ADVISORY COMMITTEE ON REACTOR SAFEGUARDS UNITED STATES ATOMIC ENERGY COMMISSION WASHINGTON, D.C. 20545

April 6, 1971

H. L. Price, Director of Regulation

POSSIBLE BACKFIT-POSITION ON INSTRUMENT LINES IN BWRs

The ACRS has suggested the following position with respect to BWR instrument lines as the basis for discussion with the Regulatory Staff.

A suggested, draft backfit-position is the following:

- a. For Duane Arnold, where the subject was first identified, and all BWRs whose ACRS construction letters came afterwards, the conditions of the safety guide should apply.
- b. For other BWRs with CP's prior to Duane Arnold but not yet reviewed for operation and where installation of instrument lines has not occurred, or where access within the drywell to all lines is straightforward, orifices should be installed in each line within the drywell.
- c. For BWRs which are in operation, or whose construction is too far along to comply with b., studies be made by the applicant as to which lines are reasonably accessible within the drywell, which lines might be classed as vulnerable or invulnerable outside the drywell, and what other considerations apply, and a case-by-case judgment made as to which lines, if any, should be orificed during an upcoming refueling outage.

If you will inform me of a date by which the Staff will be prepared to discuss this matter, I will schedule an appropriate Subcommittee meeting or a session with the full Committee.

Original Signed by R. F. Fraley

R. F. Fraley Executive Secretary