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Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Dircks:

Subject: ACRS COMMENTS ON D. L. BASDEKAS' PROFESSIONAL OPINION
CONCERNING THE PROPOSED FINAL RULE ON PRESSURIZED THERMAL SHOCK

During its 298th meeting, February 7-9, 1985, the Advisory Committee on Reactor Safeguards considered D. L. Basdekas' professional opinion concerning the proposed final rule on pressurized thermal shock. During our review we had the benefit of discussions with I. Catton, ACRS consultant, D. L. Basdekas and the NRC Staff. We also had the benefit of the documents referenced.

Mr. Basdekas has expressed several concerns, including the possibility of transients worse than those postulated in the rule. However, he has not expressed these concerns in quantitative terms. Our review of these matters suggests no reason for delaying issuance of the proposed rule.

Sincerely,

David A. Ward

Chairman

References:

1. Memorandum dated January 4, 1985 from N. J. Palladino, Chairman, NRC, to W. J. Dircks, EDO, Subject: Pressurized Thermal Shock and Safety Implications of Control Systems USI A-47/49
2. Memo dated December 19, 1984 from W. J. Dircks, Executive Director for Operations, NRC to J. C. Ebersole, Chairman, ACRS, Subject: Proposed Final Rule on Pressurized Thermal Shock
3. Letter dated February 5, 1985 from D. L. Basdekas, NRC, to D. A. Ward, ACRS, transmitting paper by K. Kussmaul on the German Basis Safety Concept published in December 1984 issue of "Nuclear Engineering International"
4. The following documents were sent by D. L. Basdekas clarifying some of his discussion notes attached to Reference 1:
 - a. Letter from D. L. Basdekas to Commissioners, Subject: Pressurized Thermal Shock in Commercial Pressurized Water Reactors and the Safety Implications of Control Systems, dated April 29, 1982
 - b. Letter from D. L. Basdekas to Commissioner Gilinsky, Subject: Staff Comments on Pressurized Thermal Shock (A-49) and the Safety Implications of Control Systems (A-47), dated December 14, 1982
 - c. Letter dated December 3, 1982 from D. L. Basdekas to Commissioners Gilinsky and Ahearne, Subject: Staff Report on

- Pressurized Thermal Shock, SECY-82-465, November 23, 1982,
- d. Letter dated October 6, 1982 from D. L. Basdekas to P. Shewmon, ACRS, Subject: Comments on the Draft Staff Report on Pressurized Thermal Shock of September 13, 1982
5. Letter from D. L. Basdekas, NRC, to M. K. Udall, House of Representatives dated May 28, 1980
6. Draft Final Report prepared for U. S. NRC by Oak Ridge National Laboratory, "An Assessment of the Safety Implications of Control at the Oconee-1 Nuclear Plant," Volume 2, Methods and Conclusions dated September 30, 1984

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