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Date: 8/22/96 4:25am  
Subject: 10CFR50.54(f)

From a friend.

Paul:

As part of its 10CFR50.54(f) response efforts, NU is developing design and licensing bases documentation packages for the systems with the highest contribution to core melt frequency. As I understand the reason for the 10CFR50.54(f) letters, NU had lost configuration control such that the as-built configuration of the plants did not match the UFSAR and controlled drawings. Given this rather significant discrepancy, how can the plant specific PRAs be meaningful? Granted, the top ten 'risk' systems will probably be the same if the PRAs are revisited with the actual plant configurations, but there could be some surprises. In any event, it would seem prudent (if not mandatory) that NU revise the plant specific PRAs after they figure out the actual plant configurations. The NRC does not rely too heavily on absolute PRA numbers, but they do place greater reliance on the relative difference between PRA results. For example, if the Millstone-3 core melt frequency increased 50% simply due to using the as-built configuration instead of the as-thought-to-be-built configuration, the NRC would then have a measure of the safety impact of Millstone-3 operating outside its design/licensing bases over the years. If on the other hand the Millstone-3 core melt frequency decreases, one shouldn't make the argument that the forced shutdown lessened safety, since risk was always dependent on the as-built configuration.

Food for thought,

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