



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

July 9, 1984

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EDO 14494

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.

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 Cmr's Offices by C/R.
Ref.-CR-84-62

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

Originating Office: EDO/NRR:Brinkman

OFFICE	SEGY	OCA	OCM	OCM	OCM	OCM
SURNAME	TCombs <i>T.C.</i>		<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	
DATE	6/29/84		7/5/84	7/5/84	7/8/84	

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Sincerely,

Nunzio J. Palladino
Chairman

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MJambor
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R. Perch

*PREVIOUS CONCURRENCES OBTAINED

SSPB:DL	LB#2*	SSPB:DL*	AD/SA:DL	OELD*	DL*	NRR*
DBrinkman:ls	RPerch	CThomas	FMiraglia	JGray	DEisenhut	ECase
6/18/84	6/11/84	6/11/84	6/18/84	6/11/84	6/18/84	6/18/84
D:NRR*	EDO	OCA				
HRDenton	WJDircks					
6/18/84	6/18/84	6/18/84				

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Sincerely,

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Chairman

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- D. Eisenhut/R. Purple
- Attorney, OELD
- J. Taylor
- R. Perch
- E. Jordan
- M. Jambor
- F. Miraglia/Lee
- K. Bowman w/original ticket
- C. Thomas
- D. Brinkman
- P. Anderson
- W. Dircks
- OELD

*See Previous Concurrences

SSPB:DL	LB#2*	SSPB:DL*	AD/6/11/84	OELD*		
DBrinkman:ls	RPerch	CThomas	FMiraglia	DEEisenhut	EGO	
6/18/84	6/11/84	6/11/84	6/11/84	6/18/84	6/18/84	
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UNITED STATES
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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, D. C. 20515

Dear Mr. Chairman:

This is in response to your June 1, 1984 letter in which you stated your understanding that the inadequacies in the Nuclear Regulatory Commission's staff's review of the technical specifications for the Grand Gulf Nuclear license application may be generic in nature and not limited only to that license application. Your letter also requested details of all similar instances since the Three Mile Island accident in which errors have been discovered in the technical specifications subsequent to NRC staff approval of those technical specifications. Your letter specifically cited Susquehanna as an example of another plant which had similar problems due to an inadequate review of the technical specifications by the NRC staff.

To determine whether the Grand Gulf Technical Specification problems were limited to that plant or generic in nature, we contracted with Idaho National Engineering Laboratory to perform a limited comparison of the technical specifications, Final Safety Analysis Reports and Safety Evaluation Reports for four plants including Grand Gulf and Susquehanna. Except for the Grand Gulf plant, only minimal discrepancies were identified--no more than would normally be expected for documents containing so much information.

While there are a substantial number of differences in 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 inadequate review by the NRC staff.

Based on the above, we believe the Grand Gulf Technical Specification problems are limited to that plant. No errors of the magnitude of those found for the Grand Gulf plant have been identified in the technical specifications for any other plant. Nevertheless, we realize the Grand Gulf experience does suggest that improvements to the technical specification development process may be needed. Improvements presently envisioned include increased sensitivity to the technical specification development process for first-of-a-kind plants and new nuclear utilities; and increased formality, and management discipline

and oversight in the technical specification development process. Other such improvements will be considered as part of our reassessment of our overall 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.

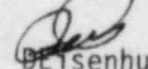
Sincerely,

Nunzio J. Palladino
Chairman

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*See Previous Concurrences

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In summary, we believe that the technical specification problems discovered at Grand Gulf are not of a generic nature but are limited to the Grand Gulf Technical Specifications.

Sincerely,

Nunzio J. Palladino

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no legal objection
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CORRESPONDENCE CONTROL TICKET

Rep Edward Markey

NUMBER: 84-0588

LOGGING DATE: 6/4/84

OFFICE OF THE SECRETARY

ACTION OFFICE: EDO

AUTHOR: Rep Edward Markey

AFFILIATION:

LETTER DATE: 6/1/84 FILE CODE:

ADDRESSEE: Palladino

SUBJECT: Inadequacies in the NRC's Staff review of the tech specs for the Grand Gulf station

ACTION: Chm's Sign and Comm Review..Date due Comm: June 13

DISTRIBUTION: RF, OCA to Ack

SPECIAL HANDLING: None

SIGNATURE DATE:

Rec'd Off. EDO
 Date... 6-4-84
 Time... 1:45 PM

FOR THE COMMISSION: Billie