

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION I 631 PARK AVENUE KING OF PRUSSIA, PENNSYLVANIA 19406

MAR 29 1984

MEMORANDUM FOR: Richard R. Keimig, Chief, Project Branch No. 3, DPRP FROM: Ronald R. Bellamy, Chief, Radiological Protection Branch SUBJECT: THREE MILE ISLAND UNIT 1 SALP

Attached for your information is the SALP input for TMI Unit 1 (SALP period October 1, 1982 to January 31, 1984).

Ronald R. F. Ronald R. Bellamy, Chief

Radiological Protection Branch

Attachment: As stated

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THREE MILE ISLAND UNIT 1 SALP

6. Emergency Preparedness

An emergency preparedness inspection (50-289/82-25) was conducted on November 4-9, 1982, to evaluate corrective actions regarding seven items requiring resolution and eight improvement items which had been identified during the emergency preparedness appraisal (50-289/81-20) on July 13-24, 1981. As a result, four items requiring resolution (Appendix A items) and all improvement items (Appendix B items) were closed. One of the remaining Appendix A items pertain to modifications of the reactor building evacuation alarm and the other two pertain to installation, calibration and procedures for post-accident sampling. During the November 1982 inspection, the evacuation alarm system was noted as being modified, but performed poorly when tested on November 5-12, 1982.

Another inspection (50-289/83-13) was conducted on May 9-11 and June 29, 1983, to verify completion of the three items that had remained open and to ascertain whether corrective actions regarding deficiencies identified during the emercency exercise (50-289/82-12) conducted on August 11, 1982, had been implemented. The inspectors verified that the three Appendix A items were closed. It is noted that the reactor building alarm system had been modified and acceptably tested. In addition, the inspectors closed TMI-1 Restart Certification Items 137A and 137B, which are concerned with training of local offsite support groups (e.g. ambulance service, state police). The inspectors noted that licensee's committments, in a letter dated January 13, 1983 (5211-83-012) to the NRC, pertaining to exercise findings were being actively pursued, but had not been completed. These items included a new Emergency Operations Facility (EOF) and significant modifications to their Technical Support (TSC) and Operational Support Centers (OSC). Other exercise findings which required re-training of observers and exercise participants had been completed.

On November 3-4, 1983, a special inspection (50-289/83-31) of the licensee's Prompt Notification Systems was conducted. As a result, the inspector verified that administrative and physical means to alert and provide prompt instructions to the public within the Emergency Planning Zone (EPZ) were in place.

A full scale exercise inspection (50-289/83-35) was conducted on November 15-18, 1983. As a result of the exercise, the inspectors concluded that within the limitations of the exercise scenario the licensee's emergency

Three Mile Island Unit 1 SALP

response provided adequate protection of public health and safety. In addition, the licensee's emergency response organization demonstrated acceptable implementation of their Emergency Plan and Emergency Implementing Procedures.

Additionally, the inspectors noted that Emergency Response Facilities (e.g. OSC, TSC and EOF) showed marked improvement over the previous exercise. New and upgraded facilities (including a new building for the EOF) and equipment contributed to a coherent and overall very good accident response.

The licensee has been responsive to NRC initiatives and acceptable resolutions were proposed and implemented on a timely basis.

Summary-of-Rating

Category 1



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

April 4, 1984

Docket No. 50-289

MEMORANDUM	FOR:	E. Conner, Chief, Reactor Projects Secti No. 3B, PB No. 3, Region I	0
FROM:		James Van Vliet, Project Manager Operating Reactors Branch #4, DL	

SUBJECT: NRR SALP INPUT FOR TMI-1

Enclosed is NRR's SALP input for TMI-1 for the period 10/1/82 through 1/31/84. This input has been prepared in accordance with NRC Manual Chapter 0516 criteria.

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James Van Vliet, Project Manager Operating Reactors Branch #4, DL

Enclosure: As Stated

cc: JStolz RConte



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

Facility Name: Three Mile Island, Unit No. 1 Licensee: GPU Nuclear Corporation NRR Project Manager: James A. Van Vliet

I. Introduction

This report presents the results of an evaluation of the licensee, GPU Nuclear Corporation in the functional area of licensing activities. It is intended to provide NRR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period 10/1/82 to 1/31/84.

The basic approach used for this evaluation was to first select a number of licensing issues which involved a significant amount of staff manpower. Comments were then solicited from the staff. In most cases the staff applied the evaluation criteria for the performance attributes based on their experience with the licensee or its products. Finally, this information was assembled in a matrix which allowed an overall evaluation of the licensee's performance. This evaluation is based on staff input from branches in three NRR divisions.

II. Summary of Results

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating is then tempered with judgement as to the significance of the individual elements.

Based on this approach, the performance of GPU Nuclear Corporation in the functional area - Licensing Activities - is rated category 2.

III. Criteria

Evaluation criteria, as given in NRC Manual Chapter Appendix 0516 Table 1. were used for this evaluation.

IV. Performance Analysis

The licensee's performance evaluation is based on a consideration of seven attributes as given in the NRC Manual Chapter. For most of the licensing actions considered in this evaluation, only three or four of the attributes were of significance. Therefore, the composite rating is heavily based on the following attributes:

- Management involvement
- Approach to resolution of technical issues
- Responsivene.s

Of the remaining attributes of:

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- Enforcement History
- Reportable Events
- Staffing
- Trainino

only staffing was judged to apply to the licensing activities evaluated.

The evaluation was based on our evaluation of the following licensing activities:

- Response to NUREG-0737 Items
- Fire Protection Program (Appendix R Requirements)
- Steam Generator Recovery Program
- Pre-Restart License Amendments
- Seismic Qualification of Auxiliary Feedwater
- Licensed Operator Requalification Program Changes
- Inadequate Core Cooling Instrumentation
- Plans for Preventing Exceeding PTS Screening Criterion
- Long Term Review of Containment Purge & Vent
- Effluent Discharge Monitor Relocation
- Raising HPI & LPI Bypass Setpoints
- Station Distribution Voltage Verification Test
- Post-Accident Shielding Alternate
- Environmental Qualification

A. Management Involvement in Assuring Quality

Overall rating for this attribute is category 2. All rated activities were considered category 2, except for the steam generator recovery program and the effluent discharge monitor relocation which were rated category 1 and the environmental qualification program which was rated category 3. In general, the level of management involvement has been appropriate for the significance of the issue. Prior planning, prioritization of activities and corporate management involvement in site activities are evident. In the case of the steam generator recovery program, an issue of high company priority, safety significance, and public visibility, involvement by the highest levels of GPU management has been readily apparent. The effluent discharge monitor relocation licensing activities seemed to have been well founded and properly presented, thus implying close management involvement.

There is, however, little indication of management involvement in the TMI-1 environmental qualification issue. This conclusion was reached based on review of a number of environmental qualification submittals, and one meeting on this subject with GPU Nuclear personnel. Subsequent to the evaluation period, another meeting and a two-day audit of the environmental qualification files were conducted: and the results confirm our conclusion in this report. There is little evidence of programmatic planning for the TMI-1 environmental qualification program. The Corporate Policy on environmental qualification became effective on January 20, 1984 and it is not clear what the previous policy may have been. There is no indication of any management or quality assurance review of the environmental qualification files. Although the files generally seem to contain the information needed to demonstrate qualification, there is no GPU analysis, other than miscellaneous hand-written notes, describing how the information relates to TMI-1 and why it demonstrates qualification. There is no indication that environmental qualification decision making is being done-at the appropriate management level. More management attention is needed.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

Overall rating for this attribute is category 2. Six issues were rated category 1 and eight issues were rated category 2. There were no category 3 ratings.

The licensee's understanding of the issues has been generally apparent and the proposed resolutions have been generally conservative and sound. In particular the licensee's approach to resolution of fire protection (Appendix R requirements) demonstrates a clear understanding of the technical issues; leading to technically sound, thorough approaches for resolution of the issues. The licensee's steam generator recovery program has continued to be thorough, well planned, conservative and technically sound. For both of these issues, the licensee has frequently posed questions and requested clarifications from the staff on technical or licensing aspects of the issues. This has tended to assure continued clarity of the issues to be resolved and minimized false starts, rework, etc. For environmental cualification, the category 2 rating is marginal, but improvement is anticipated as a result of increased management involvement (see above).

C. Pesponsiveness to NRC Initiatives

Overall rating for this attribute is category 2, with all activities rated category 2. A noted trend is that the licensee is most responsive to those issues that licensee considers having higher priority (those issues impacting restart). Issues to which licensee assigns lesser priorities periodically require submittal schedule extension. Although it is not an activity listed in the evaluation matrix, the Control of Heavy Loads is one issue for which significant submittal extensions have been necessary. Licensee responses to ARC initiatives are generally sound and thorough; and acceptable resolutions are generally proposed.

D. Enforcement History

Not applicable.

E. Reporting and Analysis of Reportable Events

Not applicable.

F. Staffing (Including Management)

Staffing was only evaluated for two activities, thus there is insufficient basis for a meaningful overall rating of this attribute. Staffing was rated category 1 for the steam generator recovery program. Consistent with the scope and priority of the steam generator recovery program, the licensee has dedicated ample staffing (including management) of appropriate oualifications. Staffing was rated category 3 for environmental qualification. Two engineers are currently assigned to TMI-1 environmental qualification. This level of staffing is significantly smaller than the levels seen at other utilities. It therefore appears that additional staffing would be appropriate, (see above).

G. Training

Training was not evaluated for any of the activities evaluated. Thus there is no basis for evaluation.

V. Conclusions

Based on an NRR evaluation of 14 licensing activities during the period October 1, 1982 through January 31, 1984, the overall performance rating for GPU Nuclear licensing activities for Three Mile Island Nuclear Station, Unit 1 is category 2. The overall rating for each evaluated attribute is category 2. No major deficiencies affecting licensing activities became apparent during the evaluation period. GPU Nuclear should focus on improving its environmental qualification program. The licensee generally devotes an adequate level of management involvement to licensing activities; the licensee's approach to the resolution of technical issues is generally sound and conservative; and, the licensee is generally responsive to NRC initiatives.

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James A. Van Vliet, Project Manager Operating Reactors Branch #4 Division of Licensing

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	Response to HURLG-0737 Items	2	2	2	× 1/H	N/N	llo basts	II/N
1 1 1 1 1	Free Protection Program (Appendix R requirements)	2	-	2	N/N	V/II	llo basts	II/N
1 H	Steam Generator Recovery Program	-	-	2	V/N	N/11	-	II/N
1/ V	Pre-Restart License Amendment	5 2	2	2	II/N	11/N	llo hacte	
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4. 4. 4. 4.	Llcensed Uperator RequalIfication Program Changes	2	2	2	N/N	N/N	llo basts	V/H
N-1	Inadequate Core Cooling Instru- mentation	2	-	2.		N/N	llo basts	II/A

HHI-I EVALUATION HAINIX (Continued)

Iraining	V/h	V/N	V/H	N/N	V/N	V/N	1/N	V/1
Statting	No basis	No basis	tto basts	do basis	lo basis	o basis		basis 1
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Approach to Resolution of Technical Issues	. 2	2			-	2	2	2
Hanagement Involvement	2	Not evaluated	-	Not evaluated	Not evaluated	Not evaluated	E	2
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