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January 14, 1980

CHRIS H. POINDEXTER
VICE PRESIDENT
ENGINEERING AND CONSTRUCTION

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: ATWS Concerns Relative to Safety/Relief
Valve Testing

Reference: NRC letter dated 11/30/79 from H. R. Denton
to C. H. Poindexter, same subject.

Dear Mr. Denton:

The referenced letter, which was addressed to me as the CE ATWS Owners Group Representative, requested that we include ATWS considerations in the proposed Industry/EPRI Safety and Relief Valve Testing Program. This Program, as you know, has been established in direct response to NUREG-0578 Item 2.1.2, using guidance received in discussions with your Staff this past Fall.

The CE NSSS Owners Group is fully aware of the need to address relief and safety valve capacity and reliability in both the NUREG-0578 and ATWS arenas. However, whereas the requirements for a testing program have been defined with respect to Post-TMI-2 concerns, the requirements for a similar ATWS-oriented program have not yet been defined. It is understood that an effort to define these requirements will be initiated in an upcoming meeting of Industry, EPRI and NRC Staff representatives to be held on or about January 24, 1980 in Washington, D. C. Therefore, it seems appropriate to take that opportunity to discuss plans for providing the information requested in your November 30, 1979 letter.

If you have any specific concerns regarding the relationship of ATWS to relief/safety valve testing, it may be helpful if you were to forward those concerns in advance of the meeting to Mr. D. P. Hoffman, Consumers Power Company with a copy to the undersigned.

Very truly yours,

C. H. Poindexter
For the CE NSSS Owners (ATWS)

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