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> March 15, 1985 LD-85-012

Hugh L. Thompson, Director Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Subject: CESSAR Confirmatory Issue 2, Atmospheric Dump Block Valves

References:

- (A) C-E Letter LD-84-009, A. E. Scherer to D. G. Eisenhut, dated February 24, 1984.
- (B) C-E Letter LD-84-042, A. E. Scherer to D. G. Eisenhut, dated August 3, 1984
- (C) NRC Letter, C. O. Thomas to A. E. Scherer, dated November 15, 1984

Dear Mr. Thompson:

Reference (A) was submitted to close out Confirmatory Issue 2 of Supplement 2 to the CESSAR Safety Evaluation Report (Steam Generator Tube Rupture Analysis). The letter added two interface requirements to CESSAR. The first required the use of Atmospheric Dump Valve (ADV) block valves. The second stipulated that the ADV block valves be accessible at all times during operation. These requirements were added to support the CESSAR Appendix 15D Steam Generator Tube Rupture (SGTR) analysis. This beyond design basis event included a double-ended rupture of a steam generator tube, loss of offsite power and a stuck open ADV.

Reference (B) suggested deletion of the requirement stated in Supplement 2 of the SER that the ADV block valves be safety grade. Reference (C), which responded to this suggestion, indicated that ADV block valve interface requirements would be the subject of future correspondence.

In subsequent discussions with C-E, the Staff indicated that the ADV block valves should be safety grade except that they do not have to be remotely operable, be ause the SGTR analysis in CESSAR assumes manual actions to close the block valve. The Staff further indicated that implementation of the inverface requirement on accessibility of the block valve would be reviewed on each referencing applicant's docket. C-E, therefore, is modifying the CESSAR interface requirements, in addition to those added by Reference (A), as shown

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Mr. Hugh L. Thompson March 15, 1985 LD-85-012 Page 2

in the Attachment to this letter. The interfaces will be included in a future amendment to CESSAR.

C-E believes that this modification to CESSAR resolves the Staff concerns regarding the qualifications of the ADV block valves. If you have any questions or comments, feel free to call me or Mr. T. J. Collier of my staff at (203) 285-5215.

Very truly yours,

COMBUSTION ENGINEERING, INC.

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Director Nuclear Licensing

AES:las cc: P. Moriette (NRC) Attachment

Attachment LD-85-012

Revised CESSAR Interface Requirements

CESSAR Section: 5.1.4

Item B.2

The steam piping and associated supports from the steam generators up to and including the Main Steam Isolation Valves (MSIVs), the ADVs and their associated isolation valves, and any auxiliary steam supply systems up to the isolation valves which connect upstream of the MSIVs shall be Seismic Category I and designed to ASME B&PV Code, Section III, Class 2 requirements.

Item I.14

If the isolation valves upstream of the ADVs are ctrically controlled or operated, the valve operator and concrol systems shall be designed to the same IEEE standards as applied to the ADVs.