

Union Electric

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J. O'Brien

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US NRC

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64FR 66213
Nov. 24, 1999

(21)

Mr. David L. Meyers
Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ULNRC-04177

Dear Mr. Meyers:

Comments Related to Elimination of Post Accident Sampling at Nuclear Plants



AmerenUE is pleased to provide comments related to elimination of post accident sampling at commercial nuclear power generating stations. These comments are in response to the NRC's request published in the Federal Register on November 24, 1999 in Vol. 64, No. 226, pp. 66213 and 66214.

AmerenUE endorses the elimination of the post accident sampling system (PASS). Our endorsement for PASS elimination is based on its current lack of contribution to emergency planning activities or routine operations at the Callaway Plant in addition to the significant resources expended to maintain the PASS and train operators.

In particular, all emergency planning decisions and recommendations at Callaway Plant made in the first few hours of an event are made without reliance on PASS. The declaration of Emergency Action Levels, the formulation of Protective Action Recommendations, Offsite Dose Projections and Core Damage Assessment are based on established guidance. This guidance considers the loss / potential loss of fission product barriers, measured plant parameters, measured radiation releases, and offsite field monitoring. The input to these activities is from plant instrumentation and field monitoring and not PASS sampling. The methodology used at the Callaway plant is:

- Protective Action Recommendations are evaluated using plant parameters, effluent monitoring, field monitoring teams, and dose projections. Plant procedure EIP-ZZ-00212 implements this process and does not require use of the PASS to evaluate these conditions. The source documents used to develop this program at Callaway Plant are: EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" and NUREG 0654/FEMA-REP-1, "Criteria for Preparation of and Evaluation for Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants".
- Offsite Dose Projections are made using plant procedure EIP-ZZ-01211 and does not utilize information obtained from PASS to evaluate offsite dose. Effluent radiation monitors, plant parameters, field monitoring teams and software calculations are used to make dose projections.

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- **Emergency Action Levels** are evaluated under the following conditions: abnormal radiation events, loss of fission product barriers, hazards affecting plant safety, and system malfunctions. Effluent radiation monitors, plant parameters, field monitoring teams, and software calculations are used. Plant procedure EIP-ZZ-00101 implements this process and does not require use of the PASS to evaluate these conditions. The source documents used to develop this program at Callaway Plant are: NUREG-0818, "Emergency Action Levels for Light Water Reactors", NESP-0007, "Methodology for Development of Emergency Action Levels", and Reg. Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors".
- **Core Damage Assessment** is calculated using plant procedure EDP-ZZ-00005. AmerenUE concurs with Topical Report WCAP-14696, "Westinghouse Owners Group Core Damage Assessment Guidance". This revised methodology uses a calculational technique for estimating core damage using real-time plant indications rather than samples of plant fluids by the PASS.

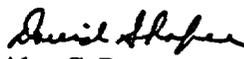
AmerenUE does not believe that PASS could realistically play a significant role in formulating emergency planning decisions based on the following:

- PASS samples may not be available in a timely manner.
- PASS samples may divert resources from other important emergency response activities, especially early in an event.
- PASS samples, although designed to minimize radiation exposures to plant personnel, could result in significant radiation exposures compared to monitoring plant instrumentation in the Control Room.
- After the initial PASS sample is taken, personnel access to certain portions of the plant auxiliary building may be limited or restricted, potentially hampering the implementation of certain recovery / mitigation activities.

AmerenUE has also recently discussed the planned elimination of PASS with the state and local emergency response organizations that interface with the Callaway Plant. As a result of those discussions, we have not identified any situations where the elimination of PASS might degrade the effectiveness of the Callaway Plant emergency response.

Based on these considerations of the current role of PASS in emergency planning and normal operations at the Callaway Plant, AmerenUE can confidently endorse its elimination from the plant design. Consequently, AmerenUE supports NRC's proposed endorsement of the Westinghouse Owners Group and Combustion Engineering Owners Group topicals.

Sincerely,


for Alan C. Passwater
Manager Corporate Nuclear Services

DJW/jdg

cc: M. H. Fletcher
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