

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON D. C. 20555

MAR 1 8 1986

MEMORANDUM FOR:

James M. Taylor, Director Office of Inspection and Enforcement

FROM:

Harold R. Denton, Director Office of Nuclear Reactor Regulation

SUBJECT:

PROCEDURE FOR AUGMENTED INVESTIGATION TEAM (AIT) RESPONSE TO OPERATIONAL EVENTS

In the latter part of December 1985, NRR provided comments on the Program Plan for the development of the Incident Investigation Program (a copy of which was sent to you). About the same time we received a copy of draft procedures for the conduct of an AIT, which is a subset of the Incident Investigation Program (IIP).

Later, we became aware that an NRC Manual Chapter was being prepared to define more precisely the IIP. Now that the draft Manual Chapter is out for review, it appears that a significant revision of the AIT procedure may be needed. NRR will provide additional specific comments on the AIT procedure when the next revision of the Draft Manual Chapter is available.

We would like to offer the following general comments on the AIT procedure at this time.

- We are concerned that the AIT-level of investigation may be too formal and that it may even interfere with the course of the normal regulatory process. The formal AIT process should not inhibit the normal interactions between project managers or inspectors and licensees in following up on plant problems. The process should recognize that informal contacts, including site visits, are encouraged for events below the AIT threshold.
- 2. Members of an AIT should be relieved of all other duties during the investigation so as to avoid either interference with the functioning of the AIT or an undue burden on the personnel involved, as was a concern during the AIT investigation of reactor trip breaker failures at the Cook plant.
- Failed or malfunctioned equipment involved in the event should be preserved in an undisturbed state at least until it is determined that an IIT response is not necessary.

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- The AIT procedures should include adequate provisions for the possible upgrading of the effort to an IIT, as occurred at Rancho Seco.
- We believe that a copy of the procedures for an AIT (while still under the control of IE) should be a part of the same document containing the procedures for an IIT. As a minimum, cross-references must be provided.

If you have any questions on our comments, the NRR technical contact for the IIP (including the AIT) is J. T. Beard (x24415).

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Harold R. Denton, Director Office of Nuclear Reactor Regulation

cc: J. Heltemes H. Bailey W. Lanning James M. Taylor

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Original Signal by E.R. Debiso

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cc: J. Heltemes

H. Bailey

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