



CHARLES CENTER • P. O. BOX 1475 • BALTIMORE, MARYLAND 21203

October 22, 1984

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Docket Nos. 50-317
50-318
License Nos. DPR-53
DPR-69

ATTENTION: Mr. R. W. Starostecki, Director
Division of Project & Resident Programs

Gentlemen:

Inspection Report 50-317/84-18, 50-318/84-18; identified one item of apparent noncompliance with NRC regulations. The apparent noncompliance concerned the Plant Operations & Safety Review Committee's (POSRC) evaluation of a system and procedure change pursuant to 10 CFR 50.59. A thorough review of our evaluation indicates that it adequately addressed the criteria of 10 CFR 50.59 and that no written safety evaluation was required in determining whether an unreviewed safety question was created.

At a POSRC meeting in early June 1984, a Committee member questioned whether the reliability of the High Pressure Safety Injection (HPSI) system line-up (i.e., both #11(21), #12(22), and #13(23) HPSI pumps in "normal") was the most reliable alternative. The Committee instructed one member to contact the NSSS vendor to determine if the line-up was, in fact, the most reliable. After several conversations over a two or three week period, the NSSS vendor responded by letter to the POSRC and proposed through a written evaluation an alternate line-up to enhance system reliability. Upon receipt of the vendor recommendation, the POSRC felt compelled to take prompt action instituting an HPSI system realignment. As a result, HPSI pump #12(22) was placed in "pull-to-lock" on June 14, 1984, to enhance the reliability of the HPSI system. This change ensures the operability of one HPSI pump and its suction paths from the Refueling Water Tank and Containment Sump in the event of an accident involving a loss of off-site power and any single active failure.

The procedure and system change which placed #12(22) HPSI pump in "pull-to-lock" was subsequently reviewed by the POSRC within 14 days as required by Technical Specification 6.8.3. In approving this change to the operation of #12(22) HPSI pump, the POSRC determined that a safety evaluation pursuant to 10 CFR 50.59 was not required. This determination was based on the following facts:

1. The "pull-to-lock" feature of #12(22) HPSI pump is part of the approved plant design.
2. No change was made to the facility design, because the logic for the #12(22) HPSI pump is fully described in Chapter 7 of the Updated Final Safety Analysis Report.

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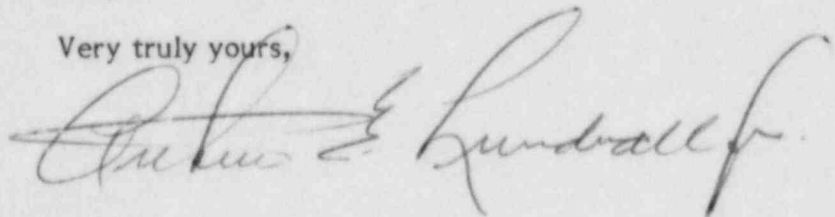
Mr. R. W. Starostecki
October 22, 1984
Page 2

3. The HPSI system contains three 100% capacity pumps, one more than is credited in Chapter 14 of the Updated Final Safety Analysis Report.
4. The requirements of Technical Specification 3.5.2 were satisfied since #11(21) and #13(23) HPSI pumps remained fully operable on independent subsystems. Placing #12(22) HPSI pump in "pull-to-lock" was permitted by the Limiting Conditions for Operation which requires that two independent ECCS subsystems be operable in **MODES 1, 2, and 3.**
5. The Operating Instruction for the HPSI system is not described in the Updated Final Safety Analysis Report.

In light of the information provided above, we feel the intent of 10 CFR 50.59 was met through the combination of the POSRC's review, the written analysis from the NSSS vendor, and the safety evaluations in Chapter 14 of the Updated Final Safety Analysis Report which assumes only two operable HPSI pumps. It is our view, that a written safety evaluation was not needed to authorize defeating the automatic start of #12(22) HPSI pump.

Based on the information provided above, we request you reconsider the issuance of the subject item of noncompliance. Should you have further questions regarding this reply, we will be pleased to discuss them with you.

Very truly yours,



AEL/SRC/gla

cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC