

S. Hanauer



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

OCT 5 1979

TAP A-9

NOTE TO: A. Thadani  
FROM: M. Srinivasan  
SUBJECT: ATWS RULE

Pursuant to your request made at the meeting held on September 25, 1979 on the above subject, I put forth the following thoughts as they pertain to E, I&C areas:

1. Discerning the style and poor quality of responses we had been receiving from some of the MSSS vendors and the unresponsiveness of the others to our early verification information request of February 15, 1979, I believe that, to attain any reasonable resolution of ATWS concerns, we should proceed with ATWS rule making without any further loss of time.
2. The proposed ATWS rule should stipulate specific requirements for scram system modifications and/or mitigating systems relied upon for ATWS conditions.
3. From the E, I&C point of view, I consider the ATWS rule included in Appendix IV of NUREG-0460, Volume 2 as good base document to work with towards development of the final rule.
4. The ATWS rule referred to in Item 3 above, only addresses ATWS mitigating systems and their requirements. This should be appropriately revised to include scram system modifications where such design changes are necessary and stipulate the requirements for such modifications.
5. With regard to qualification of ATWS mitigating system equipment and components, we should strive to eliminate the vagueness and subtle differences existing in the following sections of NUREG-0460 and should include specific, explicit requirements in the final ATWS Rule:
  - a. Appendix IV.1, ATWS Rule, Item b(6)(v)

The mitigating systems shall be qualified to perform their function under natural environmental phenomena such as earthquake, tornadoes, floods, etc."

1736 076

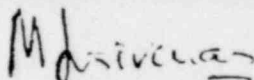
8001110 517

b. Appendix IV.4 Mitigating System Requirements, Item d.

" ATWS mitigating system equipment and components shall be tested to verify that the system will provide, on a continuing basis, its functional capability under conditions relevant to the postulated ATWS, including extremes of conditions (as applicable) relating to environment which are expected to occur."

c. Appendix C, Volume 3, Item c.

" The equipment shall be tested to verify that it will provide, on a continuing basis, its functional capability under conditions relevant to the postulated ATWS, including extremes of anticipated environmental conditions (as applicable) which are expected to occur in the lifetime of a plant (operating basis earthquakes, etc.)."



M. Srinivasan  
Instrumentation & Control Systems Branch

cc: S. Hanauer  
M. Aycock  
R. Satterfield