

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
ARKANSAS 1, CRYSTAL RIVER 3, OCONEE 1, 2, AND 3,
RANCHO SECO AND TMI-1

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ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals for several nuclear plants for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3. The specific plants selected were reviewed as a group because of similarity in type and applicability of the review items. The group includes the following plants:

<u>Plant</u>	<u>Docket Number</u>	<u>TAC Numbers</u>
Arkansas 1	50-313	52978, 53816
Crystal River 3	50-302	52992, 53830
Oconee 1	50-269	53022, 53861
Oconee 2	50-270	53023, 53862
Oconee 3	50-287	53024, 53863
Rancho Seco	50-312	53036, 53875
TMI-1	50-289	53051, 53890

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRC Licensing Support Section.

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CONFORMANCE TO GENERIC LETTER 83-28

ITEMS 3.1.3 AND 3.2.3

ARKANSAS 1, CRYSTAL RIVER 3, OCONEE 1, 2, AND 3,
RANCHO SECO AND TMI 1

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

This report documents the EG&G Idaho, Inc. review of the submittals from the Arkansas 1, Crystal River 3, Oconee 1, 2 and 3, Rancho Seco and TMI 1 plants for conformance to Items 3.1.3 and 3.2.3 of Generic Letter 83-28.

The submittals from the licensees utilized in these evaluations are referenced in Section 10 of this report.

These generic review results are applicable to the group of nuclear plants previously identified because of their similarity. These plants are similar in the following respects.

1. They are operating B&W reactors
2. They utilize the type 3B containment system
3. They are 2 loop plants
4. They utilize 2 emergency diesel generators except the Oconee plants that utilize alternate hydro-power units for emergency power

5. They utilize two class 1E power trains except the Oconee plants that utilize three class 1E power trains
6. They utilize AK-2 reactor trip breakers.

An item of concern identified for any one of these plants is assumed to be potentially significant for all of the remaining plants in the group.

2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System (RTS) Components) requires that licensees and applicants identify, if applicable, any post-maintenance test requirements for the RTS in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

3. GROUP REVIEW RESULTS

The B&W Owners Group submitted a response dated November 9, 1983 to Generic Letter 83-28.³ This response states that the owners group, after considerable review and discussion, concluded that plant-specific differences precluded a generic program for resolving items 3.1.3 and 3.2.3.

The relevant submittals from each of the named reactor plants were reviewed to determine compliance with items 3.1.3 and 3.2.3 of the Generic Letter. First, the submittals from each plant were reviewed to determine that these two items were specifically addressed. Second, the submittals were checked to determine if any post-maintenance test items specified in the technical specifications were identified that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or other significant information relating to the two items of concern. The results of these reviews are summarized for each plant in Table 1.

TABLE 1.

<u>Plants</u>	<u>Were items 3.1.3 and 3.2.3 addressed in submittal</u>	<u>Licensee Findings</u>	<u>Response Acceptable</u>	<u>Comments</u>
Arkansas 1	Yes	No tech spec items that degrade safety	Yes	Depth of review not identified--evaluation to continue
Crystal River 3	Yes	No post-test tech spec items identified that degrade safety	Yes	Review will continue
Oconee 1,2 & 3	Yes	No tech spec items identified that degrade safety	Yes	--
en Rancho Seco	Yes	To date no items identified that degrade safety	Yes	Review is ongoing
TMI	Yes	To date no items identified that degrade safety	Yes	--

7. REVIEW RESULTS FOR RANCHO SECO

7.1 Evaluation

The Sacramento Municipal Utility District, licensee for the Rancho Seco nuclear plant states in their response to Generic Letter 83-28 dated May 5, 1985¹⁰ that they have not to date identified any post-maintenance test requirements in existing technical specifications that degrade rather than enhance safety.

7.2 Conclusion

The licensee response meets the requirements of items 3.1.3 and 3.2.3 and is acceptable to the staff.

9. GROUP CONCLUSION

The staff concludes that the licensee responses to items 3.1.3 and 3.2.3 of Generic Letter 83-28 are adequate and acceptable.

10. REFERENCES

1. NRC Letter, D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. B&W Owners Group Response to Generic Letter 83-28 by B&W Owners Group ATWS Committee, November 4, 1983.
4. Letter, J. R. Marshal, Arkansas Power and Light Co., to D. G. Eisenhut, NRC, November 5, 1983.
5. Letter, G. R. Westafer, Florida Power Corp, to D. G. Eisenhut, NRC, November 4, 1983.
6. Letter, G. R. Westafer, Florida Power Corp., to D. G. Eisenhut, NRC, July 7, 1984.
7. Letter, H. B. Tucker, Duke Power Co. to H. R. Denton, NRC, November 4, 1983.
8. Letter, R. J. Rodriguez, Sacramento Municipal Utility District, to D. G. Eisenhut, NRC, November 4, 1983.
9. Letter, R. J. Rodriguez, Sacramento Municipal Utility District, to J. F. Stolz, NRC, October 5, 1984.
10. Letter, R. J. Rodriguez, Sacramento Municipal Utility District, to H. L. Thompson, NRC, May 23, 1985.
11. Letter, H. D. Hukill, GPU Nuclear Co., to D. G. Eisenhut, NRC, November 8, 1983.
12. Letter, H. D. Hukill, GPU Nuclear Co., to D. G. Eisenhut, NRC, February 1, 1984.