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

OCT 31, 1980

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

Gentlemen:

SUBJECT: POST TMI-REQUIREMENTS

On September 5, 1980, the NRC staff sent you a draft clarification letter regarding approved TMI Action Plan items. During the week of September 22, 1980, four regional meetings were held to provide a more detailed explanation of these requirements and to obtain industry comments concerning these items. Based on these discussions and other comments received, the NRC has revised its requirements regarding these items. It is the purpose of this letter to set forth those requirements.

This letter incorporates in one document all TMI-related items approved for implementation by the Commission at this time. This document is being published as NUREG-0737. Enclosures 1 and 2 contain an itemized listing of OR and OL requirements including implementation schedules, applicability, method of implementation review and licensee submittal dates. Enclosure 3 contains more detailed clarifications of most of the NRC positions including the identification of any changes from previous requirements and guidance.

Most of the items in the attached document have already been issued as requirements by previous correspondence. Those items that are being issued as requirements for the first time by this letter are identified by an asterisk in Enclosures 1 and 2. Additional guidance on the Emergency Response Facilities, Section III.A.1.2, will be forwarded separately in the near future.

Licensees and applicants should note that the set of requirements identified in the enclosures do not constitute the total set of TMI-related actions in the TMI-2 Action Plan, NUREG-0660. Rather, as noted above, the enclosures are a compilation of those items that have been specifically approved by the Commission for implementation. Upon further staff development of criteria and planning, additional items will be issued. For example, in the relatively near future, the staff expects to issue further criteria on emergency operational facilities (NUREG-0696), auxiliary feedwater system improvements (derived from NUREG-0667) and instrumentation (Regulatory Guide 1.97, Revision 2). In general, the implementation of those requirements will be carefully examined to ensure that they do not unnecessarily impact any of the requirements in this letter.

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The requirements herein(which include the requirements from NUREG-0694) are applicable to applicants for operating licenses and such applicants are expected to meet the same schedule of implementation as indicated for operating reactors. Operating license reviews being finalized over the next few months will be handled on a case-by case basis. Any item which the implementation date is prior to the expected ate of issuance of an operating license will be considered to be prerequisite to obtaining that license. For such items, applicants must submit information or documentation four months prior to the staff's scheduled issuance of its Safety Evaluation Report for four months prior to the listed implementation date, whichever is later.

A large number of post-TMI requirements require the installation of a number of control room indications. It is important that licensees and applicants give consideration to human factor engineering considerations in planning for the installation of such new control room equipment. In the coming months, the NRC will be requiring human factors engineering reviews of control room designs as part of Action Plan Item I.D.1, and such an effort at this time may reduce the potential for later modifications. As an example of possible considerations, licensees and applicants might well consider at this time whether some control panel indications are of lesser safety significance and can be moved to other locations in the control room.

It is expected that the requirements contained herein will be met. However, it is recognized that licensees have proceeded with implementation of some of these items prior to issuance of these clarifying criteria. The staff will consider requests for relief from various aspects of these criteria. Such requests should explain the need for relief, include a clear description of design features of the proposed installation, and provide a safety or rationale supporting the adequacy of the proposed installation. A licensee or applicant seeking relief from any element of our criteria should submit for relief, along with supporting justification, in the response to this letter.

Accordingly, pursuant to 50.54(f) operating reactor licensees are requested to furnish, within forty-five (45) days of this letter, confirmation that the implementation dates indicated in Enclosure 1 will be met. For any date that cannot be met, furnish a proposed revised date, justification for the delay, and any planned compensating safety actions during the interim. After our evaluation of your response the NRC staff will take action, as necessary to assure that such requirements and commitments are appropriately enforceable. This may include, as needed issuance of a Confirmatory or Show-Cause Order.

Sincerely,

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

Enclosures:

As stated