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JUL 15 1985

Dr. David Rossin, Director  
 Nuclear Safety Analysis Center  
 3412 Hillview Avenue  
 Palo Alto, California 94303

Dear Dr. Rossin:

SUBJECT: REQUEST FOR PEER REVIEW COMMENTS ON PRELIMINARY CASE STUDY  
 REPORT - LOSS OF SAFETY SYSTEM FUNCTION EVENTS

The Office for Analysis and Evaluation of Operational Data has completed a case study of events involving a total loss of safety system function (LSSF). The study identified 133 LSSF events in the 1981 to June 1984 time period, 87 of which (65%) were the result of human factors considerations.

Although the study found no evidence of any previously unrecognized safety problems, it also found no clear evidence that a large improvement is being made, on an industry-wide basis, in preventing loss of safety system events. Therefore, it is recommended that the results of the study be fed back to industry and to the Regions for possible use in the SALP process. In addition, it is recommended that training and qualifications development programs consider the types of personnel actually involved in LSSF events.

In accordance with AEOD's "peer review" process, prior to the finalization and distribution of our case study reports, we are providing NRR, IE, Regional Offices, RES, NSAC, and INPO with a copy of a preliminary report for review and comment, particularly regarding accuracy and completeness of the technical details. Changes to the findings, conclusions, and recommendations will be considered only if the underlying information concerning the details of plant design, systems operation or sequence of events is in error. Therefore, comments are being solicited on the technical accuracy of the report. The findings, conclusions and recommendations are provided for your information in order that you may understand the significance which AEOD places on this issue and, therefore, obtain a more complete picture of the total report. We would welcome comments either informally by phone or formally by memorandum.

Since we wish to finalize and issue the report shortly, we ask that any comments be received by us within 30 days from receipt of the preliminary report. Should your office require some additional time beyond that point, please let us know, otherwise it will be assumed that there are no comments.

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As you may know, AEOD reports do not represent an official NRC position or the position of the responsible NRC program office. Our reports are one input to an ongoing review and evaluation process, and any recommendation contained in our final report will be considered and perhaps modified or eliminated by the responsible NRC office.

We are placing a copy of the preliminary report in the Public Document Room. If you or your staff have any questions regarding this matter, please contact Gene Trager of my staff. Mr. Trager can be reached at (301) 492-4495.

Sincerely,

Original Signed by  
C. J. Heltemes, Jr.

C. J. Heltemes, Jr., Director  
Office for Analysis and Evaluation  
of Operational Data

Enclosure: *SEE Ltr 7/2/85*  
As Stated

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