

EFD(1)

May 19, 1979

SECY-79-344

COMMISSIONER ACTION

To:

The Commissioners

Thru:

Lee V. Gossick
Executive Director for Operations

From:

Harold R. Denton, Director
Office of Nuclear Reactor Regulation



Subject:

INTERIM NRR ORGANIZATION TO DEAL WITH IMPACTS OF TMI-2
AND OTHER NRR PRIORITY TASKS

Purpose:

To obtain Commission approval of NRR plan to formalize
an interim organizational structure to deal with the
impacts of TMI-2 on resources and priorities within
that office.

Category:

This paper contains a major policy question.

Discussion:

The accident at TMI-2 which occurred on March 28, 1979 has
and is continuing to divert significant managerial and technical
resources of NRR from its principal FY 79 work priorities
(Operating Reactors including SEP and Safeguards, Unresolved
Safety Issues and Casework). It is clear that certain
TMI-related activities (TMI Direct Support, Bulletins/Orders
and "Lessons Learned") which have evolved since the accident
require such priority attention.

As a result, we have examined our pre- and post-TMI
activities and have determined that our current and
near-term (six to eight months) priority tasks should be
as follows:

1. TMI Direct Support
2. Bulletins/Orders
3. Lessons Learned
4. Operating Reactors, including the
five shutdown facilities
5. Unresolved Safety Issues (USI's)
6. Casework (as resources permit)

Contact:

H. R. Denton, NRR

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A short description of each of the above tasks is contained in Enclosure 1.

Examination of the tasks in Enclosure 1 suggested the interim organizational structure to best accomplish these tasks. The first three priority tasks (TMI Support, Bulletins and Lessons Learned) are three efforts requiring immediate attention and an initiation of immediate task force efforts for these tasks appears to be in order. The last three priority tasks (Operating Reactors, Unresolved Safety Issues and Casework) are now being worked within the current NRR organizational structure and should remain there.

Since the first three priority tasks will require substantive resources (approximately 70 professionals from the NRR staff), reassignment of NRR personnel to these tasks will require a realignment of managerial and some technical personnel. In addition, one NRR Division Director has been assigned to the Commission investigation and we anticipate the loss of an additional 6-8 senior staff to that effort. Enclosure 2 contains the interim NRR organizational and managerial structure and essentially formalizes the ad hoc efforts which are now ongoing.

The efforts of the interim Divisional structure (DOR, DPM, DSE and DSS) will be directed toward maintaining the FY 79 and FY 80 goals in the Operating Reactors and Unresolved Safety Issues Decision Units.

As a result of the realignment of resources and priorities, the expected accomplishments in the Casework task will be severely limited. The priority of casework reviews will be:

- Near Term OLs
- Completion of CPs in hearing
- Other OLs where completion of construction is anticipated by January 1981
- CPs and OLs having special review considerations (i.e., Bailly, Midland)

A preliminary and optimistic identification of specific reviews that will be continued is contained in Enclosure 3. A final and more realistic assessment of the expected casework accomplishments can only be made after resource allocations to other higher priority tasks and assignments to the Commission investigation have been made. At this point in time the available resources can be matched against the resources required to continue the reviews identified in Enclosure 3 on a "best-effort basis." It is our expectation that the casework accomplishments in Enclosure 3 are the most we can expect to accomplish and that it is highly likely

that our accomplishments in this area would be less than that identified.

In addition to the identified impacts on Casework, the following FY 79 and FY 80 efforts will be severely restricted in that these efforts will continue only as available resources permit:

- Generic Issues (other than USI's)
- Licensing Improvements
- Topical Reports
- Contract Management
- Research Coordination
- Non-NRR Support
- SRP Revisions
- Audit Calculations
- Advanced Reactors*
- Standards Assistance
- Training

Several alternative approaches to address the post-TMI efforts were considered. A potential alternative is to utilize the technical staff in other NRC program offices to supplement NRR resources. These offices are already providing assistance to NRR in the Unresolved Safety Issues program and SRP revisions. They are also involved in post-TMI 2 analyses and investigations. To further divert substantive resources for six to eight months may have serious adverse impact on their programs. However, assistance, from these Offices, in several severely impacted disciplines could mitigate the impact on some of the diverted efforts identified above.**

It is our view that a realignment of NRR resources and priorities is required to effectively and expeditiously perform the post-TMI activities and continue efforts in our major programs. The proposed alignment (shown in Enclosure 2) combines the best of the advantages of several alternatives to this interim organization. The range of alternatives available included maintaining the existing organization intact and accomplishing these tasks within the existing structure, or establishing task forces for all these efforts (which would result in essentially a complete abandonment of the current organization). The advantages of the former include (1) maintenance of the existing managerial and organizational structure; (2) assurance of quality control of review product;

* Support efforts for Ft. St. Vrain and FFTF will be maintained.

** IE is and will continue to provide assistance to NRR in reviewing responses to Bulletins. RES is and will continue to provide assistance to NRR in the seismic design review area.

and (3) minimum disruption of the staff. The disadvantages of the former include (1) no clear responsibility for task assigned, and (2) progress of tasks on expedited bases may be impeded because of conflicting priorities.

The advantages of the latter include (1) clear responsibility for each task, and (2) clear assignment of priority and resources to assure expedited effort. The disadvantages are (1) a complete disruption of the current organization; (2) limited assurance of quality control of the review product; and (3) competing priorities for limited resources could restrict progress on other important NRR efforts.

It is our view that the proposed organizational structure shown in Enclosure 2 provides the best basis for performing the identified tasks within the next six to eight months. The interim organization retains the integrity of the current Divisional structure. Thus, an orderly transition to normal operations following completion of the TMI-2 tasks can be effectively accomplished.

Coordination

Since this matter affects NRR solely, there was no coordination with the other program offices.



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Post-TMI Task Descriptions
2. Interim NRR Organizational Structure
3. Identification and Summary and Casework
Impacts

DISTRIBUTION

Commissioners
Commission Staff Offices
Exec Dir for Operations
ACRS
Secretariat

Commissioners' comments should be provided directly to the Office of the Secretary by c.o.b. Friday, June 1, 1979.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT May 25, 1979, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional time for analytical review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

Enclosure 1

POST-TMI

TASK DESCRIPTIONS

TMI-2 DIRECT SUPPORT

This TMI-2 Support Task includes core cooling, cleanup and recovery operations. The support effort will include:

- Analysis, as appropriate, of plant conditions and proposed changes in system design or operating mode.
- Performance of independent analysis of dose to public via all pathways for proposed releases of gaseous or liquid activity and evaluation of solid storage.
- Analysis of plant activities in conformance with ALARA objectives, to include evaluation of plant organization, personnel training and procedures.
- Review and analysis of proposed operating plans and procedures to accomplish major operations such as long term cooling, containment cleanup and entry, and core removal.

- Preparation of Technical Specifications appropriate to the plant conditions and activities.
- Interfacing with the licensee, IE, and all government agencies involved in reactor safety and environmental issues.
- Preparation of presentations and correspondence appropriate to the TMI accident such as green tickets, briefings of State, local and Federal agencies and the Commission as well as international officials.

The scope of this task will include all TMI-2 site activities. Approvals and SERs for various stages and modes of core cooling, cleanup and recovery operations will be the principal end-products of this task.

Bulletin/Orders

This Task includes review responses to orders and I&E Bulletins.

The support effort will include:

- Orders - Perform the necessary reviews of licensee and vendor supplied information to support a decision regarding plant operations.

- I&E Bulletins - Assure that (a) licensees are informed of accident sequence and contributors, (b) minimum procedural and administrative actions are taken for continued safe operation, (c) plant designs are examined, (d) results are promptly reported to NRC, and (e) necessary short-term measures are implemented.

The scope of review for the order will be as defined for each facility. With respect to the I&E Bulletins, the scope will be limited to short-term measures to assure safe operation of restarted B&W plants and continued safe operation of operating Westinghouse, Combustion Engineering and General Electric designed plants. The end-products for this task will include: (1) Safety evaluations and authorizations to resume or continue operations; (2) Licensing positions regarding the implementation of short-term measures on operating B&W, W, CE and GE designed plants, and (3) Recommendations for further improvements in the areas of: design and operation/and administrative procedures.

Lesson Learned

This Task for the TMI-2 accident includes the review and evaluation of investigative information, staff evaluations of responses to I&E Bulletins and orders, staff recommendations and recommended actions from outside of the NRC; to identify, analyze and recommend changes to licensing requirements and the licensing process for nuclear power plants based on the lessons learned and provide recommendations for interim requirements for new operating licenses prior to completion of long-term activities. There is a range of area of immediate interest to NRR in which possible regulatory improvements are suggested by the TMI accident. These include:

- (1) Reactor operator training and licensing.
- (2) Reactor transient and accident analysis.
- (3) Licensing requirements for safety and process equipment, instrumentation, and controls.
- (4) Offsite and onsite emergency preparations and procedures.
- (5) Reactor siting.
- (6) Licensee technical qualification.

- (7) NRR accident response role, capability and management.
- (8) Reactor operating experience
- (9) Environmental Effects
- (10) Licensing requirements for post-accident monitoring and controls.
- (11) Post-Accident Cleanup and Recovery.
- (12) NRR engineering evaluation of the TMI-2 event sequence.

End-products may take the form of proposals for changes in legislation, policy, regulations, staff technical positions, review procedures, or NRR organizational structure and responsibilities. All information developed by the Task Force will be made public and submitted to others investigating the TMI-2 accident. The Task Force will serve as the focal point for NRR interaction with these groups.

Operating Reactors

The Task for Operating Reactors is to assure the continued safe operation of operating plants. All routine DOR activities with the exception of those specifically included in other tasks, are included in the scope of this task. Review and authorization of restart of the five plants shutdown for seismic design reanalysis, continued support of Unresolved Safety Issues, the Systematic Evaluation Program and Safeguards are also included. Routine licensing approvals, orders, etc., and authorizations for restart of Maine Yankee, Beaver Valley 1, FitzPatrick, Surry 1 and 2 are the end products for this task.

Unresolved Safety Issues

This Task is to continue to perform those reviews and analyses necessary to complete generic tasks that address "Unresolved Safety Issues" with minimum impact on current schedules. Initially this Task will include the 19 generic tasks identified in NUREG-0510 that address "Unresolved Safety Issues." Several of these 19 generic tasks will likely be expanded to address issues identified as a result of the TMI-2 accident. In addition, new "Unresolved Safety Issues" will likely be identified as a result of the TMI-2 accident. This "Unresolved Safety Issues" Task will be expanded to include generic tasks to address these new issues as they are identified. The end products will be NUREG reports describing the staff's evaluation of and conclusions for each issue. More specific end products are described in the Task Action Plan for each generic task.

Casework

This Task includes:

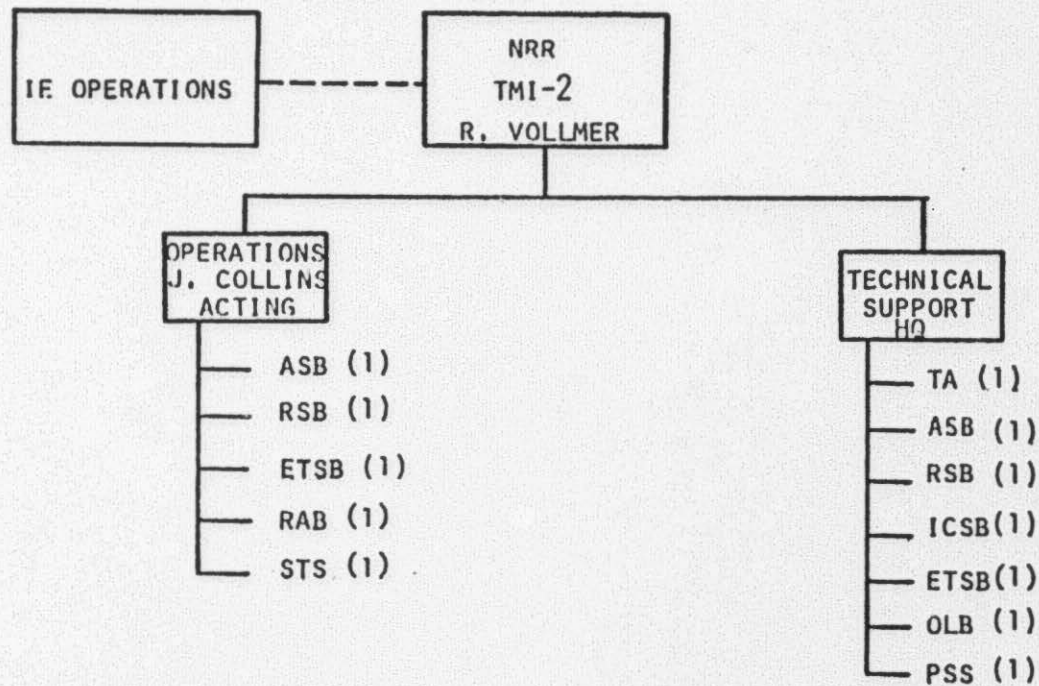
- Completion of review of near term OL's and coordinate "TMI Lessons Learned" for these plants. Plants in this group include Salem 2, North Anna 2, Sequoyah 1 and 2, Diablo Canyon 1 and 2, McGuire 1 and 2, Zimmer, and LaSalle 1 and 2.
- The continuing of ongoing OL reviews with priority based on NRC estimates of construction completion dates up to January 1981. Plants in this group include Watts Bar 1 and 2, Fermi 2, Summer, Shoreham, San Onofre 2 and 3, Susquehanna 1 and 2, and WPPS 2.
- Completion of CP's now active in hearing process. Plants in this group include Perkins, Pebble Springs 1 and 2, Skagit 1 and 2, Pilgrim 2, Allens Creek, New England 1 and 2 and Black Fox 1 and 2.
- Completion of environmental reviews for the identified projects to proceed with corresponding priorities.

The end products for this task includes the issuance of SER's and EIS for the projects identified.

ENCLOSURE 2

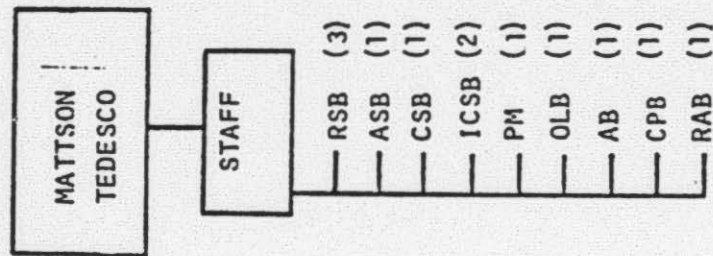
INTERIM NRR ORGANIZATIONAL STRUCTURE

TMI-2 SUPPORT



TOTAL STAFFING: 14 PROFESSIONAL
AND MANAGERS

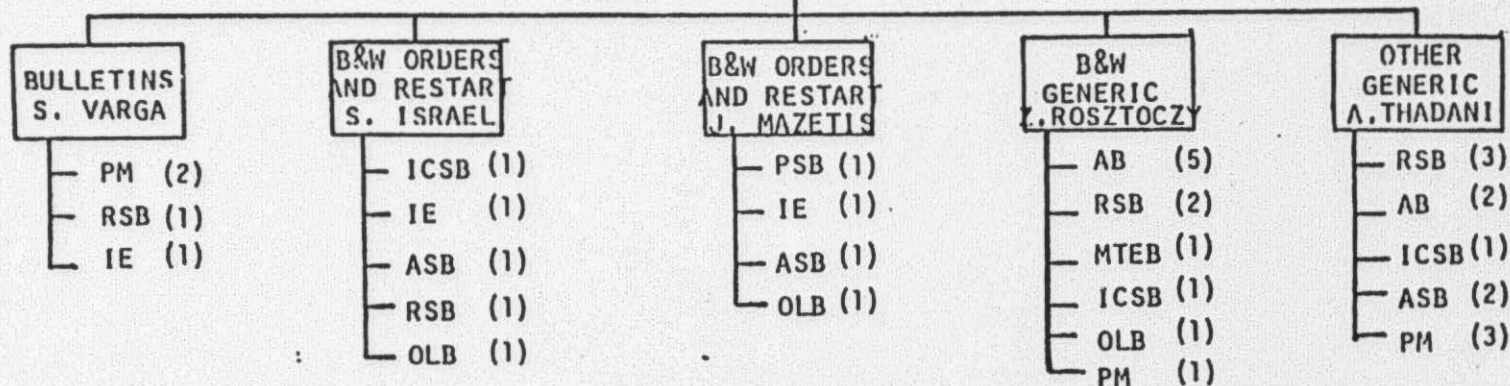
LESSONS LEARNED



TOTAL STAFFING: 14 PROFESSIONALS
AND MANAGERS

BULLETINS/ORDERS

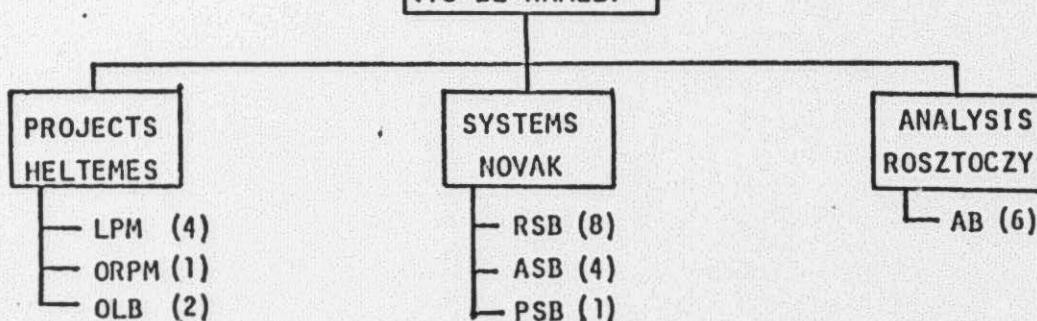
D. ROSS



Total Staffing: 39 Professionals and Managers

UNTIL JUNE 1

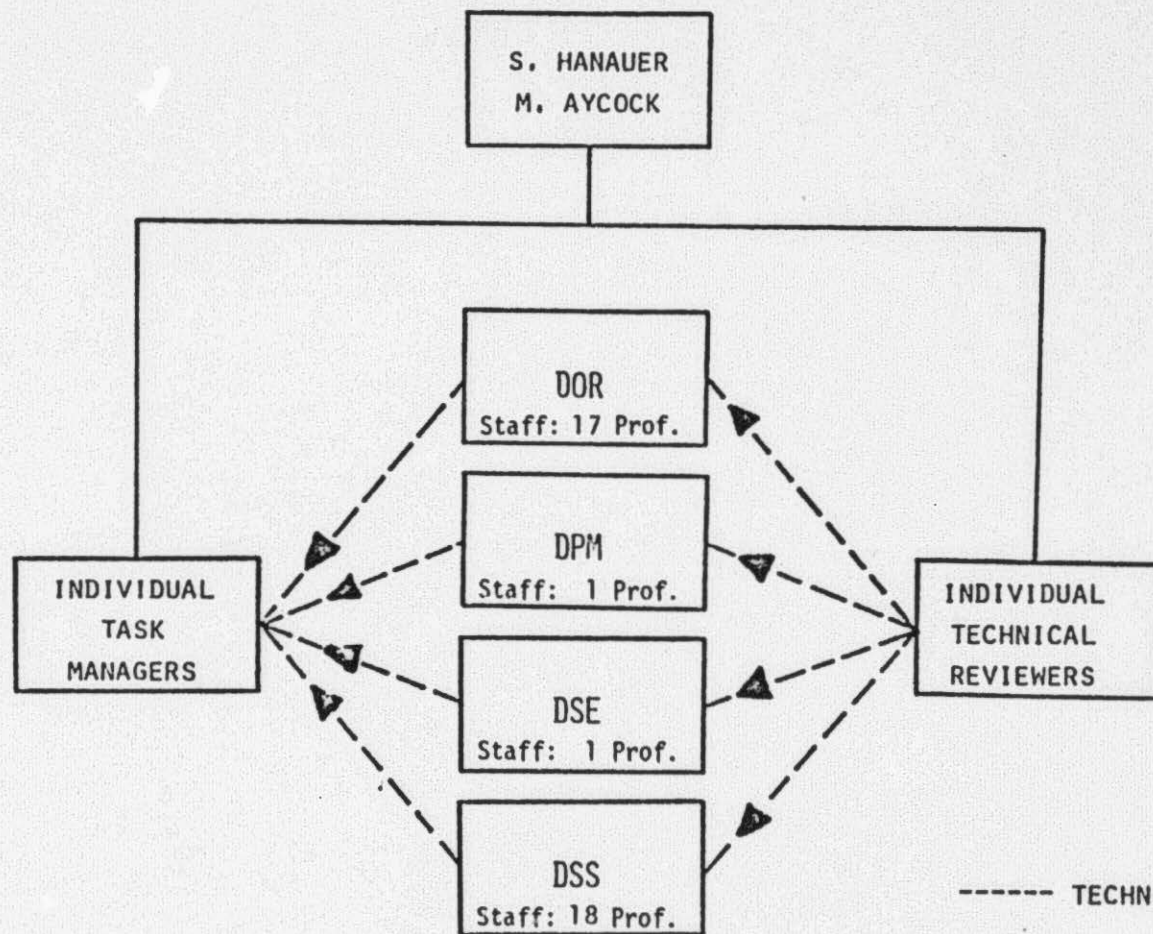
D. ROSS
DEPUTY
(TO BE NAMED)



Total Staffing: 33 Professionals and Managers

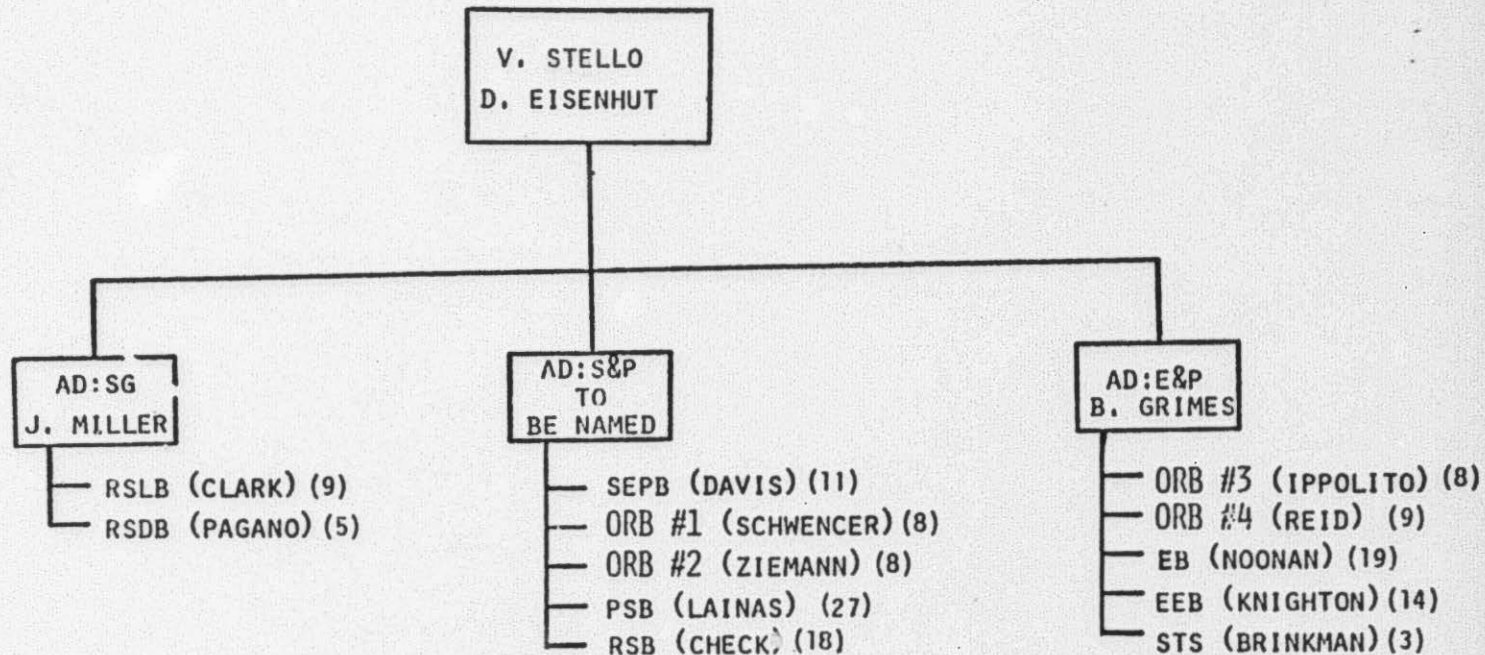
AFTER JUNE 1

UNRESOLVED SAFETY ISSUES



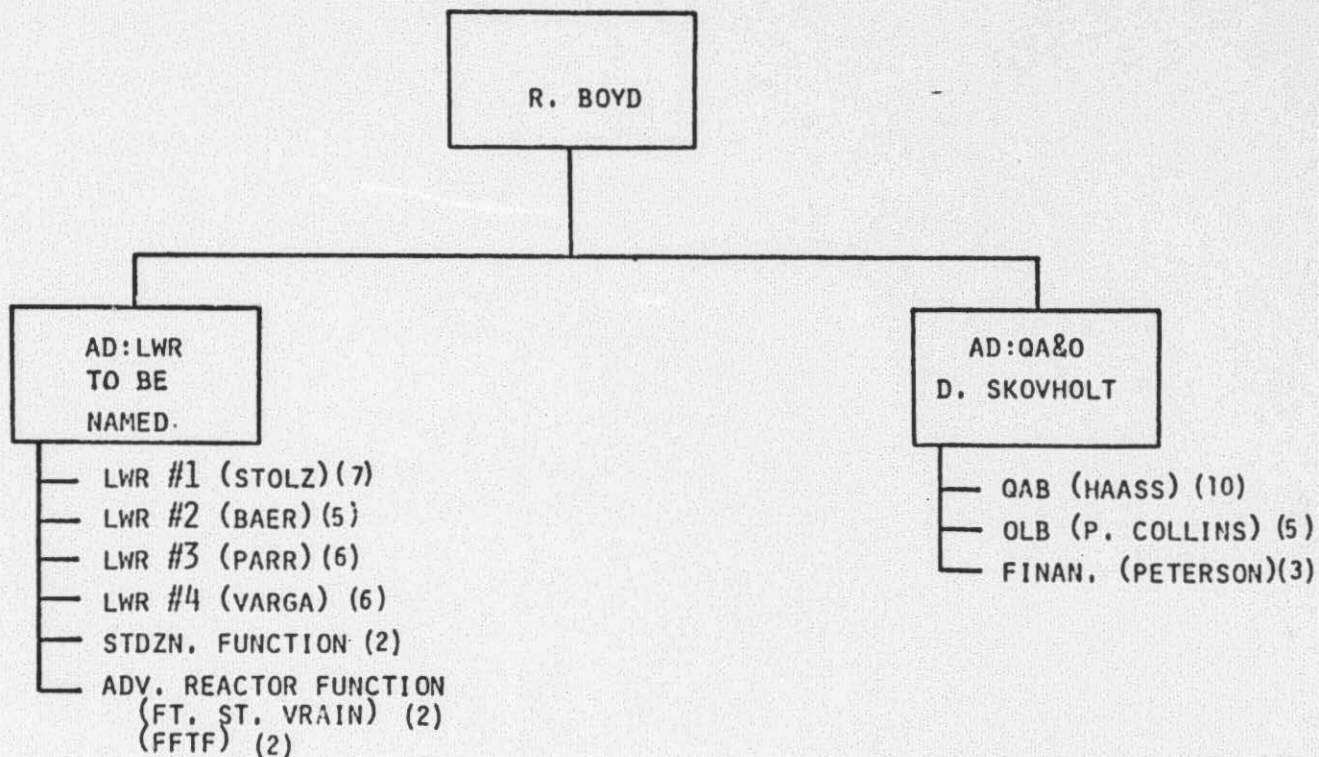
----- TECHNICAL SUPERVISION

DIVISION OF OPERATING REACTORS



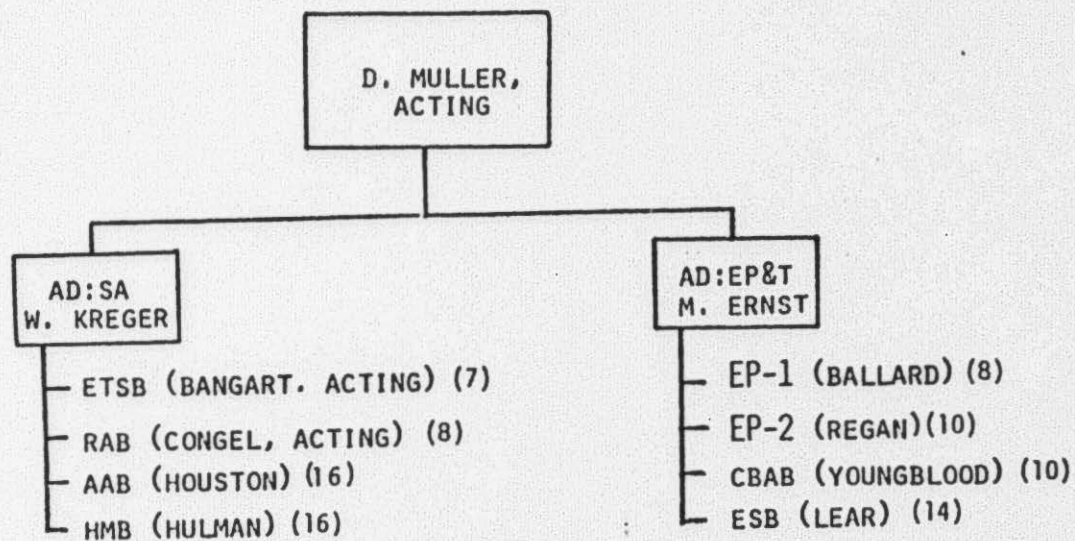
TOTAL STAFFING: 143 PROFESSIONALS AND MANAGERS

DIVISION OF PROJECT MANAGEMENT



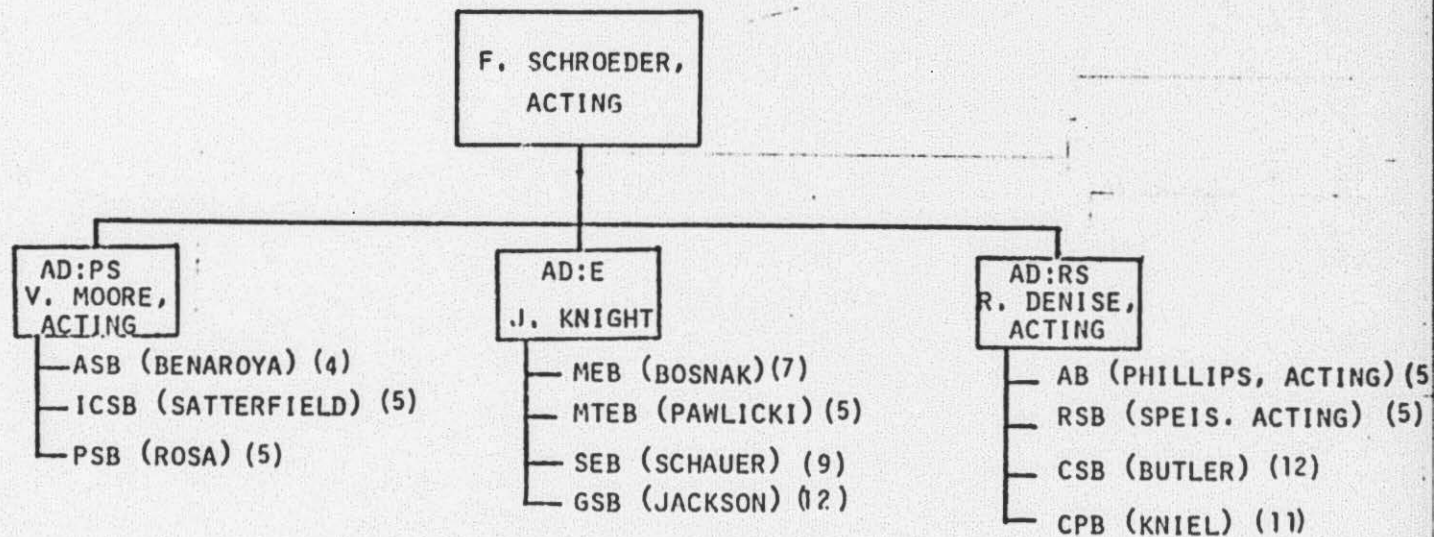
TOTAL STAFFING: 51 PROFESSIONALS AND MANAGERS

DIVISION OF SITE SAFETY AND ENVIRONMENTAL ANALYSIS



TOTAL STAFFING: 92 PROFESSIONALS AND MANAGERS

DIVISION OF SYSTEMS SAFETY



TOTAL STAFFING: 84 PROFESSIONAL AND MANAGERS

Enclosure 3

IDENTIFICATION AND SUMMARY

AND

CASEWORK IMPACTS

Identification of Continued and Suspended Casework Reviews

The completion of reviews of near term OLs including the coordination and implementation of input from Lessons Learned and Bulletins groups for these plants:

Salem 2	(May 1979)*
North Anna 2	(June 1979)
Diablo Canyon 1	(June 1979)
Sequoyah 1	(July 1979)
McGuire 1	(October 1979)
Zimmer	(December 1979)
LaSalle 1	(December 1979)

*Construction completion dates are shown in ().

The completion of CP's for which the reviews are essentially complete and are already active in the hearing process:

Perkins	Pebble Springs 1 and 2
Skagit 1 and 2	Pilgrim 2
Allens Creek	New England 1 and 2
Black Fox 1 and 2	

The resulting Board actions could adversely impact staff efforts to complete these reviews in a timely manner.

The review of OL's for which construction is expected to be completed prior to January 1981 include will continue. These reviews include:

Watts Bar 1	(June 1980)
Fermi 2	(June 1980)
Summer	(October 1980)
Shoreham	(October 1980)
San Onofre 2	(November 1980)
Susquehanna 1	(December 1980)
WPPSS 2	(December 1980)

In spite of recently announced delays in Fermi 2 (now June 1981) and WPPSS 2 (now March 1981) these reviews will continue due to the considerable amount of effort already expended.

Suspended Activities

As a result of realignment resources and new priorities the following in the Casework Decision Unit will be suspended:

1. Suspend OL reviews until January 1980:

Grand Gulf 1 and 2	(March 1981)
Farley 2	(June 1981)
Waterford 3	(September 1981)
Byron/Braidwood	(September 1981)
Midland 1 and 2	(November 1981)*
Comanche Peak 1 and 2	(November 1981)
Bellefonte 1 and 2	(March 1982)
Catawba 1 and 2	(September 1982)
South Texas 1 and 2	(October 1982)

*Except for work on structural/foundation problems

2. CP reviews to be suspended until January 1980:

Erie 1 and 2 Davis-Besse 2 and 3
Haven 1
New Haven 1 and 2 Greenwood 2 and 3

(Preapplication Review for Carroll County will be postponed; however, Early Site Review efforts will continue.)

3. Other activities:

a. Standardization Reviews

- (1) All seven BOP reviews
- (2) FDA review of CESSAR-80
- (3) RESAR-412 PDA (for Carroll County)
will be delayed well into 1980

(FNP, if possible, will be continued but with no essential priority).

b. NASAP and INFCE activities

Summary of Casework Impacts

The following summarizes the Casework Impacts resulting from the realignment of resources and priorities:

o Near term OL applications delays:

Salem	3 months
North Anna 2	2 months
Diablo Canyon 1	2 months
Sequoyah 1	1 month

Reopened hearing for Three Mile Island 2 issues could cause further delays

o Suspended OL review delays:

Grand Gulf	12 months
Waterford 3	6 months
Byron/Braidwood	6 months
Comanche Peak	4 months

Other minor delays may occur in Bellefonte, Catawba and Comanche Peak reviews

o CP Delays

Carroll County 12 months

Haven 1

Central Virginia 12 months

Erie*

Davis Besse*

* If applicant proceeds on schedule - 12 months delay

o Suspend Standardization Reviews