

January 25, 2001

MEMORANDUM TO: Steven K. West, Chief
Generic Issues and Regulatory Improvements Section
Generic Issues, Environmental, Financial &
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Division of Reactor Program Management, NRR

FROM: Peter C. Wen, Project Manager/**RA**
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SUBJECT: TELECONFERENCE WITH A REPRESENTATIVE OF THE NUCLEAR
ENERGY INSTITUTE (NEI) TO DISCUSS POSSIBLE SIMPLIFICATION
OF EMERGENCY OPERATING PROCEDURES (EOPs)

On January 23, 2001, Mike Snodderly (SPSB), John Tappert (REXB), Bob Hagar (REXB) and Peter Wen (RGEB) held a teleconference with Adrian Heymer of NEI on the possible removal of certain combustible gas control actions from EOPs. The purpose of the teleconference was to (1) discuss two potential concerns, (2) discuss their possible safety significance, and (3) determine industry's interest in simplifying the related EOPs.

Background:

During public meetings on risk-informed alternatives to 10 CFR 50.44, "Standard for Combustible Gas Control," the staff became aware that some licensees' EOPs may contain steps that could result in dose consequences that are not commensurate with the intended safety benefit.

The first concern deals with the fact some generic technical guidelines recommend activating the external hydrogen recombiners when the containment hydrogen concentration exceeds 0.5 percent. This could result in an additional potential leakage path from the containment, a distraction to operators, and unnecessarily high exposure rates to operators activating and isolating the recombiner system.

The second concern deals with plants that rely, primarily, on a hydrogen purge system. The EOPs that were developed for these facilities may instruct operators to vent containment prior to reaching 4 percent hydrogen. This would increase the probability of bypassing containment and may result in unnecessary exposure to plant personnel and the public. The staff has been unable to confirm or deny this second concern. The staff has determined that this action is not included in generic guidance for the development of EOPs. If this action was included in a licensee's EOPs, the staff believes that operators would successfully transition to more appropriate venting guidance in the severe accident management guidelines.

Summary:

The staff indicated its interest in engaging NEI to determine the extent of the above concerns and licensee interest in resolving any possible conflict between design-basis combustible gas control requirements and severe accident management guidance. Resolution of these concerns may include removing certain combustible gas control actions from the EOPs. The NEI representative indicated that he understood the issue and will brief his management on this issue. NEI may raise the issue to the Owner's Groups. The NEI representative plans to provide feedback to the staff the week of 1/29/2001.

The staff's effort to develop a risk-informed alternative to the combustible gas control rule, 10 CFR 50.44, would address the above concerns by eliminating the design-basis hydrogen source term. There may still be industry interest in pursuing this possible simplification of EOPs because adoption of the risk-informed alternative would be voluntary and some licensees may not adopt it.

A copy of the staff's talking points were faxed to NEI prior to this teleconference and are attached.

Project No. 689
Attachment: As stated

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