



Commonwealth Edison

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OG-177

March 20, 1986

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, Maryland 20814

Dear Mr. Denton:

WESTINGHOUSE OWNERS GROUP
SUBMITTAL OF WCAP-10271, SUPPLEMENT 2,
"EVALUATION OF SURVEILLANCE FREQUENCIES
AND OUT OF SERVICE TIMES FOR THE
ENGINEERED SAFEGUARDS FEATURES ACTUATION SYSTEM"

Enclosed are twenty-five (25) copies of WCAP-10271, Supplement 2, "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safeguards Features Actuation System" (Proprietary), twelve (12) copies of the non-proprietary version, WCAP-10272, Supplement 2, one (1) copy of Application for Withholding, CAW-86-014, and one (1) copy of the original affidavit. This report provides documentation of a program authorized by the Westinghouse Owners Group to develop a methodology to be used to justify revisions to generic and plant specific technical specifications. More specifically, this report represents the completion of the Owner's Group program to justify relaxing surveillance intervals and allowed outage times for Reactor Trip and Engineered Safeguards Features Instrumentation. Earlier reports in this program include WCAP-10271, issued in January 1983 and WCAP-10271, Supplement 1, issued in July 1983. The methodology used in this report to justify these technical specification relaxations is the same as the methodology used in the earlier reports. The NRC's Safety Evaluation Report on WCAP-10271 was issued by NRC letter of February 21, 1985 to J. J. Sheppard, past Chairman of the Westinghouse Owners Group, from C. O. Thomas, Chief, Standardization and Special Projects Branch of the NRC's Division of Licensing.

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Two Rids 1007.1/25 WCAP-10271 Suppl 2
1008.1/12 WCAP-10272 Suppl 2

Operating utilities are becoming increasingly aware of the impact of current test and maintenance requirements on plant operation. Many inadvertent reactor trips have occurred which can be attributed to incidents during the performance of testing and maintenance and which have caused unnecessary plant transients and challenges to protection systems. Additionally, there is a significant manpower commitment associated with the performance and administration of the surveillance program. Much of this manpower can be redirected to matters more appropriate to the assurance of safe operation by decreasing the frequency of surveillance of some equipment while still maintaining the high reliability of that equipment. A particularly salient aspect of the manpower commitment is the amount of time and attention required on the part of the control room operators and shift supervisor in test and maintenance activities. Less frequent surveillance would minimize this distraction from the primary function of monitoring and maintaining the plant in a safe condition. The demonstrated high reliability of plant equipment, especially the instrumentation systems, justifies a reevaluation and modification of test and maintenance requirements related to these concerns.

Accordingly, it is requested that the NRC review and approve WCAP-10271, Supplement 2, as providing an acceptable methodology for obtaining technical specification revisions and indicate that this report can be referenced in plant specific submittals to justify relaxing Engineered Safeguards Features Actuation System Instrumentation surveillance intervals and allowed outage times. Upon approval of WCAP-10271, Supplement 2, it is expected that the NRC would revise generic Standard Technical Specifications for Westinghouse Pressurized Water Reactors based upon the results of the evaluation of the Engineered Safeguards Features Actuation System.

This submittal contains Westinghouse proprietary information - commercial and financial information which they consider privileged or confidential. It is of a type customarily held in confidence by Westinghouse and is customarily not disclosed to the general public. A non-proprietary version of the report is also included.

This information is being furnished in accordance with the request of the Commission and pursuant to the Commission's general powers under Section 161 of the Atomic Energy Act of 1954, as amended. Accordingly, it is requested that the Westinghouse proprietary information attached hereto be handled on a confidential basis and be withheld from public disclosure.

This material is for your internal use only and may be used only for the purpose for which it is submitted. It should not be otherwise used, disclosed, duplicated or disseminated, in whole or in part, to any other person or organization outside the Office of Nuclear Reactor Regulation without the prior written approval of Westinghouse. Correspondence with respect to the application for withholding should reference CAW-86-014, and should be addressed to R. A. Wieseemann, Manager of Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P. O. Box 355, Pittsburgh, Pennsylvania 15230.

Very truly yours,



L. D. Butterfield, Chairman
Westinghouse Owners Group

LDB:dac
Attachments

cc: H. L. Thompson, Jr.
E. J. Butcher, Jr.
F. J. Congel
T. Novak