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POLICY ISSUE
(Information)

SECY-91-036

February 12, 1991

For: The Commissioners
From: James M. Taylor
Executive Director for Operations

Subject: MARK I CONTAINMENT PERFORMANCE IMPROVEMENT PROGRAM

Purpose: To provide the Commission with a status report relative to the implementation of the hardened vent modification program as outlined in the Commission's directives in the staff requirements memorandum of July 11, 1989.

Background: In SECY-90-206, of June 7, 1990, the staff summarized its actions regarding installation of hardened vents at Mark I Containment plants from September 1, 1989, to June 7, 1990. In that paper, the staff indicated that all but four licensees (five plants) had committed to voluntarily install the hardened vent modifications. The staff also indicated that it had completed the backfit analyses for five plants (Dresden Units 2 and 3, Millstone Unit 1, Oyster Creek, and FitzPatrick) because their licensees declined to install the hardened vent capability. The staff concluded that the proposed backfits were justified because a significant additional protection of the health and safety of the public would result from the operation of the vent system. The staff indicated that it would forward the backfit analyses to the licensees with a request that, in light of the conclusions of the backfit analyses, they reconsider their decisions to not install hardened vents.

NOTE: TO BE MADE PUBLICLY AVAILABLE
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The staff had set a target date of January 1993 for the implementation of the hardened vent capability at Mark I plants. The staff indicated that the schedules were acceptable for 16 out of the 18 plants that were to be modified voluntarily. The staff did not accept the schedules for the modification of Nine Mile Point Unit 1 and Peach Bottom Unit 3, and was conducting further negotiations to improve their implementation schedules.

Discussion:

This paper summarizes the staff's actions following the issuance of SECY-90-206 relative to the installation of hardened vent capabilities at the Mark I plants.

On June 15, 1990, the staff transmitted to the non-volunteer licensees the backfit analyses and the staff's conclusions that the backfits were warranted. The staff requested that the licensees reconsider their decisions in light of the results of the staff's plant-specific backfit analyses and commit to install the hardened vents on a voluntary basis. As a result of the staff's request, a follow-on meeting with the licensees, and several telephone discussions, the licensees for four plants (Dresden Units 2 and 3, Millstone Unit 1, and Oyster Creek) committed to voluntarily install hardened vent capability. The staff summarized the details of its actions relative to the backfits in a memorandum of September 14, 1990 from James M. Taylor to the Commissioners. However, the Power Authority of the State of New York (PASNY), the licensee for the FitzPatrick plant, provided new plant-specific information which indicated that the wetwell vent path at FitzPatrick is hardened up to the outer wall of the reactor building. PASNY requested that the NRC should defer consideration of further vent modifications until the individual plant examination (IPE) for FitzPatrick is completed (June 30, 1991) and integrated into the decisions regarding any further modifications.

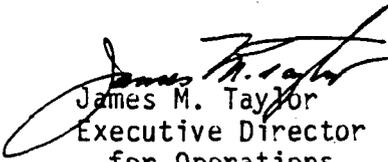
The staff summarized the conclusions of its evaluation of the new information provided by PASNY in a memorandum, from James M. Taylor to the Commissioners, of January 17, 1991. On January 24, 1991, the staff

communicated the results of its analyses to PASNY approving the delay in implementation requested by PASNY and requesting that PASNY provide the staff with its evaluation of further modifications following completion of its IPE program.

The present implementation status is that the licensees for 22 out of the 24 Mark I Containment plants have volunteered to install hardened vent modifications. Boston Edison Company has already installed a hardened wetwell vent path at its Pilgrim facility. The licensee for the remaining Mark I Containment plant (FitzPatrick) has requested, and the staff has approved, a delay in adopting modifications until the licensee completes its IPE program and addresses the NRC-approved general design criteria as applied to the FitzPatrick facility.

The staff previously accepted the implementation schedules for 20 of the 22 plants that are being voluntarily modified. These 20 plants should either be modified by the spring of 1993 or are in an extended shutdown phase (Browns Ferry Units 1, 2, and 3) and will be modified either upon startup (Browns Ferry Units 1 and 3) or after one fuel cycle (Browns Ferry Unit 2). Following negotiations with the staff, the Niagara Mohawk Power Corporation (NMPC) revised its schedule for implementation of hardened vent capability at Nine Mile Point Unit 1 from March 1994 to January 1993 (letter of June 22, 1990). The staff has accepted the NMPC's revised schedule. Peach Bottom Unit 3 is scheduled for modification by the fall of 1993. The staff has not accepted the schedule for Peach Bottom Unit 3 and is exploring with the Philadelphia Electric Company a possibility that the modifications which do not require an outage can be completed following the fall 1991 outage at Peach Bottom Unit 3, and the balance of modification requiring an outage can be made during the two week midcycle outage scheduled for January 1993.

The Enclosure summarizes the modification status and schedule of the 24 Mark I plants.


James M. Taylor
Executive Director
for Operations

Enclosure:
Status List

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STATUS OF HARDENED VENT MODIFICATIONSAT 24 MARK I CONTAINMENT PLANTS

<u>PLANT</u>	<u>MODIFICATION SCHEDULE</u>
Browns Ferry 1	Upon Restart
Browns Ferry 2	18 months from restart
Browns Ferry 3	Upon Restart
Brunswick 1	January 30, 1993
Brunswick 2	January 30, 1993
Cooper	Spring, 1993
Dresden 2	January 1, 1993
Dresden 3	January 1, 1993
Duane Arnold 1	December 31, 1992
Fermi 2	December 31, 1992
FitzPatrick	Implementation to be determined after IPE Spring 1993
Hatch 1	Spring 1993
Hatch 2	December 1, 1992
Hope Creek	January 1, 1993
Millstone 1	March 1993
Monticello	March 31, 1993
Nine Mile Point 1	prior to January 1993
Oyster Creek	November 1992
Peach Bottom 2	Fall, 1992
Peach Bottom 3	Fall, 1993
Pilgrim 1	Implemented
Quad Cities 1	January 1993
Quad Cities 2	January 1993
Vermont Yankee	December 1992