



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

April 30, 1987

Mr. Phil Olson
General Accounting Office
C/O DOE
Room E-178
Germantown, Maryland 20548

Dear Mr. Olson:

The following information is provided in response to your request dated March 27, 1987, related to the "GAO Audit of Adequacy of NRC Safety Standards for Nuclear Power Plants." I understand that this information was provided to you informally between April 9-15.

Since the beginning of 1981, the NRC has issued 500-600 Orders to licensees of operating power reactors. I understand that you agreed that the level of NRC effort necessary to provide the exact number of Orders is not warranted. These Orders included Confirmatory Orders, Show Cause Orders, and Orders Modifying Licenses. In many cases, a single Order was issued covering multiple reactor units on a single site such as Browns Ferry Units 1, 2 and 3. Most of the Orders were generic which means that similar Orders addressing a safety issue or a group of safety issues were sent to all plants or a group of plants on or about the same date. The following are examples of generic Orders:

- ° 1981 - Scram Discharge Volume Issues Associated with Browns Ferry Event - issued to most General Electric boiling water reactors
- ° 1981 - Mark I Containment Issues - issued to boiling water reactors with Mark I containments
- ° 1980/ - Environmental Qualification of Electrical Equipment -
1981 issued to most power reactors
- ° 1981 - Event V (Overpressurization of low pressure ECCS piping) -
issued to plants with Event V piping configuration
- ° 1981 - NUREG-0737 Issues (TMI Issues) - issued to all plants
- ° 1982 - Mark I Containment Issues - issued to boiling water reactors with Mark I containments
- ° 1982 - Inadequate Core Cooling Instrumentation (TMI issue) -
issued to Babcock and Wilcox reactors

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- ° 1983 - NUREG-0737 Issues (TMI Issues) - issued to all plants
- ° 1983 - Scram Discharge Volume Issues - issued to some boiling water reactors
- ° 1983 - Recirculation Piping Cracks - issued to some boiling water reactors
- ° 1984 - Supplement I to NUREG-0737 Issues - issued to most plants

In a few instances, Orders have been used to shut down operating power reactors. On March 13, 1979, five plants (Beaver Valley 1, Surry 1&2, Fitzpatrick, and Maine Yankee) were ordered to shut down because of an error discovered in Stone and Webster's seismic piping analyses. In 1981, the NRC suspended Diablo Canyon Unit 1's low power operating license because of seismic design concerns. Very few Orders actually impose a plant shut down because such imposition is seldom needed. NRC experience shows that licensees generally shut down voluntarily once they understand the seriousness of the issue.

Orders are mainly a tool used by the Office of Enforcement or the Office of Nuclear Reactor Regulation, although the Commission or other NRC Offices can also issue Orders. Traditionally Orders have dealt mainly with licensing issues, although occasionally Orders dealt with more operationally oriented issues like pipe cracking and the attentiveness of control room operators. Orders continue to be used by NRC in this manner as a regulatory tool today. Orders are legally binding.

As requested, copies of Orders issued to the following five plants since the beginning of 1981 were given to you on April 9, 1987:

1. Rancho Seco (7 Orders)
2. Pilgrim (10 Orders)
3. Davis Besse (8 Orders)
4. Brunswick (9 Orders)
5. Browns Ferry (14 Orders)

Copies of the five Orders issued March 13, 1979 regarding seismic piping analyses were also provided to you on April 9, 1987. Copies of two other Orders (Diablo Canyon, November 19, 1981; Zimmer, November 12, 1982) were provided to you on April 15, 1987.

Using our available computerized document systems, we estimate that the NRC's Regional Offices have issued 150-200 Confirmatory Action Letters (CALs) to licensees of operating power reactors since the beginning of 1981. While performing checks of the computerized data for a few plants, we found that some of the CALs issued by the Regional Offices were not in the system. This problem appeared to be more prevalent in the earlier years of the time frame beginning in 1981. I understand that you agreed that the level of NRC effort necessary to provide the exact number of CALs is not warranted. These CALs

were used by the NRC to confirm the NRC's understanding of operational commitments made by power reactor licensees. In contrast to Orders, CALs have been generally operationally oriented, meaning that they resulted from operational occurrences or problems. When a significant problem was identified by the licensee or by NRC inspection personnel, the licensee examined the problem and developed a solution to the problem. Then the licensee informed the NRC's Regional Office of the proposed solution. In many cases when NRC was satisfied with the proposed solution, the NRC sent a CAL to the licensee confirming the NRC's understanding of the proposed solution. While these CALs were not legally enforceable (Orders are legally enforceable), compliance was not a problem. Licensees were aware that the CAL could be quickly followed by an Order if the licensee did not comply with the CAL. CALs continue to be used in this manner as a regulatory tool by the NRC.

As requested, copies of CALs issued to the following five plants since the beginning of 1981 were given to you on April 15, 1987:

1. Rancho Seco (5 CALs)
2. Pilgrim (5 CALs)
3. Davis Besse (9 CALs)
4. Brunswick (2 CALs)
5. Browns Ferry (5 CALs)

These CALs were found using the computerized system and were provided as examples; one of our spot checks revealed some additional CALs (not provided) for Brunswick. I understand that you agreed that further NRC effort to provide you all of the CALs for these plants is unwarranted.

I trust this information is responsive to your needs.

Sincerely,

(Signed) T. A. Rehm

T. A. Rehm, Assistant for Operations
Office of the Executive Director
for Operations

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