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 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Submits details of info to be provided per SSER 2 re venting of primary containment under emergency operating procedures in event of severe accident (beyond DBA conditions).
 Submittal of results of analysis scheduled for 870731.

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BOOK #

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MOCKUP OF 02/06/00

UNIT 2, Niagara Mohawk Station Unit 2, Niagara Mohawk Station

AUTHOR: B. J. J. J.

DATE: 02/06/00

PROJECT: 02/06/00

ISSUE: 02/06/00

Submit details to be provided per BMR 5 re venting of primary containment under emergency operating procedures in event of severe accident (before PSA conditions). Submittal of results of analysis scheduled for 02/06/00.

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June 9, 1986
(NMP2L 0736)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

My letter of April 24, 1986 (NMP2L 0693) stated that Niagara Mohawk will submit additional information concerning containment venting described in Supplement No. 2 to the Safety Evaluation Report for Nine Mile Point Unit 2 by July 31, 1987. This letter provides more details of the information to be provided regarding venting of the primary containment under emergency operating procedures in the event of a severe accident (beyond design basis accident conditions).

It is certainly prudent to be able to intentionally vent the containment to atmosphere at a pressure above the design pressure in the event of a severe accident (beyond design basis accident) before a containment failure occurs as the ultimate pressure is reached. It may also be prudent to vent to atmosphere at a pressure below the design pressure in the early stage of a beyond design basis accident when only nonradioactive (or slightly radioactive) steam is present, then close the vent path so as to be able to contain subsequent possibly more radioactive material at a lower pressure.

As Mr. Stello wrote in the draft of a memo to R. F. Fraley, Executive Director of the ACRS, in early March 1986, "The subject of containment venting is complicated and, as can be seen from our responses, not all of our concerns have been resolved. We welcome ACRS comments and advice. However, keep in mind that containment venting guidance is evolutionary and our review is not complete." We are in a somewhat similar position. Our analysis of containment venting procedures and techniques is not complete. The BWR Owners' Group Emergency Procedures Guideline, Revision 4, is being reviewed before being submitted to the Nuclear Regulatory Commission. In the attachment to Mr. Stello's memo mentioned above, the Nuclear Regulatory

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Commission staff said that they projected completion of their review of Revision 4 some seven months after submittal.

Our containment venting analysis will take into account these Emergency Procedures Guidelines and the staff's review and evaluation of them, and will also consider the analysis submitted by the Philadelphia Electric Company for the Limerick Generating Station which was reviewed and found acceptable in August 1984.

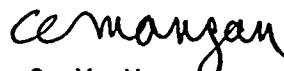
Our analysis will include the following:

- 1) Determination of the appropriate containment pressure and rate of pressure increase at which venting procedures will be initiated;
- 2) A determination of alternative vent paths, and a ranking of priority of use;
- 3) A best-estimate evaluation of the operability of the valves in the selected vent paths;
- 4) An effort to minimize radioactivity releases by proper choice of vent path and timing;
- 5) The exposure of plant personnel to radiation doses;
- 6) The effect of venting on plant equipment.

A determination that suppression pool flashing and hydrodynamic loads do not exceed the design capability of the suppression pool was submitted in my letter of March 10, 1986 (NMP2L 0658).

The amount of effort required for the analysis, together with the dependence of the effort on the availability of the BWR Owners' Group Emergency Procedures Guidelines and the staff's review of them combine to make the date for submittal of the results of our analysis of July 31, 1987 a reasonable one. We want to emphasize, however, that between now and the formal submittal of the results, we will be developing an ever increasing understanding of how to cope with containment venting in the event of a severe accident (beyond design basis accident).

Very truly yours,



C. V. Mangan
Senior Vice President

RAC:ja
1681G

xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

