



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

November 14, 1979

Honorable Peter A. Bradford
Commissioner
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Bradford:

In your letter of October 9, 1979 to the Advisory Committee on Reactor Safeguards you referred to the Committee's letter to Chairman Hendrie of August 13, 1979 concerning "Short-Term Recommendations of TMI-2 Lessons Learned Task Force" and noted the ACRS statement that "orderly and effective implementation and the appropriate level of review and approval by the NRC Staff will require a somewhat more flexible, and in some cases more extended, schedule than is implied by NUREG-0578." You asked that the ACRS "identify in more detail which of the scheduled items the Committee believes should be extended and the basis for those recommendations."

The ACRS comment was intended as a general observation. The Committee was not favoring any unnecessary delays. However, the Committee anticipated that exceptions to the original schedule might be desirable or even necessary. For example, with regard to the Shift Technical Advisor, the Committee anticipated that not all licensees would be able to obtain within the time specified the services of sufficiently qualified personnel for three-shift, seven-days-a-week duty, including provisions for the ongoing training which is called for and appropriate to the task. In this respect, the Committee believes that, where licensees are not able to comply with the NRC requirements on schedule, they should be required to submit temporary alternative proposals for approval by the Staff.

Other items, such as the establishment of an onsite technical support or operational support center may also be difficult to achieve at all operating reactors by the scheduled time. In addition, some items of equipment or instrumentation may not be available on the time schedule proposed.

Furthermore, some of the changes will require shutdown of the reactor. Some grouping of such changes is likely to be desirable to limit the number of transients associated with shutdowns that are required for this purpose.

The Honorable Peter A. Bradford

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The ACRS does not believe public safety will be unduly jeopardized by extending the implementation schedule for some reasonable period.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Max W. Carbon".

Max W. Carbon
Chairman

cc: Chairman Hendrie
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Ahearne
Samauel Chilk