SGPR: CEG 50-272/311

1983 AUG 2

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MEMORANDUM FOR: Cecil O. Thomas, Chief

Standardization and Special Projects Branch

Division of Licensing, NRR

FROM:

George W. McCorkle, Chief

Power Reactor SG Licensing Branch

Division of Safeguards, NMSS

SUBJECT:

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

SALEM NUCLEAR GENERATING STATION

SAFEGUARDS REGULATORY EFFECTIVENESS REVIEWS

Enclosed is a proposed letter to the licensee which closes out the two open items in our memorandum of May 20, 1983.

We agree with your comments, dated June 29, 1983, regarding surveillance of the day tank valves and accordingly, this matter is being dropped.

> George W. McCorkle, Chief Power Reactor SG Licensing Branch Division of Safeguards, NMSS

Enclosure: As stated

cc: Region I

CONTACT:

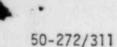
C. E. Gaskin, NMSS

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PROPOSED LETTER

Mr. Richard A. Uderitz Vice President - Nuclear Public Service Electric and Gas Company P. O. Box 236 Hancocks Bridge, NJ 08038

Dear Mr. Uderitz:

This is a supplement to our letter dated June 24, 1983 regarding two unresolved safeguards matters.

Concerning the procedures for personnel search at the protected area entrance, we have concluded that your proposal (as presented telephonically by Mr. Ivanic of your staff) to install and operate electronic search equipment is acceptable provided that the action is completed in a timely manner. Accordingly, it is requested that you submit an implementation schedule for our review within 45 days of receipt of this letter.

Concerning the surveillance of the day tank valves, no further action is required.

Sincerely,



BRIEFING PAPER - REGULATORY EFFECTIVENESS REVIEWS

1. Brief Explanation of What is Done

Safeguards Regulatory Effectiveness reviews are performed by a multidisciplinary team consisting of Safeguards Division staff, U.S. Army Special Forces personnel, and, as appropriate, reactor safety staff from the Office of Nuclear Reactor Regulation and participants from the affected NRC Regional Offices. The review itself is conducted in three basic phases. It begins with a preliminary analysis, performed at NRC Headquarters, that includes review of reactor site vital area analysis data, plant layout diagrams, and reactor safety system diagrams. This preliminary analysis is used to form a working notebook and a draft Vital Area Definition report that will guide the actual on-site review. The on-site review, which requires approximately one week per reactor unit, does not include challenges to the site security program but rather consists of a structured examination of vital equipment, a validation of the site vital areas, and an assessment of the site security program's effectiveness and impact upon plant safety. The final phase of the review consists of follow-up activities, conducted at NRC Headquarters, that include documentation and management review of the results and assembly of site data for possible use in future safeguards licensing decisions or NRC emergency response activities.

2. Facilities Done to Date - Summary of Results

Field tests were successfully conducted at three different operating reactor sites (North Anna Unit 1, Pilgrim, and Crystal River) to refine the technique. Full fledged RER's were conducted for five reactors: Palisades, Salem Units 1 and 2, and Turkey Point Units 3 and 4. Vital Area Validations have been done for those same five reactors and also for St. Lucie Units 1 and 2.

No significant vulnerabilities requiring immediate remedial attention were found as a result of these reviews; however, at one site the review found indications that the overall effectiveness of some of the elements of the safeguards system did not assure fulfillment of the intent of the regulations. Suggestions were made which, if adopted, would improve that effectiveness. Some suggestions were also made for changes to licensee procedures which, if adopted, had potential to improve the interaction between licensee safeguards and operational activities. At another site some areas being protected as vital were judged not to require that level of protection and suggestions were made which, if adopted, would lessen the burden on the licensee.

3. Number by Year to Completion

FY	RERS	Cumulative RERs	
83	4	4	*Includes 4 fuel cycle
83 84 85 86 87 88 89	6	10	facilities.
85	18*	28*	
86	18	46	**Includes 130 power reactors
87	18	64	(10 yr plan total) plus 4
88	18	82	fuel cycle facilities.
89	18	100	
90	18	118	
91	16	134**	

4. Problems/Issues

- a) Loss of expertise due to resignations and reassignments has had a negative impact on our learning curve, but we have initiated both interim and long term measures to keep on schedule.
- b) Although the emphasis is to be on performing the RERs prior to issuance of operating licenses, the reactor unit needs to be at least 95% complete prior to the visit by our technical assistance contractor (Los Alamos National Laboratory) needed to conduct the fault tree analysis that precedes the NRC staff analysis.

c) Criteria for vital areqidentification should be consistent with the vital island requirements and guidance of the Insider Rule package. This can be accommodated in the reviews since the present language of 10 CFR 73 can be interpreted to permit the grouping of items of vital equipment in vital areas (ELD agrees).

STATUS OF FIRST QUARTER PROGRAM BRIEFING ISSUES

May Coulded

		ISSUE & OFFICE ACTION	DIVISION	STATUS
	1.	Consider options for LLW in case of failure of state compacts. Discuss with EDO by 3/1/83.	FC/WM	FC requested extension from Rehm to 4/1/83. Rehm approved. Currently on schedule.
	2.	Consider transferring all or part of the IAEA study to DOS, or-as a minimum - align output timing with DOS reappraisal and restrict study to technological issues. Advise EDO of progress by 1/15/83.	SG	NMSS AND IP staffs are currently discussing comments on a contractor report relating to INEA safeguards. There will be a meeting between the The Safety/Safeguardo Refat (NUREG om) was published in May. It endorsed the RER program and recommends broadening it to examine license Safety/Safeguard interfaces and erphasizing post-inplementation licens reviews for sew operating licenses. The RER program plan was modified (6/29/83) per these recommendation and program indicatation fire five recommendation and program indicatation fire five rescarted to Part 35 rewrite provided to restart. EDO on 1/11/83 Item Closed.
him	3.	Reassess utility of the Regulatory Effectiveness Review in conjunction with re-examination of the Safety/ Safeguards study.	56	
	4.	Part 35 (Medical Licenses) - provide rewrite to EDO by 1/15/83.	FC	
	5.	In conjunction with IE and the Regions, complete review of procedures for NRC response to transportation accidents and provide recommendations to EDO by 1/15/83.	FC	Transportation emergency response policy paper sent to Regions for comment on 1/17/83. Regional comments due by 3/2/83. FC requested extension to 5/15/83. Rehm approved, but wants staffapproved draft sent to EDO before it goes to states for comments.
	6.	Review strategies for dealing with issue of decontamination criteria for W. Valley and discuss with EDO by 5/1/83.	FC/WM	Davis sent memo to Dircks 2/3/83 discussing strategies, decision points and timing for West Valley decontamination activies.



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

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INFORMATION FOR MR. DAVIS EDO PROGRAM REVIEW 8/1/83

- 1. Update EDO Monthly Status Report to 7/31/83.
- 2. Update PPG Performance Report to 7/31/83.
- Quenn 3. Update 2/27/83 Status fo 1st Quater Program Briefing Issues.
 - Update NWPA Schedules see chart used in 1st qtr review
 add other pertinent milestones
 cover FC items (e.g. MRS)
 - 5. Provide Chart on Status of NWPA Recruitment
 - 6. Update Chairman's Background Paper on LLW Compact Status.
- 7. Write BP on RERs Brief explanation of what is done
 Facilities done to date summary of results .
 # by year to completions (see budget)
 problems/issues
 - 8. Write BP on Safety / SG summarize committee recommendations
 NMSS actions planned to implement/status
 problems/issues
 - 9. Update Chairman's BP on Mill Tailings Rule SECY paper on suspension Udall letters on misinterpretation of Atomic Energy Act (EDO 13351)
 - 10. Decentralization status
 results of first NPR
 summary of how NMSS does NPR
 - 11. West Valley BP on current status & schedule - shifting to new phase - construction - fuel shipment