

D850916

Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Dircks:

SUBJECT: ACRS REVIEW OF PROPOSED RESOLUTION FOR USI A-43, "CONTAINMENT EMERGENCY SUMP PERFORMANCE" AND REGULATORY GUIDE 1.82, REVISION 1, "WATER SOURCES FOR LONG TERM RECIRCULATION COOLING FOLLOWING A LOSS OF COOLANT ACCIDENT"

During its 305th meeting, September 12-14, 1985, the Advisory Committee on Reactor Safeguards reviewed the proposed resolution for USI A-43, "Containment Emergency Sump Performance," and companion Regulatory Guide 1.82, Revision 1, "Water Sources for Long Term Recirculation Cooling Following a Loss of Coolant Accident." This topic was also discussed during a joint meeting on August 27, 1985 of the ACRS Subcommittees on ECCS and on Fluid Dynamics. We also had the benefit of the documents referenced.

We concur in the NRC Staff's proposed resolution for USI A-43 and the regulatory positions of Regulatory Guide 1.82, Revision 1. However, we wish to offer the following comments.

We understand that the Revised Guide will apply only to standard plant FDAs or new construction permit applications. Further, we understand that a generic letter (for information only) will be sent to all holders of an operating license or construction permit suggesting, but not requiring, that such licensees utilize Regulatory Guide 1.82, Revision 1, as guidance for conduct of the 10 CFR 50.59 review of any future plant modifications which involve replacement of insulation on primary system piping and/or equipment.

We believe that Positions C.1.g. and C.2.f., relating to screen or strainer blockage due to LOCA-generated debris, and Positions C.1.h. and C.2.g., relating to the effect of debris on pump seals and bearing assemblies, should be the basis for any safety review if a change from metallic to fibrous insulation is proposed. For this reason, we recommend that the implementation section of this Guide be changed to make these positions applicable for such future modifications. We believe that such a requirement ought not to be considered a backfit.

Sincerely,

David A. Ward
Chairman

References:

1. U. S. Nuclear Regulatory Commission, "USI A-43 Regulatory Analysis," USNRC Draft Report NUREG-0869, Revision 1B, dated June 1985
2. U. S. Nuclear Regulatory Commission, "Containment Emergency Sump Performance," USNRC Draft Report NUREG-0897, Revision 1B, dated June 5, 1985
3. U. S. Nuclear Regulatory Commission, Regulatory Guide 1.82, "Water Sources for Long Term Recirculation Cooling Following a Loss of Coolant Accident," Draft 3, Proposed Revision 1, dated July 24, 1985

cc: S. J. Chilk, SECY
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