

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To |

J.H. TAYLOR, MANAGER, LICENSING

From

B.M. DUNN, MANAGER, ECCS ANALYSIS (2138)

Cust.

File No.  
or Ref.

Subj.

Date

Potential Safety Concern

November 3, 1978

This letter is cover and customer and and subject only.

*not have*  
After discussing the question of the Potential Safety Concern filed against the 205 plants in regards to the secondary side auxiliary feedwater control level for many months, I have reached the conclusion that the concern is of a paper-nature only. An examination of the paper trail leads to a belief that we altered and perhaps shipped equipment before resolution of potential ECCS concerns were achieved and that further we were ignorant of these concerns. We do not manage by paper alone, however, and we were not ignorant of the potential concerns. I believe "ignorant" is the key word. So long as a responsible, recognizable, and responsive path toward resolution of problems with design changes exists, I believe there is no safety concern regardless of equipment status. ECCS and Integration were always aware of the problem with a 6 foot level control and the path for resolution always existed.

The key change to a positive 6 foot control was made in the summer of 1977. ECCS was consulted and gave verbal approval, pending analysis confirmation, as at that time we believed it was probably acceptable. We were wrong as documented in the PSC of 4/4/78. At present, we are engaged in studies to decide whether to return to a 40 foot level control or to upgrade an alternate system to compensate for the 6 foot level. Again, a logical and timely path has been followed. Therefore, no safety concern exists in my mind.

Why then did ECCS file a PSC? I believe the fault lies within ECCS and the surrounding organizations which control our funding and work flow. As of 4/4/78 we felt we had a problem with the design of the plant and that serious obstructions to resolution would exist in obtaining funding and manpower to resolve the concern. Our response, although I believe it to be inappropriate, was to file the PSC. For whatever reasons, those potential obstructions are today nonexistent and this PSC should either be withdrawn or considered resolved, per the comments in this memo.

BMD/lc

cc: E.A. Womack  
R.C. Jones  
N.H. Shah

CONFIDENTIAL

*of 6' level concerns*  
Since the discovery was not inadvertent, but out of planned effort, the PSC is not warranted in review that the PSC should not have been filed. Therefore, —

8307090002 781103  
PDR ADOCK 05000289  
P HOL

2111824

0218 0346

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To |

J.H. TAYLOR, MANAGER, LICENSING

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BMD/lc

cc: E.A. Womack  
R.C. Jones  
N.H. Shah

CONFIDENTIAL

*of 6' level concerns*  
Since the discovery was not inadvertent, but out of planned effort, the PSC is not a safety concern. It is a paperwork issue. The PSC should not have been filed. Therefore, —

C111824

0218 0346

0 3 4

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To |

J.H. TAYLOR, MANAGER, LICENSING

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B.M. DUNN, MANAGER, ECCS ANALYSIS (2138)

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Subj.

Potential Safety Concern

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J.H. Taylor

NOV 6 1978

GPU 2704

SCS

File No.  
or Ref.

Date

November 3, 1978

*not have been*  
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BMD/lc

cc: E.A. Womack  
R.C. Jones  
N.H. Shah

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*of 6' level concern*  
Since the discovery was not inadvertent, but out of planned effort, the PSC is not a safety concern. It is a review that the PSC should not have been filed. Therefore, —→

C111824

0218 0346

034

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To |

J.H. TAYLOR, MANAGER, LICENSING

From

B.M. DUNN, MANAGER, ECCS ANALYSIS (2138)

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cc: E.A. Womack  
R.C. Jones  
N.H. Shah

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*of 6' level concern*  
Since the discovery was not inadvertent, but out of planned effort, the PSC is not a safety concern. It is a personnel problem that the PSC should not have been filed. Therefore, —

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0218 0346



THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To

J.H. TAYLOR, MANAGER, LICENSING

From

B.M. DUNN, MANAGER, ECCS ANALYSIS (2138)

Cust.

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Potential Safety Concern

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J.H. Taylor  
NOV 6 1978

GPU 2704

File No.  
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R.C. Jones  
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cc: E.A. Womack  
R.C. Jones  
N.H. Shah

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of 6' level concerns  
Since the discovery was not inadvertent,  
but not of planned effort, no safety concern  
exists. I am in agreement that the PSC should  
not have been filed. Therefore, —→

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0218 0346

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THE BABCOCK & WILCOX COMPANY  
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To |

J.H. TAYLOR, MANAGER, LICENSING

From

B.M. DUNN, MANAGER, ECCS ANALYSIS (2138)

Cust.

Subj.

Potential Safety Concern

This letter is cover and customer and not subject only.

ERK

What do you think  
J.H. Taylor  
NOV 6 1978

GPU 270f

Rest Dunn

205 205

File No.  
or Ref.

Date

November 3, 1978

After discussing the question of the Potential Safety Concern filed against the 205 plants in regards to the secondary side auxiliary feedwater control level for ~~manpower~~ <sup>not have</sup> I have reached the conclusion that the concern is of a paper-nature only. An examination of the paper trail leads to a belief that we altered and perhaps shipped equipment before resolution of potential ECCS concerns were achieved and that further we were ignorant of these concerns. We do not manage by paper alone, however, and we were not ignorant of the potential concerns. I believe "ignorant" is the key word. So long as a responsible, recognizable, and responsive path toward resolution of problems with design changes exists, I believe there is no safety concern regardless of equipment status. ECCS and Integration were always aware of the problem with a 6 foot level control and the path for resolution always existed.

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but out of planned effort <sup>the PSC</sup> it is  
not a matter of concern that the PSC should  
not have been filed. Therefore, —→

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0 3 4