

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR

7/8/94

Date

[Handwritten initials]
Initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION
FROM: COMMISSIONER DE PLANQUE
SUBJECT: SECY-94-084 - POLICY AND TECHNICAL ISSUES
ASSOCIATED WITH THE REGULATORY TREATMENT OF
NON-SAFETY SYSTEMS IN PASSIVE PLANT DESIGNS

APPROVED X(in part) DISAPPROVED X(in part) ABSTAIN _____

NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:

See attached comments.

110040

9407120292 940630
PDR COMMS NRCC
CORRESPONDENCE PDR

[Handwritten signature: C. Guil de Planque]

SIGNATURE

RELEASE VOTE 101

June 30, 1994

DATE

WITHHOLD VOTE 1

ENTERED ON "AS" YES 1 No _____

[Handwritten initials: DFOZ]

Commissioner de Planque's comments on SECY-94-084

A. Regulatory Treatment of Non-safety Systems (RTNSS)

I approve the RTNSS process because it establishes a reasonable method, agreeable to staff and industry, to identify those NSSS significant to risk. The comments from Westinghouse should be incorporated.

B. Passive Failures

I approve the staff's position concerning single failure considerations for check valves, but caution that in some situations, a design that considers such failures may overall be less reliable (due to added complexity, new failure modes) than one where the valve is treated as passive.

C. Safe Shutdown Requirements

I approve the staff's recommendation. With respect to whether systems needed for cold shutdown should be designated as "important non-safety systems", I would let this be determined by application of the RTNSS process.

D. Control Room Habitability

I approve the general approach outlined by the staff.

E. Reliability Assurance Program

I approve the proposed position for D-RAP, including the requirements upon the COL applicant as modified by the OGC recommendation. I agree with Commissioner Remick's comments on O-RAP, and thus disapprove imposition of O-RAP.

F. Station Blackout

I approve the staff's position

G. Electrical Distribution

I approve the staff's position

H. Inservice Testing of Pumps and Valves

I agree to defer a final Commission decision on this issue pending staff consideration of Commissioner Remick's comment. I have the following additional comments on the numbered provisions of staff's proposal for inservice testing:

1. Testing of important non-safety components.

The testing provisions and frequency should be commensurate with safety significance as determined by the RTNSS. The ASME code provisions may not be necessary.

2. Quarterly testing during operation

The requirements for testing during operation should be determined from a risk perspective, e.g. balancing the risks of testing against the benefits of a simpler design (that might result if testing during operation is not to be done). (See also comment on B above).

4. Test valves under design basis differential pressure and flow.

I approve the proposal for testing during startup, but would approve testing during power operation only if the benefits of the test outweigh the potential risk.