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ACCESSION NBR:8308010446 DOC.DATE: 83/07/26 NOTARIZED: NO DOCKET #
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SUBJECT: Reviews independent design verification program resolution re disposition of EOI Files 8018 & 8047. Technical concerns properly investigated & satisfactorily resolved.

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July 26, 1983
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Mr. J. B. Martin, Regional Administrator
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Subject: Review of IDVP Resolution to EOI File 8018 and 8047.

Gentlemen:

During the review of some documents prepared by the IDVP, the NRC Staff raised questions about the dispositions of EOI Files 8018 and 8047. The questions were discussed in telephone conversations between the IDVP, PGandE, and the NRC during the week of July 18, 1983. The IDVP has reviewed those dispositions and considers that the files were adequately and properly addressed.

In the initial investigation for EOI 8018 which was performed in accordance with the NRC approved Program Management Plan, the IDVP stated that flow control valves, FCV-37 and 38, were installed in a Class I steam line and that their associated instrumentation and control devices were designated as Class II. The IDVP interest in these valves was restricted to their function with respect to the AFW system, the fluid system which was included in the initial sample. In ITR-27 this item is considered technically adequate since the licensing commitment to maintain a safe shutdown capability was satisfactorily demonstrated. This resolution was supported by information from Westinghouse (thru PGandE) providing an analyses of various conditions which concluded that the valves were acceptably classified for the AFW System.

These valves have an additional function as part of the containment isolation system. The valves' function was included in the FSAR description of the containment isolation system. However, the licensing commitments of DCNPP-1 specific to the containment isolation system were not reviewed. If an unresolved issue had been identified with these valves as part of the initial sample, the IDVP program would have been expanded and may have included these valves in their containment isolation function. Since such conclusions were absent from the initial sample, the IDVP program was not expanded. The concern with respect to the containment isolation function is being evaluated by PGandE in response to recently expressed staff comments. PGandE has committed to report its evaluation.

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In the investigation for EOI 8047, which was also done in accordance with the NRC approved Program Management Plan, the IDVP concern was that a non-safety relay device could prevent the automatic closure of the steam generator blowdown valves and that this may not have been properly accounted for in the various accident analyses. Discussion of the details of the resolution of this file are presented in ITR-27. In the FSAR Chapter 15 accident scenario, the AFW blowdown valves are tripped by safety grade trip signals from other sources, such as safety injection, assuring that the blowdown valves will receive diverse safety grade trip signals and shut automatically in accordance with the Westinghouse accident analysis assumptions.

Based on the aforementioned discussion the IDVP considers that the technical concerns for these two files were properly investigated and technically resolved in a satisfactory manner.

Sincerely,

TELEDYNE ENGINEERING SERVICES

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for W. E. Cooper
Project Manager

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