

4/27/84

Note to: John Hopkins

From: J. R. Gray

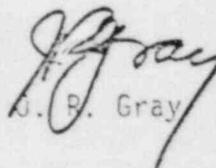
SUBJECT: PROPOSED NSHC FINDING FOR SUMMER AMENDMENT DELETING REQUIREMENT FOR REMOTE RHRS VALVE LOCKOUT CAPABILITY

OELD has been asked to concur in a proposed notice and NSHC finding for a Summer amendment which would delete a requirement for installation in the control room of the capability to remotely lock out RHRS valves. Apparently, as an alternative to remote control capability, licensee will keep the valves locked out administratively and, when there is a need to open them, send an operator from the control room to the valve motor control centers. That operation will take 10 minutes.

You propose to find that this license amendment involves NSHC on the ground that it falls within the Commission's example of a NSHC action where the action may reduce a safety margin but the results of the change are within all acceptable criteria specified in the SRP. I just don't see how that example applies. What are the criteria in the SRP which are applicable here? What does the SRP say about replacing remote operation of safety equipment from the control room with an operator who is sent out into the plant to operate that equipment? As I see it, you must either demonstrate fairly explicitly how this particular example of a NSHC action applies (including what SRP criteria are applicable and are met) to this specific license amendment or provide some other basis (e.g. apply the criteria for NSHC in 10 CFR § 50.92) for NSHC.

It is not clear to me what the present license condition requires. If it requires only the capability to lock out the valves from the control room rather than the capability to both open and close the valves, then under such requirement, it would be necessary to send an operator out into the plant to unlock the valves in any event. The Licensee's new proposal, to administratively lock out the valves and send an operator out to unlock them, would be equivalent. If that were the case, you should easily be able to apply the 10 CFR 50.92 criteria to find NSHC. I doubt that that is the case however. In any event, you need to provide a better basis for the NSHC finding either by showing how that Commission example applies or by applying the 50.92 criteria.

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