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ORIGINAL  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of:

STAFF BRIEFING ON TMI-1 CERTIFICATION UPDATE

OPEN MEETING

Location: Washington, D.C.

Pages: 1-40

Date: Monday, June 4, 1984

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
STAFF BRIEFING ON TMI-1 CERTIFICATION UPDATE  
OPEN MEETING

Nuclear Regulatory Commission  
1717 H Street, N.W.  
Room 1130  
Washington, D.C.

June 4, 1984

The Commission met, pursuant to notice, at  
2:00 p.m.

COMMISSIONERS PRESENT:

- NUNCIO PALLADINO, Chairman of the Commission
- FREDERICK BERNTHAL, Commissioner
- THOMAS ROBERTS, Commissioner
- VICTOR GILINSKY, Commissioner
- JAMES ASSELSTINE, Commissioner

STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:

- E. Christenbury
- G. Lainas
- D. Eisenhut
- R. Starostecki
- S. Schwartz
- H. Plaine
- J. Hoyle

DISCLAIMER

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This is an unofficial transcript of a meeting of the United States Nuclear Regulatory Commission held on June 4, 1984 in the Commission office at 1717 H. Street, N.W., Washington, D.C. The meeting was open to public attendance and observation. This transcript has not been reviewed, corrected, or edited, and it may contain inaccuracies.

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P R O C E E D I N G S

1  
2 CHAIRMAN PALLADINO: Good afternoon, ladies and  
3 gentlemen. The Commission is meeting this afternoon on  
4 the status of the staff certification of the completion  
5 of items related to the restart of TMI-1. The items to  
6 be discussed include those that resulted from the Commis-  
7 sion's shut down order as well as other items of interest  
8 that affect the operation of the facility.

9 I understand that personnel from both NRR and  
10 Region I are present to provide this status of their  
11 respective actions. Are there any additional comments  
12 from the Commission? All right. Then let me turn the  
13 meeting over to Mr. Eisenhut.

14 MR. EISENHUT: Thank you, Mr. Chairman. We're  
15 going to try to go through today and give you a status or  
16 a fact status on where we stand on a number of major  
17 issues pending on TMI-1. As you've said, a Region I repre-  
18 sentative is here.

19 We also have representatives from the Office of  
20 I and E since one of the major issues that is still  
21 pending is the area of emergency preparedness. I'm going  
22 to turn the meeting over to Gus Lainas who is the Assistant  
23 Director for Operating Reactors who will walk through the  
24 items today.

25 But before I do, I want to just call the

1 Commission to, to call the Commission's attention to a  
2 report I believe we sent down to you in draft form some  
3 time ago called A Comparison of the Impletation of  
4 Selected TMI Action Plan Requirements on Operating Reactors  
5 Designed by BNW. The question always comes up as we go  
6 through the briefing, you find the status on one issue or  
7 another is not what we'd all hope that it is, so we  
8 conducted a study which we did earlier this year, so much  
9 ago it was actually completed in April of '84, where we  
10 sent a team of people of some half dozen engineers to each  
11 of the operating BNW plants.

12 And they took with them a listing of all of the  
13 issues basically that flowed out of TMI-1 and they went  
14 to each of the plants, flowed out of TMI-2. They went and  
15 met at each of these plants and went down a detailed  
16 listing of the status and comparison of how well the plants  
17 are doing.

18 I think the conclusion of that report was pretty  
19 simple, that in some cases TMI-1 was doing better than  
20 other plants; in other cases it was not doing as well and  
21 the overall bottom line of that report was that GPU Nu-  
22 clear was on a sort of a par with all the other plants.  
23 I just want to point that out.

24 That report is now published, is a new reg  
25 document, New Reg 1066.

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CHAIRMAN PALLADINO: 1066?

MR. EISENHUT: Yes, sir. With that, I'll turn this meeting over to Gus Lainas who will go through the briefing finds.

MR. LAINAS: Okay. Can I have the first slide, please?

(Slide No. 1)

MR. LAINAS: Second slide?

(Slide No. 2)

MR. LAINAS: In fact, make it the third slide.

MR. EISENHUT: We're moving right along.

MR. LAINAS: That's just an outline of what I'm going to talk about. The first thing I'll start talking about is the overall -

MR. EISENHUT: It's a good briefing, sir.

MR. LAINAS: Next slide.

(Slide No. 3)

MR. LAINAS: As far as the licensee's overall schedule, any time we talk about TMI it's nice to talk about where we stand. The licensee has complete hot functional testing, completed it last week and he's planning another start up and cool down to do some additional steam generator leak testing about the middle to the end of the month.

There are some additional modifications that have

1 to be made to the emergency feed water system and he plans  
2 to have those completed this month and the plant should be  
3 ready for criticality towards the end of the month and  
4 ready for power escalation testing the first week in July.  
5 That's generally where he stands now.

6 CHAIRMAN PALLADINO: Are they pretty much on  
7 this schedule?

8 MR. LAINAS: Yes. They're pretty much on that  
9 schedule. Next slide?

10 (Slide No. 4)

11 MR. LAINAS: We've talked about the 154 certifi-  
12 cation items. One hundred thirty-seven are complete. The  
13 licensee has completed all his actions with respect to  
14 certification. Now, there are some items that rely on  
15 power escalation testing and we plan to handle that by  
16 issuing a license condition and there are eight of those.

17 There are remaining nine actions that require  
18 either evaluation by NRR or inspection by the Region. As  
19 far as the licensee is concerned, with the exception of  
20 those items that rely on power escalation testing, he's  
21 essentially complete. That's with respect to the certifi-  
22 cation items.

23 CHAIRMAN PALLADINO: You say at least off the  
24 top of your head three needing licensee action and NRC  
25 approval before restart?

1 MR. LAINAS: I think that might have been an  
2 earlier slide that you had. We've updated it since then  
3 and the licensee has made his submittals.

4 CHAIRMAN PALLADINO: You mean there are no longer  
5 three items?

6 MR. LAINAS: No longer three items that rely on  
7 the licensee. The next two slides give you a breakdown  
8 of each of those items that remain to be done, whether  
9 they're going to be done as a license condition or whether  
10 they rely on NRR review or regional inspection.

11 (Slide No. 5)

12 MR. LAINAS: I don't intend to go through a  
13 detailed description of each one of those.

14 CHAIRMAN PALLADINO: Well now, I was looking at  
15 the items that the licensee had to do. You have seismic  
16 capability review back up.

17 MR. LAINAS: Yeah.

18 CHAIRMAN PALLADINO: Incore thermo-couple.

19 MR. LAINAS: Right. Item 113, yes.

20 CHAIRMAN PALLADINO: Was that done on 5-80,  
21 during May?

22 MR. LAINAS: That was done, yes. That was  
23 submitted.

24 CHAIRMAN PALLADINO: NRR reviews complete?

25 MR. LAINAS: No. It's going to be submitted,



1 completed this month.

2 CHAIRMAN PALLADINO: Oh, not yet done. Okay.  
3 And let's see. Any other item? I was trying to find the  
4 three that still needed to be done by the licensee but  
5 there was only one that I saw.

6 MR. LAINAS: Well, there were a total of three.  
7 I'll have the old slide. Do you remember what they were?

8 CHAIRMAN PALLADINO: The old slide didn't have  
9 but one.

10 MR. LAINAS: Under licensee?

11 CHAIRMAN PALLADINO: At least that I could  
12 identify. Okay. If you say they're done then I guess I  
13 that --.

14 MR. LAINAS: Okay. I'm reminded that the items,  
15 the other two items that remain for the licensee to be  
16 done were, you can flip the next slide. It's on page two  
17 of the next slide, item 23 and 116, the next to the last  
18 item.

19 (Slide No. 6)

20 CHAIRMAN PALLADINO: And they are now complete?

21 MR. LAINAS: They are now complete and the next  
22 item is 119. They were all relying on hot functional  
23 testing and he's completed those.

24 CHAIRMAN PALLADINO: Now, I wish we'd go into  
25 the items that NRR has to perform. You go to the old

1 schedule for -

2 MR. LAINAS: This month.

3 CHAIRMAN PALLADINO: This month.

4 MR. LAINAS: And as far as the Regional inspec-  
5 tion items, they're all scheduled for this month, again,  
6 excluding power excalation testing which will be a  
7 condition. Okay. Next slide.

8 (Slide No. 7)

9 MR. LAINAS: This is a list of items that  
10 should be done prior to restart and ah, of course the  
11 steam generator is a significant item which is, requires  
12 Commission approval. Another amendment that's relied upon  
13 is the use of krypton during hot functional testing.

14 What the licensee has done is to inject some  
15 krypton into the reactor cooling system to determine very,  
16 very low leak rates on the steam generator. And this is  
17 going to be done by license amendment. Now, you may  
18 remember that this was also done during the steam generator  
19 testing phase which was done prior to hot functional test-  
20 ing.

21 He used krypton at that time, but he had done it  
22 under a materials license and it should have more appro-  
23 priately been done as part of an amendment.

24 CHAIRMAN PALLADINO: Now what does that involve,  
25 issuing the amendment?

1 MR. LAINAS: Well, it's been noticed. It's been  
2 -- noticed and -

3 CHAIRMAN PALLADINO: Is it a no significant  
4 hazard?

5 MR. LAINAS: It's a no significant hazard, yes.  
6 In other words, it was also analyzed during, as part of  
7 the steam generator amendment where we took all the krypton  
8 that was to be used and released it and found insignificant  
9 releases at the boundary.

10 CHAIRMAN PALLADINO: Have you received any -

11 MR. LAINAS: No comments so far.

12 CHAIRMAN PALLADINO: When's the close out date?

13 MR. LAINAS: I believe it's the fourteenth?  
14 June eleventh.

15 COMMISSIONER BERNTHAL: This is just a leak test,  
16 in effect?

17 MR. LAINAS: Just a leak test. The krypton is  
18 injected into the primary system and leakage is detected  
19 on the secondary side of the steam generator. It gives  
20 you very, very low leak detection capability. So that  
21 still has to be done.

22 COMMISSIONER BERNTHAL: This is krypton-87 or  
23 the standard krypton? A very long half life.

24 MR. LAINAS: Okay. Then I've indicated those  
25 remaining licensee actions which are not certification

1 related that the licensee plans to do and they are primari-  
2 ly modifications to the EFW system. And with the exception  
3 of one of them, all the modifications had been identified  
4 by licensee and were being planned to be completed at the  
5 next refueling outage, but I guess materials became  
6 available to him and time became available to him, so he's  
7 gone ahead and done these modifications.

8 EFW flooding modifications consist of removing  
9 some walls to give additional capability to isolate any  
10 potential leakage in the EFW area. Again, I mention that  
11 these things were identified by the licensee to be done  
12 at the next refueling.

13 There's one exception to that, that's the EFW  
14 pump motor terminations which he's just recently decided  
15 to change.

16 CHAIRMAN PALLADINO: Which one is that?

17 MR. LAINAS: That's under item 3, under action  
18 required, the last item, EFW pump motor terminations modi-  
19 fication.

20 CHAIRMAN PALLADINO: You said you would look at  
21 the new one.

22 MR. LAINAS: Yeah, right. That's something  
23 that's different from the earlier version of the slide  
24 because we got this information in Friday.

25 COMMISSIONER ASSELSTINE: So that's one they'll

1 do also in June?

2 MR. LAINAS: That's one they'll do also this  
3 month. All of these will be done this month. There are  
4 some Regional inspection items which we'll talk about  
5 later. Item No. 5 which is offsite emergency preparedness  
6 exercise, we recently received a memorandum from FEMA  
7 indicating some deficiencies in the previous exercise that  
8 was done in November and I think we sent a copy of the  
9 FEMA memorandum -

10 COMMISSIONER ASSELSTINE: Yes, you did.

11 MR. LAINAS: Down to the Commission on Friday.  
12 And I guess right now their comments are on the review and  
13 I think they'll also be sent to the licensee for his  
14 comments on it.

15 CHAIRMAN PALLADINO: Well, can TMI-1 restart be  
16 considered without standing deficiencies?

17 MR. EISENHUT: Let's see. I think we have a  
18 representative of the Office of Inspection and Enforcement,  
19 Shelley Schwartz will be here.

20 MR. SCHWARTZ: Excuse me. Mr. Chairman, Shelley  
21 Schwartz from I and E. Your question was could the restart  
22 be considered -

23 CHAIRMAN PALLADINO: Without standing deficien-  
24 cies on emergency preparedness exercise?

25 MR. SCHWARTZ: I think at this point in time,

1 based on what we see from FEMA, I think we have to -- the  
2 staff decide -

3 CHAIRMAN PALLADINO: You have to what?

4 MR. SCHWARTZ: The staff I think is still looking  
5 at what course of action we could take in discussion among  
6 ourselves and also with FEMA as to the significance of the  
7 deficiencies that FEMA has delivered to us as a result of  
8 their negotiations and categorization with the licensee  
9 with the offsite authorities.

10 COMMISSIONER ASSELSTINE: They did find signifi-  
11 cant deficiencies, did they not?

12 MR. SCHWARTZ: That's correct.

13 COMMISSIONER ASSELSTINE: In a couple of cate-  
14 gories?

15 MR. SCHWARTZ: Yes. The latest report from FEMA  
16 reported two significant deficiencies in Dauphin County  
17 and three, originally there were three significant defi-  
18 ciencies in Lancaster County which I think the May twenty-  
19 third memo points out that one of them has been resolved  
20 which leaves two for Dauphin and two for Lancaster.

21 COMMISSIONER ASSELSTINE: Is FEMA planning a fol-  
22 low up exercise to test the areas in which deficiencies  
23 were found?

24 MR. SCHWARTZ: Yes. There is an exercise  
25 scheduled, table-top exercise in Dauphin County in

1           September and also an exercise as I understand it in Octo-  
2           ber where Lancaster County would play with the Peachbottom,  
3           in the Peachbottom exercise.

4                    COMMISSIONER BERNTHAL: I just have to read some  
5           of this for the record, I think, because it's worth read-  
6           ing in the summary of deficiencies that we received on  
7           Friday. Now, this is Three Mile Island and the State of  
8           Pennsylvania and the counties surrounding Three Mile  
9           Island that we're talking about here.

10                   Category A, the following deficiencies indicate  
11           that offsite emergency preparedness was not adequate to  
12           provide reasonable assurance that appropriate protective  
13           measures can be taken to protect the health and safety of  
14           the public. That's what category A is.

15                    Under Dauphin, Dolfin County, whichever way it's  
16           pronounced, demonstrated staffing at, which way is it?

17                    MR. SCHWARTZ: Dauphin County.

18                    COMMISSIONER BERNTHAL: Dauphin County? You  
19           would know, yes. That the Dauphin County EPZ was very,  
20           limited and in fact would not be adequate to support the  
21           county's response to an incident at TMI for either the  
22           short or long term.

23                    Dauphin County officials did not respond prompt-  
24           ly during demonstration of the transfer of notification  
25           and alerting responsibility from the state emergency

1 operation center. Lancaster County, notification of site  
2 area emergency was not promptly received by any of the  
3 five Lancaster County municipalities in the ten mile EPZ  
4 and was not received for almost two hours by several of  
5 the five.

6 The county, I'm jumping down here. The county  
7 did not demonstrate it's ability to operate its decontamin-  
8 ation center and relocation center at the Park City Mall.  
9 I think that's the one that's been corrected now?

10 MR. SCHWARTZ: Yes, Commission Bernthal.

11 COMMISSIONER BERNTHAL: I think that's enough  
12 said.

13 MR. EISENHUT: Yeah, I think, Commissioner, you  
14 certainly, as you read down that list, we view those as  
15 rather significant issues that are still identified as, in  
16 here, significant deficiencies. Though I think the real  
17 reason we're just not prepared today to say we're going is  
18 only because we received it very recently.

19 COMMISSIONER BERNTHAL: I understand. I'm not  
20 being critical of you. I think it's just incredible to  
21 me that five years after a rather serious incident we're  
22 still encountering this sort of thing in emergency pre-  
23 paredness.

24 MR. EISENHUT: I think that's correct and if you  
25 looked at this, we share that, because if you looked at



1 this at any other operating reactor in the United States  
2 you would have a great concern and as you've said, in this  
3 case it is Three Mile Island, the case where this all got  
4 started. So I think we share looking at these as very  
5 significant issues, that we're just going to have to sit  
6 down and try to resolve where we're going.

7 CHAIRMAN PALLADINO: Is this the kind of situa-  
8 tion in which we would normally start a 120 day clock?

9 MR. SCHWARTZ: Mr. Chairman, yes, in a true  
10 sense of an operating reactor, if this was a plant that  
11 was operating, yes, we would have started or we would  
12 start based on this report a 120 clock.

13 COMMISSIONER ASSELSTINE: Since these are imple-  
14 mentation kinds of problems that were identified during the  
15 previous exercise, is FEMA taking the position that it's  
16 taken in previous cases, that until these follow up exer-  
17 cises are conducted, they can't say for sure whether these  
18 four remaining problems have been, four remaining signifi-  
19 cant deficiencies have been corrected or not?

20 MR. SCHWARTZ: The letters to us indicate that  
21 and without presuming any more than that, we have repre-  
22 sentative from FEMA here and if you wish, Commissioner  
23 Asselstine, I can call on them and ask them to respond to  
24 that question. I have Bob Wilkerson of the Federal  
25 Emergency Management Agency.

1 MR. WILKERSON: Mr. Chairman, Commissioners,  
2 yes, our position, in response to that question, our posi-  
3 tion that we feel prior to rendering a decision -

4 CHAIRMAN PALLADINO: I'm sorry. Could we have  
5 one meeting? I'm having difficulty hearing.

6 MR. WILKERSON: We feel that prior to rendering  
7 a finding on offsite preparedness as it relates to Three  
8 Mile Island that the exercises should take place to demon-  
9 strate not only that the corrective actions have taken  
10 place, but that they have a meaningful impact on the off-  
11 site preparedness.

12 COMMISSIONER ASSELSTINE: Is it your position  
13 that a table top exercise at least with respect to Dauphin  
14 County is sufficient?

15 MR. WILKERSON: Yes. Our feeling is that the  
16 table top which is to be held in conjunction with a full  
17 facility test of the new facility which is being construc-  
18 ted in Dauphin County would adequately demonstrate Category  
19 A deficiencies that related to that facility and to person-  
20 nel requirements in Dauphin County.

21 COMMISSIONER ASSELSTINE: Thank you.

22 MR. SCHWARTZ: Thank you very much.

23 CHAIRMAN PALLADINO: Shelley -

24 MR. SCHWARTZ: Yes, sir?

25 CHAIRMAN PALLADINO: I still don't know whether,

1 what the staff position is or maybe you haven't determined  
2 yet whether restart of TMI-1 can be considered with these  
3 outstanding deficiencies.

4 MR. SCHWARTZ: Mr. Chairman, we have not reached  
5 a determination.

6 CHAIRMAN PALLADINO: Do you have any idea when  
7 you might make such a determination, roughly?

8 MR. SCHWARTZ: I think within weeks. In fact,  
9 within days, Mr. Chairman.

10 CHAIRMAN PALLADINO: Do you think a 120 day  
11 clock is appropriate in this circumstance or is that  
12 another question you have to still evaluate?

13 MR. SCHWARTZ: That's another question that -  
14 In answer to the question about if this was an operating  
15 reactor, yes, we would have started a 120 day clock on  
16 this.

17 CHAIRMAN PALLADINO: Let me ask another ques-  
18 tion. Maybe this is as much for OGC as it is for the  
19 staff. Must the exercise results from TMI-1 be litigated  
20 before restart per recent Court decision on new starts?

21 GENERAL COUNSEL PLAINE: I would think so, Mr.  
22 Chairman.

23 CHAIRMAN PALLADINO: Well, this is lifing an  
24 enforcement action. That's why it's not all that clear.  
25 I'm not trying to argue the point. I just trying to point

1 out the differences.

2 MR. CHRISTENBURY: Mr. Chairman, we do have a,  
3 one circumstance here that this, as you recall, we have  
4 litigated emergency planning. It went through the Appeal  
5 Board and the Commissioner reviews. So to that extent, we  
6 do have final Agency action as to emergency planning, so  
7 I think that's yet another factor to consider in this when  
8 we're making a determination.

9 CHAIRMAN PALLADINO: Is that question that the  
10 staff's going to address or ELD is going to address?

11 MR. CHRISTENBURY: We can certainly, with Mr.  
12 Schwartz's other questions, we can -

13 MR. SCHWARTZ: We can certainly address that,  
14 Mr. Chairman.

15 CHAIRMAN PALLADINO: Well, I think that's an  
16 important thing to settle and I think you ought to, that  
17 we ought to have both the OGC and ELD look at that issue.

18 MR. SCHWARTZ: Fine. We will confer with them.

19 CHAIRMAN PALLADINO: I'm not sure which way it  
20 goes. There is a difference between this and new starts  
21 and yet I don't understand the Court decision well  
22 enough to know whether it applies.

23 COMMISSIONER BERNTHAL: Well, maybe since the  
24 subject's been raised, it wouldn't hurt to have a little  
25 more enlightenment on what the Court decision does mean.

1 because, I hesitate to say it, but it appeared that it was  
2 misreported by two of our leading newspapers and that the  
3 summary of the meaning of the Court's opinion was not  
4 properly portrayed. Can somebody clear that up here in  
5 a word or two?

6 GENERAL COUNSEL PLAINE: I can't do it in a word  
7 or two, no, sir, but I think we should provide you with  
8 something on that if necessary.

9 CHAIRMAN PALLADINO: Yeah. I think that's a very  
10 important issue and I think we should have General Coun-  
11 sel's analysis of the Court decision any recommendations  
12 that General Counsel may wish to provide.

13 COMMISSIONER ASSELSTINE: Were there any expres-  
14 sions of interest in this case in litigating the results  
15 of the emergency planning exercise?

16 MR. SCHWARTZ: I have no knowledge of any.

17 MR. CHRISTENBURY: Of course, if you recall, we  
18 litigated, we had, I guess this is the third exercise as I  
19 recall -

20 MR. SCHWARTZ: That's right.

21 MR. CHRISTENBURY: So at the time we litigated  
22 it, we had benefit of one exercise and we litigated that.

23 MR. SCHWARTZ: Yes.

24 COMMISSIONER ASSELSTINE: And some of the conten-  
25 tions were based upon the results of the exercise as I

1 recall.

2 MR. CHRISTENBURY: That is correct. Let me, I  
3 have the case attorney here. I can see if there was  
4 expression.

5 MR. GRAY: Yes, there were several contentions  
6 going to the exercise. In fact, they were raised prior to  
7 the time the first exercise was held. And the results of  
8 the exercise were presented in evidence subject to cross  
9 examination and basically answering or providing a record  
10 on the exercise.

11 COMMISSIONER ASSELSTINE: Thank you.

12 CHAIRMAN PALLADINO: I think in reviewing these  
13 questions, you ought to look at the Licensing Board's  
14 conditions for restart because they spoke to this issue.  
15 They said there must be held prior to restart of TMI at  
16 least one communications drill similar to that suggested  
17 by the Commonwealth, paragraph 118.

18 The drill should include a DOE communication  
19 between licensee and PIMA, PIMA and each risk county  
20 emergency management coordinator, each risk county and  
21 key officials and each municipality key officials. Such  
22 a drill should be structured to test telephone service and  
23 various radio systems.

24 If possible, stress should be placed on the  
25 communications systems to test the possible affect of

1       them in emergency overload situation. And I think this is  
2       one of the Licensing Board conditions. I'm not trying to  
3       interpret it, but I think in answering the questions you  
4       need to look at that paragraph.

5               MR. SCHWARTZ: Yes, sir.

6               COMMISSIONER ASSELSTINE: I guess I would also  
7       ask in doing your analysis if you would look specifically  
8       at the question of whether the recent exercise provides  
9       significant new information on matters that were litigated  
10      in the proceeding.

11              CHAIRMAN PALLADINO: But with regard to the more  
12      generic question, I think it's very important to get an  
13      OGC analysis and recommendations with regard to what we  
14      ought to do about this.

15              GENERAL COUNSEL PLAINE: Yes, sir.

16              CHAIRMAN PALLADINO: Can we continue?

17              MR. LAINAS: Okay. I guess there are two other  
18      items. Of course, review of the 2.206 petition we're  
19      very active on.

20              CHAIRMAN PALLADINO: Now, which one is this?

21              MR. LAINAS: This is the UCS petition on emergen-  
22      cy feed water.

23              COMMISSIONER ASSELSTINE: Do you have a date for  
24      when the staff expects to complete their work on the 2.206  
25      petition?

1 MR. EISENHUT: Well, I think a little bit of  
2 that depends on what answer we get back from or the infor-  
3 mation put together by our GPU. If you recall, I think we  
4 sent down Mr. Dirks's memorandum of last week, attached a  
5 letter I recently sent to the utility. That confirmed  
6 that the utility would have their information together for  
7 our audit sometime in mid-June.

8 Assuming that would be together, I would expect  
9 we would be targeting to complete our review a couple  
10 weeks after that -

11 COMMISSIONER ASSELSTINE: Okay.

12 MR. EISENHUT: But that's a rough kind of time  
13 frame. But, of course, it's always subject to the  
14 utility having the information together for our review --.

15 MR. LAINAS: Okay. The last item that we have  
16 here is related, if you remember Nureg 0680 was our  
17 review of the HRH and the beta and the info documents and  
18 in it was a recommendation for a review of operator guides  
19 on independent verification of valve and breaker lineup.  
20 And NRR will review that. That was an item for restart.

21 COMMISSIONER ASSELSTINE: Before you leave that  
22 slide - Well, go ahead. I want to go back to item one.

23 CHAIRMAN PALLADINO: Let me just ask on this.

24 COMMISSIONER ASSELSTINE: Sure.

25 CHAIRMAN PALLADINO: You say this is an item that



1 needs to be completed before restart?

2 MR. LAINAS: Yes.

3 CHAIRMAN PALLADINO: And when might the SCR come  
4 out again?

5 MR. LAINAS: I think it's due this month. Yes,  
6 this month. The licensee has submitted the information.  
7 It's just under review by us now.

8 COMMISSIONER ASSELSTINE: I had a question about  
9 item No. 1, the license conditions.

10 MR. LAINAS: Oh, yeah.

11 COMMISSIONER ASSELSTINE: We received the pro-  
12 posed license conditions, the SECY paper on May thirty-  
13 first. Just going through them, I guess I had a couple of  
14 questions about some of them. It seemed that some of them  
15 might well have been overtaken by events, particular the  
16 adoption of the second SRO rule. I wondered whether you  
17 still needed some of those license conditions since the  
18 Commission had already adopted the regulation?

19 And the other question I had was it appeared that  
20 perhaps a couple of the conditions might be affected by  
21 how the Commission came out on some of the management  
22 issues, particularly particular individuals, and I guess  
23 I was interested in what the staff's intentions were in  
24 terms of going ahead with these licence conditions, parti-  
25 cularly those that we might have some questions about or

1 might want to make some modifications in?

2 MR. LAINAS: Okay. I might need some legal help  
3 with respect to your first question. And that has to do,  
4 you're saying why make a condition when it's a regulation?  
5 I don't remember the exact condition.

6 COMMISSIONER ASSELSTINE: Okay. The ones that  
7 I was thinking about were the ones on pages 2 and 3, item  
8 5 on page 2, items 8 and 9, I guess even 10 on page 3. I  
9 wondered whether those were all subsumed by the rule? It  
10 struck me that perhaps there were a holdover from those  
11 previous requirements and that maybe they were overtaken  
12 by events, but I may be wrong on that.

13 MR. EISENHUT: I can address it certainly from the,  
14 sir, from the standard practice point is we typically would  
15 not put it in as a license condition unless it's necessary.  
16 That is, unless it goes beyond the existing rule or is  
17 different than the existing rule. So with that in mind,  
18 I'm sure with the new rule we'll go back and take another  
19 look at those.

20 COMMISSIONER ASSELSTINE: Okay.

21 MR. EISENHUT: And dropping them out as appropriate  
22 as we go across.

23 COMMISSIONER ASSELSTINE: But the intention here  
24 was not to impose license conditions that would relax the  
25 elements in the second SRO rule?

1 MR. EISENHUT: No, that is correct.

2 COMMISSIONER ASSELSTINE: So at least to do as  
3 much and perhaps go beyond, okay.

4 MR. EISENHUT: I don't have the actual paper  
5 here with me, but I think that came down as a, in effect a  
6 consent calendar item so we would be -

7 COMMISSIONER ASSELSTINE: Okay. It's a notation  
8 code item.

9 MR. EISENHUT: A notation code, so it'd be in  
10 effect we'd go back and look at any of those conditions if  
11 there were any comments across the board.

12 COMMISSIONER ASSELSTINE: Okay.

13 CHAIRMAN PALLADINO: Other questions on this?  
14 Okay. We'll proceed..

15 MR. LAINAS: The Region I inspection items, of  
16 course, the non-certification mods that I talked about  
17 earlier with respect to the EFW is going to be inspected  
18 by the Region. There was another item in Nureg 0680 which  
19 was, which was a review of the HRH, beta and info and  
20 that had to do with licensee -- vendor information and --,  
21 so the Region's going to handle that.

22 CHAIRMAN PALLADINO: It's getting very difficult  
23 to hear you. Why don't you speak up?

24 MR. LAINAS: The Region's going to handle that  
25 particular aspect. Rich Starostecki is here from the

1 Region. Reactor coolant system leak rate calculation pro-  
2 cedure, I believe that there's a new system for that.

3 (Slide No. 8)

4 MR. STAROSTECKI: This slide shows what Region  
5 I intends to do besides the certification items. We in-  
6 tend to go back and look at the calculational procedure  
7 that the GPU uses. Although we have not seen a problem  
8 on Unit 1, the history of the leak/break procedures and  
9 some of the minor problems we found in there, we wanted  
10 to make sure that there were ironed out prior to any  
11 restart decision.

12 So that's an item that we will send people there  
13 and we should have no problem solving it. The licensee  
14 handling of vendor information -

15 CHAIRMAN PALLADINO: Is that, how long does that  
16 take?

17 MR. STAROSTECKI: It will just be an inspection  
18 that will take maybe a few days, two days.

19 CHAIRMAN PALLADINO: And when is this scheduled?

20 MR. STAROSTECKI: It's scheduled within the  
21 next two weeks, and again, it depends upon the availability  
22 of the people and what other problems we have to resolve  
23 in the next few weeks. The licensee handling of vendor  
24 information, this item is a spin off from the beta/HRH  
25 effort.

1                   We will look at those aspects addressed in  
2 Supplement 4. This topic will be further pursued as part  
3 of this generic Salem/Atwiss inspection procedure that we  
4 will be following.

5                   CHAIRMAN PALLADINO: I'm not sure I understand  
6 what this is going to involve. You say it's a spin off  
7 from beta/HRH report?

8                   MR. STAROSTECKI: The administrative processes  
9 used in handling vendor information was one of the problems  
10 that we're going to be going back and looking to see how  
11 the station is handling that.

12                  CHAIRMAN PALLADINO: Is that a restart item?

13                  MR. STAROSTECKI: We are considering it a re-  
14 start item, yes, sir, because the staff addressed it in  
15 this nureg and we committed at that point in time that we  
16 would go back and look at those things. The non-certifi-  
17 cation modifications, these are the major items that we  
18 will be inspecting and these are items that NRR has  
19 addressed in in the safety evaluation report at one time  
20 or another and are relying on the equipment to function  
21 as designed.

22                  We go in and inspect the items and close the  
23 loop so to speak. NRR will address it from a licensing  
24 standpoint and then SCR will address it from an inspection  
25 standpoint in terms of what's actually in the field. Some

1 of this involves environment qualification documentation,  
2 some of it relocating a wall for flood protection, things  
3 of that nature.

4 CHAIRMAN PALLADINO: Now, are these modifications  
5 that have been made or are being made, will be made or  
6 which category?

7 MR. LAINAS: Well, in the case of flooding mods,  
8 I think they have been completed. I don't know exactly  
9 the status of the flow control converter, whether that's  
10 been done. The steam line vent stack -

11 CHAIRMAN PALLADINO: The reason I asked is be-  
12 cause I thought you had said earlier that everything that  
13 the licensee had to do was done, either that or I misunder-  
14 stood you.

15 MR. LAINAS: He's planning to complete it this  
16 month. In other words, all these items are intended to be  
17 completed this month.

18 CHAIRMAN PALLADINO: I see.

19 MR. LAINAS: Some have been completed; some he's  
20 in the process of completing.

21 CHAIRMAN PALLADINO: And then after he's done  
22 them, what does it take on our part? Do we have to  
23 inspect?

24 MR. STAROSTECKI: We have to do an inspection.  
25 There's a safety evaluation that NR will do and based on

1 any assumptions they may make, we will also inspect those  
2 items. But, yes, we only inspect the as-built configura-  
3 tion.

4 CHAIRMAN PALLADINO: So if they don't get them  
5 done 'til the end of June, there has to be a safety evalua-  
6 tion report, inspection and the reinspection or, you said  
7 they're going to do these and you said there's an NRR  
8 report?

9 MR. LAINAS: Yeah. Well, there will be. Many  
10 of these things have been considered by NRR in their  
11 previous safety evaluation report, such as the EFW flooding  
12 modifications and the steam line vent stack seismic modifi-  
13 cations.

14 They've been identified before and included, as  
15 a matter of fact, in at least one of them in the seismic  
16 evaluation. And as I mentioned, the licensee had committed  
17 to replace those. So they were considered in our evalua-  
18 tion.

19 But he was going to replace them at the next  
20 refueling. However, he's increased his schedule and is  
21 putting them in now. With respect to the EFW flow control  
22 converter, that's a recent modification identified by the  
23 licensee together with the EFW pump motor determination.

24 That was a very recent modification. Both of  
25 those are related to the EQ evaluation that we're doing.

1 CHAIRMAN PALLADINO: What I'm trying to under-  
2 stand is what is it that the licensee must do? What is it  
3 that the NRR staff must do? What is it that inspection  
4 must do?

5 MR. LAINAS: Okay. For two of the modifications,  
6 they were already considered in our evaluations. We  
7 assumed that he was going to do it. They are highlighted  
8 here because he's going to do it, be committed to do it  
9 prior to restart.

10 With respect to two of the other modifications,  
11 the flow control valve converter, the EFW pump motor  
12 determination modifications, these have not been identified  
13 before, but have been identified within the last two or  
14 three months. Those will be included in our evaluation  
15 of the EQ, the EFW system, the environmental qualification  
16 of the EFW system. Those will be included in our safety  
17 evaluation.

18 CHAIRMAN PALLADINO: So those two items you need  
19 an NRR safety evaluation?

20 MR. LAINAS: That's right.

21 CHAIRMAN PALLADINO: After the completion of the  
22 items or -

23 MR. EISENHUT: Not necessarily physically after  
24 the completion. Certainly after the program has been laid  
25 out and we go audit the utilities program, what he's



1 accomplished. He also has some information he's submitting  
2 to us on the environmental qualification program.

3 The information is due to be available for us to  
4 audit by about mid-June and we're shooting for a safety  
5 evaluation about the end of June. That was the item on  
6 our --.

7 CHAIRMAN PALLADINO: And then you have to  
8 inspect or does that go on?

9 MR. STAROSTECKI: In parallel, as NRR is pre-  
10 paring the safety evaluation, we will be inspecting the  
11 final modification. So if there's an item that NRR will  
12 be relying on in making a conclusion, we'll in the field  
13 to be able to inspect it.

14 MR. EISENHUT: All of these schedules were laid  
15 out, geared towards having all the work completed by the  
16 end of June and that still looks like the same kind of  
17 time line we're on today. We haven't identified anything  
18 that, I believe anything that extends beyond that.

19 The environmental qualification review is going  
20 to be right up to the end of June and the other issues we  
21 have before us which is brand new information. In fact,  
22 we first got the May twenty-third FEMA report on Friday.  
23 So for a number of the staff today that's very new informa-  
24 tion and we have to assess what that really means. So  
25 those I think are the key issues in the overall schedule

1 as we see it.

2 CHAIRMAN PALLADINO: Now, why do you call these  
3 non-certification modifications?

4 MR. LAINAS: Well, they're not related. They're  
5 not certification items specifically.

6 MR. EISENHUT: Remember the certification list  
7 that we discussed at, over a number of months in meetings  
8 and we concluded the 154 items on our certification list  
9 were really the certification items. And so we call that  
10 the certification list.

11 CHAIRMAN PALLADINO: I see.

12 MR. EISENHUT: And we try to fix that as these  
13 are the issues that came out of the certification issues  
14 came out of the hearing boards, came out of a number of  
15 things as we went through it. These other matters,  
16 though, that have come up, where we feel it's appropriate  
17 to go ahead and that they be resolved prior to restarting  
18 in the cases where we've identified and we feel we  
19 shouldn't just ignore them just because they're not on the  
20 certification list. So they are items that we feel it's  
21 important to resolve prior to any restart decision.

22 CHAIRMAN PALLADINO: How do you make your certi-  
23 fication? Is this a document to the Commission, a docu-  
24 ment to the licensee?

25 MR. CHRISTENBURY: It would be -

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CHAIRMAN PALLANDINO: What's that?

MR. CHRISTENBURY: It would be to the Commission. Under the earlier order that was issued it would be a certification to the Commission.

MR. EISENHUT: I think the Director of NRR must certify to the Commission a list of the certification issues have been resolved. That's why we felt it was appropriate to very early try to resolve what the list was we were trying to resolve and came up with 154 issues.

CHAIRMAN PALLADINO: And I gather you're planning on at least right now, on a schedule that should bring us about on or near the end of June?

MR. EISENHUT. With the exception of the two items, the qualifiers I put on two issues.

CHAIRMAN PALLADINO: With the exception of what?

MR. EISENHUT: The qualifiers that I put on the issue of environmental qualification which we are still reviewing and we just haven't seen the information from the utility so it's hard for us to assess where we are, and the new information we received from FEMA last week.

CHAIRMAN PALLIDINO: Any other questions?

MR. EISENHUT: That basically concludes the issues we were going to go through to show you the status of where we are.

COMMISSIONER BERNTHAL; Let me just ask what may

1 well be the same question in a different way since we tend  
 2 to get bogged down around here in arcane terminology,  
 3 certifications and lists and things. Can you give us in  
 4 plain words the status of the hardware in the plant as you  
 5 see it now and on what timetable that hardware in your  
 6 judgment can reasonably be brought to the point where it  
 7 would be ready for restart?

8 COMMISSIONER ASSELSTINE: Part of that question  
 9 obviously goes beyond the certification items to contested  
 10 issues that are still before the Commission in the hardware  
 11 decisions.

12 COMMISSIONER BERNTHAL: I understand. I'm just  
 13 asking for a staff judgment here.

14 COMMISSIONER ASSELSTINE: You're asking one  
 15 party for its view on what admittedly is a contested  
 16 matter.

17 COMMISSIONER BERNTHAL: Is that illegal? Is  
 18 that the problem? Okay.

19 COMMISSIONER ASSELSTINE: So long as you  
 20 basically give the other party another opportunity to  
 21 provide comments.

22 COMMISSIONER BERNTHAL: Certainly.

23 MR. STAROSTECKI: It would be my judgment that  
 24 the plant is very nearly there. The number of issues that  
 25 you have left open, they're going to be resolved. But the

1 rest of the plant is there and in shape and the staff is  
2 ready and the hardware's ready. I do not see except as  
3 Mr. Eisenhut point out, I do not see any difficulty with  
4 hardware or staff.

5 COMMISSIONER BERNTHAL: I'm really focusing on  
6 hardware right now and you can, you're saying at the pre-  
7 sent time you can point to no single item of hardware  
8 that you flatly will say is unprepared for startup? It  
9 didn't sound that way over the last hour.

10 MR. STAROSTECKI: No, you have to recognize that  
11 they've had an on-going maintenance program that's been  
12 maintaining the hardware as if it were operational so  
13 from that standpoint, yes, in my judgment the hardware is  
14 ready. If you would like, the senior resident inspector  
15 may have an opinion on that if you would like to hear from  
16 him.

17 CHAIRMAN PALLADINO: Does that include the  
18 krypton leak test?

19 MR. LAINAS: Yes. He's already done that before.  
20 He has the equipment capability to go ahead and to it.  
21 All he's waiting for is our approval.

22 MR. EISENHUT: Would you like to hear from the  
23 senior resident?

24 COMMISSIONER BERNTHAL: I heard from him about  
25 six weeks ago. In fact, I was interested in hearing your

1 collective judgment here.

2 CHAIRMAN PALLADINO: Does the senior inspector  
3 have any change in what you've heard? I think it might be  
4 worth getting a few minutes from him. I don't want to  
5 prolong the meeting unnecessarily.

6 COMMISSIONER BERNTHAL: Oh, I didn't realize  
7 he was here. If it's so easy, then by all means.

8 MR. CONTE: Rich Conte, senior resident for  
9 Three Mile Island. Commissioner, I confirm what Mr. Staro-  
10 stecki said. I believe the plant, let's take three  
11 categories. In the certification hardware point of view  
12 I think that plant is very ready.

13 With respect to restart issues such as the  
14 emergency feed water system, that's a little different  
15 story. I think the modifications are scheduled to be  
16 completed. It's not already completed by June. There may  
17 be a little bit of a tight frame there with the restart  
18 date of supposedly June or July third.

19 We would probably need a final week to look at  
20 those modifications to make sure that the licensee has  
21 done or fulfilled the commitments. I guess my bottom line  
22 is I would like to confirm what Mr. Starostecki said. The  
23 equipment is ready for restart with the exception of  
24 emergency feed water and I really don't see any schedule  
25 problems with getting those final modifications in.

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COMMISSIONER BERNTHAL: Thank you.

CHAIRMAN PALLADINO: Anything more to present?  
Any more questions? by the Commission?

COMMISSIONER ASSELSTINE: May I just make one suggestion to the Secretary that the transcript of the meetings be served on the parties since obviously different parties may have a different view than the staff on the last question that was asked.

MR. PALLADINO: Okay. Well, we scheduled it for an hour and we did it in fifty minutes. I hope we did it adequately. But it is a status report and we're going to have to revisit this issue again before taking any action on the basis of the information here. Okay. If there's nothing more, we'll stand adjourned.

(Whereupon, at 2:52 on Monday, June 4, 1984, the meeting was adjourned.)

CERTIFICATE OF PROCEEDINGS

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

In the matter of: Staff Friefing on TMI-1  
Certification Update

Date of Proceeding: Monday, June 4, 1984

Place of Proceeding: Washington, D.C.

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

Melba Reeder  
Official Reporter

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COMMISSION BRIEFING

JUNE 4, 1984

STATUS OF MATTERS AFFECTING TMI-1 RESTART

## OUTLINE

### STATUS OF MATTERS AFFECTING TMI-1 RESTART

- o LICENSEE'S OVERALL SCHEDULE
- o CERTIFICATION SUMMARY
- o STATUS OF REMAINING CERTIFICATION ITEMS
- o OTHER MATTERS AFFECTING RESTART
  - o REGIONAL INSPECTION ITEMS

LICENSEE'S OVERALL SCHEDULE

- o PLANT HOT FUNCTIONAL TESTING - 5/21/84 (1 WEEK) (COMPLETE)
- o START HEAT UP & COOL DOWN - SG LEAKAGE TESTING - 6/14/84 (ABOUT 1 WEEK)
- o COMPLETION OF MODIFICATIONS AFFECTING EFW SYSTEM - 6/84
- o PLANT READY FOR CRITICALITY AND LOW POWER TESTING - 6/22/84
- o PLANT READY FOR POWER ESCALATION TESTING - 7/3/84

CERTIFICATION SUMMARY

- o 137 OF 154 CERTIFICATION ITEMS ARE COMPLETE
- o OF REMAINING 17 ITEMS REQUIRING NRC CERTIFICATION
  - 8 INVOLVE POST RESTART TESTING REQUIRED BY LICENSE CONDITIONS
  - 9 ARE AWAITING NRC ACTIONS BEFORE RESTART

STATUS OF REMAINING CERTIFICATION ITEMS

<u>TABLE I CERT. ITEM</u>	<u>REMAINING ITEM</u>	<u>LICENSEE</u>	<u>NRR</u>	<u>NRC RI</u>	<u>COMMISSION</u>
1, 81, 121	EFW - AUTO INITIATION TESTING	PET	LC	PET	
14	EFW - INITIATION INDEPENDENT OF AC FOR 2 HOURS (TESTING)	PET	LC	PET	
34	ANTICIPATORY REACTOR TRIP (TESTING-LOFW, OR TURBINE TRIP)	PET	LC	PET	
76	INADEQUATE CORE COOLING; TESTING SMM; INCORE T/C; HOT LEG TEMP- ERATURE	PET	LC	PET	
105	LICENSE CONDITIONS FOR SHIFT MANNING		LC	6/84	
113	-TESTING OF BACKUP INCORE T/C DISPLAY	PET	LC	PET	
	-SEISMIC CAPABILITY REVIEW BACKUP INCORE T/C			6/84	
126	TRAINING DURING LOW POWER TESTING (IMPLEMENTATION TESTING)	PET	LC	PET	

LC - LICENSE CONDITIONS 6/84

PET - POWER ESCALATION TESTING - TO BE DETERMINED (TBD)

<u>TABLE I</u> <u>CERT. ITEM</u>	<u>REMAINING</u> <u>ITEM</u>	<u>LICENSEE</u>	<u>NRR</u>	<u>NRC</u> <u>RI</u>	<u>COMMISSION</u>
64	GPU MANAGEMENT INTEGRITY/COMPE- TENCE	TBD	6/84	TBD	6/84
79	INTEGRITY OF SYSTEMS OUTSIDE OF CONTAINMENT			6/84	
132	VENTILATION SEPA- RATION PROGRAM (TESTING)			6/84	
153	MAIN STEAM RUPTURE DE- TECTION SYSTEM				(PER COMM. 1/27/84 ORDER) 6/84
154	SUBCOOLING MARGIN INSTRUMENT ERROR		6/84	6/84	
23, 116	SAFETY RELATED VALVE POSITION LINEUP VERIFICATION			6/84	
119	ADDITIONAL LOCA ANALYSIS (TEST HPI SYSTEM CROSS CONNECT & CAVITATING VENTURIS)			6/84	

OTHER MATTERS AFFECTING RESTART

<u>ITEM</u>	<u>ACTION REQUIRED</u>
1. RESTART PROCEEDING LICENSE CONDITIONS (INCLUDING CERTIFICATION ITEMS)(NRR)	SECY PAPER: 5/84 (COMPLETE); LICENSE AMEND. 6/84
2. LICENSE AMENDMENTS TO BE ISSUED (NRR) - STEAM GENERATOR OPERABILITY - BYPRODUCT MATERIAL AMENDMENT (USE OF KRYPTON DURING HFT)	COMM. APPROVAL ISSUE AMENDMENT 6/84
3. PLANT READINESS (REMAINING LICENSEE ACTIONS)	o HFT o EFW FLOODING MODS o EFW FLOW CONTROL VALVE CONVERTER MOD. o ST. LINE VENT STACK SEISMIC MODS. o EFW PUMP MOTOR TERMINATIONS MOD. (EQ)
4. REGION I INSPECTION ITEMS	REGION INSPECTION
5. OFFSITE EMERGENCY PREPAREDNESS EXERCISE (COUNTY PREPAREDNESS)(I&E)	EVALUATE FEMA FINDINGS
6. REVIEW OF UCS 2.206 PETITION	ISSUE FINAL NRR DIRECTOR'S DECISION
7. REVIEW OF OPERATOR GUIDANCE ON INDEPENDENT VERIFICATION OF VALVE/BREAKER LINEUP (NUREG-0680, SUPP. 4) (NRR)	ISSUE SER

ALL  
6/84

REGION I INSPECTION ITEMS  
(OTHER MATTERS AFFECTING RESTART)

ALL 6/84

- o REACTOR COOLANT SYSTEM LEAK RATE CALCULATION PROCEDURE
  
- o LICENSEE HANDLING OF VENDOR INFORMATION  
(RI TO REVIEW PROGRAM PER NUREG-0680, SUPP. 4)
  
- o OUTSTANDING NON-CERTIFICATION MODS.
  - EFW FLOODING MODS.
  - EFW FLOW CONTROL VALVE CONVERTER
  - ST. LINE VENT STACK SEISMIC MODS.
  - EFW PUMP MOTOR TERMINATIONS MODS (EQ)



3/84

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Meeting Title: Staff Briefing on TMI-1 Certification Update

Meeting Date: 6/4/84 Open  Closed

DCS Copies  
(1 of each checked)

ITEM DESCRIPTION:	Copies Advanced to PDR	*	Original Document	May be Dup*
1. TRANSCRIPT w/ <u>Viewgraphs</u>	<u>1</u>	*	<u>1</u>	<u>    </u>
2. <u>SECY-84-221</u>	<u>2</u>	*	<u>    </u>	<u>2</u>
3. <u>    </u>	<u>    </u>	*	<u>    </u>	<u>    </u>
4. <u>    </u>	<u>    </u>	*	<u>    </u>	<u>    </u>
5. <u>    </u>	<u>    </u>	*	<u>    </u>	<u>    </u>

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

\*Verify if in DCS, and change to "PDR Available"