



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 21 1984

MEMORANDUM FOR: C. J. Heltemes, Jr., Director
Office for Analysis and Evaluation
of Operational Data

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: AEOD CASE STUDY REPORT (C401) "LOW TEMPERATURE
OVERPRESSURIZATION EVENTS AT TURKEY POINT UNIT 4"

We have reviewed the recently completed AEOD Case Study on Low Temperature Overpressurization Events at Turkey Point Unit 4. The report initially focused on the two events that occurred at Turkey Point during November 1981 and then expands to discuss NRR's handling of the generic issue. The case study points out that the NRR review of low temperature overpressure protection system (LTOPS) for operating plants, which has been ongoing since the late 1970's, is still incomplete. It correctly points out that some plants were reviewed and approved without LTOP Technical Specifications, while other plants were approved with Technical Specifications that we now consider to be inadequate. The report concludes that (1) nearly 75% of operating reactors need modifications and/or upgrades to their LTOPS Technical Specifications, and (2) the implementation of this can be accomplished under the staff's current program MPA B-04, "Reactor Vessel Overpressure Protection."

We are in technical agreement with the recommendations made in the case study. Considering both the frequency of potential overpressurization events and the number of events involving the inoperability of LTOPS trains, we agree that additional regulatory actions should be pursued.

Although I would prefer to resolve the LTOPS issue as quickly as possible (i.e., implement the recommendations via MPA B-04), I do not consider all the AEOD recommended changes to the Technical Specifications to be within the original scope of the generic issue. The recommended changes consist of both new requirements and new interpretations to existing regulatory requirements and represent significant deviations from licensee submittals that have previously been reviewed and approved by the staff. Therefore, I believe that the LTOPS issue cannot be resolved completely through the existing MPA B-04 program.

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Therefore, I have decided that these issues must be included in a new generic issue. Accordingly, NRR/DSI will prepare a paper by June 30, 1984 for prioritization as a generic issue. This paper, which will address all remaining issues including those raised by AEOD, will be prioritized by DST/SPEB in accordance with Office Letter No. 40.

Original Signed by
H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

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