

PK paragraph w/pk

11/16/00 6:15 p

For the purpose of ranking the licensee's performance, the staff's risk analysis for the degraded tube condition indicates that the risk was in the "red" range for the last year of operation with the original steam generators. The threshold for the "red" range is set at a risk level that still provides adequate protection to the public, so that NRC regulatory actions will be taken to ensure that the level of protection remains adequate. The effects of the tube rupture event that occurred on February 15, 2000 were inconsequential to the public, because the licensee effectively controlled the plant, keeping the reactor core from being damaged and keeping the amount of radioactivity released so low that it could not be measured off-site. The "red" finding is based on the degree of potential for operator errors and/or other equipment malfunctions to have resulted in damage to the reactor core and release of large amounts of radioactive materials, considering the spontaneous rupture event that occurred and other accidents that might have occurred to challenge the degraded tubes. The results of the staff's risk assessment indicate that an adequate level of public protection was maintained during plant operation with this condition, although the finding was "red."

J/40

Visualization of LERF issue;

Imagine going out to the front of the White Flint building and drawing a graph with the release from a contained core damage accident (about  $1E-4$  of core radioactive iodine inventory) being drawn as a 1" high bar.

Then, the NRC would model the releases for an SGTR core damage accident (about  $2E-1$  of core iodine inventory) as a bar that reaches above the 15<sup>th</sup> floor if the SG safety valve fails open, and as a bar that goes above the 11<sup>th</sup> floor if the SG safety valve never sticks open.

EPRI proposed a LERF definition that would cut off at a level about at the middle of the 7<sup>th</sup> floor.

Con. Ed. models IP2 SGTRs as having slightly lower releases than NRC does. They would put an SGTR core damage accident with a stuck SG safety valve at about the 10<sup>th</sup> floor, and an event with a functioning valve at the middle of the 5<sup>th</sup> floor.

Con. Ed's position is that, because the middle of the 5<sup>th</sup> floor is below the EPRI criterion at the middle of the 7<sup>th</sup> floor, the SGTR core damage sequences with functional SG safety valves should be treated as if it is only about an inch high on the graph. (But, it is still about 750 times greater than the contained release.)