



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

PDR-016

SEP 13 1984

Ms. Lesley Roberts Evans
International Energy Associates Limited
2600 Virginia Avenue, NW
Washington, DC 20037

IN RESPONSE REFER
TO FOIA-84-596

Dear Ms. Evans:

This is in further response to your letter of July 18, 1984, in which you requested, pursuant to the Freedom of Information Act, copies of documents associated with NRC's new procedures for handling plant-specific backfits as was directed in SECY-83-321 and Generic Letter 84-08.

Enclosed are the documents listed on Appendix A. The documents listed on Appendix B are publicly available for review, and copying for a fee, at the NRC's Public Document Room located at 1717 H Street, NW, Washington, DC 20555. The accession number for each document is indicated for your information.

The search for and review of documents pertaining to three additional nuclear power plants have not been completed. As soon as the search and review are completed, we will contact you.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Felton", written over a horizontal line.

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

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APPENDIX A

TURKEY POINT

1. 8/12/83 Memo for Cecil Thomas from H. Brent Clayton, re: Comments on Regulatory Effectiveness Review for Turkey Point Nuclear Power Station Units 3 and 4
2. 8/23/83 Memo for Cecil Thomas from Olan D. Parr, re: Regulatory Effectiveness Review for Turkey Point Nuclear Power Station Units 3 and 4 (2 pages)
3. 9/4/83 Memo for H. Brent Clayton from William G. Kennedy, re: Trip Report for Turkey Point Visit Observing NMSS Regulatory Effectiveness Review (RER) (2 pages)
4. 11/8/83 Memo for Robert F. Burnett from Darrell G. Eisenhut, re: Report on Turkey Point Regulatory Effectiveness Review without attachments (2 pages)
5. 1/31/84 Memo for Cecil O. Thomas from Dennis L. Ziemann, re: Comments on Revised Regulatory Effectiveness Review Report for Turkey Point Nuclear Power Station Units 3 and 4
6. 2/1/84 Memo for Cecil O. Thomas from Olan D. Parr, re: Comments on Regulatory Effectiveness Reviews for North Anna and Turkey Point (2 pages)
7. 2/6/84 Memo for Cecil O. Thomas from Daniel G. McDonald, Jr., re: Comments on Regulatory Effectiveness Review and Vital Area Validation - Turkey Point Plant Units 3 and 4 without attachments (2 pages)
8. 4/2/84 Memo for Robert F. Burnett from Darrell G. Eisenhut, re: Regulatory Effectiveness Review Reports without attachments (2 pages)
9. 5/7/84 Memo for Gus C. Lainas from Daniel G. McDonald, re: Backfit Issue at Turkey Point Plant Units 3 and 4 (2 pages)
10. 5/7/84 Memo for Gus C. Lainas from Daniel G. McDonald, re: Backfit - Turkey Point Plant, Units 3 and 4, Regulatory Effectiveness Review (RER) and Vital Area Validation (VAV) without enclosures (3 pages)
11. 5/31/84 Memo for Gus C. Lainas from Daniel G. McDonald, re: Backfit Issue at Turkey Point Plant Units 3 and 4 (2 pages)

DRESDEN/QUAD CITIES

12. 11/4/83 Letter to Dennis L. Farrar (Commonwealth Edison) from Dennis M. Crutchfield with attached Safety Evaluation (8 pages)
13. 12/21/83 Letter to Harold R. Denton from B. Rybak (Commonwealth Edison) with attached procedures for venting and purging (7 pages)
14. 5/3/84 Letter to Harold R. Denton from B. Rybak (Commonwealth Edison) with attached response to NRC concerns on Purge and Vent Valves at Dresden/Quad Cities (20 pages)
15. 10/21/83 Memo for Gus C. Lainas and Lester Rubenstein from James Sniezek Subject: MEETING TO DISCUSS PROPOSED TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS ON BWRs FOR HIGH WATER LEVEL TRIP (L8) AND THE TURBINE BYPASS SYSTEM (1 page)

APPENDIX B

PALISADES

- | | | |
|------------------|-----------------------------|-------------|
| 1. October 1982 | NUREG-0820, Palisades IPSAR | #8211190341 |
| 2. November 1983 | NUREG-0820, Supplement I | #8312070296 |

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

August 12, 1983

MEMORANDUM FOR: Cecil O. Thomas, Chief
Standardization & Special
Projects Branch
Division of Licensing

FROM: H. Brent Clayton, Acting Chief
Procedures and Systems Review Branch
Division of Human Factors Safety

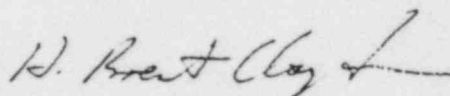
SUBJECT: COMMENTS ON REGULATORY EFFECTIVENESS REVIEW FOR
TURKEY POINT NUCLEAR POWER STATION UNITS 3 AND 4

As requested in your August 3, 1983 memorandum to me, we have reviewed the subject report and are providing comments. It should be noted, however, that our involvement in this review was as an NRR observer of the review not as a participant in the review. The Regulatory Effectiveness Review (RER) report seems complete and accurate based on the portions of the review we actually observed and discussed during the visit. However, the appropriateness of the NRC officially recommending methods to improve the weaknesses noted should be reconsidered as this is not normally considered to be a regulatory function. The recommendations should be deleted from the official report and provided to the licensee under separate cover.

Because one of the purposes of the RER is to check the effectiveness of the staff's programs for ensuring acceptable levels of reactor safeguards, comments addressing this subject based on the Turkey Point review should be included in the report.

Finally, since the purposes of the review were explained carefully to the licensee on the first day of the visit, it is probably unnecessary to repeat the complete description in the report. The introduction provided should suffice to provide a reader an explanation of the purpose of the review.

If you desire to discuss any of the comments in more detail, contact Bill Kennedy, Senior Operational Safety Engineer (X24578).


H. Brent Clayton, Acting Chief
Procedures and Systems Review Branch
Division of Human Factors Safety

cc: D. McDonald
E. McPeck

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

AUG 23 1983

MEMORANDUM FOR: Cecil Thomas, Chief, Standardization & Special
Projects Branch, Division of Licensing

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

SUBJECT: REGULATORY EFFECTIVENESS REVIEW FOR TURKEY
POINT NUCLEAR POWER STATION UNIT 3 AND 4

As requested by your memorandum dated August 3, 1983, the Auxiliary Systems Branch (ASB) has reviewed the Regulatory Effectiveness Review (RER) report including the Vital Area Definition Reports for Turkey Point Nuclear Power Station Unit 3 and 4. ASB offers the following comments on the NMSS reports for the Turkey Point units.

1. Attachment 1 to the RER report indicates that the purpose of the onsite reviews is "to assess the effectiveness of reactor safeguards against radiological sabotage. . ." and "to determine whether existing regulations yield a level of protection intended by NRC." However, the RER report is mainly an assessment of the plant's safeguards program. For most of the items discussed in the report, there is no comparison to the regulation or an evaluation of the effectiveness of the regulation. For example, the detailed evaluation of the plant's perimeter detection system and barriers which outlines many deficiencies from a security standpoint, does not present a comparison to the regulations. The conclusion does not identify whether the deficiencies were caused by inadequate implementation of the regulation or inadequate regulations.

Further, for the few items compared to the regulation, the format of the onsite review and report implies backfit of requirements beyond present requirements. For example, the portion of the report titled "Safeguards Program Concerns" discusses the inadequacies of the vital area barriers for the auxiliary feedwater pumps and condensate storage tank areas. "Safeguards Program Concerns" are identified as weaknesses considered to be of "sufficient significance to indicate a need for prompt remedial action." The chain-link fencing around the auxiliary feedwater equipment in combination with the protected area barriers was judged by the team to be inadequate for meeting the two barrier requirements of 10 CFR 73.55. The team suggested replacement of the fencing with a more substantial barrier. However, the report does not identify that 10 CFR 73.2 defines a "physical barrier" as fencing of No. 11 American wire gauge or heavier wire fabric. It is beyond the identified scope of the RER reviews to recommend that licensees upgrade plant security to accommodate deficiencies in the regulations.

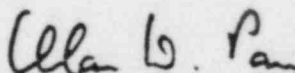
Contact:
N. Fioravante
X28299

8308290532 XA


Cecil Thomas

2. The vital area definition reports states that the analysis "does not consider indiscriminate destruction of cables in trays. . ." This assumption should be modified to take into account that analyses performed for 10 CFR 50.48 and Appendix R to 10 CFR 50. These analyses identify locations in the plant where fire damage to cabling could result in loss of shutdown capability.
3. The vital area definition report identifies very limited systems needed to mitigate transients initiated by sabotage. The limiting transient was assumed to be a loss of feedwater transient caused by a loss of the electrical power grid. The reactor protection system and the auxiliary feedwater system were identified as necessary systems. While these systems mitigate the immediate effect of the transient, additional systems are needed to achieve and maintain stable conditions (hot standby) for an extended period. These systems could include the charging system, component cooling water system, intake cooling water system, diesel generator, and electrical distribution system. The vital area assumptions should be modified to include protection of one train of systems necessary to achieve and maintain stable plant conditions including instrumentation and support systems.

The above comments on the vital area definition report are generic in nature for a PWR. We are willing to assist NMSS in reviewing the assumptions of the vital area analyses to assure consistency with other requirements such as Appendix R.



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

cc: R. Mattson
L. Rubenstein
F. Miraglia
J. Wermiel
D. McDonald 
E. McPeek
N. Fioravante