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## NUCLEAR REGULATORY COMMISSION ADVISORY COMMITTEE ON REACTOR SAFEGUARDS WASHINGTON, D. C. 20555

JUL 2 7 1979

July 25, 1979

Mr. Mitchell Rogovin, Director NRC/TMI Special Inquiry Group U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Rogovin:

Your letter to me of June 19, 1979 requested information regarding significant ACRS recommendations, in 14 areas, which were made on non-B&W plants prior to March 28, 1979. Attachment A contains such recommendations by ACRS where specific documentation could be found and is organized to follow the ordering of your letter. While other examples could undoubtedly be added, I believe that Attachment A contains a fully representative set.

Tabs 1, 2, 3, 4, 6, 7, 8, 9, 10, 12 and 14 of the Attachment contain information related to the corresponding items in your letter. Tabs 11 and 13 include narrative responses to your items 11 and 13. Tab 5 is blank because we find no significant written material on the subject of programming of simulators.

The atmosphere in which the above recommendations were generated included continuing interaction with members of the Regulatory Staff (AEC and NRC) and applicants in several cases. In the course of the associated discussion, the regulatory requirements and plant designs were often modified without specific Committee recommendation. For this reason, and in the hope that it might be useful in your investigation, I have included, under the appropriate Tabs, examples of such interactions taken from pertinent sections of full Committee and Subcommittee meeting minutes and transcripts in addition to specific recommendations and comments taken from ACRS letter reports.

In connection with Item No. 10, "Requirements for Containment Isolation Actuation," material has been included which illustrates the early interaction between the ACRS and the AEC Regulatory Staff in establishing the original requirements for diversity of the signals which actuate Engineered Safety Features, including the Containment Isolation System. Similarly, in connection with Item No. 6, on the effect of noncondensible gases in the primary system, several illustrations have been included demonstrating the Committee's early interest in evaluating situations or sequences of events which could lead to the formation of such gases.

You also requested the Committee's views on the NRC's responsiveness to its recommendations in the specific areas listed in your letter. The Committee feels that the response of the NRC (and of the AEC before it), in connection with "instrumentation to follow the course of an accident" has not been adequate. Although this item has been addressed by the issuance of a Regulatory Guide, that

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Guide has not, to the Committee's knowledge, yet been implemented on any operating nuclear power plant. Finally, although the NRC has given increased attention and resources to the so-called "unresolved generic items" within the past two years, we would welcome additional emphasis on resolution of these matters.

I trust that the above will prove responsive to your needs.

Sincerely,

Max W. Carbon

Chairman

Attachments: Reply to M. Rogovin, Director NRC/TMI Special Inquiry Group, Attachment A

cc: M. W. Carbon, w/o attmt.