



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

April 6, 1990

MEMORANDUM FOR: All IRR Project Managers

FROM: Kathan N. Jabbour, Lead Project Manager for
USI A-47, (MPA B-113), "Safety Implication of Control
Systems in LWR Nuclear Power Plants"

SUBJECT: GUIDANCE REGARDING UTILITIES' RESPONSES TO GENERIC LETTER
89-19

By memorandum dated September 20, 1989, from J. Partlow to All NRR Project Managers, you were informed about the issuance of Generic Letter (GL) 89-19, "Request For Action Related to Resolution of Unresolved Safety Issue A-47 'Safety Implication of Control Systems in LWR Nuclear Power Plants' pursuant to 10 CFR 50.54(f)." Subsequently, TACs were issued for all plants.

Briefly, the GL recommended that licensees and applicants should provide automatic steam generator overfill protection for all PWRs, and automatic reactor vessel overfill protection for all BWRs. Also, plant procedures and technical specifications (TSs) should include provisions to verify periodically the operability of the overfill protection and to assure that automatic overfill protection is available to mitigate main feedwater overfeed events during reactor power operation.

The utilities' responses were due March 20, 1990 (180 days from the date of the GL issuance, September 20, 1989). The BWR Owners' Group (BWROG) stated, in a February 16, 1990, letter to NRC, that it is preparing a generic response to the GL which would be submitted March 20, 1990. Furthermore, the BWROG requested that an extension of about 45 days (i.e., from March 20, 1990, until May 4, 1990) be granted to utilities comprising the BWROG. By letter dated March 20, 1990, the NRC granted the requested extension.

Other licensees' responses may be categorized as follows:

1. If your licensee stated that the automatic overfill protection system was implemented for its plant and it meets all the guidance provided in the GL, then a closeout letter should be sent to the licensee. The Instrumentation and Control Systems Branch (SICB) should be in the concurrence chain. A sample of the closeout letter is enclosed. Subsequently, you should close the TACs and should enter the licensee's implementation date in WISP.
2. If your licensee has determined that a modification is required, a request for a TS change which includes a brief description of the design modification and an implementation schedule should be provided. You should review the licensee's response (in particular regarding schedule) for conformance to the guidance provided in the GL, and should process the TS changes in a timely manner. Enclosure 2 to the September 20, 1989, memorandum provided a model SER. However, if review assistance is needed, you should contact SICB.

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April 6, 1990

The original TACs should remain open until all NRC actions (including TS changes) are completed. Also the date of the modification implementation should be entered in WISP's licensee implementation field. You should request that the licensee document the actual implementation date in a docketed submittal because the implementation date accession number is now required in WISP for all items implemented after January 1, 1990. Furthermore, as you are aware, NRC staff review of TS changes are fee recoverable while reviews of responses to GLs are not. Therefore, when you receive the licensee's TS change request, you should fill out a new TAC form with the original TAC number to indicate the change to fee recoverability. The application date in the new TAC form should be the date of the TS change request.

3. If your licensee has technical questions that cannot be answered by reading the GL, you should arrange a conference call with our principal technical reviewer, Sang Rhew (X20779) and/or his Section Chief, Jerry Mauck (X23264).
4. If your licensee's response does not fall in any of the above categories, please consult with your management, SICB and the lead PM regarding the appropriate course of action.

Please include SICB (S. Newberry, MS: 7E-12) and myself (K. Jabbour, MS: 14H-25) in the distribution for the outgoing letters. Feel free to contact me if you need any assistance (X21496).

Kahtan N. Jabbour

Kahtan N. Jabbour, Senior Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

April 6, 1990

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Kahtan N. Jabbour, Senior Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
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Enclosure:
As stated

* See previous concurrence.

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| OFC | :LA:PDII-3 | :PM:PDII-3 | :D:PDII-3 | :DRP | :DRSP |
| NAME | :RIngram | :KJabbour:mes | :SNewbury * | :DMatthews | :MSlosson |
| DATE | :4/6/90 | :4/6/90 | :4/6/90 | :4/6/90 | :4/6/90 |

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Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

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| OFC | : LA: PDII-3 | : PM: PDII-3 | : | : D: PDII-3 | : DRP | : DRSP |
| NAME | : RIngram | : KJabbour: mes | : SNewberry | : DMatthews | : MSlosson | : RDudley |
| DATE | : 4/ /90 | : 4/5/90 | : 4/5/90 | : 4/ /90 | : 4/ /90 | : 4/ /90 |

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

Dockets Nos.

(Addressee)

Dear Mr:

SUBJECT: CLOSEOUT OF GENERIC LETTER 89-19, "REQUEST FOR ACTION RELATED TO
RESOLUTION OF UNRESOLVED SAFETY ISSUE A-47 'SAFETY IMPLICATION OF
CONTROL SYSTEMS IN LWR NUCLEAR POWER PLANTS' PURSUANT TO 10 CFR
50.54(f)" (TACs)

Your letter dated _____, responded to Generic Letter (GL) 89-19 for the
_____ (plant name). Your response stated that your plant meets all
the guidance provided in the GL. A detailed technical review of your response
has not been performed and therefore approval of your design is neither
intended nor implied. However, your confirmation provides an adequate basis
to consider NRR's review of your response complete. Further NRC review, if
any, will be performed either by inspection or audit.

Sincerely,

_____, Project Manager
Project Directorate _____
Division of _____
Office of Nuclear Reactor Regulation

cc:
See next page

cc:

Docket File

PDII-3 r/f

K. Jabbour

R. Ingram

S. Newbury

D. Matthews

M. Slosson

R. Dudley