



GE Nuclear Energy

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General Electric Company  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Charles L. Milder, Director  
Standardization and Non-Power Reactor Project Directorate

Subject: **Additional Information Concerning the ADS Timer**

The following provides some additional information concerning the ADS timer with respect to the Engineering Operating Procedures (EOP).

There are two instances in the EOPs where the operator is instructed to prevent ADS actuation. The first is during an ATWS event. The second is when the operator believes that the reactor water level may go below Low Water Level (LWL) 1 setpoint but will remain above the top of the active fuel (TAF) without ADS actuation. In either case, the ADS timer is of little consideration since the water level is above the LWL 1 setpoint when the decision to prevent ADS is made.

For the ATWS case, the reactor water level is being controlled above the LWL 1 setpoint by the high pressure makeup systems when the decision is made to prevent ADS actuation and reduce power by lowering the water level to TAF. For the second case, since the distance from the LWL 1 setpoint to TAF is only about 1 foot, the operator must decide to prevent the ADS as the reactor water level approaches the LWL 1 setpoint. For small LOCAs, there is sufficient time (about 3 minutes) for the high pressure ECCS to begin injection and control the water level before the LWL 1 setpoint is reached. If the high pressure ECCS cannot control the level it is prudent to allow the ADS actuation to occur and quickly depressurize the vessel to gain the additional reflooding capacity of the low pressure ECCS.

Sincerely,

*R. C. Mitchell*

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