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FAX MESSAGE

TO: Joe Shea (NRC)
FROM: Dave Lochbaum *DL*
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By letter dated January 17, 1977, Robert W. Reid, Chief - Operating Reactors Branch #4, Division of Operating Reactors, provided Mr. George T. Berry, General Manager and Chief Engineer, Pwer Authority of the State of New York, with (1) a copy of a letter from Mr. Robert D. Pollard concerning an unanalyzed refueling accident inside the reactor containment building, and (2) a copy of the notice to be filed with the Office of the Federal Register. The notice contains this text:

"Much of the information required to do an evaluation [of the refueling accident inside reactor containment] for specific plants is not available to us. We do recommend, however, that you evaluate the consequences of the potential incident to assure that unacceptable doses are not a probable result. Since the NRC regulations do not require the analysis, we do not believe this situation requires reporting to the NRC unless your engineering evaluation shows unacceptable results. In accomplishing the evaluation for your plant, we recommend that you use Regulatory Guide 1.25 assumptions or other conservative justifiable parameters. We also believe that you should not take credit for the function of any system or component that is not qualified for operation during this particular incident. For example, we think you might take credit for equipment not qualified for the post accident containment environment but seismic qualification may very well be required."
[emphasis added]

This NRC statement supports our longstanding position that systems and components should not be relied upon, from a design perspective, to handle a postulated design basis event unless they are qualified for the conditions resulting from that event.

If you are unable to retrieve this NRC letter, I can send you a copy.

Attachment 1

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