

D861216

The Honorable Lando W. Zech, Jr.
Chairman
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Zech:

SUBJECT: ACRS REPORT ON PROPOSED POLICY STATEMENT ON DEFERRED PLANTS

During our 320th meeting, December 11-13, 1986, the members of the Advisory Committee on Reactor Safeguards considered the NRC Staff's proposal for a Commission policy statement on deferred plants (see Reference). This subject was also discussed during the Safety Philosophy, Technology and Criteria Subcommittee meeting held on December 10, 1986. In our review, we had the benefit of discussions with the NRC Staff and of the document referenced.

We agree that a policy statement on deferred plants would be useful and agree in general with the Staff's recommended positions on: (1) documentation, and maintenance and preservation requirements for deferred plants, and (2) procedures for reactivating deferred plants. However, it is not clear to us whether the ongoing preservation/inspection program would prevent or detect all types of equipment deterioration. It also is not clear that the Staff would assure itself of the adequacy of a plant owner's design and construction force when reactivation begins.

We question the Staff's proposal to apply the backfit rule uniformly for deferred plants irrespective of the duration of the deferral period. We believe the proposal is too open-ended in this regard. Finally, it is not clear to us how the NRC will ensure that the owners of a deferred plant will remain knowledgeable about applicable construction and operating experience and incorporate the appropriate modifications when the plant is reactivated.

Sincerely,

David A. Ward
Chairman

Reference:

SECY-86-359, entitled "Deferred Plant Policy Statement," Memo from Victor Stello, Jr. for the Commissioners, dated December 2, 1986.

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