

proj-669



Electric Power  
Research Institute

Leadership in Science and Technology

May 31, 1994

Mr. W. T. Russell  
Director, Office of Nuclear Reactor Regulation  
USNRC  
Mail Stop 12G18  
Washington DC 20555

Dear Mr. Russell:

Reference: **SECY-94-084, "Policy and Technical Issues Associated With The  
Regulatory Treatment of Non-Safety Systems In Passive Plants"**

We have reviewed SECY-94-084, and, as a result, forward one specific comment concerning Section D, Control Room Habitability.

In Section D, Control Room Habitability, on page 16 of SECY-94-084, the second complete bullet indicates the need to demonstrate the adequacy of the pressurization system to pressurize and maintain acceptable conditions in the control room for a 72-hour period at least once each refueling cycle. The basis for this demonstration is indicated in the next sentence, "this is consistent with the present requirements for bottled air systems".

The implications of these sentences are not clear to us. We assume that they indicate the specific need to demonstrate that the pressurization system functions by itself as designed. The need to test for leaktightness of the control room is discussed in the last paragraph on page 16. We are concerned that the second bullet could be interpreted to mean that a long pressurization of the control room is required at least once each refueling cycle. Thus we request clarification of this point in the SECY.

Thank you for your consideration of this comment. Please contact me at (205) 802-0375 should there be any questions.

Sincerely,

R. P. McDonald  
Chairman, ALWR Utility Steering Committee

cc: J. Wilson (NRC), Project 669

0001: Santucci (EPRI)

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