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Westinghouse Electric Corporation Power Systems

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April 29, 1980

NS-TMA-2242

Mr. Harold Denton, Director
Office of Nuclear Regulation
U. S. Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, Maryland 20014

Subject: Special Low Power Testing

Dear Mr. Denton:

We are encouraged by the recent licensing progress, limited as it is, on near term operating license applications with Westinghouse supplied NSSS. Westinghouse has maintained, and we continue to do so, that the Three Mile Island accident does not justify a delay on these applications insofar as requiring that the "lessons learned" from that accident be addressed as a precondition for granting new operating licenses. Rather these lessons can be addressed following issuance of licenses as is the case for currently operating nuclear power plants.

We are aware that the NRC has recognized some benefit associated with conducting a special low power testing program at TVA's Sequoyah plant. These special tests are basically directed at an improved understanding of natural circulation modes of heat removal under various plant conditions such as loss of AC power, loss of pressurizer heaters, secondary side isolation, etc.

Westinghouse has reviewed TVA's test procedures for these special tests and has further completed a safety evaluation to identify any incremental risks associated with the performance of these tests. We have concluded that these tests have a value commensurate with any associated incremental risk identified and therefore are in support of this program conducted by TVA at the Sequoyah plant.

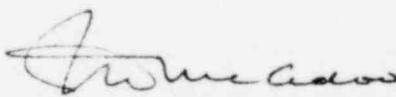
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The purpose of this letter is to bring to your attention Westinghouse's concern that these tests apparently have some potential for becoming a standard NRC requirement with repetitive application on other near term operating plants. Our concern primarily derives from the somewhat special conditions necessary to conduct two particular tests of this test series, viz, test 8 - Stagnant Flow Startup and test 9B - Boron Mixing and Cooldown. We see little benefit to be derived from repeating these tests since the plant behavior should not be plant specific whereas the difficulty of performing the tests remains the same.

As an alternate, the TVA results can be made available for simulator adaptation as a means of augmenting operator training under these conditions. We are willing to work further with TVA and the other near term utilities to define and implement a program for adapting the results from the two tests in question to simulator use, insofar as possible.

We would appreciate a clarification of the staff's intentions regarding the application of the test program to other Westinghouse supplied near term plants and would welcome an opportunity to discuss this matter further with you or the appropriate members of your staff.

Very truly yours,
WESTINGHOUSE ELECTRIC CORPORATION


for T. M. Anderson, Manager
Nuclear Safety Department

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cc: D. G. Eisenhut
R. L. Tedesco