

From: Peter Tam
To: internet:Patricia.s.furio@ccnppi.com
Date: 9/26/02 9:53AM
Subject: Proposed amendments re. 2 TSTFs (**TAC MB6062, MB6063**)

Pat:

Donna Skay is still on leave, hence I am handling this during her absence.

Our reviewer, David Cullison, has looked at your application and it appears to be in accordance with the two TSTFs. David does have a number of concerns about the addition of the note to allow the penetrations to be open (LCO for TS 3.9.3, Containment Penetration).

1. The Reviewer's Note in TSTF-312 requires a confirmatory dose calculation indicating acceptable dose consequences if a FHA occurs while the penetrations are open. We need to verify your position that the FHA analysis assumption that any radioactive release is unfiltered bounds having the penetrations open. The application indicates that the FHA analysis assumed the personnel airlock door is open but not the penetrations. It is also stated that the time to close such penetrations or combinations of penetrations shall be included in the confirmatory calculations.

2. The Reviewer's Note also requires commitments from the licensee to implement acceptable administrative procedures to ensure that in the event of a FHA, the penetrations can and will be promptly closed. Insert 2 in the TSTF provides some information on what are attributes of acceptable administrative controls. The application appears to be silent on the administrative controls you have or will put in place to meet the requirements of the TSTF.

3. TS 3.9.4 and 3.9.5. According to the application, the two purposes of closing containment in the case of a loss of SDC are fission product release prevention and the retention of the pressure generated by the boiling of the reactor coolant. The containment door is probably fine for limiting fission product release but can it act as a pressure boundary?

Please call me to arrange a conference call. **The sole purpose of this e-mail is to prepare Calvert Cliffs personnel for a conference call. This e-mail does not convey an NRC position, nor does it formally request for additional information. The comments in this e-mail will be dispositioned in the conference call.**

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