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Docket No.: STN-50-470F

August 3, 1984  
LD-84-042

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Safety Evaluation Report Suggested Changes

Dear Mr. Eisenhut:

During work with the CESSAR Safety Evaluation Report (SER) and its supplements, four (4) items have been identified which we suggest should be updated. These items are identified in the enclosure to this letter along with justification for each change. Combustion Engineering suggests that these items be updated when the SER is generated to close out the remaining issues on CESSAR.

If you have any questions or comments, please feel free to call me or Mr. T. J. Collier of my staff at (203) 285-5215.

Very truly yours,

COMBUSTION ENGINEERING, INC.

A handwritten signature in dark ink, appearing to read 'A. E. Scherer'.

A. E. Scherer  
Director  
Nuclear Licensing

AES:las  
Enclosure  
cc: K. Eccleston, Project Manager, USNRC

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SER SUGGESTED CHANGES

SUPPLEMENT #2 Section 15.3.7 Steam Generator Tube Rupture

The SER states, "We require C-E to provide an interface requirement on the need to classify the block valves upstream of the ADVs as safety-related and, therefore, required to be designed to safety grade requirements consistent with the assumptions in the SGTR analysis". As a result of the re-analysis, required by the NRC, C-E added an interface requirement for ADV block valves to be installed. Failure of a block valve would constitute a second failure which is beyond the basis for licensing analysis. Thus, C-E believes that the requirement to make the ADV block valves safety grade should be deleted.

In addition, the SER description of the re-analysis states, "Credit will be taken for operator action ten (10) minutes after it would become apparent that an ADV on the affected steam generator is stuck open". Actually, however, in the revised CESSAR analysis, credit was taken for operator action thirty (30) minutes after realization that the ADV was stuck open. C-E believes, therefore, that the ten (10) minutes in the SER should be changed to thirty (30) minutes.

SUPPLEMENT #2 Section 15.4 Radiological Consequences of Design Basis Accidents

Item (2) of the site-related interface requirements for CESSAR reference plants states that Steam Generator tube leakage be 0.1 gpm primary to secondary. This value was based on the Reactor Coolant Pump locked rotor/shaft seizure analysis originally submitted with CESSAR and was required to show acceptable off-site doses. Subsequent analyses evaluated in SER Supplement #2 have shown acceptable consequences for steam generator tube leakage of 1.0 gpm. Therefore, the maximum steam generator tube leakage should be changed to 1.0 gpm, consistent with analyses for worst case assumptions used in design basis accidents.

SUPPLEMENT #1 Section 5.4.3 Shutdown Cooling (Residual Heat Removal) System

Pages 5-2 and 5-3 provide a discussion of the applicability of Power Operated Relief Valves (PORVs) to C-E plants. The discussion is concluded with the statement, "Should the NRC decide that design or procedural changes are necessary, C-E will be required to implement them for CESSAR". Since the NRC has deferred the decision on PORVs to the resolution of Unresolved Safety Issue A-45, C-E believes that this should be reflected in the SER.