

Docket No. 50-320

SEP 13 1974

Voss A. Moore, Assistant Director for Reactor Projects, L

FIRST ROUND QUESTIONS FOR METROPOLITAN EDISON COMPANY, RE THREE MILE  
ISLAND STATION UNIT 2 FSAR

Bev Washburn's August 17, 1974 memo to Karl Kniel highlighted Request  
No. 22.16 from the Electrical Instrumentation, and Control Systems  
Branch (EICSB) that contains a Regulatory staff position regarding  
the design of manually-controlled electrically-operated valves.

Bev Washburn and L. L. Kintner discussed this position with Frank Ashe  
and Faust Rosa of the EICSB. A summary of the discussion follows.

1. Item (2) in the position states that the guidelines apply to  
valves if a single failure "results in total loss of the system  
safety function,....". The word "total" should be eliminated  
because it does not include loss of function below the minimum  
required by accident safety analyses.

Mr. Rosa agreed to delete "total" from the position.

2. Item 3 (b) gives as one condition for acceptance of manually  
controlled active valves that "valve operation is not necessary  
for at least 10 minutes following occurrence of the event  
requiring such operation." This condition may be interpreted  
as staff acceptance of this time interval following the start  
of an accident for manual operations without any other conditions  
such as limiting the total number and complexity of such operations.

Mr. Rosa agreed to change the wording to say "following indication of  
the plant condition requiring such operation" which is the intended  
interpretation.

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3. Item 3 (c) lists as a condition that it should be "demonstrated that there is reasonable assurance that all necessary operator actions will be performed within the time shown to be adequate by the analysis." The question pertaining to this position should be specific with regard to the information required to demonstrate the "reasonable assurance", e.g., the following information should be requested: operator instructions, instruments to be used for monitoring and for operator action, the values of the plant conditions for which action is required, and the expected range of values (based on safety analyses) for measured plant conditions that will be monitored to follow the course of the accident.

Mr. Rosa agreed to consider the more specific question for future requests and will follow up on Met Ed with a second round question if necessary.

Request No. 22.16 was modified by the EI&CS Branch as stated above.

Original Signed by  
Karl Kniel  
Karl Kniel, Chief  
Light Water Reactors Branch 2-2  
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