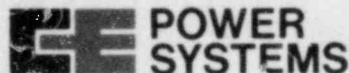


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Docket No. STN 30-470F

April 26, 1985  
LD-85-020

Hugh L. Thompson, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: CESSAR Technical Specifications

Reference: NRC Letter, D. M. Crutchfield to A. E. Scheriff, "Proposed CESSAR Changes", dated March 26, 1985

Dear Mr. Thompson:

CESSAR Technical Specifications were reviewed by the NRC Staff as indicated in the CESSAR SER (NUREG-0852). Since then, a number of changes have been made in conjunction with the final review of Technical Specifications on the Palo Verde docket. The purpose of this letter is to request the finalization of NRC review efforts associated with Staff approval of CESSAR Chapter 16 Technical Specifications. Combustion Engineering (C-E) understands that the schedule for completing NRC review has yet to be determined (see the Reference letter) and, therefore, the final draft of Chapter 16 was prepared in a manner to facilitate a timely review and approval by the Staff.

The System 80 and Palo Verde Technical Specifications were compared on a word-by-word basis and all differences were identified. In an effort to minimize the impact of the review on NRC priorities and resources, most of these differences were resolved by revising the System 80 Technical Specifications to be consistent with the Palo Verde Technical Specifications. C-E believes that this approach will enable the Staff to base their review on the existing, approved Palo Verde Technical Specifications and, therefore, expedite the NRC review effort.

Prior to the Staff's consideration of potential review schedules, C-E requests a meeting to discuss the expected scope of the review with Staff reviewers in Bethesda. C-E has evaluated each difference and is anticipating the NRC review to require minimal Staff effort. For example, it is C-E's opinion that open items, if any, could be resolved in a follow-up working meeting, if such an approach was supported by the Staff.

C-E believes that a timely NRC review is consistent with an agreement in December 1984 that the NRC would make every effort to close out CESSAR issues as soon as possible after resolution of Palo Verde issues. A timely review will increase the likelihood of review participation from NRC reviewers and C-E

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engineers who are veterans of the Palo Verde certification effort. The NRC will benefit from this approach in that a timely review which capitalizes on the reviewers' familiarity with Palo Verde Technical Specifications will provide the most effective utilization of manpower and minimize review costs (probably by an order of magnitude below the effort of using new reviewers). C-E therefore urges the NRC to support an efficient and timely resolution of this issue.

If you have any questions on this subject, please feel free to call me or Mrs. R. O. Hoogewerff of my staff at (203) 285-5217.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer  
Director  
Nuclear Licensing

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