



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

ACRSR-1125

March 13, 1985

Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Dircks:

SUBJECT: ACRS COMMENTS REGARDING DESIGNATION OF STEAM GENERATOR AND BWR
VESSEL OVERFILL AS A SEPARATE ISSUE

During its 299th meeting, March 7-9, 1985, the Advisory Committee on Reactor Safeguards held discussions with the NRC Staff on the status of the NRC work on steam generator overfill. This subject was discussed in some detail during a November 14, 1984 meeting of the combined ACRS Subcommittees on Reactor Operations and Reliability and Probabilistic Assessment. Some of the ACRS concerns on this subject were discussed in Mr. Fraley's memorandum of June 21, 1984 to you.

The NRC Staff is conducting a number of activities in this area which are coordinated and are producing useful results. However, these programs do not address all of the issues raised in the June 21, 1984 memorandum. We are concerned that these programs in themselves will not lead to resolution of the steam generator overfill issue.

We believe that greater attention should be given to an appropriate and timely resolution of the PWR steam generator overfill issue and the corresponding issue of reactor vessel overfill for the BWR. We believe that the present approach of considering this issue partly under the scope of USI A-47, "Safety Implications of Control Systems," and partly under the steam generator tube rupture activities has not resulted in a cohesive, comprehensive, or expeditious treatment. We recommend that steam generator and BWR vessel overfill be designated as a separate issue in its own right, and that appropriate resources be applied to assure the achievement of a near term resolution.

We suggest that the Staff prepare an overview of the integral problem of steam generator and BWR vessel overfill, including a summary of activities of the individual utilities regarding this issue for presentation to the ACRS in the not too distant future.

Sincerely,

David A. Ward
Chairman

8503250055 XA