

December 13, 1995

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

Dear Mr. Taylor:

SUBJECT: PROPOSED FINAL GENERIC LETTER, "TESTING OF SAFETY-RELATED  
LOGIC CIRCUITS"

During the 427th meeting of the Advisory Committee on Reactor Safeguards, December 7-8, 1995, we reviewed the proposed final Generic Letter on Testing of Safety-Related Logic Circuits. This Generic Letter was developed by the staff to address continuing problems with licensee actions to correct deficiencies associated with testing of safety-related logic circuits. During this meeting, we had the benefit of discussions with representatives of the NRC staff and the Nuclear Energy Institute. We also had the benefit of the documents referenced.

Despite a number of Information Notices describing observed deficiencies in the testing procedures for safety-related logic circuits, deficiencies continue to be reported. This suggested to the staff that licensees had not taken sufficient action to correct such deficiencies.

The proposed Generic Letter would (1) notify licensees about problems with testing of safety-related logic circuits, (2) request that all licensees perform an in-depth review of their surveillance procedures and to modify them as required to ensure compliance with technical specifications, and (3) require that all licensees submit a written response regarding implementation of the requested actions. The NRC staff judges this Generic Letter to be a "compliance backfit" per 10 CFR 50.109, because technical specification requirements for testing safety-related logic circuits have not been met. Consequently, the staff determined that a full backfit analysis was not required.

We agree that there is a need for the NRC staff to address the issues associated with testing of safety-related logic circuits in a comprehensive manner. However, we believe this issue could be more appropriately addressed by existing NRC inspection programs. Additionally, the Nuclear Energy Institute has offered to work with the staff in developing a more effective means of ensuring compliance with requirements for testing of safety-related logic circuits.

Additional comments by ACRS Members Thomas S. Kress and William J. Shack are presented below.

Sincerely,

/s/

Robert L. Seale  
Vice-Chairman

Additional Comments by ACRS Members Thomas S. Kress and William J. Shack

We believe that the actions required by the proposed final Generic Letter are reasonable and appropriate and that the Generic Letter should be issued.

References:

1. SECY-95-287, Memorandum dated December 4, 1995, from James M. Taylor, NRC Executive Director for Operations, to the Commissioners, Subject: Proposed NRC Generic Letter 95-XX, "Testing of Safety-Related Logic Circuits"
2. Memorandum dated October 18, 1995, from Frank J. Miraglia, Office of Nuclear Reactor Regulation, to Edward L. Jordan, Chairman, Committee to Review Generic Requirements, Subject: Request for Endorsement, Without Formal Review, of Proposed Generic Letter, "Testing of Safety-Related Logic Circuits"

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