



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

February 11, 1980

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

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

Dear Dr. Ahearne:

On February 7, 1980, during its 238th meeting, the ACRS received additional information from Messrs. Denton and Mattson on the status of the Action Plans and the requirements for near term operating licenses (NTOL). The Committee was advised that a large number of NTOL items, including the TMI-2 related NRC Bulletins and Orders, had been approved as a minimal set earlier that day.

The ACRS believes that its input into this process has been largely ignored by the Commission and is concerned that the "rush to judgment" on those important matters may result in, at worst, error, and at best inefficient use of resources important to safety.

During its January 1980 meeting, the ACRS had received a briefing on the Draft Action Plans (following a subcommittee meeting on the same subject) and sent you a letter, noting the lack of priorities within the Plans and the lack of an adequate method to establish such priorities. We further stated that we expected to see and to review the Plans when this had been accomplished.

In view of our letter, the ACRS was surprised to learn that the Staff had requested, and the Commission had approved, a large set of NTOL items without ACRS comment, while an ACRS meeting was in progress. While the Committee recognizes the needs and pressures for action, we believe it is important to be sure that a reasonable rationale exists for the setting of priorities, that there is reasonable assurance that there are no adverse safety effects from new requirements, and that the limitations on total resources have been carefully factored into the decision making.

A principal concern is that a very large number of operational and hardware changes are being mandated with, in most cases, little analysis to establish their safety relevance or impact. Design and operational stability is itself a safety asset and, confident though we are in the engineering judgment of the Staff, we think that there would be merit in ACRS review before, not after adoption.

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The ACRS will not be ready to provide its advice on the recommendations of the Bulletins and Orders Task Force until it can hold an additional Subcommittee meeting which will include a discussion of questions that have been raised by reactor vendors and operators.

Messrs. Denton and Mattson also stated on February 7 that they were not sure whether the ACRS would be asked to comment on the final Action Plans before the Commission was asked for its approval. The NRC Staff schedule for the availability of Draft 3 of the Action Plans is not firm. The ACRS is planning to meet with the NRC Staff on the Action Plans at its March meeting if the Committee receives Draft 3 in time. However, there appears to be the element of a timing problem which the Commission must consider in deciding whether, how, and when ACRS input in the decision-making process will be obtained.

Sincerely,

A handwritten signature in cursive script that reads "Milton S. Plesset".

Milton S. Plesset
Chairman