

April 4, 2002

The Honorable Mitch McConnell  
United States Senate  
Washington, DC 20510

Dear Senator McConnell:

I am writing in response to your letter of January 30, 2002, to Dennis Rathbun of the Nuclear Regulatory Commission (NRC). In your letter, you forwarded an e-mail from a constituent, Mr. Lanson Rogers, and asked the NRC to review and respond to his concerns. In his e-mail, Mr. Rogers said he was concerned about nuclear power plant safety, particularly Generic Safety Issue (GSI) 191, "Assessment of Debris Accumulation on PWR Sump Performance." He also said that the NRC was not responding to his concerns.

The NRC has been evaluating GSI-191 since 1998 to determine whether debris would clog the emergency core cooling system (ECCS) sump screens after a postulated break in the primary coolant system piping of a pressurized-water reactor (PWR). Approximately two thirds of U.S. nuclear power plants are PWRs.

We have discussed this issue with Mr. Rogers in meetings, phone conversations, letters, and e-mail. Mr. Rogers is concerned about coating debris. Coatings (i.e., paint) are present in large quantities in PWR containments. The concern is that a large-scale failure of coatings could impede the operation of the ECCS during a design basis accident by clogging the sump screens. We believe we have addressed Mr. Rogers' concerns. However, in reviewing our correspondence with Mr. Rogers, we noticed that we did not tell him about our action plan to resolve GSI-191. The plan includes a brief history of the issue, a list of major ongoing activities to address the issue, the major milestones, and the basis for the schedule. This action plan is updated on a quarterly basis, and is publicly available. Please see the Director's Quarterly Status Report dated February 7, 2002 (Accession number ML020150515), which is available at the Commission's Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland, or electronically on the Internet at the NRC Web site <http://www.nrc.gov/reading-rm/doc-collections/cfr>. If there are problems in accessing the document, please contact the PDR Reference staff at 1-800-397-4209, 301-415-4737, or by e-mail to [pdr@nrc.gov](mailto:pdr@nrc.gov).

We invited Mr. Rogers to attend a meeting with the industry's ECCS Task Force which took place on March 28, 2002. He did not attend the meeting in person or by phone.

We have extensively tested and analysed the failure of containment coatings under postulated accident conditions. We have spent over \$2.7 million on the GSI-191 evaluation and over \$2.5 million on the containment coating evaluation. Based on the NRC's coatings evaluation, we concluded that any failed coatings, in the absence of other types of debris (e.g., insulation), are unlikely to clog ECCS sumps. However, the GSI-191 study considered combinations of

potential debris types. When considering combinations of debris, the GSI-191 study concluded that sump clogging is a credible safety concern for PWR plants; therefore, we are tasking licensees to evaluate the susceptibility of their plants to clogging. If they determine that their plants are susceptible, they should take appropriate action. It is clear that coating debris should be considered as a possible contributor when evaluating plant susceptibility to clogging. Our schedule for resolving GSI-191 is commensurate with the level of risk to the public health and safety.

If Mr. Rogers has any further questions, he may contact John Lamb. Mr. Lamb is the lead project manager for this issue. He can be reached at 301-415-1446 or by e-mail to [jgl1@nrc.gov](mailto:jgl1@nrc.gov).

Sincerely,

***/RA by William F. Kane Acting For/***

William D. Travers  
Executive Director  
for Operations

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This correspondence addresses policy issues previously resolved by the Commission, transmits factual information, or restates Commission policy.

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