

----- E-mail Message -----

From: Thomas Green, Boiling Water Reactor Owners Group (BWROG)  
Sent: September 28, 2001  
To: Robert Pulsifer, NRC Project Manager for BWROG

Can you answer the attached question that regards PASS contingency plans?

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----- Attached Message 1 -----

From: Licensee (Niagra Mohawk)  
Sent: Friday, September 28, 2001 1:06 PM  
To: Green, Thomas A. (PS, NE)  
Subject: RE: PASS Question

I understand that the contingency does not need to be demonstrated-----but does that mean that the contingency methods that are devised DO NOT need to meet GDC dose limitations for emergency plan?

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----- Attached Message 2 -----

From: Thomas Green (BWROG)  
Sent: 09/28/2001, 03:38:49 PM  
To: Licensee (NiagaraMohawk)  
Subject: RE: PASS Question

NRC staff told us that the contingency does not have to be demonstrated.

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----- Attached Message 3 -----

From: Licensee (Niagra Mohawk)  
Sent: Friday, September 28, 2001 12:37 PM  
To: Thomas Green (BWROG)  
Subject: PASS Question

Page 12 of the NRC Safety Evaluation that allows PASS relaxation states:

"The staff has identified the following actions (as discussed in the above sections) that licensees should commit to fulfill when proposing to eliminate PASS in accordance with NEDO-32991 and this safety evaluation:

1. Establish a capability for classifying fuel damage events at the Alert level threshold (typically this is 300 microcuries per ml dose equivalent iodine). This capability may utilize the normal sampling system or correlations of radiation readings to coolant concentrations.
2. Develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, suppression pool, and containment atmosphere. These plans should detail the plant's existing sampling capabilities and what actions (e.g., assembling temporary shielding) may be necessary to obtain and analyze highly radioactive samples. Because these are contingency plans, the staff concludes that, in accordance with 10 CFR 50.47 and Appendix E to 10 CFR

Enclosure

Part 50 for emergency plans, these contingency plans must be available to be used by the licensees during an accident; however, these contingency plans do not have to be carried out in emergency plan drills or exercises.

3. Licensees will maintain an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment."

Since the statement above that is highlighted in red references 10CFR50.47 and Appendix E, some individuals at the Nine Mile Point facility feel that we are obligated to demonstrate that contingency sampling methods can be performed within GDC dose limits for the various accident scenarios.

What is the Owner's Group interpretation on this? What is the basis for the Owner's Group opinion? Do we need to conduct person motion studies and dose projections for the various contingency sampling methods and provide shielding so that GDC doses will not be exceeded?

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