



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

JUL 25 1985

MEMORANDUM FOR: Chairman Palladino
FROM: William J. Dircks
Executive Director for Operations
SUBJECT: INADVERTENT ESF ACTUATIONS

As discussed in your memo dated June 28, 1985, we share your concern about unnecessary challenges to safety systems, inadvertent ESF actuations, and unnecessary reactor scrams. Unfortunately, such events were not reportable to the NRC until January 1, 1984 when 10 CFR 50.73 became effective. Now that we are routinely receiving reports of such events, the analysis of these events has become a key element in the AEOD program to analyze the trends and patterns in reactor operational experience. AEOD is currently in the process of completing reports of an analysis of ESF actuations and an analysis of RPS actuations. The study of ESF actuations will cover the period from January through June 1984, and the study of RPS actuations will include all RPS actuations that occurred in 1984. The reports of these studies will be issued within the next few weeks. Some preliminary results from these studies are discussed in the AEOD Semiannual Report which I forwarded to you on May 6, 1985.

We currently plan that these studies will be the first in a series of studies of these subjects. As subsequent studies are performed, they will consider trends in the data assessed. In addition, as the staff becomes more accustomed to performing this type of analysis and as the analysis process becomes better developed, we would expect the time between the end of an assessment period and the issuance of the analysis report to shorten substantially.

Scrams and ESF actuations are also monitored and evaluated by IE on a real-time basis as these individual events are reported to the Operations Center. Certain specific events and repetitious events are followed up on a plant-specific basis by the appropriate Regional Offices in terms of licensee performance. Particular attention is given to newly licensed units or those starting up following a prolonged outage. Generic applicability of individual plant events is assessed the next working day following the event jointly by IE and NRR events personnel.

Finally, the staff has considered trending scrams and ESF actuations on a virtually real-time basis (e.g., continuously updating year-to-date statistics as events are reported to the Operations Center). However, this has not proven to be very productive. Reactor scrams, particularly on a per-plant

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basis, are relatively infrequent events. Thus, it is generally necessary to assess the rates over relatively long periods of time in order to produce meaningful results. ESF actuations are more frequent, particularly in the case of certain plants. However, the definition of what constitutes an ESF varies so greatly from plant to plant that unanalyzed counts of actuations are not a very meaningful measure of the need for corrective action. Thus, while we plan to continue to analyze trends and patterns in scrams and ESF actuations, and expect to complete that analysis more timely in the future, we do not plan to systematically trend scrams and ESF actuations on a real-time, per-plant basis.

Please call me or Jack Heltemes if you have any additional questions concerning this matter.

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

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