



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MEMORANDUM FOR: Cecil O. Thomas, Chief, Standardization and Special Projects
Branch, Division of Licensing

FROM: Olan D. Parr, Chief, Auxiliary Systems Branch, Division
of Systems Integration

SUBJECT: COMMENTS ON REGULATORY EFFECTIVENESS REVIEWS FOR
NORTH ANNA AND TURKEY POINT

By memoranda dated January 19, 1984 and January 25, 1984, you requested the Auxiliary Systems Branch's (ASB) comments on the reports for the Regulatory Effectiveness Reviews including the Vital Area Validation for North Anna Nuclear Power Station Units 1 and 2 and Turkey Point Nuclear Power Station Units 3 and 4. ASB offers the following comments on the NMSS reports.

In comparing the Vital Area Validation Reports for the two sites (North Anna and Turkey Point) a number of inconsistencies were observed. Under saboteur assumptions, the North Anna reports include an external threat. The Turkey Point reports assume only an insider threat. The North Anna reports include assumptions concerning the need for a source of 125 volt DC control power and 120 volt AC instrumentation power for the control room to achieve safe shutdown. The Turkey Point reports contain no assumption regarding instrumentation and control power. The North Anna reports assume fuel melting may result from any of six sabotage actions; whereas the Turkey Point reports consider only four sabotage actions. The two additional actions of the North Anna reports are (1) the reactor core is isolated from its heat sink and (2) massive destruction of cables. The above set of inconsistencies resulted in a greater list of protection options for North Anna than for Turkey Point. We are not aware of any design or site differences between North Anna and Turkey Point that would justify the differences in assumptions used by Los Alamos in developing the vital area reports.

Also, for both sites, in analyzing the mitigation systems necessary to prevent an offsite radiological release, maintenance of the plant in hot standby was considered an adequate final state. However, the time period for maintenance of hot standby conditions was not defined. For extended time periods (10 hours), reactor water inventory and primary system pressure control systems would be required. These systems are not included under the present assumptions. Additionally, reactor water inventory or pressure control systems may be required to respond to plant transients or massive destruction of cabling which result in lifting of the pressurizer PORV or safety relief valves. The assumptions concerning maintenance of hot standby conditions should be clarified.

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Presently, we are re-reviewing the assumptions used in the vital area determination analysis in connection with our review of the insider rule package. In accordance with our agreement, with NMSS, we are preparing our position regarding the equipment which should be protected from sabotage. Our plans are to send NMSS our recommendation within the next few weeks.

As for the RER reports, NMSS appears to be addressing our previous concerns with RER reports (memorandum from O. Parr to C. Thomas, dated August 23, 1983). According to Burnett's memorandum to Eisenhut dated January 12, 1984, ELD has been consulted in preparing the proposed letter to the licensee. However, the format of the RER report still contains wording that tells the licensee to take corrective actions. While the RER report concludes that no safeguards deficiencies exist that would prevent protecting against the design basis threat for radiological sabotage, it, nevertheless, contains several recommendations for improving safeguards. Attachment C, "Regulatory Improvement Recommendation Based on Turkey Point RER" identifies the security deficiencies with respect to compliance with the approved security plan and with respect to inadequacies with the security plan or safeguards regulations. However, Attachment C is not being sent to the licensee. Therefore, we recommend that the RER report and Attachment C be integrated. The licensee would be required to propose changes to address any noncompliance with the regulations or previously approved security plans. And, the licensee would be requested to propose changes or supply justifications for their position to address any safeguards problems associated inadequacies with approved security plans or regulations. Then, as indicated in Burnett's memorandum to Eisenhut, appropriate regulatory action would be taken if the licensee did not voluntarily correct these problems.

The above comments on the report format of the RER apply to both Turkey Point and North Anna reports. Also, we are not questioning the value or functioning of the RER program but merely how the results are implemented. We are available to meet with you or NMSS to discuss our comments.

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