



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JAN 17 1991

MEMORANDUM FOR: Chairman Carr  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick

FROM: James M. Taylor  
Executive Director for Operations

SUBJECT: MARK I CONTAINMENT PERFORMANCE IMPROVEMENT PROGRAM.

In a memorandum of September 14, 1990, the staff informed the Commissioners that it was acting on the new information provided by the Power Authority of the State of New York (PASNY) in its letter of July 25, 1990, regarding the plant-specific features of the containment vent path at the James A. FitzPatrick Nuclear Power Plant (FitzPatrick). The staff stated that, when it completes its review regarding FitzPatrick, it will communicate its conclusions to PASNY and will advise the Commission accordingly. This memorandum provides the results of the staff's review and summarizes the staff's response to PASNY's letter of July 25, 1990.

The existing wetwell vent pathway at Fitzpatrick, as outlined by PASNY in its letter, consists of schedule 40 hard pipe throughout the reactor building, fully capable of withstanding the anticipated pressures. The vent path is "soft" only at the standby gas treatment trains which are outside the reactor building. If venting resulted in a rupture of a standby gas treatment train, the impact is that much of the energy released would be at ground level rather than elevated. Some fraction of the energy release would continue to be elevated as long as standby gas treatment fans continued to operate. In no case would the reactor building or plant personnel be affected.

The licensee requests that in view of existing venting capability and accident management strategies, the NRC defer consideration of vent modifications until the results of their plant-specific IPE program for FitzPatrick are integrated into the decisions on such modifications.

On August 22, 1990, the staff inspected the FitzPatrick facility to verify PASNY's statement that the current plant-specific features show that the FitzPatrick wetwell vent path is hardened. The inspection results indicate

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that, although the present vent path does not fully meet the industry's general design criteria for hardened vents that were approved by the staff, there is a reasonable expectation that the only safety-related equipment that could be damaged as a result of venting are the two Standby Gas Treatment System (SGTS) trains. Both of the SGTS trains are located in a separate enclosure outside the reactor building. The postulated failure of the SGTS trains is not likely to affect the performance or accessibility of the other safety equipment.

The staff has prepared a response to PASNY's letter of July 25, 1990, approving PASNY's request to be allowed sufficient time to properly integrate the results of its IPE program into its decision to fully implement the approved general design criteria for hardened vent paths. The staff requested that, following completion of the IPE on June 30, 1991, PASNY should integrate the results of the pertinent sections of the IPE into a final position regarding implementation of the hardened vent criteria. Also, the staff requested that PASNY should use the results of the IPE to re-examine the venting procedures and the training of operators. Within 60 days following completion of the IPE, PASNY should submit to the NRC the details of the analysis, justification for the positions taken, and any proposed plant modifications and resulting changes to the operating procedures. The staff will consider this information in its final decision concerning implementation of the hardened vent capability at FitzPatrick.

**Original Signed By:**  
**James M. Taylor**  
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Executive Director  
for Operations