

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

May 7, 1984

MEMORANDUM FOR: Gus C. Lainas, Assistant Director
for Operating Reactors
Division of Licensing

THRU: Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

FROM: ~~Daniel G. McDonald, Project Manager~~
~~Operating Reactors Branch #1~~
Division of Licensing

SUBJECT: BACKFIT - TURKEY POINT PLANT, UNITS 3 AND 4, REGULATORY
EFFECTIVENESS REVIEW (RER) AND VITAL AREA VALIDATION (VAV)

By memorandum dated April 13, 1984, Darrell Eisenhut has directed all Project Managers to identify by memorandum any potential backfits to the cognizant Assistant Director. As previously discussed and identified in my memorandum (enclosure 1) to Cecil Thomas dated February 6, 1984, I have provided comments on the RER/VAV Reports prepared by NMSS for Turkey Point Units 3 and 4. I have indicated in the memorandum that these reports are actions that maybe considered to be backfit items.

Therefore, in accordance with the current guidance provided in the Eisenhut memorandum identified above, I am informing you of the potential backfit. I have also provided a summary of this backfit issue for the monthly report in the appropriate format. Item 5 of the guidance memorandum indicates that the procedures are not applicable to generic backfit, however, an approved generic backfit can have plant-specific backfit aspects which are appealable. As stated in my memorandum, I do not believe or am not aware that the RER/VAV Program, as being implemented and documented in the Turkey Point Report, is in conformance with SECY 83-321.

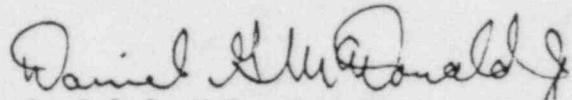
The RER/VAV Reports for North Anna and Surry have been returned to NMCS by memorandum, (enclosure 2) dated April 2, 1984, based on the same concerns identified on Turkey Point for reconsideration by NMSS. I have enclosed additional comments (enclosure 3) from the Division of Human Factors Safety and Systems Integration which also identify potential backfit concerns.

The licensee has not formally indicated what action they will take, however, they have expressed concern as to the RER/VAV Reports, the lack of basis

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May 7, 1984

provided in requiring prompt corrective action in light of the finding of no potential sabotage vulnerabilities identified in the report and the detailed NRC staff review and approval of the existing security plan. The licensee will provide comments, actions being taken and schedules within two weeks.



Daniel G. McDonald, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:
As stated

ENCLOSURES:

1. Memorandum dated February 6, 1984, Comments on the Turkey Point RER/VAV Report - D. McDonald to C. Thomas
2. Memorandum dated April 2, 1984, Regulatory Effectiveness Review Reports - D. Eisenhut to R. Burnett
3. Other comments on the Turkey Point RER/VAV Report.
Memorandums dated:
 - August 12, 1983, H. Clayton to C. Thomas
 - August 23, 1983, O. Parr to C. Thomas
 - August 29, 1983, D. McDonald to C. Thomas (This memorandum is not attached due to containing safeguards information)
 - September 6, 1983, G. Kennedy to H. Clayton
 - November 8, 1983, D. Eisenhut, to R. Burnett
 - January 31, 1984, D. Ziemann to C. Thomas
 - February 1, 1984, C. Parr to C. Thomas