



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

34/B695 ~~Jan~~ 02/29
~~Heller~~
Kane

December 28, 1981

MEMORANDUM FOR: Darrell Eisenhut, Director
Division of Licensing

FROM: Richard H. Vollmer, Director
Division of Engineering

SUBJECT: MIDLAND - DE SUPPORT FOR REVIEW OF REMEDIAL ACTIONS
AND HEARING

By memorandum, dated December 14, 1981, Robert Tedesco transmitted a schedule for the numerous actions necessary to support a hearing schedule consistent with the applicant's predicted construction start dates. We can support this schedule in principle and have already moved to gain additional resources for HGEB by contract and for SEB by revising assignments to make an additional structural engineer available for the term of the hearing.

In addition, we are delaying transfer of the MEB reviewer to the ACRS until March. Despite this action, the schedule as proposed for MEB input will have to slip approximately one month.

The schedule as currently proposed, is optimistic to a fault. The underlying assumption that the applicant will submit completely acceptable material on the established date for each action is belied by the record to date. The applicant is moving on many fronts and undertaking remedial actions that are well outside the usual scope of construction activities for nuclear power plants. As a result, his submittals are frequently both incomplete and controversial with regard to normal engineering practice.

This flaw in the scheduling philosophy is particularly acute because of the highly compressed nature of the review process and the complex interactions between the various construction activities. The result of a small number of applicant delays at the front end of the process will be a cascade of changes that will cause overlaps and further compress the staff review time, e.g., a reviewer required by schedule to be writing testimony on one subject while he is in fact attending the hearings for an earlier subject. The confusion that could ensue will render the schedule useless and demonstrate that it is in fact no schedule at all.

In my opinion, a viable schedule for this review must recognize the need for at least one iteration with the applicant following each significant submittal. If we choose to proceed on a less realistic schedule, I believe that preservation of our resources will demand that each applicant's delay be immediately assessed with regard to the overall schedule and that commensurate schedule revisions be prepared by the Project Manager on a continuing basis. The attached memorandum from J. Knight indicates that the first such delay may have occurred.

XA 3pp.

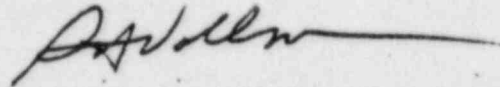
84

8201220049

D. Eisenhut

- 2 -

DE will use all available resources to help preserve the schedule. We have arranged for ETEC to put extra help on this job and to work over the holidays. Even so, you should be aware, and make Consumers aware, that any delay or lack of complete and acceptable submittals by them will likely cause a schedule breakdown.



Richard H. Vollmer, Director
Division of Engineering

Attachment:
As stated

cc: H. Denton
E. Case
R. Tedesco
J. Knight
E. Adensam
D. Hood
R. Bosnak
G. Lear
F. Schauer