



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

PDR
8005150195

APR 18 1980

Mr. D. L. Renberger
Assistant Director - Technology
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Richland, WA 99352

Dear Mr. Renberger:

Subject: Anticipated Transients Without Scram

The purpose of this letter is to respond to the comments made in your letter of March 21, 1980, to Mr. Harold Denton.

The WPPSS letter dated January 21, 1979, estimated the cost of a number of potential ATWS modifications under consideration. For example, implementation of the backup trip system considered cost of such items as contract administration, security training, sales tax, financing, estimated man-rem exposure and additional time, if any, of normal refueling outages which are normally considered indirect costs (see letter from John Ward, AIF to Roger Mattson, NRC, dated December 8, 1978). All the above items were also included for implementation of three safety valves, item 10 in the WPPSS letter.

The WPPSS letter of March 21, 1980, stated that indirect costs, which included such items as replacement power cost, testing and startup, radiation exposure, etc., were not included in the January 2, 1979 letter. While all the indirect costs may not have been included, sales tax, financing, contract administration, security training, estimated extension time of refueling period and amount of exposure were included.

NUREG-0460, "Anticipated Transients Without Scram for Light Water Reactors," Vol. 4, Section 4.2, stated that the direct costs are the cost of equipment and its installation. The indirect costs were estimated to be equal to the direct cost for this analysis. We recognize the difficulty of accurate assessment of indirect cost and stated that for particular plants and utilities these costs could exceed the direct cost by several factors. The indirect costs include items such as licensing costs, operating and maintenance, unidentified analysis, financing and escalation, taxes and insurance, contingency funds and radiation exposure. This is in keeping with usual engineering cost accounting. Replacement power cost is also an indirect cost; however replacement power costs were not included for this analysis because of the time period allowed for the installation of the major equipment.

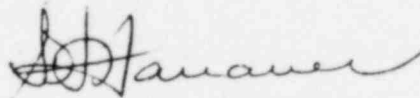
Another point of concern results from reviewing the March 21, 1980 letter from WPPSS along with the March 26, 1980 presentation by Mr. Sorenson from WPPSS for the Atomic Industrial Forum to ACRS Subcommittee on ATWS. The letter states that replacement power cost is part of the cost to the owner. However,

the March 26 presentation, Section 3 Value-Impact, stated that including the cost of replacement power was incorrect and incomplete to the point of being deceptive.

One of the values in the value-impact assessment performed by the staff was the averted cost of replacement power as well as the averted cost for replacement of the facility following a core-melt accident. The replacement power cost as well as the cost of cleanup and rebuilding the Three Mile Island Unit 2 reactor are costs the utility is experiencing and must be included as part of a value-impact assessment.

We think Vol. 4 is clear and consistent with information furnished by industry.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. Hanauer".

S. Hanauer, Director
Unresolved Safety Issues