



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

MAR 13 1986

NOTE TO: Edward L. Jordan, Director  
Division of Emergency Preparedness &  
Engineering Response  
Office of Inspection and Enforcement

FROM: C. J. Heltemes, Jr., Director  
Office for Analyses and Evaluation  
of Operational Data

RE: Proposed Memorandum to the EDO entitled "Challenges to PWR Plant  
Protection Systems Caused by Transients in Feedwater Systems"

AEOD has reviewed the subject memo (attached) and we have several comments for your consideration:

- (1) We note that the NRC's policy regarding regulatory involvement in BOP systems is under development. It would seem appropriate to develop this policy prior to initiating action to reduce the general frequency of feedwater system transients.
- (2) The fact that feedwater transients result in frequent reactor transients is not a new issue. The IE tabulation validates the results of previous studies, such as AEOD/P501, Feedwater Transient Incidents in Westinghouse PWRs. The results seem essentially identical (AEOD average number of feedwater transients was 0.54 per 1000 critical hours while IE found the average was 0.55). AEOD/P501 was widely distributed within the NRC and provided to INPO and NSAC.
- (3) The proposed IN would have an updated listing of specific plant performance data for feedwater transients. We understand that such rankings are of concern to the EDO because they send a message to the licensee (i.e., you better take action so you are not one of the "worst offenders") and the agency must be selective about the nature and number of such messages.
- (4) The IE study seems to duplicate a previous AEOD Trend and Pattern study (AEOD/P501). Rather than having multiple offices perform Trend and Pattern studies, it would seem more efficient in these times of limited resources to request that AEOD modify or update its existing studies which are part of its established program.

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Edward L. Jordan

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Please let me know if we can provide any additional information or assistance.

Original signed by  
C. J. Heltemes, Jr.

C. J. Heltemes, Jr. Director  
Office for Analysis and Evaluation  
of Operational Data

Enclosure:  
As stated

cc w/enclosure:  
J. Taylor  
J. Roe

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