



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

July 9, 1984

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The Honorable Edward J. Markey, Chairman
Subcommittee on Oversight and Investigations
Committee on Interior and Insular Affairs
United States House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

This is in response to your June 1, 1984 letter concerning the Nuclear Regulatory Commission (NRC) staff's review of the Technical Specifications for the Grand Gulf Nuclear Power Plant license application. Your letter requested details of instances since the Three Mile Island, Unit 2 accident in which errors have been discovered in Technical Specifications subsequent to NRC staff approval of those Technical Specifications. You cited the Susquehanna Steam Electric Station as an example.

The review procedures used by the NRC staff for preparing the Grand Gulf Technical Specifications were not restricted to Grand Gulf but were typical of those used for preparing the Technical Specifications for other facilities. While we have not performed an extensive review of past cases, we are aware of isolated instances where errors or inadequacies in Technical Specifications have been discovered subsequent to NRC approval of them. However, none of those instances were of the extent of the Grand Gulf case. As a result, the staff initiated a number of actions for several near term operating licenses (NTOLs). These actions include:

- (1) contractor (Idaho National Engineering Laboratory) review of selected systems in Technical Specifications for four NTOLs, including Grand Gulf and Susquehanna, against the Final Safety Analysis Reports and Safety Evaluation Reports;
- (2) regional inspections of selected systems in Technical Specifications for three NTOLs, including Grand Gulf and Susquehanna, against the as-built plant; and
- (3) all NTOL applicants have been requested to certify the accuracy of their Technical Specifications prior to issuance of an operating license.

While discrepancies were noted as a result of these reviews, they do not indicate a significant weakness in the Technical Specification development process.

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The Honorable Edward J. Markey - 2 -

Nevertheless, we realize that the Grand Gulf experience does suggest that further improvements to the technical specification development process are needed. In addition, a recent resolution of a differing staff view regarding the Technical Specifications for the McGuire facility also indicated a need for improvements in the technical specification development process. Improvements presently envisioned include increased sensitivity to the technical specifications development process for first-of-a-kind plants and new nuclear utilities, increased formality, and management discipline and oversight in the technical specification program. This program, which was started prior to the Grand Gulf experience, includes re-evaluation of the scope and content of the technical specifications.

With respect to the number of differences noted between the technical Specifications for Susquehanna Units 1 and 2, these differences are due largely to new regulatory requirements and guidance, administrative-type changes, and differences in the designs of the two units. The Susquehanna licensee has proposed to upgrade the Unit 1 Technical Specifications to make them as similar to the Unit 2 Technical Specifications as possible. Few, if any, of the proposed changes are to correct errors or are a result of the technical specification development process.

Sincerely,

Original signed by
Nunzio J. Palladino
Nunzio J. Palladino

cc: Rep. Ron Marlenee

Cleared with all Comrs' Offices by C/R.
Ref.-CR-84-62

(Neither Comr. Zech nor former Comr. Gilinsky did not participate in this response.)

Originating Office: EDO/NRR:Brinkman

OFFICE	SEGY	OCA	OCM	OCM	OCM	OCM
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DATE	6/29/84		7/5/84	7/5/84	7/8/84	