

UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

1973

DEC 12 1973

B. H. Grier, Assistant Director for Construction and Operation, RO
PREOPERATIONAL TESTING PROGRAM FOR ECCS'S AT PWR'S

This is in response to your November 21, 1973 memo to me on the same subject requesting comments concerning your proposed schedule for application of the subject test program. As requested, we are confining our comments to the proposed schedule for requiring the subject test program, and are not commenting on the program itself.

We concur with your apparent objective that this program be incorporated in reactor startup test programs as soon as possible. Your proposal to require this for all "PWR facilities for which the DL (OL) safety evaluation report has not been issued and/or the final ACRS review has not been completed" is acceptable to us. This is true however, only because there is currently only one project, the BG&E Calvert Cliffs project, that is within a few months of achieving these milestones, and there are special circumstances concerning this project so that we could implement this new requirement on this project. In general, it would be unreasonable to try to implement such a new requirement if there were not a few months time to do so. The special circumstances for Calvert Cliffs that make it acceptable for this project are that although we have issued our OL SER and the ACRS is scheduled to complete its review of this project at its January 1974 meeting, construction of the facility is currently not scheduled to be completed until May 1974. There is therefore time to complete the necessary interaction with the applicant and get the applicant to document in the FSAR its plans for complying with the proposed testing guidance.

We also concur with your stated belief "that consideration should not be given for the fact that one facility at a multi-unit site was not required to conduct these tests". In doing so, however, we assume that you intend that the criterion discussed above prevails. That is, for multi-unit applications for which our DL SER has been published and the ACRS has completed its review, but construction of all units has not been completed, these additional testing requirements would not be required for the uncompleted units. There are currently two facilities

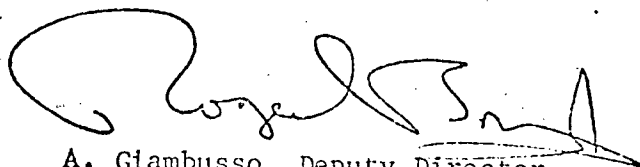
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- 2 -

DEC 12 1973

in this situation, Prairie Island Unit 2 and Oconee-3. We think it would not be reasonable to require any changes to the preoperational testing to be performed on these units.

A handwritten signature in black ink, appearing to read 'A. Giambusso', written over a horizontal line.

A. Giambusso, Deputy Director
for Reactor Projects
Directorate of Licensing

cc: D. F. Knuth