

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

GPU 2528

To	J.H. TAYLOR, MANAGER, LICENSING	BDS 663.5
From	B.M. DUNN, MANAGER, ECCS ANALYSIS (2138) <i>B.M. Dunn</i>	
Cust.		File No. or Ref.
Subj.	Potential Safety Concern	Date November 3, 1978

This letter to cover one customer and one subject only.

After discussing the question of the Potential Safety Concern filed against the 205 plants in regards to the secondary side auxiliary feedwater control level for many months, I have reached the conclusion that the concern is of a paper nature only. An examination of the paper trail leads to a belief that we altered and perhaps shipped equipment before resolution of potential ECCS concerns were achieved and that further we were ignorant of these concerns. We do not manage by paper alone, however, and we were not ignorant of the potential concerns. I believe "ignorant" is the key word. So long as a responsible, recognizable, and responsive path toward resolution of problems with design changes exists, I believe there is no safety concern regardless of equipment status. ECCS and Integration were always aware of the problem with a 6 foot level control and the path for resolution always existed.

The key change to a positive 6 foot control was made in the summer of 1977. ECCS was consulted and gave verbal approval, pending analysis confirmation, as at that time we believed it was probably acceptable. We were wrong as documented in the PSC of 4/4/78. At present, we are engaged in studies to decide whether to return to a 40 foot level control or to upgrade an alternate system to compensate for the 6 foot level. Again, a logical and timely path has been followed. Therefore, no safety concern exists in my mind.

Why then did ECCS file a PSC? I believe the fault lies within ECCS and the surrounding organizations which control our funding and work flow. As of 4/4/78 we felt we had a problem with the design of the plant and that serious obstructions to resolution would exist in obtaining funding and manpower to resolve the concern. Our response, although I believe it to be inappropriate, was to file the PSC. For whatever reasons, those potential obstructions are today nonexistent and this PSC should either be withdrawn or considered resolved, per the comments in this memo.

BMD/lc

cc: E.A. Womack  
R.C. Jones  
N.H. Shah

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