



AG

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

S. Hanauer

OCT 3 1979

NOTE TO: A. Thadani
FROM: F. Cherny
SUBJECT: ATWS RULE - COMMENTS

Reference: Your 09/24/79 note to S. Hanauer and its attachment dated 03/29/79

Rather than making detailed comments on the draft "Commission Paper Outline" attached to your note, I have a number of general comments, some of which relate to the mechanical equipment area solely and a few of which spill over into other areas also. The comments are listed in no particular order, but are simply numbered and put down as they have come to mind.

1. Value/Impact Consideration - I have not ever read completely through the write-up in Appendix XII of Volume 2 to NUREG-0460; however, I think that this will have to be improved upon in some areas before transmittal to the Commission in support of the ATWS rule. For operating plants I would imagine we would have to address the cost of exposure to radiation for personnel that would make the necessary hardware modifications to the primary system. Also the cost of additional equipment modifications - whatever they turn out to be - that will be required due to the addition of the 40 yr. earthquake load requirement will somehow have to be addressed.
2. It appears at this point in time that by early next spring - target for submittal of proposed rule to Commission - we will be getting little or no information from the vendors regarding Alternative 4 plants. I personally don't believe we will get any. I suggest in order to simplify our present task i.e., drafting some kind of a meaningful rule - that we give serious consideration to drafting a rule at this time that would apply solely to the Alternative 3 plants. This approach would "fix" ATWS for most operating plants and all those due to receive an OL for the next several years. The rule could simply say that for plants whose CP issue date is after January 1, 1978 (Alternative 4 plants) ATWS mitigation criteria are in preparation. The few Utilities that have Alternative 4 plants could be sent a letter stating that the design of their plant must include whatever hardware is required to mitigate ATWS in compliance with the criteria discussed for such plants in Volume 3 of NUREG-0460,

1736 072

8001110 543

OCT 3 1979

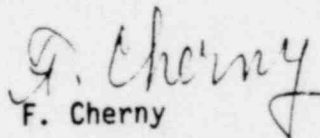
A. Thadani

- 2 -

that an ATWS rule for such plants is in preparation (give target date for completion), and ask the Utilities to support a generic verification effort for these plants. With this approach the Commission could go to Congress and report that ATWS has been "resolved" for operating plants and those due to receive OL's in the next several years and that for the rest of the plants under construction ATWS is "being fixed."

Additionally, with this approach, I could envision that at least for the Alternate 4 plants, it might be possible to issue the type of rule that R. Mattson had hoped we could use for all the plants.

3. What are we doing about Alternate 2 plants?
4. Mechanical Equipment Requirements for Proposed Rule - Based on discussions we've had with the vendors and the letters they've recently sent in, it is almost impossible to tell what conclusions, if any, we will have formed on equipment by the end of 1979. If we're going to start writing a rule now, I would think the only thing worth spending time on for mechanical components would be to extract some of the very general Alternative 3 requirements from Vol. 3 of NUREG-0460 for the rule. The associated Reg. Guide would have to contain quite a bit of the information on mechanical components that's contained in the attachment to the Mattson February 15 letter.


F. Cherny

cc: J. P. Knight
R. J. Bosnak
S. Hanauer
M. Aycock
B. D. Liaw
K. Desai

1736 073