIORITY ITEMS SHOULD BE ELIMINATED, AS APPROPRIATE
- o MODIFICATION OF INTEGRATED SAFETY ISSUE TRACKING SYSTEM - SCHEDULED FOR COMPLETION BY MARCH 1983
 - TRACKS IDENTIFIED SAFETY ISSUES THRU SUBMISSION TO CRGR FOR REQUIREMENTS APPROVAL
 - TRACKS APPROVED CHANGES TO THE STANDARD REVIEW PLAN
- o MODIFICATION OF OPERATING REACTORS LICENSING ACTION TRACKING SYSTEM - PHASE I SYSTEM AND RELATED REPORTS SCHEDULED FOR COMPLETION BY JANUARY 1983

THE EXTENT TO WHICH FY 1982 REGIONALIZATION TARGETS HAVE BEEN MET AND EXPLANATION OF FY 1983 AND FY 1984 TARGETS

0 THE STATUS OF MEETING THE FY 1982 REGIONALIZATION TARGETS IS SUMMARIZED AS FOLLOWS;

1. OPERATING REACTOR LICENSING ACTIONS

- 364 LICENSING ACTIONS WERE TRANSFERRED TO THE REGIONS; 532 WERE PLANNED
- A NEW SECTION HAS BEEN ADDED TO THE ORLAS BOOK TO TRACK COMPLETION OF LICENSING ACTIONS ASSIGNED TO THE REGIONS

2. REACTOR OPERATOR LICENSING

- ON AUGUST 26, 1982 THE DIRECTOR OF NRR FINALIZED A MOU FOR REGIONALIZING REACTOR OPERATOR LICENSING IN REGIONS II AND III. ELD IS DRAFTING A DELEGATION OF AUTHORITY FOR REACTOR OPERATOR LICENSING TO SUPERSEDE THE MOU.

3. MATERIALS LICENSING

- ON MAY 13, 1982 THE DIRECTOR OF NMSS AND THE EDO DELEGATED AUTHORITY FOR FIVE CATEGORIES OF MATERIALS LICENSING TO REGIONS I AND III.

4. PROPOSED CIVIL PENALTIES

- IN MAY 1982, THE DIRECTOR OF IE AUTHORIZED REGIONAL ADMINISTRATORS TO SIGN CORRESPONDENCE IN WHICH NRC PROPOSES CIVIL PENALTIES ON REACTOR LICENSEES.

THE EXTENT TO WHICH FY 1982 REGIONALIZATION TARGETS HAVE BEEN MET AND EXPLANATION OF FY 1983 AND FY 1984

TARGETS (CONTINUED)

5. OBSERVATION OF EMERGENCY PREPAREDNESS EXERCISES

- WITH ASSISTANCE OF HEADQUARTERS PERSONNEL AND CONTRACTORS, THE REGIONS CONTINUED TO MONITOR ANNUAL EMERGENCY PREPAREDNESS EXERCISES CONDUCTED IN FY 1982.

6. LEGAL ASSISTANCE TO THE REGIONS

REGIONAL WORKLOADS HAVE BEEN ASSIGNED TO HEADQUARTERS-BASED ATTORNEYS. AS OF OCTOBER 1982, AN ATTORNEY HAS BEEN PLACED IN REGION III AND ONE HAS BEEN SELECTED FOR REGION II.

7. STATE AGREEMENTS OFFICERS

- OFFICERS IN PLACE IN REGIONS I, II, IV, AND V. TWO IN REGION IV BECAUSE OF MILL TAILINGS LICENSING. THERE ARE NO AGREEMENT STATES IN REGION III.

8. BUDGET ACTIVITIES

- REGIONS TOOK AN EXPANDED ROLE IN EXECUTING FY 1982 BUDGET AND FORMULATING FY 1983-1985 BUDGET.

o FY 1983/84 REGIONALIZATION TARGETS

- CONSISTENT WITH COMMISSION-APPROVED BUDGET TO OMB
- THE TARGETS CONTAINED IN THE EDO PROGRAM GUIDANCE DATED SEPTEMBER 20, 1982
- DETAILED SCHEDULES FOR TRANSFER OF THESE FUNCTIONS ARE BEING DEVELOPED
- DENVER OFFICE ESTABLISHED OCTOBER 1, 1982

HIGH LEVEL WASTE REPOSITORIES TECHNICAL CRITERIA

As of 9/30/82

MILESTONE DESCRIPTION	FY 82				FY 83				FY 84
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Complete Staff Assignments for Response to Public Comments	▲								
Public Comments on Major Items Summarized and Staff Positions Drafted		▲							
Complete First Draft of Text for Final Rule and Entire Response to Public Comments			▲						
Final Rule to EDO				▲					
Final Rule to COMM						▲			

SCHEDULED ▲

SCHEDULED(REVISIED) - - - - - ▲

COMPLETED ▲

LOFT WITH CONSORTIUM

As of 9/30/82

MILESTONE DESCRIPTION

FY 02

FY 03

FY 04

Q1

Q2

Q3

Q4

Q1

Q2

Q3

Q4

AHS Tests (2)

Large Break LOCAS (2)

Boron Dilution Transient Test

Operational Transient Tests.

Consortium Formation^{1/}

Consortium Test Program Finalized^{1/}

LOFT Consortium Completion^{1/}

^{1/} Assumes approval of the DOE sponsored International LOFT Consortium.

^{1/}
FY 86

^{1/}
FY 86

SCHEDULED Δ

SCHEDULED(REVISED) Δ

COMPLETED Δ

QUALIFICATION OF SAFETY RELATED EQUIPMENT

As of 9/30/82

MILESTONE DESCRIPTION	FY 82				FY 83				FY 84
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Environmental Qualification of Electrical Equipment									
- Proposed Rule		△							
- Interim rule suspending deadline for qualification of electrical equipment			△						
- Final Rule to Commission			△	△*					
- Issue SER Supplements 1 and 2				△			△		
Seismic and Dynamic Qualification of Safety Related Equipment									
- Advanced Notice of Rulemaking			△ 1/						
- Cost/Benefit Analysis					△				
- Proposed Rule									
- Final Rule								△* 1/	1/△*
Independent Verification Testing Program to Review Approximately 10 Industry Tests and Perform Approximately 3 Independent Verification Tests Per Year				△					
Rulemaking on Laboratory Accreditation									
- NRC/IEEE Agreement on Lab Accreditation	△								
- Proposed rule to Commission			△						

*Commission decision
 1/Delayed pending approval of comprehensive program plan.

SCHEDULED △

SCHEDULED(REVISED) - - - - △

COMPLETED △

PROGRESS ON REASSESSING THE RADIOACTIVE SOURCE TERM AND SCHEDULE FOR COMPLETION

- o FIRST PBF TEST IS SCHEDULED FOR OCTOBER 1982
- o FIRST ESTIMATE FOR REVISED SOURCE TERM UNDERGOING DEVELOPMENT BY CONTRACTOR
- o PEER REVIEW HAS SLIPPED TO MARCH 1983
- o RADIOACTIVE SOURCE TERM WORK IS PROGRESSING ON THE FOLLOWING SCHEDULE:
 - NEEDED RESEARCH ON RISK DOMINANT SEQUENCES WILL BE COMPLETED BY THE END OF DECEMBER 1982
 - THE RADIOACTIVE SOURCE TERM ADDRESSED IN NUREG-0772 WILL BE RE-EVALUATED IN MID-CY 1983
 - THE EMERGENCY PLANNING REQUIREMENTS (EMERGENCY NOTIFICATION RULES) WILL BE RE-EVALUATED TO DETERMINE IF MODIFICATIONS ARE NEEDED

SUMMARY OF THE USE OF PROBABILISTIC RISK ASSESSMENT AND SCHEDULE FOR STAFF REVIEWS OF ZION AND INDIAN POINT PRA'S

o PRA CURRENT USE INCLUDES:

- PRIORITIZATION OF GENERIC SAFETY ISSUES
- REVIEW OF HIGH POPULATION DENSITY SITES
- STANDARD PLANT AND NEW CP REQUESTS
- DECISIONS ON NEW REQUIREMENT (CRGR REVIEWS)
- SEP PHASE II INTEGRATED SAFETY ASSESSMENTS
- SELECTED OL/OPERATING REACTOR ISSUES

o POTENTIAL USE OF PRA DISCUSSED IN DETAIL IN EDO MEMO TO COMMISSION OF JULY 6, 1982, SUBJECT: ACTION PLAN FOR IMPLEMENTING THE COMMISSIONS PROPOSED SAFETY GOAL

ZION AND INDIAN POINT

- o SANDIA WILL SUBMIT A LETTER REPORT ON INDIAN POINT IN JANUARY 1983. THE STAFF EVALUATION IS EXPECTED TO BE COMPLETED BY END OF APRIL 1983
- o SANDIA WILL SUBMIT A LETTER REPORT ON ZION BY END OF APRIL 1983. THE STAFF EVALUATION IS EXPECTED TO BE COMPLETED BY END OF AUGUST 1983

SUMMARY OF THE STEPS TAKEN AND PLANNED TO IMPROVE THE RESEARCH PROGRAM, HIGHLIGHTING THE USE OF RESEARCH TO ASSIST IN ESTABLISHING REGULATIONS

- 0 INTEGRATION OF THE RESEARCH EFFORTS INTO AGENCY-WIDE PROGRAM PLANS FOR HUMAN FACTORS, EQUIPMENT QUALIFICATION, DECOMMISSIONING, WASTE MANAGEMENT, CRBR AND SEVERE ACCIDENT
- 0 SPECIFIC RESEARCH IN DIRECT SUPPORT OF AND COORDINATED WITH USER OFFICES SUCH AS THE CURRENT PROGRAM ON PRESSURIZED THERMAL SHOCK, STEAM GENERATOR RELIABILITY, AND RISK APPLICATION SUCH AS IREP/NREP SUPPORT
- 0 LONG RANGE RESEARCH PLAN (LRRP) FOR FY 1984-1988 WILL EMPHASIZE A TOP DOWN PLANNING APPROACH BASED ON STATED CONTRIBUTIONS FROM THE RESEARCH PROGRAM TO THE REGULATORY PROCESS
- 0 USER OFFICES WILL BE ASKED TO ENDORSE THE STATED REGULATORY NEEDS AND ASSIGNED PRIORITIES PRIOR TO RES BUDGET DEVELOPMENT IN THE LRRP

INSIDER RULE

As of 9/30/82

MILESTONE DESCRIPTION	FY 82				FY 83				FY 84
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Final Package to Director NMSS									
Vital Area Access Control		▲							
Pat Down Search Rule		▲							
Personnel Screening Rule		▲							
Submit Rule to EDO									
Vital Area Access Control			▲						
Pat Down Search Rule			▲						
Personnel Screening Rule			▲						
Submit Rule to COM									
Vital Area Access Control				△			△		
Pat Down Search Rule				△			△		
Personnel Screening Rule				△			△		

SCHEDULED △

SCHEDULED(REVISED) - - - -

COMPLETED ▲

SUMMARY OF ACTIONS TAKEN TO ADDRESS (A) INFORMATION NEEDS, (B) INSIDER RULE, AND (C) SAFETY AND SAFEGUARDS

INTERFACE QUESTIONS

O SAFETY AND SAFEGUARDS INTERFACE QUESTIONS

- IN RESPONSE TO THE CHAIRMAN'S AUGUST 16, 1982 MEMORANDUM CONCERNING THE SAFETY/SAFEGUARDS INTERFACE, A MULTI-OFFICE COMMITTEE HAS BEEN ESTABLISHED FOR A FOUR MONTH DURATION.
- DRAFT CHARTER FOR COMMITTEE SUBMITTED TO EDO SEPTEMBER 1982
- SAFETY-SAFEGUARDS REVIEW COMMITTEE RECOMMENDATIONS DUE BY FEBRUARY 1983

O INFORMATION NEEDS

- CONCLUSIONS OF SAFEGUARDS INFORMATION NEEDS EVALUATION SUBMITTED TO THE COMMISSION ON JUNE 10, 1982.
- OFFICE OF RESOURCE MANAGEMENT CONTRACTED TO PERFORM A COST ANALYSIS OF MATERIAL ACCOUNTING SERVICE MODULE (MAC). COST ANALYSIS WILL BE COMPLETED BY JANUARY 1983
- NMSS WILL RECOMMEND TO THE EDO BY APRIL 1983 WHICH COURSE OF ACTION TO TAKE

TRANSMITTAL TO:



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DATE:

11/2/82

cc: OPS File

From: SECY OPS Branch

C&R (Natalie)

Attached are copies of a Commission meeting transcript/s/ and related meeting document/s/. They are being forwarded for entry on the Daily Accession List and placement in the Public Document Room. No other distribution is requested or required. Existing DCS identification numbers are listed on the individual documents wherever known.

Meeting Title: Year End Program Review

MEETING DATE:	Open		DCS COPIES:		
	Closed	Copies	(1 of each Checked)		
ITEM DESCRIPTION:	Advanced	To PDR:	Original Document	May be Dup*	Duplicate Copy*
1. <u>Transcript</u> <u>(w/ micrographs)</u> <u>(attached)</u>		<u>1</u>	<u>1</u>		
2. <u>Memo from Dircks</u> <u>to Commission</u> <u>dated 10/27/82</u>		<u>1</u>		<u>1</u>	
3. _____					
4. _____					
5. _____					

(PDR is advanced one of each document, two of each SECY paper.)

*Verify if in DCS, and change to "PDR available."