

Mr. Kenneth D. Bergeron
 Containment Modeling Division (6429)
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February 7, 1996

Dear Mr. Bergeron:

We have reviewed the revised draft SAND94-1174, "Assessment of the CONTAIN Direct Containment Heating (DCH) Model: Analyses of DCH Integral Experiments," dated August 1995. The revised report has addressed a number of our previous comments, and appeared to resolve many of the earlier contradictions to the conclusions reached either in the DCH experimental research or the analyses used in DCH issue resolution efforts. However, we believe that despite the significant effort devoted to the revising of specific language in the report we find that the description of the models and indeed the underlying modeling assumptions are at variance with other approaches without sufficient justification or clarification. Some of these modelling assumptions give rise to the perception of elevated importance for some phenomena, while other modelling assumptions, in our view, are either inadequately justified or have no clear physical basis (e.g., treatment of nonairborne debris, slip ratio of 1 for airborne debris in the subcompartment, debris-water interaction). While we believe the models in the code provide CONTAIN with a general capability to perform analysis, which was recognized in the earlier CONTAIN peer review, that peer review represented a macro assessment of code modelling with respect to DCH and did not concentrate at length on the individual elements of the modelling. Furthermore, validation of the DCH models against important separate effects test data was not undertaken and remains a significant shortcoming in the assessment process. At this time, we believe that the resources required to address issues in the report far outweigh any accrued benefits to the NRC. Therefore, it is our position that it will suffice to have the report transmitted to the NRC as a letter report in order to meet the contractual requirements for a deliverable. We also conclude that without substantial additional work to buttress the technical substance of this report and additional independent peer review, this research is not suitable for scientific publication.

Sincerely, /s/

Charles G. Tinkler
 Accident Evaluation Branch
 Division of Systems Technology
 Office of Nuclear Regulatory Research

cc: N. Ortiz, SNL
 J. Kelly, SNL

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