D851210

MEMORANDUM FOR: William J. Dircks
Executive Director for Operations

FROM: R. F. Fraley
Executive Director, ACRS

SUBJECT: THIRD SET OF ACRS COMMENTS ON THE PRIORITIZATION OF THE REMAINING GENERIC ISSUES

During its 308th meeting, December 5-7, 1985, the ACRS reviewed the adequacy of the proposed priority rankings for a group of generic issues identified in the attached Table 1, and its comments are contained in the following attachments.

- Attachment 1 lists those items for which the ACRS agrees with the priority rankings proposed by the NRC Staff.
- Attachment 2 includes a list of items for which the ACRS agrees with the priority rankings proposed by the NRC Staff, but has comments.
- Attachment 3 contains a list of items for which the ACRS disagrees with the NRC Staff's proposed priority rankings along with the reasons therefor.

Comments on Generic Issue 103, "Design of Probable Maximum Precipitation," have been deferred pending additional review by the ACRS.

It is requested that the NRC Staff provide written responses to the ACRS comments identified in Attachments 2 and 3.

The ACRS will continue its review of the adequacy of the proposed priority rankings for the remaining generic issues when they become available.

Attachments: As Stated

TABLE 1

THIRD GROUP OF NEW GENERIC ISSUES
REVIEWED BY THE ACRS DURING THE
308TH, DECEMBER 5-7, 1985, MEETING

GENERIC ISSUE NUMBER	TITLE	PRIORITY RANKINGS PROPOSED BY THE STAFF
30	Potential Generator Missiles - Generator Rotor Retaining Rings	DROP
37	Steam Generator Overfill and Combined Primary and Secondary Blowdown	No need for separate resolution because the principal concerns of this issue are covered in USI A-47, "Safety Implications of Control Systems," and Generic Issue I.C.1, "Short-Term Accident Analysis and Procedures Revision".
54	Survey of Valve Operator Related Events During 1978, 1979 and 1980	No need for separate resolution because the principal concerns of this issue are covered in the Generic Issue II.E.6.1, "In situ Testing of Valves".
55	Failure of Class IE Safety-Related Switchgear Circuit Breakers to Close on Demand	DROP
67	Steam Generator Staff Actions:	--
67.2.1	Integrity of Steam Generator Tube Sleeves	REGULATORY IMPACT ISSUE
67.3.1	Steam Generator Overfill	Covered in USI A-47, "Safety Implications of Control Systems," and Generic Issue I.C.1, "Short-Term Accident Analysis and Procedures Revision".
67.3.2	Pressurized Thermal Shock	Covered in USI A-49, "Pressurized Thermal Shock Program"
67.3.3	Improved Accident Monitoring	RESOLVED (Being Implemented)
67.3.4	Reactor Vessel Inventory Measurement	Covered in Generic Issue II.F.2, "Instrumentation for Detection of Inadequate Core Cooling" (Being Implemented)
67.4.1	Reactor Coolant Pump Trip	Covered in Generic Issue II.K.3.5, "Automatic Trip of Reactor Coolant Pumps" (Being

		Implemented)
67.4.2	Control Room Design	Covered in Generic Issue I.D.1, "Control Room Design Reviews" (Being Implemented)
67.4.3	Emergency Operating Procedures	Covered in Generic Issue I.C.1, "Short-Term Accident Analysis and Procedures Revision"(Being Implemented)
67.5.1	Reassess Radiological Consequences	LICENSING ISSUE
67.5.2	Evaluation of Steam Generator Tube Rupture Design Basis	LICENSING ISSUE
67.5.3	Secondary System Isolation	DROP
67.6	Organizational Responses	Covered in Generic Issue III.A.3, "Improving NRC Emergency Preparedness"
67.7	Eddy Current Tests	MEDIUM
67.8	Denting Criteria	REGULATORY IMPACT ISSUE
67.9	Reactor Coolant System Pressure Control	Covered in USI A-45, "Shutdown Decay Heat Removal Requirements," and Generic Issue I.C.1
67.10	Supplemental Tube Inspections	LICENSING ISSUE
85	Reliability of Vacuum Breakers Connected to Steam Discharge Lines Inside BWR Containments	DROP
87	Failure of HPCI Steam Line Without Isolation	HIGH
91	Main Crankshaft Failures in Transamerica Delaval Emergency Diesel Generator	RESOLUTION HAS BEEN IDENTIFIED
94	Additional Low-Temperature-Over-Pressure Protection for Light Water Reactors	HIGH
97	PWR Reactor Cavity Uncontrolled Exposures	RESOLVED
99	RCS/RHR Suction Line Interlocks on PWRs	HIGH

101	BWR Water Level Redundancy	HIGH
105	Interfacing Systems LOCA at BWRs	HIGH
112	Westinghouse RPS Surveillance Frequencies and Out-of-Service Times	REGULATORY IMPACT ISSUE
119	Piping Review Committee Recommendations	REGULATORY IMPACT ISSUE
B-50	Post-Operating Basis Earthquake Inspection	REGULATORY IMPACT ISSUE (LOW)
B-59	N-1 Loop Operation in BWRs and PWRs	REGULATORY IMPACT ISSUE (RESOLVED)

ATTACHMENT 1

LIST OF GENERIC ISSUES FOR WHICH
THE ACRS AGREES WITH THE
PRIORITY RANKINGS PROPOSED BY THE NRC STAFF

GENERIC ISSUE NO.	TITLE
30	Potential Generator Missiles - Generator Rotor Retaining Rings
67	Steam Generator Staff Actions:
67.2.1	Integrity of Steam Generator Tube Sleeves
67.3.2	Pressurized Thermal Shock
67.3.3	Improved Accident Monitoring
67.3.4	Reactor Vessel Inventory Measurement
67.4.1	Reactor Coolant Pump Trip
67.4.2	Control Room Design
67.4.3	Emergency Operating Procedures
67.5.1	Reassess Radiological Consequences
67.5.2	Evaluation of Steam Generator Tube Rupture Design Basis
67.5.3	Secondary System Isolation
67.7	Eddy Current Tests
67.8	Denting Criteria
67.9	Reactor Coolant System Pressure Control
67.10	Supplemental Tube Inspections
85	Reliability of Vacuum Breakers Connected to Steam Discharge Lines Inside BWR Containments

87 Failure of HPCI Steam Line Without Isolation

91 Main Crankshaft Failures in Transamerica Delaval Emergency Diesel Generators

94 Additional Low-Temperature-Over-Pressure Protection for Light-Water Reactors

105 Interfacing Systems LOCA at BWRs

112 Westinghouse RPS Surveillance Frequencies and Out-of-Service Times

119 Piping Review Committee Recommendations

ATTACHMENT 2

LIST OF ITEMS FOR WHICH THE ACRS
AGREES WITH THE PRIORITY RANKINGS
PROPOSED BY THE NRC STAFF, BUT WITH COMMENTS

Generic Issue No: 37

Title: Steam Generator Overfill and Combined Primary and Secondary Blowdown

Priority Ranking Proposed by the NRC Staff:
No need for a separate resolution as the principal concerns of this issue are covered in USI A-47, "Safety Implications of Control Systems," and Generic Issue I.C.1, "Short-Term Accident Analysis and Procedures Revision."

ACRS Comments: The ACRS had recommended previously in a March 13, 1985 letter from D. Ward to W. Dircks that the steam generator overfill issue be designated as a separate issue and the appropriate resources be applied to assure achievement of a near-term solution. The ACRS has been meeting with the NRC Staff and discussing these issues. At the present time, the ACRS does not see how USI A-47 and TMI Action Plan Item I.C.1 will cover all relevant aspects of this problem. The ACRS will reserve judgment on this until the NRC Staff work has progressed further.

Generic Issue No: 54

Title: Survey of Valve Operator Related Events During 1978, 1979, and 1980.

Priority Ranking Proposed by the NRC Staff:
Covered in Generic Issue II.E.6.1, "In situ Testing of Valves" - No need for separate resolution.

ACRS Comments: The Staff has assured that the safety issues identified in this item will be addressed in the resolution of Generic Issue II.E.6.1, "In Situ Testing of Valves" (MEDIUM priority ranking). The ACRS agrees that a separate resolution is not required, but would like to be kept informed of adjustments to the scope of Generic Issue II.E.6.1 to accommodate the broader and more general scope and implications of Generic Issue 54. Given the Staff's own pronouncements concerning the importance of motor-operated valves as contributors to core melt and the intention to combine the issue, the ACRS is surprised that the combined scope has not been given a higher priority ranking. As you know, an ACRS Subcommittee has been looking into the reliability of motor-operated valves for the past several months and is preparing a report for Committee consideration. The ACRS may have further comments on this matter later.

Generic Issue No: 55

Title: Failure of Class IE Safety-Related Switchgear Circuit Breakers to Close on Demand

Priority Ranking Proposed by the NRC Staff: DROP

ACRS Comments: After an exhaustive but much too narrow analysis (the only fix seriously considered was increased inspection and improved maintenance), the Staff concluded that the fix investigated was not cost-effective. The ACRS agrees that this issue should be dropped, not because of the analysis performed, but because the issue is, or certainly should be, subsumed in an area of principal importance by USI A-44, "Station Blackout."

Generic Issue No: 67.3.1

Title: Steam Generator Overfill

Priority Ranking Proposed by the NRC Staff:
No need for separate resolution as the principal concerns of this issue are covered in USI A-47, "Safety Implications of Control Systems," and Generic Issue I.C.1, "Short-Term Accident Analysis and Procedures Revision."

ACRS Comments: See comments on Generic Issue 37.

Generic Issue No: 67.6

Title: Organizational Responses

Priority Ranking Proposed by the NRC Staff: Covered in Generic Issue III.A.3., "Improving NRC Emergency Preparedness"

ACRS Comments: This issue appears to be covered in NUREG-0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident." However, NUREG-0660 was issued in May 1980 and the recommendations in Generic Issue 67.6 were originally made at the latter part of 1982. The 1982 recommendations should be evaluated in detail to ensure that all significant recommendations are factored into the TMI Action Plan Item III.A.3.

Generic Issue No: 99

Title: RCS/RHR Suction Line Interlocks on PWRs

Priority Ranking Proposed by the NRC Staff: HIGH

ACRS Comments: The ACRS agrees that this may be an important safety issue and should be investigated expeditiously. The ACRS recommends that before a final decision is made on a fix a more thorough analysis of root causes be made. This should include a re-examination of the original justification for the requirement.

Generic Issue No: 101

Title: BWR Water Level Redundancy

Priority Ranking Proposed by the NRC Staff: HIGH

ACRS Comments: The ACRS agrees that the problem of assuring reliable water level indication in BWRs should receive prompt attention. The ACRS suggests, however, that the title of the issue be revised lest those responsible for its fix be led to believe that it is "redundant water level" that is of concern rather than a reliable system for water level indication.

Generic Issue No: B-50

Title: Post Operating Basis Earthquake Inspection

Priority Ranking Proposed by the NRC Staff: LOW

ACRS Comments: The NRC Staff assigned "Low" priority ranking would in all likelihood prevent any resources from being applied to this issue in the foreseeable future. The ACRS believes that it would be wise to devote a modest level of effort to this problem. Were a plant to experience an OBE, the NRC Staff would be under considerable pressure to develop inspection requirements within a very short time. However, the operating utilities seem not to be pressing for resolution.

Generic Issue No: B-59

Title: N-1 Loop Operation in BWRs and PWRs

Priority Ranking Proposed by the NRC Staff:
Regulatory Impact Issue (Resolved)

ACRS Comments: The ACRS agrees with the proposed priority ranking subject to the confirmation of the following by the Staff:

- It should be ensured that procedures are in place and adequate to prevent "cold-slugging" and resultant fast power excursion.

- It should be verified that pumps have been suitably protected against start and run using both isolation valves closed with

safety grade equipment and annunciation. Several thousand hp dissipated as heat in small pump space can generate burst pressures in short times. Analysis should be on record.

LIST OF ITEM FOR WHICH THE ACRS
DISAGREES WITH THE PRIORITY RANKINGS
PROPOSED BY THE NRC STAFF

Generic Issue No: 97

Title: PWR Reactor Cavity Uncontrolled Exposures

Priority Ranking Proposed by the NRC Staff: RESOLVED

ACRS Comments: This has been an issue for some time and it holds promise of causing a serious occupational injury and/or fatality. Therefore, the ACRS does not consider it resolved. Since the position of the incore detectors is indicated in the control room, why not simply feed a signal to a warning light at the entry door to the cavity? This would appear to be a relatively straight-forward resolution of the problem; it could be done at presumably low cost, and it would appear to be superior and a useful adjunct to the administrative "fixes" proposed heretofore.

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