

APR 27 1977

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Mr. C. Eicheldinger, Manager
Nuclear Safety
Westinghouse Electric Corporation
Power Systems
P. O. Box 355
Pittsburgh, Pennsylvania 15230

Dear Mr. Eicheldinger:

SUBJECT: RESULTS OF NRC REVIEW OF WESTINGHOUSE LETTER ON REGULATORY GUIDE 1.54

Reference: Westinghouse letter of February 1, 1977, (NS-CE-1352) from C. Eicheldinger to C. Heltemes, Jr., "Westinghouse Position on Regulatory Guide 1.54, 'Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants'."

The staff has completed its review of the above-referenced letter, including Attachments A, B, and Table 6.1-6.

Based on our review of the Westinghouse alternate position to Regulatory Guide 1.54 presented in your letter, including your analysis and calculation on the amount of unqualified coatings, we have determined that the Westinghouse alternate position meets the intent of Regulatory Guide 1.54, and therefore is acceptable.

The staff has also reviewed the quality assurance (QA) provisions to which you commit for the purpose of providing assurance that the protective coatings will properly adhere to the base metal during prolonged exposure to a post-accident environment. We find these QA commitments acceptable.

However, since my letter to you dated November 23, 1976, the QA Branch no longer requests a commitment to Reg Guide 1.54 in QA topical reports. Thus, we request you take the following action in processing this matter:

1. The material which accompanied your letter of February 1, 1977, no longer needs to be embodied within Revision 8 of your QA Topical Report WCAP-8370. Instead, it should be included in the appropriate area of license applications, i.e., in the part of the Safety Analysis Reports and license applications for Standard Plants that address Section 6.1.2 "Organic Materials" of the NRC Standard Review Plan (NUREG-75/087).

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Mr. C. Eicheldinger

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In summary, for applications for which you plan to address Regulatory Guide 1.54, both the technical and QA material on protective coatings should be included in the area of the application that addresses Section 6.1.2 of the Standard Review Plan.

2. An acceptable alternative to the above is one in which all of the above material is included in a special topical report presenting your alternate position on Regulatory Guide 1.54. Under such arrangement, the license application would merely need to reference such topical report in Section 6.1.2 of the application.

Should you have any further questions, please contact me or Mr. Fred Liederbach on (301) 492-7741. If in the future, you have any questions regarding Regulatory Guide 1.54 or ANSI N101.4, the Accident Analysis Branch would be the appropriate point of contact.

Sincerely,

C. J. Heltemes, Jr., Chief
Quality Assurance Branch
Division of Project Management

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