Doerflein, Lawrence

From: Thadani, Mohan
Sent: Monday, May 21, 2012 8:39 AM
To: Monninger, John; Vaidya, Bhalchandra; Lee, Samson; Bickett, Brice; Doerflein, Lawrence; Jennerich, Matthew; Dennig, Robert; Ulses, Anthony; MorganButler, Kimyata; Fretz, Robert; (b)(7)(C) Eul, Ryan; Richards, Karen; Safford, Carrie; McIntyre, David; Collins, Timothy; Scott, Catherine; Albert, Michelle; Cook, William; Russell, Andrea; McCarver, Sammy; Lemoncelli, Mauri
Cc: Wilson, George
Subject: RE: G10120172, 2.206 Petition, PRB Meeting of May 17, 2012 to make Initial Recommendation to accept or reject

All:

Let me clarify. GL 89-16 states that ,"the staff believes that the available information provides strong incentive for installation of a hardened vent. First, it is realized that all affected plants have in place emergency procedures directing the operator to vent under certain circumstances (primarily to avoid exceeding the primary containment pressure limit) from wetwell airspace. Thus, incorporation of a designated capability consistent with objectives of the emergency procedures guidelines is seen as a logical and prudent plant improvement. Continued reliance on the preexisting capability (non-pressure bearing vent path) which may jeopardize the access to vital plant areas or other equipment is unnecessary complication that threatens accident management strategies." This statement was intended to make it clear that the purpose of the modification was mitigation for severe accidents. The GL goes on to state that, "second, implementation of a reliable venting capability and procedures can reduce the likelihood of core of core melt from accident sequences involving loss of long-term decay heat removability a factor by about a factor of 10. Reliable venting capability is also beneficial, depending on the plant design and capabilities, in reducing the likelihood of the core melt from other accident initiators , for example station blackout and anticipated transients without scram." (b)(5) would be for prevention of severe accidents. Thus, GL89-16 addressed both mitigations of severe accidents and their prevention also.

I hope this helps.

Mohan

From: Monninger, John
Sent: Friday, May 18, 2012 4:16 PM
To: Vaidya, Bhalchandra; Lee, Samson; Bickett, Brice; Doerflein, Lawrence; Jennerich, Matthew; Dennig, Robert; Ulses, Anthony; MorganButler, Kimyata; Fretz, Robert; (b)(7)(C) Eul, Ryan; Richards, Karen; Safford, Carrie; McIntyre, David; Collins, Timothy; Scott, Catherine; Albert, Michelle; Cook, William; Thadani, Mohan; Russell, Andrea; McCarver, Sammy; Lemoncelli, Mauri
Cc: Wilson, George
Subject: RE: G10120172, 2.206 Petition, PRB Meeting of May 17, 2012 to make Initial Recommendation to accept or reject

(b)(5)

C/27

(b)(5)

From: Vaidya, Bhalchandra
Sent: Friday, May 18, 2012 3:26 PM
To: Lee, Samson; Vaidya, Bhalchandra; Bickett, Brice; Doerflein, Lawrence; Jennerich, Matthew; Dennig, Robert; Ulses, Anthony; MorganButler, Kimyata; Fretz, Robert; (b)(7)(C) Eul, Ryan; Richards, Karen; Safford, Carrie; Monninger, John; McIntyre, David; Collins, Timothy; Scott, Catherine; Albert, Michelle; Cook, William; Thadani, Mohan; Russell, Andrea; McCarver, Sammy; Lemoncelli, Mauri
Cc: Wilson, George
Subject: G10120172, 2.206 Petition, PRB Meeting of May 17, 2012 to make Initial Recommendation to accept or reject

Folks,

Subsequent to our discussion in the PRB meeting on May 17, 2012, I have had more conversations with Mohan Thadani, who was the PM for the GL 89-16. The following points would help to clarify the claims of the Petitioners with respect to the NRC efforts during the GL 89-16 process as well as Post-Fukushima Events:

(1) Contrary to our discussion, GL 89-16 addresses all contents of "Vent Products," such as Steam, Hydrogen, Nitrogen, etc. This is mainly because the BWROG criteria that were used to evaluate the licensees' responses, included Hydrogen concerns (In addition to Sept 28, 1992 NRC Approval, I am providing two more documents from ADAMS Archive for your information). GL 89-16 was part of the NRC's program to enhance the Containment Performance in response to "Beyond Design Basis Accidents, namely SBO TW Sequence," in addition to the Design Basis Accidents. Therefore, the Petitioners' claim that the NRC's evaluation of the licensee's GL 89-16 responses being "improper," "in-adequate," "faulty," etc., is not correct. Whether, the modification to Vent system were installed, or not, FitzPatrick was found to meet the performance requirements per BWROG Criteria.

(2) After Fukushima Accident, the NRC through the near term task force (NTTF), and Japan Lessons Learned Directorate (JLD), has issued the Hardened Vent Order to achieve the "Reliable" Vent System to address the performance issues on the Vent System, all constituents of the Vent Product. The Hardened Vent Order has a prescribed time line for completion, which will require a 10 CFR 50.90 process that allows for public Participation. FitzPatrick is no different from the other 24 odd BWR, MARK I plants. Therefore, the Petitioners' claim that Fukushima event makes the FitzPatrick Vent System unreliable, undependable is true only for "Fukushima Type Event," and is no different than other 24 odd BWR, MARK I plants. The Commission has established the process to resolve the issue for all BWR, MARK I Plants for Fukushima type of events, including FitzPatrick.

With the above discussion, I believe that the Table in the Final PRB Notes of our meeting yesterday, May 17, 2012, should indicate "reject" or "no" for all items.

If you believe that we need another meeting to discuss this more, let me know and Andrea and I will make arrangement for the meeting.

Thanks,

Bhalchandra K. Vaidya
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