



February 29, 1980

RICHARD E. SCHAFFSTALL  
Associate

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Chilk:

As originally presented to the Commission and to the ACRS over two years ago, the NRC staff characterized the SEP as an evaluation effort to assess the relative status of each of eleven older plants to current safety criteria. In conducting its evaluation, the staff was tasked to perform its review with minimal support from the licensee. The ACRS at that time (and now) preferred that the licensee perform the detailed safety analysis (as in the licensing process) and submit the results to the staff for a conventional evaluation of the safety adequacy. The letter of October 11, 1979, from the ACRS to Chairman Hendrie reaffirmed this position and recommended the staff reevaluate the program and restructure it accordingly.

It is the position of the SEP Owners Group that such restructuring of the program at this late date is unacceptable. For over two years the Owners have been proceeding in good faith in this trial program and to require the SEP Owners to pick up the burden of now beginning a complete reanalysis of the safety documentation analyses at each of their plants to current criteria would be counterproductive. In this program the Owners have been supporting the staff in providing information to conduct reviews of the various topics. This has and will involve, for some topics the hiring of consultants, performing analyses and generally developing the responses which the staff needs for assessment. It is anticipated the cost both in dollars and manpower for most SEP plants to accomplish the task as presently conducted will be appreciable. For the SEP Owners to perform the safety analysis as characterized in the ACRS letter, the cost in both dollars and manpower for each plant would increase dramatically with no real benefit from the viewpoint of safety. The

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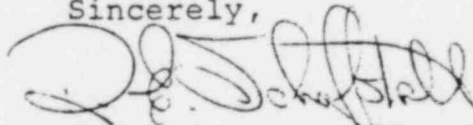
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time to develop and review each of these SAR's would require at least three years assuming adequate manpower for both the licensee and the staff. There is, therefore, little opportunity for expedited review.

Since the Three Mile Island accident, the various NRC task forces and other study groups investigating the incident have identified areas at operating nuclear power plants where corrective measures were required. The SEP plants have not been exempted from making these corrective measures; hence, there are currently two separate ongoing activities at these plants. TMI-related activities have continually extended the SEP schedule because of NRC manpower limitations. TMI corrective measures also raise the spectre of installing one set of hardware now only to have the SEP's integrated assessment require secondary modifications of newer or different hardware. Rather than a total reorientation of the SEP reviews, we would consider it more appropriate to integrate and strengthen the related review areas.

In the conduct of SEP to date, no issues have been identified which were unacceptable to the public health and safety and we do not agree that any program reorientation is called for.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. E. Schaffstall', written in a cursive style.

Richard E. Schaffstall  
Executive Director  
SEP Owners Group