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February 10, 1986

OG-171

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

SUBJECT: Technical Specification Requirements for the Westinghouse Owner's
Group (WOG) AMSAC System

Dear Mr. Denton:

On December 4, 1985, the WOG Technical Specification Subcommittee met with members of your staff to discuss the status of the NRC review of WCAP-10858, "AMSAC Generic Design Package". At that meeting, the WOG was informed that the NRC is considering Technical Specification requirements for the WOG AMSAC System. A draft copy of proposed Technical Specification requirements were provided to the Subcommittee. Although we do not believe Technical Specifications for ATWS equipment are necessary, we have provided comments on the proposed Technical Specifications in Attachment A. We strongly disagree with the need for Technical Specifications on AMSAC for the following reasons.

Nowhere during the history of the ATWS issue were the need for Technical Specifications discussed. The additional administrative costs associated with maintaining Technical Specification documentation and the negative impact on availability caused by the inflexibility of the Technical Specification outage times and surveillance intervals were not considered in the cost-benefit analysis supporting 10 CFR Part 50.62. In addition, the policy of Technical Specifications for AMSAC is contrary to NRC and industry efforts to improve Technical Specifications.

The model Technical Specifications for ATWS equipment were developed to "...ensure they (ATWS equipment) will perform their safety-related functions when required." AMSAC is not a safety-related system. In fact, the preamble to the ATWS rule clearly states in the design criteria that AMSAC (and the diverse scram system) is not required to be safety-related. Thus, to require Technical Specifications because AMSAC is a safety related system is inappropriate.

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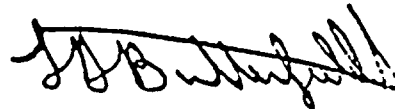
The AIF Subcommittee notes that there are means other than Technical Specifications for validating the overall safety of the plant such as the design review (FSAR, SERs etc), the quality assurance plan, the operating procedures, etc. These documents have regulatory controls on them and are both inspectable and enforceable. Generic Letter 85-06 concludes that the documentation necessary to show AMSAC will perform its intended function is left to the discretion of the utility. This is consistent with the findings of the AIF Subcommittee and the position of the Westinghouse Owner's Group.

Finally, we believe that the imposition of Technical Specification requirements on the WOG AMSAC System would constitute a backfit under the provisions of 10 CFR Part 50.109. We do not believe that Technical Specification requirements for AMSAC provide a substantial increase in the overall protection of the public health and safety from the low-probability anticipated transient without scram (ATWS) events.

In summary, we believe that Technical Specifications for AMSAC are unnecessary, do not enhance the overall safety of nuclear power plants, and constitute a backfit. We believe that normal nuclear plant administrative controls are sufficient to control AMSAC.

Should you have any questions please feel free to contact Mr. Mark Burzynski, Chairman, WOG Technical Specification Subcommittee, Tennessee Valley Authority, Watts Bar Nuclear Plant, P.O. Box 800, Spring City TN, 37381. His telephone number is area code 615 365-8863.

Very truly yours,



L. D. Butterfield, Chairman
Westinghouse Owner's Group

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