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May 6, 1983

MEMORANDUM FOR: Chairman Palladino  
 FROM: William J. Dircks  
 Executive Director for Operations  
 SUBJECT: STATUS REPORT OF REVALIDATION EFFORT  
 REGARDING TMI-1 RESTART

My memorandum of April 26, 1983, stated that we anticipated completion of the staff's revalidation efforts regarding TMI-1 by May 6, 1983. The inspection and review program, as outlined in my earlier memorandum, was begun on April 20, 1983, and consisted of a special, announced inspection by Regional inspectors, the Senior Resident Inspector, and NRR Licensee qualification engineers. The onsite inspection alone involved 380 inspection hours. The inspection and review program is now essentially complete. However, during the course of that review effort, the inspection team became aware of two recently completed studies, conducted for the licensee, which could affect the report's findings. We feel it is important to thoroughly review these studies as part of our review effort.

Accordingly, I have directed that the inspection team enlarge the scope of their activities to include the review of these studies. To do so, however, will require additional time. The team will start this additional review on May 6, 1983, and I anticipate about ten days will be required for completion.

(Signed) T. A. Rehm

for William J. Dircks  
 Executive Director for Operations

cc: Commissioner Gilinsky  
 Commissioner Ahearne  
 Commissioner Roberts  
 Commissioner Asselstine  
 SECY  
 OPE  
 OGC  
 TMI-1 Service List

8411260165 930506  
 PDR ADOCK 05000289  
 P PDR

CONTACT: L.P. Crocker, NRR, 492-4891  
 T.T. Martin, Region I, 488-1280  
 (SEE PREVIOUS CONCURRENCE SHEET)

C	:LOB/DHFS	:DHFS	:ELD <i>my</i>	:ELD <i>EC</i>	:NRR	:EDO <i>R</i>	:
ME	:LCrocker	:HLThompson	:JGoldberg	:EChristenbury	H.Denton	:WJDircks	::
TE	:5/5/83	:5/5/83	:5/6/83	:5/6/83	:5/5/83	:5/5/83	:

BRIEFING FOR COMMISSION  
TMI-1 REVALIDATION EFFORT

OVERVIEW

1. BACKGROUND
2. PURPOSE
3. PARTICIPANTS AND EFFORT INVOLVED
4. AREAS REVIEWED

SUMMARY OF REPORT

1. ADHERENCE TO PROCEDURES (REGION I)
  - ° CONDUCT OF OPERATIONS PROCEDURES
  - ° TRAINING OF OPERATORS
  - ° QA PROGRAM
  - ° AUDITS.
  - ° ENFORCEMENT
2. INSIGHT REGARDING PROCEDURE ADHERENCE (REGION I)
  - ° INSPECTION REPORTS
  - ° LICENSEE EVENT REPORTS
  - ° SALP EVALUATIONS
  - ° INPO EVALUATIONS
3. ACTIONS TO ENHANCE SAFE OPERATION (NRR)
  - ° PLANT REVIEW
  - ° INDEPENDENT SAFETY REVIEW (IOSRG)
  - ° SHIFT TECHNICAL ADVISOR
  - ° LICENSEE MANAGEMENT INITIATIVES

4. TMI-1 ORGANIZATION (NRR)
  - ° PROGRAM
  - ° CHANGES FROM PRE-ACCIDENT STRUCTURE
  - ° FINDINGS
  
5. LICENSEE CONSULTANT REPORTS (REGION I)
  - ° BETA
  - ° RHR
  
6. REPORT CONCLUSIONS (REGION I)

OVERALL CONCLUSIONS

PURPOSE

REVALIDATE THE NRC STAFF POSITION SUPPORTING  
TMI-1 RESTART IN LIGHT OF THE IMPLICATIONS OF  
THE HARTMAN ALLEGATIONS ON MANAGEMENT INTEGRITY

## AREAS REVIEWED

- ADHERENCE TO PROCEDURES
- INSIGHT REGARDING PROCEDURE ADHERENCE
- ACTIONS TO ASSURE SAFE PLANT OPERATION
- TMI-1 ORGANIZATION
- LICENSEE CONSULTANT REPORTS

ADHERENCE TO PROCEDURES

- POLICY/PROCEDURES

- TRAINING ON POLICY

- QA PROGRAM

- DISCIPLINARY MEASURES

INSIGHTS REGARDING PROCEDURE ADHERENCE

- INSPECTION REPORTS
- LICENSEE EVENT REPORTS
- SALP EVALUATIONS
- INPO EVALUATIONS

ACTIONS TO ENHANCE SAFE PLANT OPERATION

- ° PLANT REVIEW GROUP
- ° INDEPENDENT SAFETY REVIEW (IOSRG) <sup>ISE</sup>
- ° SHIFT TECHNICAL ADVISOR
- ° LICENSEE MANAGEMENT INITIATIVES



## TMI-1 ORGANIZATION

- PROGRAM
- CHANGES SINCE TMI-2 ACCIDENT
- FINDINGS

BETA (BASIC ENERGY TECHNOLOGY ASSOCIATES, INC.)

- ° NUCLEAR NAVY EXPERIENCE (W. WEGNER, RICKOVER'S PREVIOUS DEPUTY)
- ° MANPOWER UTILIZATION/EFFICIENCY
- ° AREAS FOR IMPROVEMENT BASED UPON "STANDARD OF EXCELLENCE"
  - BETTER SUPERVISION AND PLANNING
  - PLANT MAINTENANCE - SOLVE PROBLEMS NOT SYMPTOMS
  - TECHNICAL SUPPORT, UNRESPONSIVE AND OFTEN INCOMPLETE INITIALLY
- ° NO DIRECT SAFETY PROBLEMS
- ° NO CONFLICTS WITH INSPECTION FINDINGS

RHR (ROHRER, HIBLER & REPLOGLE, INC.)

- PSYCHOLOGIST WITH NO PRIOR NUCLEAR EXPERIENCE
- PILOT STUDY OF LICENSED OPERATOR OPINIONS
- SURVEY AND GROUP DISCUSSIONS
- NO. 1 OPERATOR PRIORITY - STRONG DESIRE FOR IMPROVED TRAINING
- NO DIRECT SAFETY PROBLEMS AT TMI-1
- CONSISTENT WITH INSPECTION FINDINGS.

## REPORT CONCLUSIONS

- LICENSEE'S POLICIES AND PRACTICES RELATED TO PROCEDURE ADHERENCE AND LICENSE CONDITIONS ARE ACCEPTABLE AND SUPPORT TMI-1 RESTART.
- NUMEROUS CHANGES IN ORGANIZATION, PERSONNEL AND PROCEDURE ADHERENCE ASSURE THAT PRACTICES ALLEGED BY HARTMAN DO NOT PRESENT HEALTH AND SAFETY CONCERNS IN TMI-1 RESTART.
- MANAGEMENT INITIATIVES ARE POSITIVE TOWARD SAFETY AND REFLECT A DESIRE AND COMMITMENT TO OPERATE TMI-1 SAFELY.

## OVERALL CONCLUSIONS

- ° ISSUES RAISED BY THE HARTMAN ALLEGATIONS SHOULD NOT BY THEMSELVES BE A BAR TO RESTART.
- ° BECAUSE OF OTHER OPEN ISSUES, THE STAFF CAN DRAW NO CONCLUSION AT THIS TIME REGARDING MANAGEMENT INTEGRITY.