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Mr. Louis O. DelGeorge
Director of Nuclear Licensing
Commonwealth Edison Company
P. O. Box 767
Chicago, Illinois 60690

Dear Mr. DelGeorge:

Subject: Reactor Trip Breaker Test Appeal Meeting

On January 26, 1983 members of the NRC staff met with representatives of Westinghouse Electric Corporation and a number of utilities that presently have Westinghouse-designed plants in the licensing process. The purpose of this meeting was to provide an opportunity for Westinghouse to appeal the staff position on reactor-trip breaker testing.

By letter dated February 2, 1983, the staff informed Mr. E. P. Rahe of Westinghouse that the staff's position on the breaker testing issue is unchanged. The purpose of this letter is to formally notify you of this decision. Enclosed for your information is a copy of the February 2, 1983 letter.

If you should need any additional information, please contact the NRC staff project manager.

Sincerely,

L.N. Olshan
for B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure:
As stated

cc w/encl.: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 2 1983

Mr. E. P. Rahe, Manager
Nuclear Safety Department
Water Reactor Division
Westinghouse Electric Corporation
Box 355
Pittsburgh, Pennsylvania 15230

Dear Mr. Rahe:

On January 26, 1983 a meeting was held with Mr. Dave Rawlins, other Westinghouse staff members, representatives of utilities, NRC staff members and myself. The purpose of this meeting was to provide an opportunity for Westinghouse to present an appeal of the NRC staff position on testing of reactor trip breakers. For Westinghouse plants, the manual reactor trip actuates the shunt and undervoltage coils simultaneously to trip the circuit breakers. The staff position is that surveillance tests for the manual reactor trip should independently confirm the operability of each of these diverse trip features.

The Westinghouse position is that independent verification of the shunt trip is unnecessary. This conclusion is based primarily on the fact that the Westinghouse safety analysis does not take credit for the shunt trip function as a design basis and the conclusion that the improvement in safety is questionable based on probabilistic risk studies. However, Westinghouse does concur that testing should verify the operability of the undervoltage trip independent of the shunt trip and is prepared to recommend changes to the manual test procedures.

The basis for the staff position is that testing of the shunt and undervoltage trip functions is consistent with the diversity and testing requirements of the General Design Criteria. The staff has reviewed licensee event reports and finds that in a number of cases the operability of the shunt trip function would have permitted tripping of the reactor trip breakers when the undervoltage trip function had failed. I conclude that there is a sufficient basis to justify the staff's position from a regulatory viewpoint and with due consideration to operating experience. Therefore, the Westinghouse appeal of this issue is denied.

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E. P. Rahe

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We also intend to initiate a proposal, probably in the form of an I&E Bulletin, to resolve this matter for all licensed Westinghouse plants. Such a proposal will, in accordance with current NRC procedures, require review by the Committee for the Review of Generic Requirements.

Sincerely

(for) *Walter R. Butler*
R. Wayne Houston, Assistant Director
for Reactor Safety
Division of Systems Integration