

From: Leon Whitney, *NWR*
To: Claude Johnson
Date: Thu, Apr 27, 2000 9:01 AM
Subject: SRV/LPS

Release 2

Claude,

The current staff position is that SRV/LPS can be approved as an alternative shutdown method by exemption under III.G.3 (Rubenstein to Mattason, December of 1982). However, some SERs have been written so as to draw distinction between "alternative" and "safe" shutdown methods. Geary Mizuno of OGC, in some cases at least, believes the word "safe" in the SERs, in context, means "redundant" under the meaning of III.G.2. Note that under III.G.2 the licensee would not be required to submit anything to the staff (50.48) in the first place, but apparently did go ahead and submit it. Is that the case at WNP-2?

We had a meeting with industry on this on 4/25 and plan to issue an SER this year clarifying (possibly revising and even broadening) the staff position. At the meeting on 4/25 industry gave a seemingly plausible argument that SRV/LPS can achieve hot shutdown [III.G.2.] using symptom-based procedure derived from EPG-4 for as long as the decay heat supports it, which was a step in the right direction for them. Can WNP-2 convince you of this for you?

Read their submittals and SERs closely at the site during the inspection. Possibly call Geary Mizuno of OGC to kick it around, who I think, in fact, looked at the salient WNP-2 documents during the meeting on 4/25.

If need be, of course, you may write us a TIA to look at the specifics of the documents you collect. Be sure to forward complete submittals and SERs if you have them, so their context can be appreciated.

Sorry no final generic resolution yet, but we are attuned to the issue and actively addressing it.

Leon Whitney

CC: EAC, EWW, Geary Mizuno, internet:fjwyant@sandia...

H/2