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The Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: ACRS COMMENTS ON THE NRC STAFF PROPOSAL FOR THE RESOLUTION OF USI A-44, "STATION BLACKOUT"

During the 326th meeting of the ACRS, June 4-6, 1987, and in our 325th meeting on May 7-9, 1987, we discussed the resolution of USI A-44, "Station Blackout," that is being proposed by the NRC Staff. We also discussed the Nuclear Utility Management and Resources Committee (NUMARC) initiatives directed at reducing the risk from "Station Blackout." A Subcommittee meeting was also held to discuss this issue with the NRC Staff on May 6, 1987. During these meetings, we had the benefit of presentations by representatives of the NRC Staff and NUMARC. We also had the benefit of the documents referenced.

Since March 30, 1982, members of the ACRS have considered and discussed this issue at nine meetings, and offered comments to the Executive Director for Operations in letters dated July 13, 1983 and March 12, 1985. The ACRS has been generally receptive to and supportive of the Staff's efforts in seeking resolution of the issue.

We consider the proposed resolution of USI A-44, "Station Blackout," to be workable, and we commend the Staff for its efforts. However, we do not recommend issuance of the final rule at this time.

We believe that the NUMARC initiatives may be a viable alternative for dealing with this issue on an expeditious schedule and may require the least expenditure of resources on the part of the industry. We believe that the electric utility industry has a strong incentive to deal with "Station Blackout."

One shortcoming of the proposed NUMARC initiatives is the absence of a requirement for any assessment of a plant's ability to cope with station blackout for a specified length of time. A letter from NUMARC has advised us that they are developing a methodology to do this, but that industry-wide agreement will have to be obtained. They expect that the development of their initiatives will be substantially completed by September of this year.

We recommend that the Staff continue to work with NUMARC on the technical aspects of the NUMARC efforts. If by September of this year it is determined by the Staff that the NUMARC initiatives will not be effective or timely in reducing the risk from "Station Blackout" to acceptable levels, or that the NUMARC initiatives will be unduly difficult to evaluate on a plant-to-plant basis, we then recommend issuance of the

final rule.

Additional remarks by ACRS Members Glenn A. Reed and Charles J. Wylie are presented below.

Sincerely,

William Kerr
Chairman

Additional Remarks by ACRS Members Glenn A. Reed and Charles J. Wylie

We believe the NRC Staff has done a commendable job in bringing A-44 to resolution. However, we continue to support two previous ACRS letters (July 13, 1983 and March 12, 1985) recommending in part that A-44 implementation should be integrated with A-45, "Shutdown Decay Heat Removal Requirements." Unfortunately A-45 has not arrived at the same status, and the NRC Staff wishes to proceed now with a rule and guide on station blackout which deal with A-44 only. But, the root issue is not station blackout but rather decay heat removal to limit core melt risk to an appropriate level.

We do not consider it in the best interest of nuclear safety to proceed now with an NRC rule and guide on station blackout, which could compromise future desirable and more effective action for decay heat removal. Since it appears that NUMARC-Nuclear Utilities Group on Station Blackout (NUGSBO) has also been moving forward with an industry effort, and since the electric utilities should have premiere capabilities to upgrade vulnerabilities to station electrical blackout, we recommend NUMARC-NUGSBO carry the ball, with NRC Staff interfacing and monitoring -- but without an NRC rule. This arrangement would leave the NRC uncompromised to act appropriately on A-45 when its resolution is completed. In our opinion there may be some outlier units for which it is more preferable to focus and expend funds on the root issue of decay heat removal without diverting effort to station blackout; and such focusing may be more harmonious with the backfit rule.

References:

1. U.S. Nuclear Regulatory Commission, Federal Register Notice (51 FR 9829) for the proposed Station Blackout Rule (10 CFR 50.63), published on March 21, 1986.
2. U.S. Nuclear Regulatory Guide on "Station Blackout," dated March 30, 1987.
3. U.S. Nuclear Regulatory Commission, NUREG-1109, "Regulatory/Backfit Analysis for the Resolution of Unresolved Safety Issue A-44," submitted March 30, 1987.
4. U.S. Nuclear Regulatory Commission, NUREG-1032, "Evaluation of Station Blackout Accidents at Nuclear Power Plants," draft, submit-

ted April 16, 1987.
5. U.S. Nuclear Regulatory Commission, NUREG/CR-3226, "Station Blackout Accident Analyses," dated May 1983.
6. U.S. Nuclear Regulatory Commission, NUREG/CR-2989, "Reliability of Emergency AC Power Systems at Nuclear Power Plants, dated July 1983.
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