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

September 5, 1980

TO ALL LICENSEES OF OPERATING PLANTS AND APPLICANTS FOR OPERATING LICENSES
AND HOLDERS OF CONSTRUCTION PERMITS

GENTLEMEN:

SUBJECT: PRELIMINARY CLARIFICATION OF THE ACTION PLAN REQUIREMENTS

Over the past months since TMI-2 accident, the NRC has developed a number of requirements that must be implemented on operating reactors and on plants under construction. The purpose of this letter is to provide you with a summary listing of all approved TMI-2 related requirements for operating reactors and for applicants for an operating license as we understand them today. Also included for many items are proposed revisions or clarifications. This letter is for your information and review prior to NRC regional meetings to be held during the week of September 22, 1980. It is hoped that such a listing will put together in one place a tabulation of all such requirements for ease of use. Enclosure 1 contains a listing of all approved TMI-related requirements for applicants for an operating license. Enclosure 3 to this letter contains revisions and clarifications of the NRC position on most of these requirements.

One of two types of NRC reviews is specified for each requirement listed on Enclosure 1. "Pre-implementation review" requires that the licensee proposal be reviewed and approved by NRC prior to implementation. Post-implementation review requires that the licensee submit sufficient documentation to permit NRC review following implementation reviews.

To facilitate NRC review on all pre-implementation items, in a time frame consistent with the implementation schedule, dates for the submittal of required information or documentation for licensees are also listed on Enclosure 1. Information or documentation for Operating License Applicant requirements is to be submitted four months prior to the expected issuance of an operating license or four months prior to the listed implementation date, whichever is later.

A preliminary indication concerning whether the development of Technical Specifications to a facility license will be required for each of the action items is also listed on Enclosures 1 and 2. For those items which require Technical Specifications, the proposed Technical Specification should be submitted with the required documentation.

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Experience with the implementation of these and previous TMI Action Plan requirements indicate that the scheduled implementation deadlines in some cases may not allow reasonable time for completion of the work required. In some instances, the schedules, review categories, or clarifications have been changed from previous correspondence, or the requirement is being formally transmitted for the first time. A summary of these principle changes is listed as Enclosure 5.

The licensee/applicant should formally notify the staff as soon as any delays beyond the required implementation dates become apparent. The licensee/applicant submittal for these cases should include justification for the delay, a discussion of the work that will be completed by the required date including any planned compensatory actions, and an indication of the date for completion of the required actions. The staff intends to allow case-by-case exceptions only for good cause.

In general, if a completion deadline for a requirement falls later than the operating license date for a new plant, that requirement need not be met by the newly licensed plant until the completion deadline. If a completion deadline falls before an operating license decision date, that requirement is a prerequisite for the new operating license, except when a good cause is shown for any such exception.

In view of the complexity and number of issues discussed herein, the NRC is planning regional meetings to discuss these requirements. Such meetings which will be similar to those held a year ago on the Short-term Lessons Learned requirements, will be principally for the purpose of discussing our proposed clarification and revision requirements, and to provide a forum for obtaining licensee/applicant feedback. Licensees and applicants for operating licenses are strongly encouraged to attend and participate. A Federal Register Notice is being issued in the near future stating the exact time and location of such meetings which will be held during the week of September 22, 1980. To facilitate your review, Enclosure 4 contains a listing of previous correspondence sent to licensees/applicants setting forth TMI-related requirements.

Although the requirements (Scope and Schedules) contained herein will not be put in final form until after consideration of comments received at the regional meetings, all licensees and applicants should anticipate that the final requirements will closely resemble those identified in the Enclosures. As such, utilities should continue plans to implement these requirements.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

ENCLOSURES:

1. TMI Action Plan Requirements
for Operating Reactors
2. TMI Action Plan Requirements
for Applicants for an
Operating License
3. TMI-2 Action Plan Requirements
4. Correspondence Concerning TMI
Related Requirements
5. Summary of Changes and New
Requirements TMI-2 Action
Plan Implementation

7590-01

FEDERAL REGISTER NOTICE

CLARIFICATION OF TMI-2 RELATED REQUIREMENTS

AGENCY: U.S. Nuclear Regulatory Commission

ACTION: NOTICE OF MEETING

SUMMARY: As a result of the accident at TMI-2 in March 1979, the NRC has developed a number of new requirements for nuclear power plants. The staff has recently developed a document describing in more detail certain of these requirements that are being implemented at operating plants and plants under construction. In connection with this document, which clarifies and in some cases revises the scope and and schedule of these requirements the NRC will hold regional meetings to explain these requirements in more detail.

DATES AND LOCATIONS:

Region I September 22, 1980 8:00 a.m. - 5:00 P.M.
 Twin Bridges Marriott
 333 Jefferson Davis Highway
 Arlington, Virginia

Region III September 23, 1980 8:30 a.m. - 5:00 p.m.

Region IV & September 24, 1980 8:30 a.m. - 5:00 p.m.
Region V

Region II September 26, 1980 8:30 a.m. - 5:00 p.m.

Specific locations will be provided in NRC regional press releases.

FOR FURTHER INFORMATION CONTACT:

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SUPPLEMENTAL INFORMATION: The primary purpose of these meetings will be (1) to provide a more detailed explanation of these requirements including revisions; (2) explain the Regulatory approach and schedule to be taken in implementing the requirements; and (3) to obtain industry comments on these requirements including the implementation schedules.

Persons other than the NRC staff and Licensee Representatives may observe the proceedings but will be permitted to participate in the discussions only as time will allow.

Registration of attendees will be conducted prior to each meeting at the designated locations.

Comments on the document from interested persons would be welcome. Copies are being furnished to all local NRC Public Document Rooms and it is available for inspection at the Public Document Room in Washington, D. C. (1717 H Street, N. W.). Since many of the requirements have near-term implementation dates and the detailed clarifications, therefore, must be available promptly to the nuclear industry any such comments must be received as soon as practicable. The document is scheduled for finalization in early October 1980.

Dated at Bethesda, Maryland, this the 7th day of September, 1980 for the Nuclear Regulatory Commission.

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation