



Commonwealth Edison
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 Address Reply to: Post Office Box 767
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OG-178

March 18, 1986

Ref: OG-168, dated
 December 6, 1985

Mr. Tom Novak
 Director (Acting) Licensing PWR-A
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Phillips Building
 Washington, D.C. 20555

Dear Mr. Novak:

Westinghouse Owners Group
Final Report on WOG Davis-Besse Evaluation Program

In December 1985, the referenced letter informed the NRC staff that the WOG had undertaken a program to evaluate the NUREG-1154 findings and assess their relevance to WOG plants. In order to accomplish this task the WOG established the Davis-Besse working group whose primary purpose was to develop and document the WOG position on each of the potential generic issues stemming from the Davis-Besse event. The WOG Davis-Besse Program is now complete, and the report documenting the WOG position on the Davis-Besse event is enclosed.

It was the general conclusion of the WOG that the fundamental design differences between Davis-Besse and WOG plants have two important impacts.

1. These fundamental design differences preclude the specific Davis-Besse sequence of events from occurring at a WOG plant.
2. These design differences, prove beneficial to the ability of a Westinghouse NSSS plant to respond to a loss-of-feedwater transient, and thus lessen the safety significance of the Davis-Besse type issues when applied to Westinghouse designs.

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The design differences are described in more detail in the attached report, but generally fall into four areas:

- Steam Generator Design
- Secondary Side Reactor Trip
- Auxiliary Feedwater System Diversity
- "Smart" Control Systems

The WOG recognized that the nature of the human errors and the type of equipment failures which occurred during the Davis-Besse event could occur at a WOG plant. Therefore, the primary focus of the WOG Davis-Besse Program was the evaluation of the following eleven potential issues (described in the enclosed report) stemming from the Davis-Besse event.

1. Plant Security Features
2. Adequacy of Emergency Procedures
3. Reliability of Motor Operated Valves
4. Safety System Testing
5. Acceptability of Current Safety Assessment Methods
6. Adequacy of Emergency Notifications
7. Availability of the Shift Technical Advisor
8. Resolution of Equipment Deficiencies
9. Reliability of AFW Pump Turbines
10. Adequacy of Control Room Instrumentation
11. Reliability of Pilot-Operated Relief Valves

In the course of reviewing the Davis-Besse potential issues, the WOG identified (three) issues which may warrant further consideration. For the following issues, the WOG is identifying what portions of these issues the WOG can address on a generic basis.

- Reliability of AFW Pump Turbines
- Adequacy of Safety System Testing
- Reliability of Motor-Operated Valves

The "Reliability of Motor-Operated Valves" issue has already resulted in an additional WOG program to develop a methodology to address action (a) of Bulletin 85-03 "Motor-Operated Valve Common Mode Failures During Plant Transients Due to Improper Switch Settings".

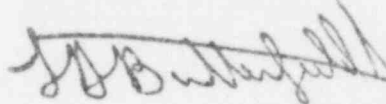
If the WOG identifies portions of the remaining two issues currently under consideration, which can be addressed on a generic basis, then potential programs will be developed to address these issues. The WOG will keep the NRC abreast of the status of these issues.

March 13, 1986

The WOG does not consider it necessary to pursue any additional generic action on the remaining eight issues.

This report completes the WOG Davis-Besse Evaluation Program. If you have questions, or wish to discuss in further detail any aspects of the program or the position, please contact me. Thank you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "L.D. Butterfield".

L.D. Butterfield, Chairman
Westinghouse Owners Group

LDB:dac

attachment

cc: WOG Representatives
Davis-Besse Working Group