



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

June 16, 1989

MEMORANDUM FOR: Charles E. Rossi, Director
Division of Operational Events, NRR

FROM: Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects I/II NRR

SUBJECT: TECHNICAL SPECIFICATION REQUIREMENTS FOR DEDICATED STANDBY
SHUTDOWN SYSTEMS USED TO MEET APPENDIX R REQUIREMENTS

We have recently issued Amendments 98/80 on McGuire to relocate fire protection requirements from the Technical Specifications (TS) to the FSAR in accordance with Generic Letter (GL) 88-12. In the letter transmitting these amendments to Duke, we acknowledged that no TS had been included in Duke's application regarding the dedicated Standby Shutdown System (SSS), and that the portion of GL 88-12 which regards SSS would be handled separately. Your assistance is needed in determining the position we should take on the need for the TS.

You should consider the following relevant background:

1. Catawba has a SSS TS (3/4.7.13) which was approved during licensing. It requires shutdown if the SSS is not restored to operable status within 7 days.
2. Oconee has proposed TS (3.18) which is under staff review. It would require shutdown if the system is not restored to operable status within 7 days.
3. On January 20, 1987, NRC denied the H. B. Robinson request for TS for dedicated/alternate shutdown system "due to the fact that fire protection systems are not part of the safety related systems relied upon for safe shutdown or mitigation of design basis accidents as defined in FSAR Chapter 15" and therefore "do not need to be incorporated in the Technical Specifications. Our NRC guidance concerning Technical Specification improvements also does not require Technical Specifications for the dedicated/alternate shutdown systems". (See the enclosed FR Notice of Denial.)
4. Following the Robinson denial, an earlier request for TS on McGuire was withdrawn by Duke.

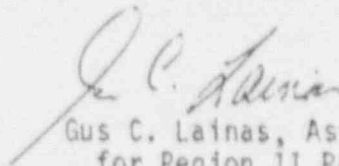
8906220192

XA

B/4

In addition, if the SSS is to be retained in TS, you should indicate the model or guidance to be used to achieve consistency among affected plants.

Your response to the above is needed for resolution of several long standing licensing actions. Accordingly, your prompt reply is requested.



Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects 1/11, NRR

Enclosure:
As stated