



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

OCT 14 1977

NOTE TO: Darrell G. Eisenhut, Assistant Director for Operational Technology, DOR

FROM: Robert L. Baer, Chief, Reactor Safety Branch, DOR

SUBJECT: CONCURRENCE WITH REACTOR SYSTEM BRANCH POSITION ON OVERPRESSURE PROTECTION

I have discussed the attached memorandum dealing with Reactor Coolant System Overpressure Protection with Tom Novak and Jerry Mazetis. I recommend concurrence subject to the changes listed below. Jerry (acting for Tom) agreed to make these changes:

1. The cover letter should be revised to clarify the implementation schedule and review procedures for plants that will be receiving an OL during 1977 and 1978. Specifically:
  - (a) plants receiving an OL prior to promulgation of this position will be required to submit a proposal for a satisfactory overpressure protection system which will not have to be backfit to satisfy the proposed DSS position on new plants.
  - (b) for plants receiving an OL after promulgation of the DSS BTP, which are permitted to operate for their first cycle based on the ability of the pressure vessel to attain pressures as high as the setpoint of the primary system safety valves at ambient temperature without failure, DSS will obtain a commitment from the licensee to fully implement the DSS BTP no later than the first refueling outage.

The cover letter should state the DSS believes that the criteria that they are using prior to promulgation of this position (e.g., Davis Besse) and that DOR is using on operating plants are satisfactory and that backfitting of these plants is not intended.

3. Section B2 should be revised to clarify the intent of that paragraph. Specifically, the licensee will not be permitted to astutely write technical specification such that the licensee could administratively eliminate certain scenarios (e.g., safety injection pump operation) from consideration in his overpressure protection system design analyses.

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