



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

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MEMORANDUM FOR: Themis P. Speis, Director  
Division of Safety Review and Oversight

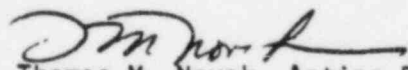
FROM: Thomas M. Novak, Acting Director  
Division of PWR Licensing-A

SUBJECT: COMMENTS ON PROPOSED REVISION TO THE ECCS RULE

Reference: Memorandum, Themis Speis to Directors, "Proposed  
Revision to the ECCS Rule (10 CFR 50.46 and Appendix K  
to Part 50)", dated December 24, 1985.

We have reviewed the subject material in response to your request and have only two comments to add to previously provided comments (Bernero to Speis, dated August 29, 1985):

- (1) The rule change is justified by RES on the basis of development of data since the original rule was written, which permits a reduction of built-in analytical conservatism. A consequence is relaxation of unnecessary plant restrictions. We suggest the inclusion of an objective discussion which addresses both the up-side and down-side effects on public health and safety. Use of a BE analysis tool clearly provides more realistic analyses and understanding of plant response. This knowledge can potentially be applied to "fine tune" design of equipment such as safety injection systems to meet the rule requirements pertinent to design basis accidents (Ch. 15 analyses). However, for balance, consideration should be given to the possible consequences on events which are beyond the design basis, such as events involving multiple equipment failures.
- (2) The old rule, with its discussion of phenomena to be treated and the inclusion of correlations considered acceptable, concentrated on large LOCA. The new rule, and the backup information we have reviewed, has a similar concentration on large LOCA. We should remember the rule is applicable to all LOCA, and the rule and backup information (ie: correlation in Regulatory Guide) should reflect this situation.

  
Thomas M. Novak, Acting Director  
Division of PWR Licensing-A

cc: See Next Page

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