

December 22, 1983

Note to: J. Scinto

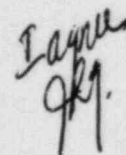
From: R. Rawson

SUBJECT: MCGUIRE AMENDMENT PACKAGE CONCERNING AMENDMENT OF APPENDIX R
REQUIREMENT

This package appears straightforward on its surface, but concerns me nevertheless. An amendment is sought to except from Appendix R, III.J ("Emergency Lighting") requirements the Safe Shutdown Facility and certain access and egress routes. The justification given for the proposed NSHCD is that "implicit in the requirement for the 8-hour battery-powered emergency lights . . . is the assumption that a fire could simultaneously disable the existing emergency lights and safe shutdown equipment." This justification would be valid if the SSF were intended only for the situation of a fire disabling the normal shutdown equipment. If the SSF is required for other situations, however, then equally implicit in the regulation is the assumption that a fire could disable existing emergency lights at a time when the SSF is otherwise needed to shut down the plant, regardless of the cause of the normal shutdown equipment being unavailable. If the SSF at McGuire is required for situations other than fire, then I find it difficult to agree that this amendment does not increase the consequences of an accident or reduce a margin of safety. I also wonder about the precedent being set here. This rationale would appear to apply to every SSF in the country.

I recommend that ELD not concur in this package in its present form.


R.R.





cc: J. Gray

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