



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555  
January 15, 1980

Honorable John F. Ahearne  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: DRAFT NUREG-0660, "ACTION PLANS FOR IMPLEMENTING RECOMMENDATIONS  
OF THE PRESIDENT'S COMMISSION AND OTHER STUDIES OF THE TMI-2 ACCIDENT"

Dear Dr. Ahearne:

During its 237th meeting, January 10-12, 1980, the Advisory Committee on Reactor Safeguards reviewed Draft NUREG-0660, dated December 10, 1979. The draft had previously been discussed at an ACRS Subcommittee meeting in Washington, D.C., on January 7, 1980. During its review, the Committee had the benefit of discussions with the NRC Staff.

The draft is a compilation of recommendations made by the several organizations and commissions that have investigated the TMI-2 accident. The Committee understands that a primary purpose of the document is to establish criteria for termination of the pause in licensing. Other purposes are to provide a complete action plan relating to all the unresolved issues and unimplemented recommendations from the lessons learned from the TMI-2 accident, and to establish priorities and requirements of funds and manpower. The draft gives preliminary target dates and estimates of the necessary resources, but does not yet recommend priorities.

The Committee believes the Plan is comprehensive, but not selective; this comprehensiveness serves to dilute the items important to safety, and therefore important to termination of the licensing pause. In the absence of priorities and identification of the items that the NRC Staff considers important, the ACRS finds it difficult to make objective comments on the Plan. The Committee understands that the Staff is proceeding to develop priorities and identification of items of primary importance, and the Committee will expect to review the important aspects of the Plan when this has been done.

The Committee is also concerned that preoccupation with the Plan may lead to neglect of pre-TMI-2 accident safety concerns, some of which are of long standing and of greater importance than some of the listed items. It is important to establish priorities on an overall consideration of both "old" and "new" items.

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The Plan lists a large number of proposed changes in plant equipment, plant staffing, operating procedures, and licensing requirements. The ACRS believes that the scheduled time for establishing a complete plan setting detailed requirements for all items is too short to give reasonable assurance that all changes will be in the direction of greater safety. In illustration of this concern, the Committee points to the controversy that arose over the directive prohibiting tripping of the reactor coolant pumps following high pressure injection initiation.

The Committee believes that a two step process is more appropriate in developing the Action Plan. On an expedited basis, the Staff should develop those recommendations for safety improvement that it believes can and should be adopted as requirements for a termination in the pause in licensing. On a longer but defined time schedule, the Staff should develop a plan for dealing with other issues and implications of the TMI-2 accident.

Additional comments by member H. Lewis are presented below.

Sincerely,



Milton S. Plesset  
Chairman

Additional Comments by Member H. Lewis

The letter of January 5, 1980 from L. V. Gossick, Executive Director for Operations, to the Commissioners describes the Action Plan as the complete list of all actions necessary as a result of the accident at TMI-2, and states that complete approval of the Plan, in its entirety, by the Commission, should be regarded as a prerequisite for the resumption of licensing. The Staff has further told us that, though they plan to assign priority scores to the items on the list (through a scoring system of dubious relevance), it is expected that all items on the list will be accomplished, in time.

It is my view that such an unselective approach to the lessons of TMI-2 is inappropriate, and that the Plan consists of an uncritical listing of anything anyone has suggested be done in the aftermath of (not necessarily as a result of) the accident at TMI-2. In particular, the Plan provides no guidance, and reflects no analysis, with respect to the safety relevance of the items, or even whether they would enhance safety. I believe adoption of the Plan would make no demonstrated contribution to a reordering of NRC priorities toward those safety weaknesses highlighted in the various reports on TMI-2.

It would be preferable to bite the bullet, and identify those twenty items that need attention, in terms of their impact on safety, as determined by any reasonable analysis. This has not been done, nor is it contemplated.