

## POWER GENERATION GROUP

To

J. H. TAYLOR, MANAGER, LICENSING

From

B. M. DUNN, MANAGER, ECCS ANALYSIS UNIT  
N. H. SHAH, ECCS ANALYSIS

BDS 663.5

Cust.

File No.  
or Ref.

Subj.

POTENTIAL SAFETY CONCERN

Date

NOVEMBER 16, 1978

This letter is cover and customer and one subject only.

After discussing a question of the Potential Safety Concern filed against 205 plants in regard to the secondary side auxiliary feedwater control level, we have reached the conclusion that the concern should be now rescinded. The change to a positive six-foot level control was made in the summer of 1977. ECCS was consulted and gave tentative approval, pending analysis confirmation, as at that time, we believed it was probably acceptable. The results of the confirmation were that ECCS was wrong about the acceptability of the six-foot control. At present, we are engaged in studies to decide whether to return to a forty-foot level control or to upgrade an alternate system to compensate for the six-foot level.

NPG-1707-01 defines a significant deficiency as:

"DEFINITION OF SIGNIFICANT DEFICIENCY

Deficiencies to be reported in accordance with this procedure are those deficiencies found in the design, manufacture, fabrication, installation, construction, testing and inspection which, were they, to have remained uncorrected, could have adversely affected the safe operation of the plant at any time throughout the expected life-time of the plant.

In addition to the above, the deficiency must also be the result of one or more of the following:

- a. A significant breakdown in any portion of the quality assurance program;
- b. A significant deficiency in final designs approved and released for construction;
- c. A significant deficiency in the construction of, or significant damage to, a structure, system or component requiring corrective action involving extensive effort;
- d. A significant deviation from performance specifications requiring corrective action involving extensive effort."

For this problem, Item b applies. ECCS now considers that the design could not have been "final" as we had recognized check work to perform. Therefore, even though many steps toward a six-foot level control had been taken, at least one, our formal and final approval remained.

**CONFIDENTIAL**

8307080777 781116  
PDR ADOCK 05000289  
P HOL

C111818

0349

In consideration of this lack of finality of design, the fact that we have followed a logical and timely path toward final design, and that the identification of the problem with six-foot control was not inadvertent, but part of a planned effort, we request that the Potential Safety Concern of April 4, 1978 be withdrawn.

BMD/dww

cc: E. A. Womack  
R. C. Jones  
E. R. King  
E. W. Swanson  
Lucius Roscoe Cartin

Signature: N. H. Shah Date: 11/16/78  
N. H. Shah

Signature: Bert M. Dunn Date: 11/16/78  
Bert M. Dunn, Manager,  
ECCS Analysis Unit

CH 1819

0 3 4 1