Nebraska Public Power District

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NLS8500193

July 30, 1985

Office of Nuclear Reactor Regulation
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief

Dear Mr. Vassallo:

Subject: Submittal of Additional Information for Generic Letter 83-28

Reference: 1) Letter from D. B. Vassallo to J. M. Pilant dated April 23, 1985, "Request for Additional Information Following Preliminary Staff Review of Licensee Responses to Generic Letter 83-28"

2) Letter from J. M. Pilant to D. B. Vassallo dated July 1, 1985, "Submittal of Additional Information for Generic Letter 83-28"

Reference 1 requested additional information be provided the staff for various items of Generic Letter 83-28. Additional information for Items 2.1, 2.2.2, and 4.5.3 was submitted in Reference 2. Supplementary information for Item 4.5.2 is provided in the attachment following a statement of the information request. This submittal completes all requests for additional information contained in Reference 1.

Should you have any questions, please call.

Sincerely,

Jay M. Pilant
Technical Staff Manager
Nuclear Power Group

JMP/grs:emz30/2



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Item 4.5 - Reactor Trip System Reliability (System Functional Testing)

Request: Your response to Part 2 is incomplete. You are requested to verify that all components needed to perform reactor trip (RTS components) can be tested on-line (backup scram valves excepted). The results of the BWROG and GE reviews of current functional testing of backup scram valves promised for March 1, 1984, should be included for review.

Response: All components needed to perform a reactor trip (RTS components) can be tested on-line with the exception of the Reactor Mode Switch (which initiates a scram in "Shutdown" position) and the backup scram valves; both of which are tested only during shutdown periods. Also, the scram valve solenoid pilot valves can not be directly verified open, but power interruption is verified by extinguished indicating lights.

The March 1, 1984, results referred to in the request was NEDC 30505, "Response Guidelines for NRC Generic Letter 83-28", prepared by General Electric for the BWR Owners Group. This report was not intended as a plant specific report ready for submittal to the NRC but instead as a core document upon which a plant specific submittal could be based. Results from NEDC 30505 are used in this response.

Reference 1 stated the licensee needs to address the staff's conclusion that testing of the backup scram valves at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in Technical Specifications. The District believes inclusion of such a requirement in the Technical Specifications is not warranted. The addition of two backup scram valves to the BWR Scram System and to CNS was initiated and designed by GE on the basis that the concept of a Backup Scram System "was a good idea". The performance requirement for this system does not call for the system to meet any transient. The system is intended to provide an alternate source of rod insertion in those instances where individual rods may not have inserted. By the nature of its design and installation, rod insertion via the Backup Scram System is a long-term event.

Since the Backup Scram System provides no increase in safety margin, the system is not classified as safety related. Failure to operate will, therefore, not prevent a scram. The Backup Scram System is intended to be a diverse system (i.e., dc powered and energized to operate versus the scram systems ac powered and de-energized to function). It should also be noted that the Backup Scram System logic is not diverse in that the contacts off of the RPS power both the Scram System and the Backup System. The Backup Scram System meets the single failure criteria (see NUREG-1000, Volume 1, Section 3.1.2.5).

In addition, as a result of the recent ATWS ruling, the District is awaiting NRC determination as to what LCO's and surveillance requirements are necessary for the Alternate Rod Insertion system which would perform the function of the backup valves. Proposed Technical Specifications are not being submitted at this time.