

From: Goutam Bagchi *NBB*  
 To: Charles Tinkler, Christopher Boyd, Farouk Eltawi... *RES*  
 Date: Thu, May 11, 2000 8:27 AM  
 Subject: Re: GT Response to ACRS on SFP Risk for Decommissioning Plants

George,

As we discussed:

1. Respond by stating that our final report will address the seismic conservatism issue - scheduled for August, 2000.
2. We should remind the ACRS that the seismic risk values we provided are conservative mean values. Remember that the use of EPRI hazard curve will lower the risk estimate. We should also remind them that both the EPRI and the LLNL hazard estimates took uncertainty into account - the difference is due to their experts vs our experts. The use of two sets of hazard curves ensures that our decision is based on a thorough understanding of uncertainty.
3. A PRA expert should write the input for the green ticket on the uncertainty issue. I met with Gareth and he is willing to write this input.
4. I intend to use 0.5 g for the HCLPF value by raising the seismic risk to 6XE-6. This would leave two operating sites and one decommissioned site. Of the two operating sites, one has already been studied in a NUREG/CR and it has a HCLPF value greater than 3XSSE any way. I have informally discussed this issue with a number of you and I think that it is a good approach.

Thank you,  
 Goutam  
 301-415-3305

>>> George Hubbard 05/10 11:45 AM >>>

Based on my notes from our meeting on the ACRS letter on April 19, 2000, we need input for our response to the ACRS in the areas provided below. Let me know if you see things differently

Our schedule is for our response to the ACRS to be to Gary by May 19. Therefore, Diane and I need input no later than **FIRST THING Monday** so that we can put the response together and start getting concurrences. If possible we would like to have your input this week. Please note that people I need input from are in bold below. I would like Gareth, Mark, Joe, and Glenn to take the lead in pulling together the information and getting the information to us. Glenn, can you take the lead in working with Goutam in providing words on seismic conservatism? ( We may just want to say we will provide further discussion in the final report).

To help I attached the slides we used at the TA brief.

Diane will be doing the first draft but be sure and provide you input to me also.

Thanks for your help

#### Basic Questions to Address relative to ACRS Letter

1. What is the effect of ACRS issues on frequency of fuel uncover/zirconium fire?
2. Is the proposed pool performance guideline (LERF -  $1 \times 10^{-5}$ ) of acceptable?
3. Do we still believe we have 10 hours after fuel uncover to take evacuation actions before having a zirconium fire?
4. Can we truly walk away from the plant after 5 years of decay time considering a zirconium fire?

Prepare response to ACRS with following points:

Question #1 Answer: No, provide reasons why frequency is not affected - input to George by Gareth/ Mike

975

0/1/83

Question #2 Answer: PPG using LERF criteria is acceptable - explain why - input to George by Mark/Charlie

Issues to address: With or without ruthenium consequences are similar to operating reactor LERF

Based on findings of study, values at decommissioning plants are way below LERF values

Discuss that we will include the additional analysis on ruthenium and the implications of it in the final report.

Discuss that we will include data for 95% (vs 99.5% previously used) evacuation efficiency in final version of report.

Discuss potential for confirmatory research and/or ongoing research relative to plume and decrepitation (fines).

Discuss land contamination as policy issue.

Question #3 Answer: 10 hours is an acceptance time for ad hoc protective actions - input to George by Joe/Farouk/Chris

Provide data from ANL in response stating why hydride formation and other phenomena don't change 10 hours.

Discuss that additional discussion on concerns will be put in final report.

Is this an area for confirmatory research???????

Question #4 Answer: Discuss that chances for zirc fire after five 5 years is remote and why we believe 5 years is good. - Input to George by Joe/Glenn

Discuss that additional data will be put in final report, including additional work on partial drain down.

Acknowledge that we will look at performing confirmatory research. (Is this right ??????)

Attendees:

Mark Rubin    Gareth Parry    Mike Cheek  
Goutam Bagchi    Glenn Kelly    Joe Staudenmeier  
Chris Boyd    Farouk/Eltawila    Charlie Tinkler  
Joe Murphy    Rich Barrett    John Hannon  
Gary Holahan    George Hubbard

George Hubbard  
2870

CC:                    Diane Jackson, Frank Akstulewicz, Gary Holahan, ...