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MEMORANDUM FOR: Richard H. Vollmer, Director
Division of Engineering

FROM: Darrell G. Eisenhut, Director
Division of Licensing

SUBJECT: PROPOSED GENERIC LETTER ON GDC-1

We have reviewed the subject proposed generic letter and do not recommend that it be issued in its present form. We question why the present process is not considered sufficient to accomplish the intended purpose. In addition to having each applicant establish a Q-list in the FSAR for the safety-related items, the Technical Specifications for each plant are developed based on standard Tech Specs which, in turn, consider all systems relied upon for Chapter 15 transient and accident mitigation and other important-to-safety items. These Tech Specs then impose Limiting Conditions for Operation (LCO's) and surveillance requirements for these systems. These go beyond the safety-related items on the Q-list and include such things as the turbine overspeed protection system, met towers, loose parts monitors (all LWR's) and PORV's on PWR plant reactor coolant systems (RCS). In the recent past, we have found this sufficient.

We do not believe that a requirement to "re-evaluate your approach" and "take appropriate action" will sharpen the issue to resolve the contention in the Shoreham Hearing.

We propose (for Shoreham) that the applicant be required, during the course of the Tech Specs finalization, to assure all such important-to-safety system items are, in fact, recognized. This approach is similar to that taken for La Salle and Susquehanna. The applicant should also assure, through an appropriate means (such as a computer-based surveillance program), that these items receive the attention required to assure their operability in their important-to-safety role, should the need arise.

If the staff wishes to perform a major generic study to consider expanding these requirements, we believe this should be properly channeled through CRGR before imposing new requirements.

"Original Signed By:

Darrell G. Eisenhut, Director
Division of Licensing

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A PDR

V. Stello
cc: E. Case
K. Goller
E. Jordan

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We propose (for Shoreham) that the applicant be required, during the course of the Tech Specs finalization, to assure all such important to safety system items are, in fact, recognized, similar to La Salle and Susquehanna Tech Spec recognition and that the applicant assure, through an appropriate means (such as a computer-based surveillance program) that these items receive the attention required to assure their operability in their important to safety role, should the need arise.

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Darrell G. Eisenhut, Director
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