



OFFICE OF THE
COMMISSIONER

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

PDR

July 9, 1985

MEMORANDUM FOR: William J. Dircks
Executive Director for Operations

FROM: Lando W. Zech, Jr. *Lando W. Zech Jr.*

SUBJECT: GENERIC GUIDANCE ON THE APPLICABILITY OF THE DEFINITION
OF VITAL EQUIPMENT TO LOW-POWER OPERATION

For Part 73 purposes, "vital equipment" is defined in Section 73.2(I) to mean:

. . . any equipment, system, device or material, the failure or destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Equipment or systems which would be required to function to protect public health and safety following such failure, destruction, or release are also considered to be vital.

Like many of our regulations, this definition does not distinguish between low-power and full-power operation of a commercial nuclear power reactor.

It strikes me, however, that a decision on whether or not equipment must be considered vital in a specific licensing context could in fact recognize the differences, from the standpoint of the measures needed to protect the public health and safety, in low-power and full-power operation.

I am particularly interested in your views of the classifications of emergency power supplies as vital equipment during operations at low power -- 5% or less.

cc: Chairman Palladino
Commissioner Asselstine
Commissioner Bernthal
Mac Cutchin
SECY
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