

June 17, 1997

Mr. L. Joseph Callan
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Callan:

SUBJECT: PROPOSED FINAL GENERIC LETTER, "ASSURANCE OF SUFFICIENT
NET POSITIVE SUCTION HEAD FOR EMERGENCY CORE COOLING AND
CONTAINMENT HEAT REMOVAL PUMPS"

During the 442nd meeting of the Advisory Committee on Reactor Safeguards, June 11-14, 1997, we reviewed the subject Generic Letter. During this review, we had the benefit of discussions with representatives of the NRC staff and of the document referenced.

It is clear that the issue of net positive suction head assurance is of high risk significance. There is, therefore, some urgency to identifying the status of the affected plants and to rectifying any noncompliances found. Thus, we support the issuance of this Generic Letter. We, however, offer the following comments.

In some cases, corrective actions will have to be taken to ensure sufficient net positive suction head. The staff needs to define acceptable corrective actions. We believe that allowing some level of containment overpressure is not an acceptable corrective action because adequate overpressure may not be present when needed. In particular, it may not be available during shutdown and containment bypass accidents.

Information obtained by the NRC inspection program is essential in providing assurance that the licensing basis is maintained. We note that most of the instances of noncompliance associated with the subject Generic Letter had remained undetected for many years. We plan to follow-up on this finding to assess how the inspection process can be made more effective.

Sincerely,

/s/

R. L. Seale
Chairman

Reference:

Memorandum to D. F. Ross, Chairman, Committee To Review Generic Requirements, from F. J. Miraglia, NRR, transmitting proposed final

Generic Letter, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," provided to the ACRS on May 15, 1997.