



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

FEB 14 1985

MEMORANDUM FOR: Frank J. Miraglia, Acting Director
Division of Licensing

FROM: Dennis M. Crutchfield, Assistant Director
for Safety Assessment
Division of Licensing

SUBJECT: PLANT-SPECIFIC BACKFITTING STATUS REPORT

Enclosed is our plant-specific backfitting status report current through February 8, 1985. Tables 1 through 3 show summaries of active appeal items for each Assistant Director in the Division of Licensing. Tables 4 and 5 show summaries of active appeal issues for the Division Director of the Division of Licensing and the Director of the Office Nuclear Reactor Regulation, respectively. Table 6 provides a summary of all closed items. For purposes of this report, closed items are defined as those issues either completed by a specific resolution or removed from the active appeal list since no formal appeal has been initiated by the licensee. One page summaries provide detailed information for each active issue and each closed issue following the tables. We are in the process of completing the structuring of our data base system in order to accommodate recommendations to include statistics on resolution of each appeal item along with the capability to sort on responsible Assistant Directors of the various NRR Divisions.

One new appeal item has been added to our list of closed items. That issue, the request for TMI-1 to develop a report on containment purging, is shown as resolved since the licensee elected to produce the required report.

The dates of appeals for all Beaver Valley 2 issues, with the exception of Class 1E lighting and communication systems (L-84-15), are the dates that the staff has suggested to the applicant for appeal meetings. To date, the applicant has not responded with its preference. The Class 1E power backfit appeal meeting, scheduled to be held on February 13, 1985, was cancelled at the applicant's request because the staff and applicant succeeded in resolving the issue in a technical meeting on February 12, 1985. A letter was sent (from

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Debbie Miller
727415

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Frank J. Miraglia

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Knighton to Woolover) on February 13, 1985 to again request the applicant to provide their preferred schedule (although as noted above, we have suggested dates) for the appeal meetings. All Beaver Valley 2 appeal issues have been elevated to the Division Director level by the Director of NRR. In addition to the current group of items for Beaver Valley 2, a potential issue relative to concerns for snow and ice loads is under discussion with the applicant.

(5)

Dennis M. Crutchfield, Assistant Director
for Safety Assessment
Division of Licensing

Enclosures: As stated

cc: D. Eisenhut
H. Thompson
DL BC's

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PTremblav:dm	JHannon	GHolahan	TNovak	GLainas	DCrutchfield
2/12/85	2/12/85	2/12/85	2/13/85	2/12/85	2/14/85

TABLE 1

SUMMARY OF ACTIVE RACKFIT APPEAL ITEMS FOR ASSISTANT DIRECTOR OF LICENSING

CODE	PLANT NAME	ISSUE	DATE IDENTIFIED AS RACKFIT	NEXT APPEAL ACTION
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N O N E

02/08/85

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TABLE 2

SUMMARY OF ACTIVE BACKFIT APPEAL ISSUES FOR ASSISTANT DIRECTOR OF OPERATING REACTORS

CODE	PLANT NAME	ISSUE	DATE IDENTIFIED AS BACKFIT	NEXT APPEAL ACTION
OR-84-26	Maine Yankee	DWST Level Alarm	09/28/84	02/28/85 AD Position
OR-85-03	Farley 1/2	RVLIS	12/18/84	03/04/85 AD Position

02/08/85

TABLE 3

SUMMARY OF ACTIVE BACKFIT APPEAL ITEMS FOR ASSISTANT DIRECTOR FOR SAFETY ASSESSMENT

CODE	PLANT NAME	ISSUE	DATE IDENTIFIED AS BACKFIT	NEXT APPEAL ACTION
N O N E				

02/08/85

TABLE 4

SUMMARY OF ACTIVE RACKFIT APPEAL ISSUES FOR DIVISION DIRECTOR OF DIVISION OF LICENSING

CODE	PLANT NAME	ISSUE	DATE IDENTIFIED AS RACKFIT	NEXT APPEAL ACTION
L-84-10	Beaver Valley 2	Cable Room Fire Prot.	05/20/84	02/22/85 Mtg
L-84-11	Beaver Valley 2	Spent Fuel Cooling	06/15/84	02/28/85 Mtg
L-84-12	Beaver Valley 2	Air Starting Sys./EDG	06/15/84	02/22/85 Mtg
L-84-13	Beaver Valley 2	SG Level Control	05/30/84	02/22/85 Mtg
L-84-14	Beaver Valley 2	MOV/Failure	06/15/84	02/28/85 Mtg
L-84-16	Beaver Valley 2	Prob. Max. Precip.	05/30/84	02/22/85 Mtg
L-84-17	Beaver Valley 2	Rocker Arm Lube Oil Alarm/EDG	06/25/84	02/28/85 Mtg
L-84-31	Beaver Valley 2	Diesel Lo Fill Proc.	10/11/84	02/28/85 Mtg

02/08/85

CODE	PLANT NAME	ISSUE	DATE IDENTIFIED AS BACKFIT	NEXT APPEAL ACTION
L-84-32	Beaver Valley 2	Applic. of GDC 4 to Lighting Systems	11/08/84	02/22/85 Mtg
L-84-33	Beaver Valley 2	Appli. of GDC 2/4 to Communication Sys.	11/08/84	02/22/85 Mtg
L-84-34	Beaver Valley 2	Appli. of GDC 5 to Communication Sys.	11/08/84	02/22/85 Mtg
L-84-35	Beaver Valley 2	Dose Proj.	11/08/84	02/22/85 Mtg
L-84-36	Beaver Valley 2	Illum. Levels	11/08/84	02/22/85 Mtg
L-84-37	Beaver Valley 2	DG Aux. Sys. Design	11/08/84	02/28/85 Mtg

TABLE 5

SUMMARY OF ACTIVE BACKFIT APPEAL ISSUES FOR DIRECTOR, OFFICE OF NUCLEAR REACTOR REGULATION

CODE	PLANT NAME	ISSUE	DATE IDENTIFIED AS BACKFIT	NEXT APPEAL ACTION
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N O N E

02/08/85

TABLE 6
SUMMARY OF CLOSED RACKFIT ISSUES

CODE	PLANT NAME	ISSUE	DATE OF CLOSE-OUT	TYPE OF CLOSE-OUT	APPEAL DECISION POSITION UPHELD
SA-83-01	Dresden 2	Seal purge/vent valves closed	02/11/85	No Formal Appeal	N/A
SA-83-02	Palisades	MSIV single failure	09/24/84	Tech Resolution	N/A
OR-83-03	Rancho Seco	AFWS missiles	10/05/84	Tech Resolution	N/A
OR-83-04	Oconee 1/2/3	STA degree	01/20/84	Tech Resolution	N/A
OR-83-05	Hatch 1/2	Turbine bypass-high water trip TS	10/28/83	Referred to CRGR	N/A
L-83-06	Palo Verde	Source range n monitor	06/25/84	AD Appeal Resolution	Licensee
L-83-07	Nine Mi. Pt. 2	PMP	09/09/84	Tech Resolution	N/A
L-83-08	LaSalle 1/2	Water level-temp. monitor isolation	11/22/83	Tech Resolution	N/A

N/A - Not Applicable

07/08/85

CODE	PLANT NAME	ISSUE	DATE OF CLOSE-OUT	TYPE OF CLOSE-OUT	APPEAL DECISION POSITION UPHELD
L-83-09	Shoreham	ECCS flooding	04/30/84	Referred to R-I	N/A
L-83-10	Shoreham	MSIV leakage control	07/02/84	Tech Resolution	N/A
L-83-11	Shoreham	PASS	03/30/84	Tech Resolution	N/A
OR-83-12	Farley 1/2	Turb. oversd. prot. TS	01/27/84	DD Appeal Resolution	Compromise
L-84-01	LaSalle 1/2	GDC1 fire protection	06/14/84	AD Appeal Resolution	Staff
L-84-02	LaSalle 1/2	NFPA codes	03/28/84	AD Appeal Resolution	Licensee
L-84-03	LaSalle 1/2	Fire pumps-dampers surveillance	06/14/84	AD Appeal Resolution	Staff
L-84-04	LaSalle 1/2	Fire watch training	06/14/84	AD Appeal Resolution	Staff
OR-84-05	Davis Besse	AFWS TS	05/10/84	Tech Resolution	Staff
OR-84-06	Turkey Pt. 3/4	Vital area alarm/barriers	07/12/84	Tech Resolution	N/A

CODE	PLANT NAME	ISSUE	DATE OF CLOSE-OUT*	TYPE OF CLOSE-OUT	APPEAL DECISION POSITION UPHELD
OR-84-07	Turkey Pt. 3/4	Vital area f.d.	07/12/84	Tech Resolution	N/A
OR-84-08	Kewaunee	RETS	08/01/84	Tech Resolution	N/A
OR-84-09	Kewaunee	ESF filters TS	08/01/84	Tech Resolution	N/A
OR-84-18	Millstone 2	MSLB/SG tube rupture analysis	09/14/84	Tech Resolution	N/A
OR-84-19	Millstone 2	H ₂ purge vlv. closure	01/14/85	Tech Resolution	N/A
OR-84-20	Millstone 2	Overtime TS	11/09/84	Tech Resolution	N/A
L-84-21	Wolf Creek	SS outside contr. rm.	08/23/84	Tech Resolution	N/A
L-84-22	Callaway 1	SS outside contr. rm.	08/23/84	Tech Resolution	N/A
OR-84-23	Ft. Calhoun 1	AFWS pump/valve testing	02/04/85	No Formal Appeal	N/A

*Date of close-out for items with no formal appeal established shows when item was included in this table.

CODE	PLANT NAME	ISSUE	DATE OF CLOSE-OUT*	TYPE OF CLOSE-OUT	APPEAL DECISION POSITION UPHELD
OR-84-25	Maine Yankee	AFW pump start	02/12/85	AD Position Pending Tech. Staff Position	N/A
OR-84-26	Maine Yankee	AFW Pump LCO	02/12/85	AD Position Pending Tech. Staff Position	N/A
L-84-27	Nine Mi. Pt. 2	Air starting sys./EDG	02/04/85	No Formal Appeal	N/A
L-84-28	Watts Bar	Fire prot. cable room.	11/27/84	AD Appeal Resolution	Compromise
OR-84-29	Pilgrim 1	Auto close purge/vent valves on high rad.	02/11/85	No Formal Appeal	N/A
OR-84-30	Oconee 1/2/3	AFWS seismic qual.	02/04/85	No Formal Appeal	N/A
L-85-01	McGuire 1/2	Fire Prot. SS	02/11/85	No Formal Appeal	N/A
L-85-04	Beaver Valley 2	Snow and ice loads	02/11/85	No Formal Appeal	N/A
OR-85-05	TMI-1	Containment purging rept.	02/04/85	Appeal Cancelled	Staff
OR-85-02	Point Beach 1/2	Fire prot. switchgear	02/12/85	No Formal Appeal	N/A
L-84-15	Beaver Valley 2	Lighting/com. sys/IE	02/13/85	Item Withdrawn	N/A

SUMMARIES: ACTIVE APPEAL ISSUES

Code: L-84-10

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The applicant's design is a deviation from the SRP (Section C.7.c of RTP CMEB 9.5-1) which the applicant has not justified, as required by 10 CFR 50.34(g). Applicant believes its CO2 fire suppression system meets the intent of BTP-CMEB 9.5-1 and complies with 10 CFR 50 requirements.

Requirement Identified: 02/84 Draft SER

Responsible Technical Division AD: AD/MCET

Technical Review Branch: CHEB (J. Stang)

Backfit Identified: 05/20/84 Applicant

Milestones:

- 05/30/84 Applicant response
- 10/05/84 Meeting
- 11/06/84 Staff position
- 11/20/84 Applicant letter
- 09/26/84 AD meeting
- 01/10/85 Staff

Appeal Status: 02/22/85 DD Meeting

Code: L-84-11

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The applicant should demonstrate that the spent fuel cooling system is capable of maintaining water temperature at or below 140°F when the pool is completely filled with the normal amount of fuel discharged during refueling, assuming one cooling train has failed. The applicant maintains that this position goes beyond acceptance criteria contained in the SRP.

Requirement Identified: 05/14/84 Draft SER

Responsible Technical Division AD: CPS

Technical Review Branch: ASB (R. Anand)

Backfit Identified: 06/15/84 Applicant

Milestones:

06/15/84	Applicant appeal
10/05/84	Meeting
11/06/84	Staff position
11/20/84	Applicant letter
01/10/85	Staff letter

Appeal Status: 02/28/85 DD Meeting

Code: L-84-12

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The staff requires compressed air starting system designs for emergency diesel generators to include air dryers for removal of entrained moisture. Applicant believes this is a backfit item since initial air starting system design was approved during CP stage review.

Requirement Identified: 09/19/83 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 06/15/84 Applicant

Milestones: 06/15/84 Applicant response
10/05/84 Meeting
11/06/84 Staff position
11/20/84 Applicant letter
01/10/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-13

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The applicant's steam generator level control design does not meet IEEE-279 which is required since SG level function is included in FSAR (Ch. 15) analysis. Applicant states IEEE-279 not required since core protection is maintained even if all staff postulated failures occur.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/RS

Technical Review Branch: ICSB (F. Burrows)

Backfit Identified: 05/30/84 Applicant

Milestones:

- 05/30/84 Applicant response
- 06/08/84 Applicant position
- 10/05/84 Meeting
- 11/06/84 Staff position
- 11/20/84 Applicant letter
- 01/10/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-14

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The applicant should modify circuit design of certain motor-operated valves, such as those for cold-leg accumulator isolation, since a short or relay failure could constitute a nondetectable failure and thus violate the single failure criterion. The applicant maintains that the existing design complies with IEEE-279 in that the valves are administratively controlled and monitored to ensure no protective action is required.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 06/15/84

Milestones: 06/15/84 Applicant response
10/05/84 Meeting
11/06/84 Staff position
11/20/84 Applicant letter
01/10/85 Staff letter

Appeal Status: 02/28/85 DD Meeting

Code: L-R4-16

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LR#3

Issue:

The applicant should use the latest publications available, Hydrometeorological Reports 51 and 52, to determine probable maximum precipitation values and to evaluate site damage. The applicant maintains that such a change in evaluation criteria is beyond applicable SRP criteria.

Requirement Identified: 08/31/84 SER

Responsible Technical Division AD: AD/MCET

Technical Review Branch: EHEB, (R. Gonzales)

Backfit Identified: 05/30/84 Applicant

Milestones:

- 05/30/84 Applicant response
- 10/05/84 Meeting
- 11/06/84 Staff position
- 11/20/84 Applicant letter
- 09/26/84 AD meeting
- 01/10/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-17

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The applicant should provide a low level alarm for the rocker arm lube oil reservoir on the emergency diesel generators in accordance with SRP 9.5.7. The applicant maintains this is a new interpretation of the SRP since their design is a standard one of the engine manufacturer which was previously approved by the NRC.

Requirement Identified: 09/19/83 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 06/25/84 Applicant

Milestones:

- 06/25/84 Applicant Response
- 10/05/84 Meeting
- 11/06/84 Staff position
- 11/20/84 Applicant letter
- 01/10/85 Staff letter

Appeal Status: 02/28/85 DD Meeting

Code: OR-84-26

Plant: Maine Yankee

Project Manager/Branch: K. L. Heitner, ORR#3

Issue:

The staff has requested that the licensee install redundant level indicators and low level alarms on DWST. The licensee maintains that the current system is adequate, since DWST is dedicated to the AFW system.

Requirement Identified: 06/04/84 SER

Responsible Technical Division AD: CPS

Technical Review Branch: ASB (N. Wagner)

Backfit Identified: 09/28/84 Licensee

Milestones: 09/28/84 Licensee Appeal Letter
11/08/84 AD Meeting

Appeal Status: 02/28/85 AD Position

Code: L-84-31

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

Beaver Valley Power Station-2 has a diesel generator lube oil addition/fill procedure that is administratively controlled. The staff requires the applicant to have the procedure located or posted in the D/G room, citing SRP 9.5.7 (which is not directly related to posting of procedures) and IE Circular 80-05 (which recommends "...operating procedures or instructions should be available locally in the area of the affected equipment.") The applicant's position is that the staff requirement has no basis in regulation. The staff has neither demonstrated that locating procedures in the D/G room improves plant safety nor that posting increases the probability of using a current approved procedure. Furthermore, the applicant's administrative controls ensures the use of controlled copies of approved procedures.

Requirement Identified: 09/13/84

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 10/11/84 Applicant

Milestones: 10/11/84 Applicant appeal letter
11/06/84 Staff position
11/20/84 Applicant letter
01/10/85 Staff letter

Appeal Status: 02/28/85 DD Meeting

Code: L-84-32

Plant: Beaver Valley 2

Project Manager/Branch: R. K. Singh, LR#3

Issue:

A functionally operable lighting system is to be available during all plant operating, transient fire and accident conditions. The applicant maintains that the staff's requirement for lighting systems to be designed to withstand conditions such as those specified in GDC 4 is contrary to the SRP Section 9.5.3 and in excess of 10 CFR 50 Appendix A.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 11/08/84 Applicant

Milestones: 02/84 Staff SER
10/19/84 Applicant letter
10/24/84 Meeting
11/08/84 Applicant appeal letter
02/05/84 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-33

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The information submitted by the applicant is insufficient for the staff to conclude that functional operability of the onsite-offsite communication system, considering conditions associated with normal operation, an accident, fire, earthquakes, etc. will not result in total loss of communications (GDC 2 and 4). The applicant maintains that SRP 9.5.2 states "There are no general design criteria or regulatory guides that directly apply to the safety-related performance requirements for the design and use of the communication system during normal plant operations and transient conditions," and are in contradiction to the SRP, and therefore, a backfit.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 11/8/84 Applicant

Milestones:

- 02/84 Staff SER
- 10/19/84 Applicant letter
- 10/24/84 Meeting
- 11/08/84 Applicant appeal letter
- 02/05/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-34

Plant: Reaver Valley ?

Project Manager/Branch: B. K. Singh, LB#3

Issue:

Beaver Valley Power Station-2 has communication systems shared with Beaver Valley Power Station-1. From the information submitted, the staff cannot determine if the communication systems are designed to meet the requirements of GDC-5. The licensee's position is that SRP 9.5.2 states: "There are no general design criteria or regulatory guides that directly apply to the safety-related performance requirements for the design and use of the communication system during normal plant operations and transient conditions." The applicant says since PSB requires communications systems meet GDC-5, in contradiction to the SRP and in excess of 10 CFR 50, Appendix A, this is a new interpretation of the SRP.

Requirement Identified:

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 11/08/84 Applicant

Milestones: 02/84 SER
10/15/84 Applicant letter
10/24/84 Meeting
11/08/84 Applicant appeal letter
02/05/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-35

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

Beaver Valley Power Station-2 calculated dose projections at the Exclusion Area Boundary (EAB) to be less than Part 100. The staff calculated values were higher. The staff states that the applicant did not meet the requirements of 10 CFR 100. The applicant's position is that the staff is requiring the applicant to use other methods (such as extending the EAB) to reduce x/q values so that lower dose projections can be achieved.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/RP

Technical Review Branch: AEB (E. Markee)

Backfit Identified: 11/08/84 Applicant

Milestones: 02/84 Staff SER
10/19/84 Applicant letter
10/24/84 Meeting
11/08/84 Applicant appeal letter
02/05/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-36

Plant: Reaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

The IES handbook guideline applies to adequate illumination for operation in safety-related areas and adequate illumination for access and egress routes to those areas. The applicant maintains that the staff's requirement to modify the Beaver Valley 2 design to assure plant illumination levels in excess of the IES lighting handbook guidelines is a new interpretation of the SRP Section 9.5.3.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfi* Identified: 11/08/84 Applicant

Milestones: 02/84 Staff SER
10/19/84 Applicant letter
10/24/84 Meeting
11/08/84 Applicant appeal letter
02/05/85 Staff letter

Appeal Status: 02/22/85 DD Meeting

Code: L-84-37

Plant: Beaver Valley 2

Project Manager/Branch: R. K. Singh, LB#3

Issue:

The diesel generator auxiliary support systems excluded from R.G. 1.26 (such as diesel fuel, starting air, lube oil, air intake and exhaust systems) and their components perform safety-related functions in support of onsite safety-related electric power systems functions stipulated in GDC 17. To assure that the diesel engine will perform its safety function, it is necessary that these support systems and their engine mounted components be designed to seismic Category I, and ASME Section III, Quality Group C requirements or equivalent. The engine mounted piping and components should be designed to assure diesel engine performance under any given design basis event (DBE). The applicant maintains that R.G. 1.26 states, "...systems not covered by this guide, such as...diesel engine and its generators and auxiliary support systems, should be designed, fabricated, erected and tested to quality standards commensurate with the safety function to be performed." In addition, Standard Review Plan Sections 9.5.4 through 9.5.8, which identify review procedures for the various diesel generator auxiliary systems, do not specify R.G. 1.26 as an acceptance criterion. The staff position is a new interpretation of the SRP and the regulatory guide.

Requirement Identified: 02/84 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 11/08/84 Applicant

Milestones: 02/84 Staff SER
10/19/84 Applicant letter
10/24/84 Meeting
11/08/84 Applicant appeal letter
02/05/85 Staff letter

Appeal Status: 02/28/85 DD Meeting

Code: OR-85-03

Plant: Farley 1/2

Project Manager/Branch: E. Reeves, ORR#1

Issue:

The staff believes the licensee's schedule of three refueling outages for installation of the reactor vessel level instrumentation is unacceptable.

Requirement Identified: 11/30/84 Staff letter and NUREG-0737 Sup. 1

Responsible Technical Division AD: AD/CPS

Technical Reviewer Branch: CPB (L. Lois)

Backfit Identified: 12/18/84 Licensee letter to NRR

Milestones: 01/22/85 AD Meeting held with APCo Senior Management

Appeal Status: 03/04/85 AD position to licensee

SUMMARIES: CLOSED/POTENTIAL APPEAL ISSUES

Code: SA-83-01

Plant: Dresden 2

Project Manager/Branch: R. Gilbert, ORB#5

Issue:

The staff's review of information submitted by the licensee led to the conclusion that purge and vent valves should be sealed closed in accordance with SRP 6.2.4.II.6.f during operating modes 1, 2, 3, and 4. The licensee maintains that it cannot operate with the large containment vent and purge valves sealed closed during operating modes except during refueling outages. The licensee must operate these valves for containment inerting, deinerting, and depressurizing.

Requirement Identified: 11/04/83 Staff letter

Responsible Technical Division AD: CSE

Technical Review Branch: EQB (R. Wright)

Backfit Identified: 12/83 Licensee verbal identification after its 12/21/83 letter.

Milestones:

- 11/04/83 Staff letter issuing requirement
- 12/21/83 Licensee letter
- 01/25/84 Licensee/staff meeting
- 03/02/84 Staff report on position
- 05/03/84 Licensee position sent
- 12/06/84 Staff transmitted position after review of licensee position

Resolution: 02/19/85 Meeting with licensee to discuss technical merits and to ascertain if staff decision will be appealed.

Code: SA-83-02

Plant: Palisades

Project Manager/Branch: T. Wambach, ORB#5

Issue:

Single failure of MSIV could lead to a two steam generator blowdown for break upstream of MSIV. Resolution requires putting in isolation valve in steam line cross connect, putting in second reverse flow check valve as redundant MSIV in each steam line, or replacing present MSIVs with type that isolates flow in both directions. Licensee believes this modification is not necessary and committed to submit a PRA justifying its position.

Requirement Identified: 1/82 SER

Responsible Technical Division AD: Tech

Technical Review Branch: RRAB

Backfit Identified: 08/15/83 Licensee

Milestones: 08/15/83 Licensee backfit identification
09/14/83 Staff SER
08/21/84 Licensee extension request for PRA
09/24/84 Staff response

Resolution: 09/24/83 Staff accepted licensee's proposed submittal of PRA to enable plant operation; PRA to be submitted by 2/30/85.

Code: OR-83-03

Plant: Rancho Seco

Project Manager/Branch: S. Miner, ORB#4

Issue:

The licensee was requested to ascertain if the potential existed in the AFWS for internally generated missiles to be the source of possible failure. The SRP requires that effects of internal missiles should be evaluated in conjunction with single active failures.

Requirement Identified: 09/26/83 Staff Letter

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 11/07/83 Licensee Appeal Letter

Milestones: 09/26/83 Staff letter issuing requirement
11/07/83 Licensee appeal letter
05/03/84 Licensee report
08/31/84 Staff evaluation
10/05/84 Staff position

Resolution: 10/05/84 Staff (ASB) proposed an approach for resolving the issue that the licensee accepted.

Code: OR-83-04

Plant: Oconee 1/2/3

Project Manager/Branch: H. Nicolaras, ORR#4

Issue:

The licensee is required to revise STA program to reflect all new hires into the program must have minimum qualifications (bachelor's degree or equivalent in scientific or engineering discipline). The licensee believes that commercial nuclear plant operations experience is equivalent to bachelor's degree.

Requirement Identified: 11/28/83 Staff Letter

Responsible Technical Division AD: DHFS

Technical Review Branch: LQB

Backfit Identified: 11/28/83 Staff advised licensee of right to appeal

Milestones: 11/28/83 Staff letter
01/20/84 Licensee commitment letter

Resolution: 01/20/84 Licensee committed to comply with NRC requirements.

Code: OR-83-05

Plant: Hatch 1/2

Project Manager/Branch: G. Rivenbark, ORB#4

Issue:

The licensee is required to change Technical Specification to ensure operability of high water level trip and turbine bypass systems.

Requirement Identified: 05/12/83 Staff Letter

Responsible Technical Division AD: RS

Technical Review Branch: RSB

Backfit Identified: 05/26/83 Licensee letter

Milestones: 05/12/83 Staff letter issuing requirement
05/26/83 Licensee letter
10/28/83 Staff letter to licensee advising that issue referred to CRGR

Resolution: 10/28/83 Issue to be resolved generically; DSI preparing CRGR package.

Code: L-83-06

Plant: Palo Verde

Project Manager/Branch: E. Licitra, LB#3

Issue:

Applicant should provide a source range neutron flux monitor in the remote shutdown panel for direct indication of reactivity to satisfy Appendix R requirements. Applicant disagrees with requirement, does not feel Appendix R applies to OLS.

Requirement Identified: 07/11/82 Staff Letter

Responsible Technical Division AD: CPS

Technical Review Branch: ASR

Backfit Identified: 05/17/83 Licensee Letter

Milestones:

- 07/11/82 Staff letter issuing requirement
- 05/17/83 Licensee letter
- 07/28/83 Staff position letter
- 11/23/83 Licensee response
- 02/14/84 Licensee appeal
- 05/31/84 Appeal meeting AD level
- 06/25/84 AD position

Resolution: 06/25/84 AD Position concurring with licensee's position.
Licensee commitment to send confirmatory PRA.

Code: L-83-07

Plant: Nine Mile Point 2

Project Manager/Branch: M. Haughey, LR#2

Issue:

The applicant should use Hydrometeorology Reports (HMR) 51 and 52 to establish probable maximum precipitation (PMP). The applicant maintains that their use of HMR 22 is sufficient to determine PMP.

Requirement Identified: 11/22/83 Staff Position

Responsible Technical Division AD: RP

Technical Review Branch: METR

Backfit Identified: 05/11/84 Applicant Letter

Milestones:

- 11/14/83 Staff plant review
- 11/22/83 Staff position discussed with applicant
- 02/03/84 Staff letter issuing requirement
- 05/11/84 Applicant letter identifying backfit and meeting request
- 05/15/84 Staff and applicant meeting with NWS and NOAA
- 05/15/84 Staff SER
- 07/19/84 Staff issued position
- 09/09/84 Applicant commitment letter

Resolution: 09/09/84 Applicant committed to use HMR 51 and 52 to determine PMP.

Code: L-83-08

Plant: LaSalle 1/2

Project Manager/Branch: A. Bournia, LB#2

Issue:

Licensee is required to electrically isolate water level and temperature monitoring instruments of the suppression pool at remote shutdown panel from control room.

Requirement Identified: 11/14/83 Region III Inspection

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 11/22/83 Staff/Licensee meeting

Milestones: 11/14/83 Region III inspection
11/22/83 Staff/Licensee meeting

Resolution: 11/22/83 Licensee committed to requirement during meeting with staff.

Code: OR-83-09

Plant: Shoreham

Project Manager/Branch: R. Caruso/LR#2

Issue:

The applicant is required to install additional sump pumps since extreme flooding will knock out all ECCS components because of containment design. The applicant does not want to install additional pumps.

Requirement Identified: 06/08/83 Region I Memo to DL

Responsible Technical Division AD: Tech

Technical Review Branch: RRAB

Backfit Identified: Was pending negotiations.

Milestones: 06/08/83 Region I identified issue
09/83 SSER 4 accepts licensee position
12/29/83 ASB memo
03/30/84 RRAB evaluation

Resolution: 03/30/84 RRAB evaluation recommends procedure modifications instead of hardware modifications. Issue referred to Region I for monitoring.

Code: L-83-10

Plant: Shoreham

Project Manager/Branch: R. Caruso, LR#2

Issue:

The applicant is required to pipe discharge in a collection system since MSIV leakage control system discharges directly into the secondary containment atmosphere. The applicant does not want to pump discharge back into the primary containment.

Requirement Identified: 06/08/83 Region I memo to DL

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: Was pending negotiations

Milestones: 06/08/83 Region I memo identified issue
07/02/84 Region I memo to D/DL

Resolution: 07/02/84 Region I memo to D/DL closed out requirement;
issue now part of Generic Issue C-8.

Code: L-83-11

Plant: Shoreham

Project Manager/Branch: R. Caruso, LB#2

Issue:

The applicant is required to provide procedure to differentiate between cladding failures and core melt including degree of each type of core damage.

Requirement Identified: 06/83 Staff Review

Responsible Technical Division AD: MCET

Technical Review Branch: CHEB

Backfit Identified: Issue determined by staff not to be a backfit upon reevaluation.

Milestones: 06/83 Staff review identified requirement
03/30/84 Applicant commitment

Resolution: 03/30/84 Applicant commitment to develop procedure;
license condition.

Code: OR-83-12

Plant: Farley 2

Project Manager/Branch: E. Reeves, ORB#1

Issue:

The licensee had requested deletion of all turbine surveillance requirements in the Technical Specifications. NRC agreed provided the licensee program for ensuring turbine overspeed reliability is included in Section 6 (Administrative Controls) of the Technical Specifications. The licensee disagreed with the NRC proposal.

Requirement Identified: 10/08/82 Licensee initiated issue.

Responsible Technical Division AD: CPS

Technical Review Branch: PSB

Backfit Identified:

Milestones:

- 10/08/82 Licensee initiated issue
- 12/30/82 Staff denied request
- 03/23/83 Appeal meeting AD level
- 04/29/83 AD position
- 05/31/83 Licensee appeal
- 08/16/83 Appeal meeting DD level
- 09/12/83 Staff forwarded meeting minutes
- 10/06/83 Licensee proposal for resolution
- 11/18/83 Staff proposal for resolution
- 11/28/83 Licensee transmitted further information
- 01/27/84 Staff letter transmitting amendment agreed upon by licensee

Resolution: 01/27/84 Amendments to licensee issued on Technical Specification change.

Code: L-84-01

Plant: LaSalle 11/2

Project Manager/Branch: A. Bournia, LB#2

Issue:

The licensee is required to apply GDC 1 to fire protection systems and equipment. The licensee does not believe that GDC 1 is applicable with SRP 9.5.1 supporting its position.

Requirement Identified: 11/30/83 Region III readiness review meeting

Responsible Technical Division AD: MCET

Technical Review Branch: CHER

Backfit Identified: 01/27/84 Licensee appeal letter

Milestones: 11/30/83 Region III readiness review meeting
01/27/84 Licensee appeal letter
03/28/84 Appeal meeting AD level
03/28/84 AD position
06/14/84 Licensee commitment letter

Resolution: 06/14/84 Licensee committed to abide by generic resolution of issue.

Code: L-84-02

Plant: LaSalle 1/2

Project Manager/Branch: A. Bournia, LB#2

Issue:

The licensee is required to comply with all aspects of NFPA codes. The licensee believes that compliance is only required in those cases where specific commitments have been made; otherwise engineering judgement can be used.

Requirement Identified: 11/30/83 Region III readiness review meeting

Responsible Technical Division AD: MCET

Technical Review Branch: CHER

Backfit Identified: 01/27/84 Licensee appeal letter

Milestones: 11/30/83 Region III readiness review meeting
01/27/84 Licensee appeal letter
03/28/84 Appeal meeting AD level
03/28/84 AD position
03/28/83 Licensee commitment/staff acceptance

Resolution: 03/28/84 Staff accepted licensee commitment to identify codes that are applicable to LaSalle.

Code: L-84-03

Plant: LaSalle 1/2

Project Manager/Branch: A. Bournia, LR#2

Issue:

The licensee is required to perform periodic surveillance tests on fire pumps and dampers. The licensee believes that this goes beyond acceptance criteria in NRC RWR Standard Technical Specifications.

Requirement Identified: 11/30/83 Region III readiness review meeting

Responsible Technical Division AD: MCET

Technical Review Branch: CHER

Backfit Identified: 01/27/84 Licensee appeal letter

Milestones: 11/30/83 Region III readiness review meeting
01/27/84 Licensee appeal letter
03/28/83 Appeal meeting AD level
03/28/84 AD position
06/14/84 Licensee commitment

Resolution: 06/14/84 Licensee committed to meet or exceed Standard Technical Specification requirements and to submit testing program by 08/22/84.

Cnde: L-84-04

Plant: LaSalle 1/2

Project Manager/Branch: A. Bournia, LB#2

Issue:

The licensee is required to comply with NFPA 51b training requirements for fire watches. The licensee does not believe this guidance document presents a formal requirement.

Requirement Identified: 11/30/83 Region III readiness review meeting

Responsible Technical Division AD: MCET

Technical Review Branch: CHEB

Backfit Identified: 01/27/84 Licensee appeal letter

Milestones: 11/30/83 Region III readiness review meeting
01/27/84 Licensee appeal letter
03/28/84 Appeal meeting AD level
03/28/84 AD position
06/14/84 Licensee commitment

Resolution: 06/14/84 Licensee committed to implement a "hands on training" by 12/31/84.

Code: OR-84-05

Plant: Davis Besse

Project Manager/Branch: A. DeAgazio, ORB#4

Issue:

The licensee is required to modify Technical Specifications to assure AFW system availability. Licensee maintains the Technical Specifications are unnecessary because station procedures address required actions and is relevant to perform AFW availability test after cold shutdown of 30 days or longer.

Requirement Identified: 08/03/82 Staff SER

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 01/12/83 Licensee appeal request

Milestones:

- 08/03/82 Staff SER
- 09/29/82 Telecon with licensee
- 10/19/82 Telecon with licensee
- 01/12/83 Appeal meeting scheduled 02/03/83
- 01/20/83 Appeal meeting cancelled
- 06/15/83 Licensee submitted Tech Spec application
- 08/29/83 Staff rejected submittal (SER)
- 02/21/84 SER issued to licensee
- 05/10/84 Licensee commitment letter

Resolution: 05/10/84 Licensee committed to submit required Technical Specifications.

Code: OR-84-06

Plant: Turkey Point 3/4

Project Manager/Branch: D. McDonald, ORB#1

Issue:

The licensee is required to provide prompt corrective action on upgrade of vital area alarm system and barriers. The licensee believes there is lack of basis for requiring prompt corrective action since no potential sabotage vulnerabilities exist in the Regulatory Effectiveness Review and Vital Area Validation Report.

Requirement Identified: 05/27/83 NMSS site review

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 08/12/83 Staff internally initiated concerns
(H. Clayton memo to C. Thomas)

Milestones: 05/27/83 NMSS site review
03/06/84 Staff issued evaluation to licensee
05/11/84 Licensee provided comments
07/12/84 Licensee compliance commitment

Resolution: 07/12/84 Licensee committed to comply with staff's position during quarterly meeting.

Code: OR-84-07

Plant: Turkey Point 3/4

Project Manager/Branch: D. McDonald, ORR#1

Issue:

The licensee is required to identify new vital areas. Licensee maintains the prior approved security plan is sufficient.

Requirement Identified: 05/27/83 NMSS site review

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 08/12/83 Staff internally initiated concerns
(H. Clayton memo to C. Thomas)

Milestones: 05/27/83 NMSS site review
03/06/84 Staff issued evaluation to licensee
05/11/84 Licensee provided comments
07/12/84 Licensee compliance commitment

Resolution: 07/12/84 Licensee committed to comply with staff's position during quarterly meeting.

Code: OR-84-08

Plant: Kewaunee

Project Manager/Branch: D. Neighbors, ORR#1

Issue:

The licensee is required to upgrade Radiological Environmental Technical Specifications to meet intent of Appendix I. The licensee contends its Technical Specifications are adequate.

Requirement Identified: 05/30/82 Staff review of Appendix I

Responsible Technical Division AD: RP

Technical Review Branch: METB

Backfit Identified: 05/22/84 Licensee meeting request

Milestones: 05/30/82 Staff review
04/20/84 Staff position issued
05/22/84 Licensee meeting request
08/01/84 Licensee commitment

Resolution: 08/01/84 Licensee committed to implement staff recommendations during meeting.

Code: OR-84-09

Plant: Kewaunee

Project Manager/Branch: D. Neighbors, ORB#1

Issue:

The licensee is required to upgrade Technical Specifications on ESF filters. The licensee maintains that existing Technical Specifications are adequate.

Requirement Identified: 05/30/82 Staff review of Appendix J

Responsible Technical Division AD: RP

Technical Review Branch: METB

Backfit Identified: 05/22/84 Licensee meeting request

Milestones: 05/30/82 Staff review
04/20/84 Staff position issued
05/22/84 Licensee meeting request
08/01/84 Licensee commitment

Resolution: 08/01/84 Licensee committed to implement staff recommendations during meeting.

Code: L-84-15

Plant: Reaver Valley 2

Project Manager/Branch: R. K. Singh, LR#3

Issue:

The applicant should modify design of lighting and communications systems to meet Class 1E power supply requirements. The applicant believes this position goes beyond SRP acceptance criteria which was used in its FSAR.

Requirement Identified: 09/19/83 SER

Responsible Technical Division AD: AD/CPS

Technical Review Branch: PSB (R. Giardina)

Backfit Identified: 06/25/84 Applicant

Milestones:

- 06/25/84 Applicant response
- 10/05/84 Meeting
- 11/06/84 Staff position
- 11/20/84 Applicant letter
- 01/10/85 Staff letter
- 01/29/85 Applicant letter

Appeal Status: 02/13/85 DD Meeting

Resolution: 02/13/85 Meeting cancelled by applicant on 02/12/85 because the staff and applicant succeeded in reaching a resolution; therefore, this item will be withdrawn by applicant.

Code: OR-84-18

Plant: Millstone 2

Project Manager/Branch: D. Osborne, ORB#3

Issue:

The licensee should perform an accident analysis on phenomena such as steam line breaks and steam generator tube ruptures with and without loss of offsite power as required by GDC-17. The licensee performed this analysis for a previous cycle.

Requirement Identified: 12/30/83 Staff SER

Responsible Technical Division AD: RS

Technical Review Branch: RSB

Backfit Identified: Was pending staff review of licensee analysis

Milestones: 12/30/83 Staff SER
02/84 RSB requested W analysis
09/14/84 Licensee response on GDC 17 compliance

Resolution: 09/14/84 Licensee submittal satisfied staff concerns.

Code: OR-84-19

Plant: Millstone 2

Project Manager/Branch: D. Osborne, ORB#3

Issue:

The licensee should ensure that hydrogen purge system valves receive a closure signal from a radiation monitor. The licensee maintains that there is no justification for closure on radiation.

Requirement Identified: 12/30/83 Staff SER

Responsible Technical Division AD: RS

Technical Review Branch: CSR

Rackfit Identified: 04/15/84 Licensee appeal letter

Milestones:

- 12/30/83 Staff SER
- 04/15/84 Licensee appeal letter
- 07/13/84 Licensee submitted analysis
- 10/19/84 Telecon with licensee
- 12/10/84 Staff position
- 01/14/85 Licensee revised analysis

Resolution: 01/14/85 Licensee revised analysis is acceptable to staff.

Code: OR-84-20

Plant: Millstone 2

Project Manager/Branch: D. Osborne, ORB#3

Issue:

The licensee should submit Technical Specifications on limiting overtime. The licensee believes that modifying Technical Specifications by referencing Administrative Procedures is adequate.

Requirement Identified: 11/28/83 Staff letter

Responsible Technical Division AD: DHFS

Technical Review Branch: LQR

Backfit Identified:

Milestones: 11/28/83 Staff issuance of requirement
05/02/84 Licensee submitted position
06/11/84 Staff requested Technical Specifications
07/02/84 Licensee submitted position
11/09/84 Licensee commitment

Resolution: 11/09/84 Licensee committed to modify Technical Specifications.

Code: L-84-21

Plant: Wolf Creek

Project Manager/Branch: P. O'Connor, LB#1

Issue:

The applicant should provide adequate isolation capability from the control room to acquire safe shutdown in the event of a control room fire. The applicant contends that the control room fire position of the audit team represented a significant change from the previously approved position on this matter for SNUPPS plants.

Requirement Identified: 07/30/84 Region IV fire protection audit

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 08/10/84 Licensee meeting with staff

Milestones: 07/30/84 Region IV fire protection audit
08/10/84 Meeting with licensee
08/23/84 Licensee commitment

Resolution: 08/23/84 Licensee committed to comply with staff position.

Code: L-84-22

Plant: Callaway 1

Project Manager/Branch: J. Holonich, LB#1

Issue:

The applicant should provide adequate isolation capability from the control room to acquire safe shutdown in the event of a control room fire. The applicant contends that the control room fire position of the audit team represented a significant change from the previously approved position on this matter for SNUPPS plants.

Requirement Identified: 07/30/84 Region IV fire protection audit

Responsible Technical Division AD: CPS

Technical Review Branch: ASR

Backfit Identified: 08/10/84 Licensee meeting with staff

Milestones: 07/30/84 Region IV fire protection audit
08/10/84 Meeting with licensee
08/23/84 Licensee commitment

Resolution: 08/23/84 Licensee committed to comply with staff position.

Code: OR-R4-23

Plant: Ft. Calhoun 1

Project Manager/Branch: E. Tourigny, ORR#3

Issue:

The current staff position is that auxiliary feedwater system (AFWS) pumps and associated valves should be tested on a monthly basis. The staff advised the licensee that their AFWS Technical Specifications should be changed requiring monthly testing instead of quarterly testing. The licensee stated quarterly testing provides adequate assurance that the AFWS will function as required for design basis accidents.

Requirement Identified: 06/15/84 Staff letter

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: 07/27/84 Licensee submitted position

Milestones: 06/15/84 Staff letter
07/27/84 Licensee position
10/26/84 Staff meeting request

Resolution: 02/04/85 No formal appeal set; issue not considered open item

Code: OR-84-24

Plant: Maine Yankee

Project Manager/Branch: K. L. Heitner, ORR#3

Issue:

The staff has requested that turbine-driven AFW pump be automatically started. The licensee believes the current manual start capability is adequate.

Requirement Identified: 06/04/84 SER

Responsible Technical Division AD: CPS

Technical Review Branch: ASB (N. Wagner)

Backfit Identified: 09/28/84 Licensee

Milestones: 09/28/84 Licensee appeal letter
11/08/84 AD appeals meeting - new information provided at meeting
03/04/85 Request for Additional Information to be forwarded to licensee

Resolution: AD position pending development of technical staff position.

Code: OR-84-25

Plant: Maine Yankee

Project Manager/Branch: K. L. Heitner, ORR#3

Issue:

The staff has requested an LCO on the turbine-driven AFW pump not to exceed 7 days. The licensee maintains no LCO is needed. Current LCO's on motor-driven pumps are adequate.

Requirement Identified: 06/04/84 SER

Responsible Technical Division AD: CPS

Technical Review Branch: ASB (N. Wagner)

Backfit Identified: 09/28/84 Licensee

Milestones:

- 09/28/84 Licensee appeal letter
- 11/08/84 AD appeals meeting - new information provided at meeting
- 03/04/85 Request for additional information to be forwarded to licensee

Resolution: AD position pending development of technical staff position.

Code: L-R4-27

Plant: Nine Mile Point 2

Project Manager/Branch: M. Haughey, LR#2

Issue:

The applicant should ensure that each diesel generator air starting system uses air dryers.

Requirement Identified: 10/17/84 Staff letter

Responsible Technical Division AD: CPS

Technical Review Branch: PSB

Backfit Identified: 10/23/84 Licensee meeting with staff

Milestones:

- 10/17/84 Staff letter issuing requirement
- 10/23/84 Licensee position stated in meeting
- 11/15/84 Staff letter advising of appeal option
- 11/19/84 Licensee position letter
- 01/18/85 Staff position letter

Resolution: 02/04/85 No formal appeal cited; issue no longer tracked as backfit.

Code: L-84-28

Plant: Watts Bar

Project Manager/Branch: T. J. Kenyon, LBi*

Issue:

The staff wants TVA to implement a stricter criterion on the Watts Bar sprinkler system throughout the plant to resolve the issue of intervening combustibles and ensure an adequate sprinkler system. TVA wants to limit implementation of the stricter criteria on the sprinkler system to a 20 ft. zone between redundant divisions.

Requirement Identified: 07/20/84 SER

Responsible Technical Division AD: MCET

Technical Review Branch: CHEB (D. Kubicki)

Backfit Identified: 10/15/84 Applicant

Milestones: 08/29/84 AD meeting
10/15/84 Applicant appeal
11/14/84 AD meeting
11/27/84 AD position issued

Resolution: 11/27/84 Applicant committed to install enhanced sprinkler system to a 30 ft. zone between redundant divisions.
02/19/85 Fire protection audit will be performed ensuring compliance with commitment.

Code: OR-84-29

Plant: Pilgrim 1

Project Manager/Branch:

Issue:

Automatic closure of all purge/vent valves on high radiation per staff's updated SE was sent to the licensee on September 26, 1984. The licensee's position is that lines less than 3 inches in diameter were excluded from this requirement by the staff's October 1981 position; thus, imposing this requirement on lines less than 3 inches in diameter is a new requirement.

Requirement Identified: 09/26/84 Staff position

Responsible Technical Division AD: AD/RS

Technical Review Branch: CSB

Backfit Identified: 11/30/84 BWROG letter

Milestones: 09/26/84 Staff position issued
11/13/84 Licensee response
11/30/84 BWROG appeal
01/18/85 AD letter to BWROG

Resolution: This will not be considered an active backfitting issue since the licensee has not appealed as of 02/11/85.

Code: OR-84-30

Plant: Oconee 1/2/3

Project Manager/Branch: H. Nicolaras, ORB#4

Issue:

The licensee should perform further analyses and possible modifications to provide adequate AFW capacity following a SSE.

Requirement Identified: 12/26/84 ASB final report

Responsible Technical Division AD: CPS

Technical Review Branch: ASB

Backfit Identified: Pending licensee response by 2/25/85

Milestones: 10/21/80 Licensee response to generic letter
02/10/81 Licensee response to generic letter
12/26/84 Staff letter advising of appeal option

Resolution: This will not be considered an active backfitting issue since the licensee has not appealed as of 02/08/85.

Code: L-85-01

Plant: McGuire 1/2

Project Manager/Branch: Darl Hood, LB#4

Issue:

Interpretation by NRC technical reviews of the definition of "area, room or zone" as used in 10 CFR 50, Appendix R, Section III.G.3 for fire suppression requirements at a plant with alternate or dedicated shutdown capability would require fire suppression systems for several additional portions of the McGuire plant. The NRC staff has previously accepted McGuire and its safe shutdown facility as responsive to Appendix R, Section III.G. (see SSER #6, Section 9.5.1); the technical staff's oral statement that McGuire needs a formal exemption is a new interpretation and unjustified.

Requirement Identified: 09/28/84 Inspection

Responsible Technical Division AD: MCET

Technical Review Branch: CHEB

Backfit Identified: 09/04/84 Licensee

Milestones: 09/04/84 Licensee Appeal

Resolution: As of 02/11/85, this will not be considered an active backfitting issue since formal staff position will be based on the pending Region II inspection report.

Code: OR-85-02

Plant: Point Beach 1/2

Project Manager/Branch: T. G. Colburn, ORB#3

Issue:

Appendix R exemption from III.G.2 20 feet separation requirements for switchgear room. Staff feels licensee's proposed modifications do not provide adequate protection. The staff wants alternative shutdown completely independent of room. The licensee feels modifications proposed will provide adequate protection for switchgear room in the event of a fire. The licensee feels they very nearly meet the rule and that additional modifications necessary to meet the rule would not provide any additional level of protection.

Requirement Identified: 12/82

Responsible Technical Division AD: AD/MCET

Technical Review Branch: CMEB

Backfit Identified: 12/82 Staff

Milestones: 02/25/83 Licensee appeal
03/22/83 Meeting
12/12/84 Meeting
01/18/85 AD meeting
03/15/85 Technical position

Resolution: Pending licensee appeal request after technical position issued.

Code: L-85-04

Plant: Beaver Valley 2

Project Manager/Branch: B. K. Singh, LB#3

Issue:

DSER identified a staff position that the Category 1 structures at RVPS-2 must be designed to accommodate snow loads of 100 psf in accordance with ANSI 58.1-1982. Applicant indicated that the plant design roof load was consistent with R.G. 1.70 and SRP Section 2.3.1 and the methods endorsed by these documents (includes ANSI 58.1-1972) were used to determine the 100 yr. return snow loads.

Requirement Identified: 03/01/84 DSER

Responsible Technical Division AD: RP

Technical Review Branch: METB (E. Markee)

Backfit Identified: 01/16/85 Applicant letter

Milestones: 03/01/84 Staff SER
01/16/85 Applicant letter
01/28/85 AD letter requesting appeal date

Resolution: This will not be considered an active backfitting issue since the applicant has not responded as of 02/11/85 with its appeal intentions.

Code: OR-85-05

Plant: TMI-1

Project Manager/Branch: O. Thompson, ORB#4

Issue:

The staff requires a report that provides the number of hours of purging during the next cycle of operation, an analysis of the benefits of purging, and a description of actions taken to minimize entries into containment. The licensee maintains that the proposed Technical Specifications commitments to limit purging and the other proposed Technical Specifications restrictions associated with staff's explicit purging requirements in MPA B-24, (e.g., primary coolant activity limits, purge valve closure times, valve seat inspections and replacements, etc.) adequately limit potential offsite doses and therefore assessment of actual purging is unnecessary for safety and would be an excessive burden on the licensee.

Requirement Identified: 12/05/84 Staff letter

Responsible Technical Division AD: RS

Technical Review Branch: CSB

Backfit Identified: 01/11/85 Licensee appeal letter

Milestones: 12/05/84 Staff letter issuing requirement
01/11/85 Licensee appeal letter
01/28/85 CSB statement of staff position
02/05/85 AD appeal meeting scheduled
02/04/85 Licensee cancelled appeal meeting

Resolution: 02/04/85 Licensee committed to develop report as requested by NRC staff.