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December 14, 1994 9:44am

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Baltimore Gas & Electric filed a report to the NRC under 10 CFR 50.72 concerning their discovery (event date - 12/09/94, 11:00 EST) during a review of the Calvert Cliffs UFSAR that the analysis of the long term cooling phase of a LOCA did not model heat transfer from the reactor coolant system metal components to the reactor coolant. BG&E reported that when the reactor coolant system metal sensible heat is included, the reactor coolant released into containment through the break is at a higher enthalpy such that the containment sees slightly higher temperatures for several days after the peak containment temperature. BG&E also reported that the omission increases the post accident load on the service water system which removes heat from the containment via the containment air coolers. BG&E indicated the omission was not an operability concern because the UHS temperatures are low enough to ensure full compliance with current plant design and licensing basis.

The event reported by BG&E per 10 CFR 50.72 is directly comparable to the event NOT reported by PP&L -- the analyzed containment response in a LOCA was non-conservative due to an error (omission) in the original analysis. That fact was apparently sufficient for BG&E to determine the condition was reportable. Independently, BG&E evaluated the magnitude of the non-conservatism and concluded that operability was not challenged.

Please note that BG&E did not claim that the reactor coolant system metal sensible heat did not have to be considered since it was not included in the original analysis and the original analysis had been 'accepted' by the staff.

This BG&E LER is representative of hundreds of reported events I have seen during my career. The PP&L policy of not reporting SGTS failures, non-conservatisms discovered in safety analyses, etc. is totally contrary to my experience at numerous utilities. PP&L's policy not only violates the law, based upon my opinion and upon the accepted practice of other utilities, but also poses a challenge to nuclear safety in this country. With the BG&E LER, other utilities and the NRC are aware of a subtle non-conservatism in the LOCA containment analyses. These utilities have an opportunity to review their own analyses and either verify that their analyses did not omit this factor or correct their analyses if they also omitted this factor. PP&L, by failing to discharge its required reporting obligations, not only keeps its report card 'clean' but also denies nuclear safety information to the industry.

This BG&E report is an excellent example of I believe the game should be played - a problem is identified, its reportability is determined, its impact on operability is determined, and it is resolved. These are the rules that the overwhelming majority of my colleagues in the industry play by. The staff cannot apply different, less rigorous rules to PP&L without making all the players pause and consider. The staff should not pave the way for the players in this important game from stampeding away from safety.

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Attachment 2

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