

SNUPPS

Standardized Nuclear Unit
Power Plant System

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Executive Director

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SUBJ: NUREG-0737, II.K.3.17

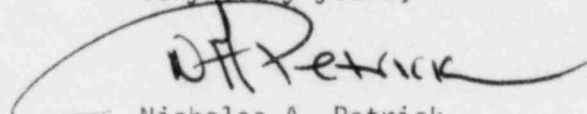
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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Docket Nos. STN-50-482, STN 50-483, and STN 50-486

Dear Mr. Denton:

Per the request of Dr. Gordon Edison, a clarification to the SNUPPS response to the subject item is provided herewith. This FSAR change will be included in Revision 8.

Very truly yours,


Nicholas A. Petrick

RLS/jdk

Enclosure

cc: D. F. Schnell	UE
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- 18.2.17.13 Reduction of Challenges and Failures of Relief Valves--Feasibility Study and System Modification (II.K.3.16)

Not applicable to Westinghouse pressurized water reactors.

- 18.2.17.14 Report on Outages of Emergency Core-Cooling Systems Licensee Report and Proposed Technical Specification Changes (II.K.3.17)

- 18.2.17.14.1 NRC Guidance Per NUREG-0737

Position

Several components of the emergency core-cooling (ECC) systems are permitted by technical specifications to have substantial outage times (e.g., 72 hours for one diesel-generator; 14 days for the HPCI system). In addition, there are no cumulative outage time limitations for ECC systems. Licensees should submit a report detailing outage dates and lengths of outages for all ECC systems for the last 5 years of operation. The report should also include the causes of the outages (i.e., controller failure, spurious isolation).

Clarification

The present technical specifications contain limits on allowable outage times for ECC systems and components. However, there are no cumulative outage time limitations on these same systems. It is possible that ECC equipment could meet present technical specification requirements but have a high unavailability because of frequent outages within the allowable technical specifications.

The licensees should submit a report detailing outage dates and length of outages for all ECC systems for the last 5 years of operation, including causes of the outages. This report will provide the staff with a quantification of historical unreliability due to test and maintenance outages, which will be used to determine if a need exists for cumulative outage requirements in the technical specifications.

Based on the above guidance and clarification, a detailed report should be submitted. The report should contain (1) outage dates and duration of outages; (2) cause of the outage; (3) ECC systems or components involved in the outage; and (4) corrective action taken. Test and maintenance outages should be included in the above listings which are to cover the last 5 years of operation. The licensee should propose changes to improve the availability of ECC equipment, if needed.

Applicant for an operating license shall establish a plan to meet these requirements.

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18.2.17.14.2 SNUPPS Response

The SNUPPS Utilities will provide safety system outage information that is proposed by "Standard Technical Specifications for Westinghouse Pressurized Water Reactors" (Rev. 3). Specifically, the following will be provided in 30-day written reports:

- Conditions leading to operation in a degraded mode permitted by a Limiting Condition for Operation or plant shutdown required by a Limiting Condition for Operation.

In addition, records will be retained of the maintenance, inspections, and surveillance tests of the principal items related to nuclear safety. These records can be reviewed by the NRC for additional specific data on component availability. INSERT

The SNUPPS facilities will report safety system outages as described above. This reporting is consistent with 10 CFR 50.36 and ensures that the data requested by Item 11.K.3.17 of NUREG-0737 is available.

18.2.17.15 Modification of Automatic Depressurization System Logic--Feasibility for Increased Diversity for Some Event Sequences (11.K.3.18)

Not applicable to Westinghouse pressurized water reactors.

18.2.17.16 Interlock on Recirculation Pump Loops (11.K.3.19)

Not applicable to Westinghouse pressurized water reactors.

18.2.17.17 Restart of Core Spray and Low-Pressure Coolant-Injection Systems (11.K.3.21)

Not applicable to Westinghouse pressurized water reactors.

18.2.17.18 Automatic Switchover of Reactor Core Isolation Cooling System Suction--Verify Procedures and Modify Design (11.K.3.22)

Not applicable to Westinghouse pressurized water reactors.

18.2.17.19 Confirm Adequacy of Space Cooling for High-Pressure Coolant Injection and Reactor Core Isolation Cooling Systems (11.K.3.24)

Not applicable to Westinghouse pressurized water reactors.

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The documentation will include: (1) outage dates and duration, (2) cause of the outage, (3) systems or components involved in the outage, and (4) corrective action taken.