



Westinghouse
Electric Corporation

Water Reactor
Divisions

Box 355
Pittsburgh Pennsylvania 15230

NS-EPR-2660

October 18, 1982

Mr. T. P. Speis
Division of Systems Integration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Speis:

I would appreciate your review of an ICSB position with which Westinghouse has taken exception as an unnecessary burden. We believe the ICSB position in question has no basis in the regulations and represents a potential threat to safety.

ICSB is requiring additional Reactor Trip breaker circuit tests in near term Westinghouse plants based on a problem in a Combustion Engineering plant which has a design unlike the Westinghouse standard design which has been reviewed and licensed many times by the NRC.

Although it is ICSB's belief that safety interests are served, the proposed tests have no basis in safety criteria and Westinghouse takes no credit for the circuit function being tested in analyzing design basis accidents. Moreover the test procedures will require entrance to the reactor trip switchgear and the use of jumpers.

The procedures recommended by ICSB are those proposed by TVA in response to the ICSB position. TVA has since withdrawn the commitment based on impracticality and potential threat to safety. The TVA position, made independently, echoes that of Westinghouse. Any subtle benefit is exceeded by potential risks to adequate and reliable automatic systems which conform to applicable safety criteria.

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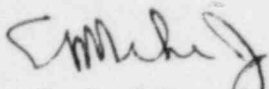
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To our knowledge, the additional Tech Spec tests are being applied by ICSB as a precondition to Westinghouse plants nearing operational status, and excludes operating plants.

For your information I have attached letters exchanged between myself and ICSB Chief, Mr. Faust Rosa. I urge a meeting with you and your Staff to review the issue in detail and recommend that the Westinghouse Utilities impacted by the ICSB position also be invited.

Mr. Dave Rawlins, Manager of Product Licensing, will be in contact with you to answer any questions and to arrange a meeting at your convenience.

Yours truly,



E. P. Rahe, Manager
Nuclear Safety Department

cc: Mr. R. Mattson
Mr. F. Rosa

FWM/keg

Attachments