DS09
T. O'Brien

64FR 66213
Nov. 24, 1999

(16)

State of New Jersey

Department of Environmental Protection

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

January 10, 2000

David L. Meyer, Chief
Rules and Directives Branch
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjucations Staff

The NRC is proposing to endorse the industry topical reports for referencing in site-specific licensing actions to remove commitments for maintaining nuclear power plant Post Accident Sampling System (PASS). The Westinghouse Owners Group and Combustion Engineering Owners Group submitted topical reports WCAP-14987-NP and NPSD-1157 that provides justification for elimination of PASS.

The NRC has concluded that the information to be obtained through PASS can be inferred to a large degree from other indications. These indications are available earlier in an event than the PASS samples due to the time needed to obtain and analyze the PASS sample. Additionally, they conclude that the PASS samples are difficult to obtain and are subject to inaccuracies due to physical phenomena involved in taking samples.

The NRC is seeking comment on whether elimination of information obtained from radionuclide sampling using the PASS may have an adverse effect on the offsite emergency response organizations' ability to respond to an accident in view of;

1) the availability of information provided by plant conditions, plant radiation monitor readings and field monitoring readings and,

2) the limitations associated with the accuracy and timeliness of information provided by the PASS.

We understand that a new scheme for classifying emergency conditions has been developed and some power plants are using them. This scheme does not rely on the results of analysis of samples of plant fluids. With the elimination of the need for determining the radionuclide content of reactor coolant, containment sump, and containment air samples for core damage assessment, they believe that the radionuclide determination in PASS is completely eliminated.

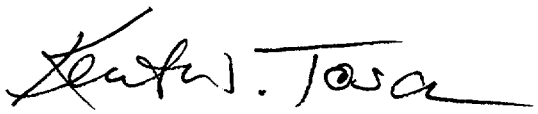
While this may be more effective in quickly determining emergency classification levels, it may not be as effective in determining short and longer-term protective actions. Off-site officials need to have a mechanism to know not only inferred source term, but also actual source term over time, and the stability and potential hazards that remain in the coolant.

Addd. J. DBrien

Both magnitude and mix of radionuclides is important once the reactor is considered stable and recoverable. As part of the licensee's plant recovery determination, a series of PASS samples should be taken. The inventory derived from these samples would support the data collected from other areas and could provide a clearer understanding of the release fraction. This inventory and source term data would enhance the confidence of public health officials in their evaluation of subsequent protective actions in the ingestion phase.

As a public health official and offsite responder whose role as a decision-maker in making protective action recommendations for the governor, the elimination of the PASS could have a detrimental effect on public actions. An assurance from the licensee of the total inventory of radionuclides for potential release needs to be understood. This understanding of what potential hazards are contained in the reactor has to become important at some phase of an emergency and is certainly necessary for public assurance.

Therefore, we recommend that the PASS not be completely eliminated and in fact be used as a tool to understand plant stability and more accurately portray core inventory and release fractions.



Kent Tosch, Manger
NJ Bureau of Nuclear Engineering