



June 11, 1984

POLICY ISSUE
(Information)

SECY-84-163A

FOR: The Commission

FROM: William J. Dircks
Executive Director for Operations

SUBJECT: PERIODIC NTOL STATUS REPORT

PURPOSE: To inform the Commission on a periodic basis on potentially significant issues for upcoming OL licensing cases.

BACKGROUND: The Chairman, in his March 20, 1984 memorandum on licensing delays, requested the staff to respond to the specific issues raised in his memorandum and to provide a paper outlining the steps for dealing with potential delays. The staff's response was provided in SECY-84-163, which was the subject of a Commission meeting on April 24, 1984. As a result of this Commission meeting the staff was requested to provide ". . . periodic reports on the status of NTOL plants using a format similar to that submitted for this briefing." (See Staff Requirements memorandum dated April 27, 1984).

DISCUSSION:

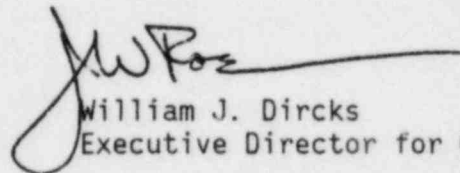
1. Enclosed with this paper are summary status reports for Byron Unit 1, Shoreham, Limerick Unit 1, Palo Verde Unit 1, Midland Unit 2, Waterford Unit 3 and Comanche Peak Unit 1. The status reports for these plants have been updated from those included in SECY-84-163 to be current through May 31, 1984.

The staff is in the process of drafting similar summaries for all plants that are within 12 months of licensing, i. e., Grand Gulf, Diablo Canyon 1/2, Callaway 1, Catawba 1, Watts Bar 1, Fermi 2, Wolf Creek 1 and River Bend 1. These summaries will be forwarded to the Commission as part of next month's update to this report.

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2. The Commission was advised by my June 1, 1984 memorandum of certain activities now underway to assure efficient management of staff actions. These activities included the development of integrated schedules for Fermi 2, Wolf Creek, Diablo Canyon 2, TMI (restart), Byron 1, San Onofre 1 (restart) and Limerick 1. The status of these efforts will be included in future periodic NTOL summary reports.


William J. Dircks
Executive Director for Operations

Enclosures:

1. NTOL Status Report

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NTOL STATUS REPORT

PLANTS INCLUDED

BYRON UNIT 1
SHOREHAM
LIMERICK UNIT 1
PALO VERDE UNIT 1
MIDLAND UNIT 2
WATERFORD UNIT 3
COMANCHE PEAK UNIT 1

BYRON UNIT 1 SIGNIFICANT ISSUES

1. DENIAL OF APPLICATION - ON 1/13/84 THE ASLB DENIED OPERATING LICENSE ON BASIS OF INADEQUACIES IN QA. APPLICANT APPEALED. APPEAL BOARD, BY ITS MAY 7, 1984 DECISION, HAS REMANDED CASE BACK TO ASLB ON CERTAIN QA ISSUES. A PRE-HEARING CONFERENCE WILL BE HELD MAY 30, 1984, TO DISCUSS SCHEDULE AND ISSUES.
2. READINESS FOR FUEL LOAD - APPLICANT HAS STATED THAT PLANT WILL BE READY TO LOAD FUEL BY 9/15/84. STAFF AGREES THIS DATE IS ACHIEVABLE.
3. FSAR REVIEW - THERE REMAINS A FEW MAJOR ISSUES YET TO BE RESOLVED INCLUDING: (1) DEVIATIONS FROM APPENDIX R REQUIREMENTS IN APPROXIMATELY 20 AREAS; AND (2) ADDITIONAL MODIFICATIONS OR ANALYSES FOR CATEGORY I MASONRY WALLS MAY BE REQUIRED.
4. OFF-SITE EMERGENCY PLANNING - ASLB HAS RETAINED JURISDICTION OVER EMERGENCY PLANNING MATTERS AND INTERVENORS WILL HAVE OPPORTUNITY TO SEEK FURTHER HEARINGS IF DISSATISFIED WITH APPLICANT'S IMPLEMENTATION OF ITS COMMITMENTS TO RESOLVE EMERGENCY PLANNING ISSUES.

EMERGENCY PREPAREDNESS APPRAISAL IN DECEMBER 1983 IDENTIFIED 14 AREAS WHERE APPLICANT'S ACTIVITIES WERE NOT COMPLETE. REGION III FOLLOWUP INSPECTION IS SCHEDULED FOR JULY 9-13, 1984.

5. INSPECTION - ROUTINE NRC INSPECTIONS ARE ON SCHEDULE FOR A SEPTEMBER 15, 1984 FUEL LOAD DATE, HOWEVER, A SIGNIFICANT NUMBER OF VIOLATIONS, OPEN ITEMS, AND UNRESOLVED ITEMS EXIST, MANY OF WHICH ARE AWAITING APPLICANT RESPONSE/ACTION.
 - IDI COMPLETED 6/83. MOST SIGNIFICANT FINDINGS WERE RELATED TO DEFICIENCIES IN PIPE BREAK AND CRACK ANALYSES. APPLICANT'S RESPONSES HAVE BEEN REVIEWED AND ADDITIONAL INFORMATION REQUESTED BY LETTER DATED MAY 2, 1984.
 - APPLICANT STOP WORK ORDER IS IN EFFECT PENDING COMPLETION OF 100% REINSPECTION OF HVAC SYSTEMS FOR AS-BUILT VS DESIGN REQUIREMENTS.
6. ALLEGATIONS - ALLEGATIONS ARE UNDER REVIEW IN THE GENERAL AREAS OF IMPROPER CERTIFICATION OF QC INSPECTOR, POSTDATING RECORDS, INTIMIDATION OF INSPECTORS, FAILURE TO MEET ASME CODE, OMISSION OF REINFORCEMENT STEEL, INSTALLED HANGER/SUPPORTS NOT PER DESIGN DOCUMENTS, FALSIFICATION OF RECORDS AND FAILURE TO CONDUCT REQUIRED INSPECTIONS.
7. INCINERATOR - UNIQUE PROPOSAL FOR HANDLING OF LOW-LEVEL WASTE UNDER REVIEW BY THE STAFF.

SHOREHAM SIGNIFICANT ISSUES

1. FSAR REVIEW -

- o TDI DIESEL RELIABILITY - REPAIRS ARE STILL IN PROGRESS. CONCURRENT WITH EFFORTS TO REPAIR AND REQUALIFY TDI ENGINES, THE APPLICANT IS CONSTRUCTING A NEW EDG BUILDING TO HOUSE THREE NEW EDGs. OWNERS GROUP STUDY IS BEHIND SCHEDULE. RELIABILITY OF THE TDI DIESELS IS AN ADMITTED HEARING CONTENTION. ON MAY 18, 1984, LILCO REQUESTED AN EXEMPTION FROM GDC-17 TO OPERATE AT LOW POWER, BASED ON ENHANCED OFF-SITE POWER SUPPLIES.
- o THE STAFF QUESTIONS LILCO'S RELIANCE ON COUNTY POLICE TO ACT AS OFF-SITE RESPONSE FORCE AS REQUIRED BY NRC SECURITY REGULATIONS.
- o SHOREHAM OPERATING STAFF HAS NO HOT BWR EXPERIENCE. LILCO HAS HIRED SHIFT ADVISORS. CHANGES IN LILCO'S MANAGEMENT AND ORGANIZATION ARE UNDER REVIEW. THE NEW VP FOR NUCLEAR WAS A FORMER BWR PLANT MANAGER.
- o REGION 1 BELIEVES MSIV LEAKAGE SHOULD BE COLLECTED OR DIVERTED TO CONTAINMENT SUMP TO MINIMIZE CONTAMINATION.

2. HEARINGS - THREE SEPARATE HEARING BOARDS (ASLBs) ARE PRESIDING.
 - o ORIGINAL BOARD IS RESPONSIBLE FOR TDI DIESEL LITIGATION. FAVORABLE DECISION ON ALL OTHER ISSUES EXCEPT EMERGENCY PREPAREDNESS WAS ISSUED IN DECEMBER 1983. A SCHEDULE FOR TDI HEARING WILL NOT BE SET UNTIL COMPLETION OF APPLICANT'S DIESEL DESIGN REVIEW QUALITY REVERIFICATION PROGRAM.
 - o EMERGENCY PREPAREDNESS ISSUES HAVE BEEN MOVED TO A SEPARATE BOARD; A DECISION IS EXPECTED BY FALL 1984.
 - o ON MAY 18, LILCO SUBMITTED A REQUEST FOR AN EXEMPTION FROM GDC-17 TO PERMIT OPERATION AT LOW POWER BASED ON THE RELIABILITY OF ENHANCED OFFSITE POWER. A THIRD BOARD WILL CONDUCT A HEARING ON THAT REQUEST. THE HEARING IS EXPECTED TO START ABOUT JULY 12, 1984.
3. OFF-SITE EMERGENCY PLANNING - SUFFOLK COUNTY HAS REFUSED TO PARTICIPATE IN OFF-SITE EMERGENCY PLANNING. GOVERNOR OF NEW YORK SUPPORTS SUFFOLK COUNTY POSITION. APPLICANT HAS ESTABLISHED ITS OWN LOCAL EMERGENCY RESPONSE ORGANIZATION, LEGALITY OF WHICH IS QUESTIONED BY COUNTY AND STATE AND IS SUBJECT OF SUIT IN NEW YORK STATE SUPREME COURT. FEMA REVIEW OF EMERGENCY PLAN FOUND 32 INADEQUACIES, SOME RELATING TO QUESTIONS OF LEGAL AUTHORITY.

LIMERICK UNIT 1 SIGNIFICANT ISSUES

1. FSAR REVIEW - THERE REMAIN A NUMBER OF MAJOR ISSUES YET TO BE RESOLVED, INCLUDING REVIEW OF ONSITE AND OFFSITE EMERGENCY PLANS, TORNADO MISSILE EFFECTS ON THE ULTIMATE HEAT SINK, FIRE PROTECTION FOR STRUCTURAL STEEL, SEISMIC/DYNAMIC QUALIFICATION OF EQUIPMENT, CONTROL ROOM DESIGN REVIEW AND THE IDVP REVIEW. DUE TO THE NUMBER OF ITEMS STILL OPEN, A SIGNIFICANT EFFORT WILL BE REQUIRED TO RESOLVE THESE ON A SCHEDULE CONSISTENT WITH THE APPLICANT'S PLANS FOR LOW-POWER TESTING.
2. HEARING SCHEDULE - HEARINGS WILL TAKE PLACE OVER NEXT SEVERAL MONTHS FOR (1) OFFSITE EMERGENCY PLANNING, AND (2) ENVIRONMENTAL ASPECTS OF SEVERE ACCIDENT RISKS. THE ASLB DECISION CONCERNING THESE ISSUES IS EXPECTED BY JANUARY 1985. THE APPLICANT'S OFFICIAL FUEL LOAD DATE HAS BEEN RECENTLY REVISED TO SEPTEMBER 15, 1984.
3. PROBABILISTIC RISK ASSESSMENT - IN CONSIDERATION OF HIGH POPULATION DENSITY, APPLICANT HAS PERFORMED A PRA. STAFF'S EVALUATION OF PRA FOR ENVIRONMENTAL IMPACTS REPORTED IN DES AND FES. STAFF HAS CONCLUDED THAT RISKS OF RADIATION EXPOSURE ASSOCIATED WITH ACCIDENTAL RELEASES OF RADIOACTIVITY IS VERY LOW FOR LIMERICK. CONSIDERATION OF PRA RESULTS IN HEARING (ENVIRONMENTAL) WILL BE UNIQUE. STAFF IS NOW PREPARING A RISK EVALUATION REPORT TO DOCUMENT REVIEW FINDINGS RELATED TO SAFETY.
4. NRC INSPECTIONS - THERE IS A CONSIDERABLE AMOUNT OF ROUTINE INSPECTION WORK YET TO BE DONE. MANY ROUTINE INSPECTIONS CANNOT BE PERFORMED YET BECAUSE OF THE TESTING SCHEDULE OR STATE OF READINESS OF PLANT. IT IS NOT YET APPARENT WHETHER THE APPLICANT'S PROGRESS WILL SUPPORT A SEPTEMBER 15, 1984 FUEL LOAD DATE.

5. IDVP - THE STAFF HAS REVIEWED THE APPLICANT'S PROGRAM PLAN (DATED MAY 8, 1984) FOR PERFORMANCE OF AN INDEPENDENT DESIGN VERIFICATION PROGRAM AND BY LETTER DATED MAY 15, 1984, STATED THAT THE PLAN WAS ACCEPTABLE SUBJECT TO CERTAIN PROGRAMMATIC MODIFICATIONS.
6. ACRS - LETTER OF 10/18/83 CONCURRED WITH ISSUANCE OF LICENSE FOR FUEL LOAD AND OPERATION UP TO 5% POWER. COMMITTEE WISHES TO REVIEW FURTHER (1) EMERGENCY PLANNING, (2) PRA, (3) POTENTIAL COOLING TOWER FAILURE EFFECTS, (4) PLANT SECURITY, AND (5) SEISMIC MARGINS.
7. POINT PLEASANT DIVERSION PROJECT - THE APPLICANT INTENDS TO USE WATER FROM THE DELAWARE RIVER FOR MAKEUP FOR CONDENSER COOLING EVAPORATIVE LOSS WHEN THE SCHUYKILL RIVER IS NOT AVAILABLE DUE TO FLOW AND TEMPERATURE RESTRICTIONS. CONSTRUCTION ON THE DIVERSION PROJECT HAS BEEN DELAYED BY COURT IMPOSED WORK STOPPAGES. EVEN IF THESE WORK STOPPAGES WERE LIFTED, IT IS LIKELY THAT THIS PROJECT WOULD NOT BE COMPLETED UNTIL EARLY 1985.
8. LOW-POWER AUTHORIZATION - IN A MOTION DATED MAY 9, 1984, THE APPLICANT MOVED THAT THE ASLB ISSUE AN EXPEDITED PARTIAL INITIAL DECISION THAT WOULD PERMIT THE LOADING OF FUEL BY SEPTEMBER 15, 1984 AND SUBSEQUENT OPERATION UP TO FIVE PERCENT OF FULL POWER.
9. ALLEGATIONS - THERE ARE CURRENTLY 12 OPEN ALLEGATIONS COVERING AREAS SUCH AS PERSONNEL QUALIFICATIONS, INTIMIDATION, IMPROPER USE OF QC PROCEDURES, USE OF UNCERTIFIED PAINT, AND IMPROPER HANDLING OF NONCONFORMANCE REPORTS.

PALO VERDE UNIT 1 SIGNIFICANT ISSUES

1. SCHEDULE SLIPPAGE - SCHEDULE FOR FUEL LOAD WAS RECENTLY REVISED FROM MAY 1984 TO FIRST QUARTER 1985. APPLICANT'S STATED CHANGE WAS RESULT OF (1) PROBLEMS WITH LPSI PUMPS, (2) EQUIPMENT PROBLEMS FOUND DURING HOT FUNCTIONAL TESTING, (3) NEED FOR CORRECTIVE ACTIONS IN RESPONSE TO NRC SPECIAL TEAM INSPECTION, AND (4) 3-MONTH SUSPENSION OF START-UP TESTING BY APPLICANT TO CONDUCT AUDIT.

2. LPSI PUMP - PROBLEMS IDENTIFIED DURING TESTING IN LATE 1983; MODIFICATIONS TO PUMP INTERNALS DID NOT COMPLETELY SOLVE PROBLEM. LARGER MOTOR HAS BEEN INSTALLED AND SIGNIFICANT IMPROVEMENTS IN PUMP PERFORMANCE RESULTED WHICH MAY HAVE SOLVED PROBLEMS. APPLICANT IS CONTINUING TO EVALUATE. STAFF REVIEW OF PROBLEM PENDING RECEIPT OF APPLICANT'S REPORT TENTATIVELY SCHEDULED FOR JULY.

3. HOT FUNCTIONAL TESTING - DAMAGE TO EQUIPMENT IN CESSAR SYSTEM 80 SCOPE OCCURRED DURING HOT FUNCTIONAL TESTING, INCLUDING (1) BROKEN THERMOWELLS, (2) LOOSE AND BROKEN PARTS TO REACTOR COOLANT PUMPS, (3) LOOSE THERMAL SLEEVES, AND (4) CRACKED SHROUDS ON THE CEA UPPER SUPPORT STRUCTURE. ANALYSES AND REPAIRS ARE UNDERWAY. DEMONSTRATION TEST IN JUNE 1984 TO CHECK OUT PLANT FIXES IN THESE AREAS. A FINAL REPORT TO THE NRC IS DUE IN AUGUST 1984. STAFF IS MONITORING PROGRESS AND WILL REVIEW/EVALUATE FINAL REPORT.

4. REGION V SPECIAL TEAM INSPECTION - A SPECIAL CONSTRUCTION APPRAISAL INSPECTION WAS COMPLETED 11/1/83. FOCUS WAS CONSTRUCTION, HOWEVER, A NUMBER OF PROBLEMS FOUND INDICATED DEFICIENCIES MAY HAVE RESULTED FROM ACTIVITIES PERFORMED AFTER TURNOVER TO OPERATIONS AND STARTUP. CIVIL PENALTY WAS ISSUED FOR VIOLATION - QA PROGRAM DID NOT MAINTAIN ADEQUATE CONTROL OVER ACTIVITIES. APPLICANT'S CORRECTIVE ACTION INCLUDED INDEPENDENT ASSESSMENT, SUSPENSION OF STARTUP WORK, MANAGEMENT REORGANIZATION, AND DIRECT INVOLVEMENT OF SENIOR CORPORATE MANAGEMENT IN SITE ACTIVITIES.
5. HEARING - LICENSING BOARD AND APPEAL BOARD DECISIONS HAVE BEEN ISSUED, HOWEVER, INTERVENORS HAVE INDICATED INTENT TO FILE CONTENTIONS AND REQUEST A REOPENING OF THE RECORD AS A RESULT OF VARIOUS ALLEGED PROBLEMS, INCLUDING CHARGES OF CONSTRUCTION DEFICIENCIES AND EQUIPMENT DAMAGE DURING HOT FUNCTIONAL TESTING.
6. ALLEGATIONS - THERE ARE SEVERAL OUTSTANDING ALLEGATIONS AT THIS TIME. THE STAFF ANTICIPATES A LARGE NUMBER OF ALLEGATIONS WILL BE RECEIVED PRIOR TO OL ISSUANCE, REQUIRING A SIGNIFICANT ALLEGATION MANAGEMENT EFFORT.

MIDLAND UNIT 2 SIGNIFICANT ISSUES

1. CONSTRUCTION SCHEDULE - ON 4/10/84, THE APPLICANT ANNOUNCED REVISION OF THE FUEL LOAD SCHEDULE FOR UNIT 2 TO 7/86. UNIT 1 STATUS INDEFINITE SINCE 7/84 DOW STEAM CONTRACT TERMINATED. COMPANY CONTINUING DISCUSSIONS WITH MPSC AND STATE OFFICIALS ON CASH FLOW PROBLEMS THAT COULD AFFECT UNIT 2. ON MAY 18, 1984, CPCO SUBMITTED A PROPOSAL TO A COALITION OF STATE OFFICIALS CALLING FOR COMPLETION OF UNIT 2 AND CANCELLATION OF UNIT 1.

2. QUALITY OF CONSTRUCTION - TO RESOLVE MATTERS REGARDING THE OVERALL QUALITY OF CONSTRUCTION, FOUR SEPARATE THIRD PARTY REVIEWS ARE UNDERWAY. THESE INCLUDE:

IDVP - EVALUATES THREE SYSTEMS. DESIGN VERIFICATION TO BE COMPLETED BY TERA IN 7/84. PHYSICAL VERIFICATION TO FOLLOW AFTER CONSTRUCTION IS MORE COMPLETE.

CCP - INSPECTION BY APPLICANT OF 100% OF ALL ACCESSIBLE SAFETY SYSTEMS. STONE & WEBSTER IS CONDUCTING INDEPENDENT OVERVIEW. ALL STOP WORK ORDERS IN EFFECT WERE LIFTED BY FEBRUARY 1984. ACTIVITIES OF THE CCP ARE BEING INITIATED BY APPLICANT AS ALLOWED BY APPROVED PLAN.

SOILS REWORK OVERVIEW - STONE & WEBSTER PERFORMING OVERVIEW OF UNDERPINNING DUE TO SOILS COMPACTION PROBLEMS.

MANAGEMENT OVERVIEW - IN RESPONSE TO NRC ORDER, AN INDEPENDENT MANAGEMENT APPRAISAL WILL BE COMPLETED END OF SEPTEMBER 1984. PLAN ACCEPTED BY NRC 5/11/84.

3. HEARINGS - TWO SEPARATE HEARINGS IN PROGRESS. THESE ARE:

SOILS HEARINGS ON MODIFICATION ORDER - ISSUES OF SOIL COMPACTION PROBLEMS AND QA/QC. BOARD'S DECISION IS EXPECTED BY 8/84. THERE IS A PENDING MOTION TO REOPEN THE RECORD ON STRUCTURAL ADEQUACY OF DIESEL GENERATOR BUILDING. TWO OTHER ISSUES OF WHETHER CPC LIED CONCERNING SCHEDULE AND WHETHER CPC KNOWINGLY RELIED ON INVALID SOILS TEST DATA BEFORE THE NRC WILL BE HEARD BEGINNING IN AUTUMN 1984.

OPERATING LICENSE HEARING - 21 CONTENTIONS WERE ADMITTED AND 17 OF THESE ARE STILL TO BE LITIGATED. NO SCHEDULE HAS BEEN ESTABLISHED.

4. REMEDIAL SOILS ACTIVITIES - BECAUSE OF SOILS PROBLEMS RAISED IN 1978, UNDERPINNING OF SOUTHERN PORTION OF AUXILIARY BUILDING IS UNDERWAY, AS IS PREPARATION FOR UNDERPINNING OF THE NORTHERN PORTION OF SERVICE WATER PUMP STRUCTURE. WHILE THE MAGNITUDE AND COMPLEXITY OF THIS PROCESS IS UNPRECEDENTED IN THE NUCLEAR INDUSTRY, EFFORTS ARE PROCEEDING WELL.5. ALLEGATIONS - MAJOR INSPECTION EFFORTS HAVE BEEN EXPENDED ON 182 ALLEGATIONS IN 1983/1984. OF THESE, 106 HAVE BEEN CLOSED. THE 76 OPEN ALLEGATIONS COME FROM 17 ALLEGERS AND COVER A WIDE SPECTRUM OF ISSUES.

6. FSAR ISSUES

- o DIESEL GENERATOR BUILDING - STAFF IS REVIEWING SIGNIFICANCE OF FURTHER STRUCTURAL SETTLEMENTS AND CRACKING OF THE BUILDING OCCURRING DURING DGB SURCHARGE
- o SEISMIC MARGIN CAPABILITY
- o EMERGENCY PREPAREDNESS OPEN ISSUES

7. PRA - THE UTILITY SUBMITTED THE PRA 5/7/84.

WATERFORD UNIT 3 SIGNIFICANT ISSUES

1. FSAR REVIEW

A NUMBER OF FSAR ITEMS REMAIN TO BE COMPLETED, THE MOST SIGNIFICANT BEING:

- o BASEMAT ADEQUACY - IN RESPONSE TO QUESTIONS RAISED REGARDING BASEMAT CRACKING, THE STAFF IS PRESENTLY REASSESSING THIS ISSUE. THE STAFF HAS ASSEMBLED A TEAM TO REVIEW THIS ISSUE ADDRESSING DESIGN (NRR AND CONSULTANTS), AND CONSTRUCTION AND ALLEGATIONS.
- o APPENDIX R - ON MARCH 26, 1984 LP&L IDENTIFIED A NUMBER OF DEVIATIONS FROM APPENDIX R, BOTH INSIDE AND OUTSIDE CONTAINMENT, WHICH ARE NOW UNDER STAFF REVIEW. THE APPENDIX R AUDIT, WHICH WAS CONDUCTED APRIL 9-13 AT THE WATERFORD SITE, INDICATED THAT THE PLANT CURRENTLY DOES NOT MEET THE REQUIREMENTS FOR EMERGENCY SHUTDOWN ON LOSS OF OFFSITE POWER WITH BURNOUT OF THE CONTROL ROOM AND CABLE SPREADING ROOM. THE STAFF IS CURRENTLY REVIEWING THE APPLICANT'S PROPOSAL FOR RESOLUTION OF THIS ISSUE.
- o TECHNICAL SPECIFICATIONS - DEVELOPMENT OF WATERFORD T.S. BASED ON: REVISION 3 OF CE STANDARD T.S.; WATERFORD SER AND SUPPLEMENTS; AND EXPERIENCE WITH THE MOST RECENT CE PLANTS (ANO-2, SONGS 2 & 3, ST. LUCIE 2). FINAL DRAFT SENT TO LP&L FOR CERTIFICATION APRIL 19, 1984 WITH ADDITIONAL CHANGES SENT MAY 30, 1984.

2. NRC INSPECTIONS

- o THERE ARE A NUMBER OF ROUTINE INSPECTION ITEMS THAT ARE BEING COMPLETED, INCLUDING AS-BUILT VERIFICATION, VARIOUS PROCEDURES, AND TESTING INSPECTIONS. FOR MANY OF THESE ISSUES, THE STAFF IS AWAITING COMPLETION BY THE APPLICANT OF THEIR EFFORTS BEFORE THE STAFF CAN FINISH THE INSPECTIONS. CONSIDERABLE ADDITIONAL INSPECTION STAFF IS BEING APPLIED TO COMPLETE THIS EFFORT.

THE STAFF HAS ASSEMBLED A TEAM COMPOSED OF ALMOST 60 HEADQUARTERS STAFF, VARIOUS REGIONAL STAFF AND CONSULTANTS THAT HAVE BEEN AT THE SITE FOR MUCH OF THE PAST TWO MONTHS. THIS TEAM WILL COORDINATE THE COMPLETION OF LICENSING AND INSPECTION ACTIONS. MOST SITE ACTIVITIES ARE EXPECTED TO BE DONE BY THE END OF MAY 1984.

3. HEARINGS

- o THERE IS A MOTION BEFORE THE APPEAL BOARD (ASLAB) TO REOPEN HEARINGS ON THE SUBJECT OF THE ADEQUACY OF THE COMMON FOUNDATION BASEMAT BASED ON ALLEGATIONS IN A NEWSPAPER ARTICLE. ON MAY 15, 1984, THE STAFF REQUESTED AN ADDITIONAL EXTENSION OF TIME IN WHICH TO RESPOND TO THE INTERVENORS' MOTION. IT IS EXPECTED THAT THIS EFFORT COULD BE COMPLETED BY JUNE 15, 1984.

4. IDVP

- o AN INDEPENDENT DESIGN VERIFICATION PROGRAM, WAS CONDUCTED BY TORREY PINES FOR LP&L. THE APPROACH WAS TO TAKE A VERTICAL SLICE OF THE EMERGENCY FEEDWATER SYSTEM A NUMBER OF DESIGN, CONSTRUCTION AND QA/QC ASPECTS WERE EXAMINED. TORREY PINES IDENTIFIED 4 FINDINGS AND 20 OBSERVATIONS. THE STAFF HAS REVIEWED AND APPROVED THE FINDINGS, OBSERVATIONS AND PROPOSED CORRECTIVE ACTIONS. THE STAFF IS VERIFYING THE IMPLEMENTATION OF CORRECTIVE ACTIONS.

5. ALLEGATIONS

- o THE TEAM DISCUSSED IN ITEM 2 ABOVE IS ALSO ADDRESSING THE ALLEGATIONS. THE ALLEGATIONS DEAL WITH IMPROPER PRACTICES DURING CONSTRUCTION. THE ONSITE TECHNICAL REVIEW IS EXPECTED TO BE MOSTLY COMPLETED BY ABOUT THE END OF MAY. IN EARLY TO MID JUNE THE STAFF EXPECTS TO PUBLISH AN SSER THAT DISCUSSES THE VALIDITY OF THE ALLEGATIONS AND AN EVALUATION OF THEIR SAFETY SIGNIFICANCE. INITIAL FINDINGS INDICATE THAT SOME OF THE ALLEGATIONS MAY HAVE MERIT. THE STAFF IS STILL ASSESSING THE SAFETY SIGNIFICANCE. THE STAFF WILL PUBLISH AN EVALUATION OF THEIR FINDINGS THAT WILL BROADLY ASSESS THE SAFETY ISSUES AS WELL AS THE SPECIFIC ALLEGATIONS. OI CURRENTLY HAS 6 OPEN INVESTIGATIONS ONGOING AT WATERFORD RELATIVE TO WRONGDOING. AS THESE EFFORTS CONTINUE AT THE SITE MORE CASES MAY BE OPENED.

6. CAT INSPECTIONS

- o A CAT INSPECTION AT THE WATERFORD SITE WAS COMPLETED ON MARCH 23, 1984. THE CAT INSPECTION REPORT WAS ISSUED ON MAY 14, 1984. AN AREA OF CONSIDERABLE CONCERN IS THE APPARENT FAILURE OF THE APPLICANT TO TAKE PROPER CORRECTIVE ACTION SUBSEQUENT TO THE PREVIOUS IDENTIFICATION OF PROBLEM AREAS BY REGION IV. ANOTHER SIGNIFICANT AREA OF CONCERN DEALT WITH SAFETY RELATED CABLE SEPARATION.

7. SCHEDULE

- o THE CURRENT UTILITY OFFICIAL COMPLETION DATE IS MAY 30. COMPLETION OF THE BASEMAT ISSUE AND THE ONSITE TEAM ACTIVITIES WILL LIKELY DELAY THE STAFF'S DECISION ON LICENSING UNTIL NOT EARLIER THAN MID-JUNE.

8. SPECIAL MANAGEMENT ATTENTION

- o ON MARCH 12, 1984 A NRC SENIOR MANAGER WAS DEDICATED TO THE OVERALL MANAGEMENT OF WATERFORD REGULATORY ACTIVITIES.

COMANCHE PEAK SIGNIFICANT ISSUES

1. FSAR REVIEW - THERE ARE A NUMBER OF ISSUES YET TO BE RESOLVED INCLUDING REVIEW OF APPLICANT'S PROPOSED DELETION OF JET SHIELDS FOR BREAKS IN THE PRIMARY COOLANT LOOPS, TRANSAMERICA DELAVAL DIESEL RELIABILITY QUESTIONS, STAFF EVALUATION OF THE REPORT ON INDEPENDENT ASSESSMENT OF ADEQUACY OF DESIGN AND CONSTRUCTION BY CYGNA CORP., AND REVIEW OF ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT.

2. QUALITY ASSURANCE/QUALITY CONTROL AREAS -
 - ° A CAT INSPECTION IN 1983 FOUND CONCERNS REGARDING QUALITY CONTROL FOR CONSTRUCTION OF THE HVAC SYSTEM AND INADEQUACIES IN DESIGN CHANGE CONTROLS AND THE FIELD INSTALLATION VERIFICATION PROGRAM.

 - ° AN INDEPENDENT ASSESSMENT WAS PERFORMED BY CYGNA CORP. TO PROVIDE THE STAFF ADDED ASSURANCE THAT THE PLANT HAS BEEN DESIGNED AND CONSTRUCTED IN ACCORDANCE WITH THE APPLICATION. QUESTIONS HAVE BEEN RAISED REGARDING THE CYGNA FINDINGS AND THE ADHERENCE TO THE PROTOCOL GOVERNING THIS INDEPENDENT ASSESSMENT. THE STAFF MET WITH CYGNA AND IS CURRENTLY PREPARING A SAFETY EVALUATION REPORT.

 - ° NUMEROUS HEARING ISSUES REGARDING DESIGN AND CONSTRUCTION ADEQUACY REMAIN UNRESOLVED. THESE INCLUDE WELDING, PIPE SUPPORTS, PROTECTIVE COATINGS, AND DOCUMENT CONTROL DEFICIENCIES.

- ° NUMEROUS ALLEGATIONS INVOLVE INADEQUACIES IN DESIGN AND CONSTRUCTION AND QA CONTROLS FOR THESE ACTIVITIES.
 - ° MOST OF THE SEVEN ACTIVE OI INVESTIGATIONS RELATE TO DESIGN AND CONSTRUCTION QA/QC, INCLUDING ALLEGED INSPECTOR HARASSMENT, AND FALSIFICATION OF RECORDS.
3. HEARING - HEAVILY CONTESTED HEARING FOR OVER TWO YEARS. ALL BUT ONE CONTENTION (QA/QC-RELATED) HAVE BEEN DISMISSED. MANY ALLEGATIONS OF DESIGN AND CONSTRUCTION DEFICIENCIES ADMITTED INTO THE HEARING AS RELEVANT TO THIS CONTENTION. UNTIL RECENTLY, THE LICENSING BOARD'S INITIAL DECISION WAS PLANNED FOR JULY 1984, HOWEVER, HEARINGS ARE NOW SCHEDULED AT LEAST INTO AUGUST 1984. AS A RESULT, THE BOARD'S DECISION MAY BE DELAYED BEYOND SEPTEMBER 1984.
 4. INSPECTION PROGRAM - MUCH OF ROUTINE INSPECTION PROGRAM (TEST WITNESSING, TEST RESULTS REVIEW AND PROCEDURES REVIEW) REMAINS TO BE COMPLETED. ADDITIONAL RESOURCES WILL BE REQUIRED TO COMPLETE THE EFFORT ON SCHEDULE. APPLICANT MUST RE-RUN PORTIONS OF TEST PROGRAM DUE TO MODIFICATIONS AND DESIGN CHANGES. THE QUANTITY OF INSPECTION FOLLOWUP ITEMS (APPROXIMATELY 377) WILL REQUIRE EXTENSIVE EFFORT TO RESOLVE.
 5. ALLEGATIONS - THERE ARE CURRENTLY NEARLY 400 ALLEGATIONS. THE MAJORITY OF THESE ALLEGATIONS LIE IN THE CATEGORIES OF WELDING, QA/QC, CONCRETE/REBAR AND COATING DEFICIENCIES. SEVERAL FORMER UTILITY EMPLOYEES HAVE CONTACTED THE DEPT. OF LABOR CONCERNING ALLEGED INTIMIDATION/HARASSMENT. NRC STAFF PREPARATION OF DETAILED WORK PACKAGES FOR ALLEGATION EVALUATIONS IS IN PROGRESS.

6. SCHEDULE - THE UTILITY HAS RECENTLY REVISED THE PLANT COMPLETION DATE FROM JULY TO SEPTEMBER 1984. THE APPLICANT'S BASIS FOR THIS PROJECTION, PROVIDED TO THE STAFF MAY 7, 1984, INDICATES THAT A SEPTEMBER FUEL LOAD DATE IS ACHIEVABLE BUT THERE IS LITTLE FLEXIBILITY FOR UNEXPECTED EVENTS IN THIS SCHEDULE. SPECIAL MANAGEMENT ATTENTION AND RESOURCES WILL BE REQUIRED TO COMPLETE NRC EFFORTS BY THAT DATE.

7. SPECIAL MANAGEMENT ATTENTION - ON MARCH 12, 1984 A NRC SENIOR MANAGER WAS DEDICATED TO THE OVERALL MANAGEMENT OF COMANCHE PEAK REGULATORY ACTIVITIES. INITIAL ACTIONS ARE TO IDENTIFY THE OVERALL WORK PROGRAM AND RESOURCES REQUIRED. TO SUPPORT THIS, A SPECIAL UNANNOUNCED 2-WEEK ONSITE TEAM REVIEW OF PROJECT CONSTRUCTION AND READINESS FOR OPERATION, CONDUCTED IN APRIL 1984, INDICATES THE APPLICANT COULD MEET HIS SCHEDULED COMPLETION DATE.