D950720

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

Dear Mr. Taylor:

SUBJECT: PROPOSED PRIORITY RANKINGS OF GENERIC ISSUES: NINTH GROUP

During the 422nd meeting of the Advisory Committee on Reactor Safeguards, June 8-10, 1995, we reviewed the priority rankings proposed by the NRC staff for the generic issues listed in the attached Table A. During this meeting, we had the benefit of discussions with representatives of the NRC staff. We also discussed this matter during our 423rd meeting on July 13-14, 1995.

Our comments on various generic issues considered during this meeting are contained in the following attachments:

Attachment 1 lists those generic issues for which we agree with the proposed priority rankings.

Attachment 2 identifies the issues for which we agree with the proposed priority rankings, but have comments.

Attachment 3 identifies the issue for which we disagree with the proposed priority ranking.

In addition to our comments on the priority rankings of those issues considered at this time, we are concerned that the prioritization process is not timely for some generic safety issues. Currently, three identified issues still await assignment of priority. One was first identified for prioritization in February 1991. However, we note that for the issues scheduled for resolution, the timeliness of resolution appears to be improving.

We note that often the title of a generic issue is much broader than the scope of the issue actually being addressed in the determination of priority. Examples are GSI-149, "Adequacy of Fire Barriers," and GSI-160, "Spurious Actuations of Instrumentation Upon Restoration of Power." Although we may agree with the priority assigned to the narrow issue defined by the scope, we do not wish to imply that we would agree that such a priority is necessarily appropriate for the larger issue denoted by the title.

Sincerely,

/s/

T. S. Kress
Chairman

Attachments:
As noted above

TABLE A

GENERIC ISSUES REVIEWED BY THE ACRS
DURING THE 422ND MEETING, JUNE 8-10, 1995

Generic Issue Number	Title	Priority Ranking Proposed by the NRC Staff	Reference Document
149	Adequacy of Fire Barriers	LOW	Memorandum from E. Beckjord to W. Minners, Oct 19, 1992
158	Performance of Safety-Related Power-Operated Valves Under Design-Basis Conditions	MEDIUM	Memorandum from E. Beckjord to J. Murphy, Jan 26, 1994
159	Qualification of Safety-Related Pumps While Running on Minimum Flow	DROP	Memorandum from E. Beckjord to W. Minners, Sep 22, 1993
160	Spurious Actuations of Instrumentation Upon Restoration of Power	DROP	Memorandum from E. Beckjord to W. Minners, Sep 30, 1993
161	Use of Non-Safety-Related Power Supplies in Safety-Related Circuits (previously called "Associated Circuits")	DROP	Memorandum from E. Beckjord to T. Murley, Mar 12, 1993
162	Inadequate Technical Specifications for Shared Systems at Multiplant Sites When One Unit is Shut Down	DROP	Memorandum from E. Beckjord to W. Minners, Jul 29, 1993

164	Neutron Fluence in Reactor Vessel	DROP (Ongoing RES efforts adequately address this issue.)	Memorandum from E. Beckjord to T. Murley, Nov 30, 1992
165	Spring-Actuated Safety and Relief Valve Reliability	HIGH	Memorandum from E. Beckjord to W. Minners, Nov 26, 1993
166	Adequacy of Fatigue Life of Metal Components	NEARLY RESOLVED	Memorandum from E. Beckjord and T. Murley to J. Sniezek, Apr 1, 1993
167	Hydrogen Storage Facility Separation	LOW	Memorandum from E. Beckjord to J. Murphy, Sep 29, 1994
168	Environmental Qualification of Electrical Equipment	NEARLY RESOLVED	Memorandum from E. Beckjord and T. Murley to J. Sniezek, Apr 1, 1993

ATTACHMENT 1

LIST OF GENERIC ISSUES FOR WHICH
THE ACRS AGREES WITH THE
PRIORITY RANKINGS PROPOSED BY THE NRC STAFF

Generic Issue No.	Title
158	Performance of Safety-Related Power-Operated Valves Under Design-Basis Conditions
159	Qualification of Safety-Related Pumps While Running on Minimum Flow
161	Use of Non-Safety-Related Power Supplies in Safety-Related

	Circuits
164	Neutron Fluence in Reactor Vessel
165	Spring-Actuated Safety and Relief Valve Reliability
166	Adequacy of Fatigue Life of Metal Components
167	Hydrogen Storage Facility Separation
168	Environmental Qualification of Electrical Equipment

ATTACHMENT 2

GENERIC ISSUES FOR WHICH THE ACRS AGREES WITH THE PRIORITY RANKINGS PROPOSED BY THE NRC STAFF BUT WITH COMMENTS

Generic Issue No.: 160

Title: Spurious Actuations of Instrumentation Upon Restoration of Power

Proposed Priority Ranking: DROP

ACRS Comment: The scope of the prioritization analysis appears limited to the risk associated with (1) inadvertent actuation of low-temperature overpressure-protection relief valve and (2) inter-system LOCA due to inadvertent opening of a low-pressure safety-injection (LPSI) discharge valve, combined with check valve failure, resulting in over-pressurization of the LPSI system from reactor coolant system pressure. This scope seems overly narrow, particularly in view of the continuing digitization of instrumentation and control (I&C) systems in operating nuclear power plants. The digitization of I&C systems warrants careful reconsideration of issues which originated with analog-based I&C systems, but which may become more risk significant due to the nature of digital technology. It may be appropriate to address this issue in the revision to the NRC Standard Review Plan.

Generic Issue No.: 162

Title: Inadequate Technical Specifications for Shared Systems at Multiplant Sites When One Unit is Shut Down

Proposed Priority Ranking: DROP

ACRS Comment: We note that the prioritization analysis did not

encompass the Susquehanna spent fuel pool issue, which partly involved shared cooling systems at a multiplant site and upon which we commented in our letter of December 19, 1994. We believe that reconsideration of the scope of systems included in the prioritization analysis may be needed.

ATTACHMENT 3

GENERIC ISSUE FOR WHICH THE ACRS DISAGREES WITH THE PRIORITY RANKING PROPOSED BY THE NRC STAFF

Generic Issue No.:	149
Title:	Adequacy of Fire Barriers
Proposed Priority Ranking:	LOW
ACRS Recommendation:	MEDIUM
Basis:	The focus of this GSI is on overpressurization of fire barrier seals in room penetrations. Nuclear plant fire barrier qualification is usually based on meeting the ASTM-119 or NFPA-251/252 Standards. As noted in NUREG-0933, testing to these Standards does not always simulate realistic nuclear plant fire conditions. Accounting for the difference between these Standards and realistic conditions is a necessary first step to be taken before assessing the safety significance of specific issues such as this one. Accordingly, we believe that additional work needs to be done on this generic issue. Alternatively, such penetration seal issues as overpressurization could be included in the scope of NRR's current task action plan on fire protection requirements.

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