



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

September 7, 1982

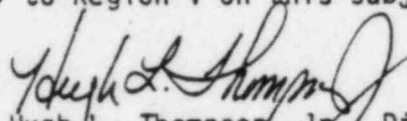
MEMORANDUM FOR: Stephen H. Hanauer, Director
Division of Safety Technology

FROM: Hugh L. Thompson, Jr. Director
Division of Human Factors Safety

SUBJECT: TECHNICAL SPECIFICATIONS REGARDING SAFETY
ENGINEERING GROUP

We have reviewed the memorandum dated March 26, 1982, from D. M. Sternberg, Region V and your memorandum to me dated May 7, 1982. We agree with Region V that the Technical Specifications should contain specific documentation and reporting requirements for the Independent Safety Engineering Group. However, since this is generic to all new operating plants, the requirements should be established via the Standard Technical Specifications (STS).

Enclosure 1 provides the information need to support this change to the STS. Enclosure 2 is a draft reply to Region V on this subject.


Hugh L. Thompson, Jr., Director
Division of Human Factors Safety

Enclosures: As stated

cc: H. Rood
R. Miraglia
D. Skovholt
D. Brinkman

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PROPOSED CHANGE TO SECTION 6.2.3 of
STANDARD TECHNICAL SPECIFICATIONS

Region V, in a memorandum dated March 26, 1982, from D. M. Sternberg to D. J. Skovholt, pointed out that the technical specifications do not contain a specific requirement that the Independent Safety Engineering Group (ISEG) document and have reporting requirements related to their function, as is required for the On-Site Review Group and the Company Nuclear Review and Audit Group. We agree with the Region V memorandum. The following is our recommended change to the Standard Technical Specification and the applicable supporting information as requested in enclosure 1 to NRR Office Letter No. 38.

a. Specification Language

Add a new subsection 6.2.3.5 as follows:

Records

6.2.3.5 Records of activities performed by the ISEG shall be prepared, maintained and forwarded each calendar month to (a high level corporate official in a technically oriented position who is not in the management chain for power protection).

b. Bases Language

This is not applicable. There is no written basis for Section 6 of the technical specification.

c. Supporting Rationale

Regional inspectors need documentation of the ISEG activities in order to verify if the licensee's ISEG is implementing the required function as described in the facility technical specifications. The inclusion of record keeping provisions in the technical specifications will ensure this documentation.

d. Risk Reduction Assessment

There is no quantifiable risk reduction associated with this record keeping requirement.

e. Value-Impact Analysis

1. NRC

Value - The proposed action will provide requirements to ensure that the Regional inspectors have the documentation needed to review the implementation of the ISEG's function.

Impact - The impact should be minimal. Additional NRC staff time will have to be devoted to review the documentation of ISEG activities.

2. Other Government Agencies

Not applicable unless the government agency is an applicant such as TVA. In that case the impact on that agency will be the same as on other comparable applicants.

3. Industry

Value - The proposed action will provide management with a tool for ensuring that the ISEG is implementing its function.

Impact - The proposed action will have the effect of requiring each new licensee to prepare additional documentation of safety related activities each month.

4. Public

There is no discernable value-impact on the public.

f. Proposed Implementation

This action should be implemented immediately in OL reviews.

g. Category

This proposed action is a Category 2 item.

ENCLOSURE 2

MEMORANDUM FOR: D. M. Sternberg, Chief
Reactor Operations Project Branch, Region V

FROM: D. J. Skovholt, Chief
Licensing Guidance Branch, NRR

SUBJECT: INDEPENDENT SAFETY ENGINEERING GROUP (ISEG) REPORTING
REQUIREMENTS - SAN ONOFRE UNIT 2. DOCKET NO. 50-361

REF: Memorandum of March 26, 1982, same subject, from
D. M. Sternberg to D. J. Skovholt

We have considered your request that specific requirements be included in the San Onofre 2 Technical Specifications (NUREG-0741), Section 6.2.3, that would require the ISEG to document performance of its assigned functions and responsibilities. We conclude that such a requirement should be included in Section 6 of the technical specifications. However, this action should not be case specific to San Onofre 2, since it applies also to other plants licensed since the TMI-2 accident. Therefore, we are proposing a change to the Standard Technical Specifications. This change would establish in the technical specifications for all new operating licenses the requirement that the ISEG document their activities.

If you have any further questions on this particular issue, please contact Larry Crocker of the Licensee Qualifications Branch on 492-3857.

D. J. Skovholt, Chief
Licensing Guidance Branch