OAK RIDGE NATIONAL LABORATORY OPERATED BY UNION CARBIDE CORPORATION NUCLEAR DIVISION POST OFFICE BOX X OAK RIDGE, TENNESSEE 37830 October 19, 1982 Mr. Richard Major Senior Staff Engineer U.S. Nuclear Regulatory Commission/ACRS Washington, DC 20555 Dear Dick, After reading the meeting summary for the September 29, 1982, Reactor Operations Subcommittee Meeting, I have the following comment. During the discussion of the Turkey Point cold overpressure incident it was repeatedly brought out by the chairman and others, including me, that the technical specifications do not properly address situations in which the availability of certain systems (in this case the overpressure mitigation systems) are more vital to safe operation than is the case during most normal operating conditions. While this point is touched on in the summary, I feel that it is of overriding importance and should receive more emphasis. Binford, Head chnical Section FTB:es cc: Jesse Ebersole, ACRS 8212070435 821019 DESIGNATED ORIGINAL PDR ACRS Certified By BLE PDR