

STN 50-470F

February 22, 1985
LD-85-007

Mr. Hugh L. Thompson, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Review of Information on the CESSAR Docket

Dear Mr. Thompson:

On December 21, 1983, the NRC issued a Final Design Approval (FDA) on CESSAR, leaving four confirmatory issues and two other issues. The FDA references Supplement 2 of the CESSAR Safety Evaluation Report (NUREG-0852) which, in turn, acknowledges submittals by C-E on the CESSAR docket through June 29, 1983. Subsequent to that date, C-E continued to submit correspondence addressing the above issues as well as other commitments made in CESSAR. A listing of submittals is provided in Enclosure 1.

In addition, C-E submitted changes on the CESSAR docket that resulted from "lessons learned" during the startup of the first System 80 unit at Palo Verde. These changes were made as "improvements" to the design which would benefit all of the System 80 units. Finally, in early December 1984, C-E submitted a number of CESSAR changes resulting from a technical specification review as well as the startup results at Palo Verde. A listing of submittals is provided in Enclosure 2.

We were advised in late December that the Staff had determined that review of all CESSAR information could not be completed in time to support the Palo Verde Operating License. The Staff thus required that the applicable CESSAR submittals be resubmitted on the Palo Verde docket. The majority of the CESSAR information was thereby submitted, reviewed and approved on the Palo Verde docket.

At the same time, it was understood that the CESSAR submittals would be reviewed on the CESSAR docket immediately after their review on the Palo Verde docket, and by the same reviewers wherever possible. In a follow-up meeting with the Staff on January 15, 1985, the Staff requested that C-E provide a letter that lists all C-E submittals (for which C-E has not received an SER) after June 29, 1983 and that C-E should indicate its intent to file a formal request for an amendment to the CESSAR FDA. Such a listing is hereby provided in Enclosures 1 and 2. Considering that there may still be additional input from the Palo Verde 1 startup and that Palo Verde 2 is scheduled for completion

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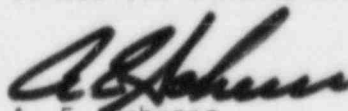
in late 1985, C-E currently plans to formally request an amendment to the CESSAR FDA around mid-1985. We would expect that amendment to close out all issues from the original FDA and the issues resulting from C-E's experience during Palo Verde's startup.

In addition, we would like to resolve the subject of future submittals on the CESSAR docket. We would hope that, in the future, the NRC will not find it necessary to review CESSAR submittals on the Palo Verde docket. The circumstances just prior to issuance of the Palo Verde 1 Operating Licensing were unique and are not expected to recur. Without a commitment on the part of C-E and the NRC Staff, there will be little or no incentive for Palo Verde to continue its commitment to standardization and CESSAR. We therefore request concurrence from the Staff that future timely C-E submittals will be reviewed and approved in a timely manner on the CESSAR docket to meet the schedular needs of the Palo Verde docket. We believe that this would be in everyone's best interest.

If we can be of any additional assistance in this matter, please feel free to call me or Mr. G. A. Davis of my staff at (203) 285-5207.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer
Director
Nuclear Licensing

AES:las
Enclosures
cc: P. Moriette (NRC)

SUBMITTALS TO CLOSE OUT FDA

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 Enclosure 1
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Correspondence submitted to address confirmatory or other issues, or to fulfill the commitments made on the CESSAR docket:

<u>Letter No.</u>	<u>Date</u>	<u>Subject</u>
1. LD-83-073	August 11, 1983	CESSAR-F Revised Pressurizer Relief Valve Blowdown Analysis
2. LD-83-074	August 12, 1983	Natural Circulation Cooldown Re-Analysis for CESSAR-F
3. LD-84-008	February 16, 1984	Comprehensive Vibration Assessment Program
4. LD-83-082	August 31, 1983	CESSAR-SER Item 7, Second Response (Confirmatory)
5. LD-83-087	September 20, 1983	CESSAR-F Standard Technical Specifications
6. LD-84-012	March 16, 1984	CESSAR-F Amendment Number 9

Topics as follows:*

- (a) CESSAR-F Revised Pressurizer Relief Valve Blowdown Analysis, LD-83-073 (also listed above)
- (b) Addition of a Reactivity vs % CEA Insertion Curve which was inadvertently deleted by previous amendment.
- (c) CESSAR-F Standard Technical Specifications, LD-83-087 (also listed above)
- (d) CESSAR-SER Item 7, Second Response (Confirmatory), LD-83-082 (also listed above)
- (e) CESSAR Appendix B changes to provide ICCI evaluation

* Other topics from this submittal are listed in Enclosure 2.

results and indicate C-E Owners Group reponses which were required in the SER and its supplements.

- (f) Correction of Chapter 4 editorial errors in Sections 4.2.3.2.3 and 4.2.3.4.
- (g) Correction of Chapter 5 editorial errors in Section 5.4.2.4.1.
- (h) Correction of Chapter 17; name of CENPD-210A.

7. LD-84-013	March 22, 1984	Safety Grade Reactor Coolant Gas Vent System
8. LD-84-049	September 7, 1984	SCS Relief Valve Operability
9. LD-84-051	September 18, 1984	CESSAR Confirmatory Issues 1 and 2
10. LD-84-055	September 28, 1984	Confirmatory Issue 4
11. LD-84-061	October 22, 1984	CESSAR Consistency Review Changes
12. LD-84-069	December 5, 1984	CESSAR Consistency Review Changes
13. LD-84-070	December 5, 1984	CESSAR Amendment 10

Topics as follows:*

- (a) Revision of Chapter 7 to indicate completion of cable separation analysis in the Plant Protective System.
- (b) Correction of Chapter 14 editorial error.

12. LD-84-074	December 13, 1984	Shutdown Cooling System Relief Valve Operability
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* Other topics from this submittal are listed in Enclosure 2.

SUBMITTALS TO INCORPORATE "LESSONS LEARNED"

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Enclosure 2
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Correspondence submitted to provide improvements for the System 80™ plants:

<u>Letter No.</u>	<u>Date</u>	<u>Subject</u>
1. LD-84-012	March 16, 1984	CESSAR-F Amendment Number 9 Topics as follows:* (a) Revision of Chapter 6 for maximum post-LOCA pressurizer pressure uncertainty and correction of the range of the narrow range pressurizer pressure. (b) Revision of Chapter 14 to clarify requirements for the following tests: Natural Circulation Test Main and Emergency Feedwater System Test Unit Load Transient Test Turbine Trip Test
2. LD-84-060	October 16, 1984	CESSAR Startup Testing
3. LD-84-070	December 5, 1984	CESSAR Amendment 10 Topics as follows:* (a) Revision of Chapter 5 and Chapter 16 to reduce maximum ΔT across the steam generators. (b) Revision of Chapter 5 to credit height difference between the pressurizer and

* Other topics from this submittal are listed in Enclosure 1.

the shutdown cooling system and indicate that pressurization rate testing is not performed during Hot Functional Testing. One editorial correction was also made.

- (c) Chapter 6 changes.
- (d) Revision of Appendix 6B to remove unwarranted restrictions on the transfer of hydrazine.
- (e) Revision of Chapter 9 and Chapter 10 to reflect updated guidance on chemistry limits.
- (f) Revision of Appendix A Regulatory Guide 1.682 Rev. 1 position.