

Public Meeting

Risk-Informing the Technical Requirements of 10CFR50.44

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Two White Flint - T-8A1

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Summary of Presentation

(from Public Workshop 2/24/00)

Sufficient knowledge exists to change the regulations for Combustible Gas Control.

Focus must be on severe accidents.

Petition for rulemaking on 10CFR50, GDC 41, and 10CFR50.44 is a combination of:

Retain what is effective and efficient.

Add where necessary.

Delete what is not effective and efficient.

Combustible Gas Control Configurations

Unit	Monitors	Hydrogen % action level	Design pressure Failure pressure (psig)	Repressurization	Purge	Permanent Recombiners	Movable Recombiners
Unit 1	90 minutes	3.5%	59/153	NA	NA	primary inside containment	NA
Unit 2	90 minutes	3.5%	55/140	primary portable blowers 2 psig	primary 6" mini purge	NA	backup off site
Unit 3	30 minutes	3.0%	36/85	primary permanent dilution blowers 18 psig	primary 4"	NA	backup off site
Unit 4	30 minutes	3.0%	59/140	NA	NA	NA	primary on site
Unit 5	varies according to EOP	3.0%	55/137	backup portable blowers 1 psig	backup 48" butterfly	primary Intermediate Building	NA
Unit 6	90 minutes	3.0%	54/141	NA	NA	Primary inside containment	NA

3/5

Observations

(on six sites evaluated so far - all large dry containments)

Wide variation in implementation of 10CFR50.44.

Use of repressurization/purge and movable recombiners. Implementation of design basis LOCA requirements (FSAR) could result in significant detriment (public health risk and worker health risk) during severe accidents for some plants.

Containment capability more than adequate (IPE).

Hydrogen monitoring safety function only for repressurization/purge or recombiners.

Personal Belief

Personnel at the nuclear electric power units should not be in the position where implementation of design basis LOCA hydrogen requirements would be detrimental to public health risk and worker health risk during severe accidents especially with respect to repressurization/purge and movable recombiners. This impacts how personnel at the nuclear unit prepare accident procedures and emergency plans and might impact how personnel would respond in an actual severe accident.

In my opinion, immediate action to remedy this situation is warranted.