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Mr. James M. Taylor
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Taylor:

SUBJECT: PROPOSED FINAL REVISION 3 TO REGULATORY GUIDE 1.118,
"PERIODIC TESTING OF ELECTRIC POWER AND PROTECTION
SYSTEMS"

During the 418th meeting of the Advisory Committee on Reactor Safeguards, February 9-10, 1995, we reviewed the subject proposed revision to Regulatory Guide 1.118 that provides guidance for implementing some of the requirements of 10 CFR 50.55a(h), "Protection Systems"; 10 CFR Part 50 Appendix A, General Design Criterion (GDC) 18, "Inspection and Testing of Electric Power Systems," and GDC 21, "Protection System Reliability and Testability"; and 10 CFR Part 50 Appendix B, Criterion XI, "Test Control." During our review, we had the benefit of discussions with representatives of the NRC staff and the Institute of Electrical and Electronics Engineers (IEEE). We also had the benefit of the documents referenced.

The proposed revision of Regulatory Guide 1.118 provides updated NRC staff guidance for complying with the Commission's regulations regarding the periodic testing of the electric power and protection systems, and endorses ANSI/IEEE Standard 338-1987, "IEEE Standard Criteria for the Periodic Surveillance Testing of Nuclear Power Generating Station Safety Systems," with certain exceptions. The staff intends to use this revision during its evaluation of future applications for construction permits, operating licenses, and licensee modifications to existing nuclear plants that require staff approval.

During the public comment period, the responsible IEEE subcommittee raised the concern that, when a safety system test is initiated by removal of fuses or the opening of a breaker, it may result in undesirable actuation of equipment during plant operations. At our meeting, the NRC staff stated that they were close to a resolution of this concern with IEEE.

Subject to a resolution of the above concern that is acceptable to the staff, we have no objection to the issuance of Regulatory Guide 1.118, Revision 3.

Sincerely,

T. S. Kress

Chairman

References:

1. Memorandum dated February 1, 1995, from E. Beckjord, Office of Nuclear Regulatory Research, to J. Larkins, ACRS Executive Director, transmitting Proposed Revision 3 to Regulatory Guide 1.118, "Periodic Testing of Electric Power and Protection Systems"
2. ANSI/IEEE Std 338-1987, "IEEE Standard Criteria for the Periodic Surveillance Testing of Nuclear Power Generating Station Safety Systems"