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SUBJECT: Suppl to 921127 Part 21 rept re high air concentration in reactor bldg making area uninhabitable for retrieving air filters,per NUREG-0737,Item II.F.1.Util current position re fuel pool cooling issues contrary to Reg Guide 1.3.

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December 14, 1992

Mr. Thomas T. Martin
Regional Administrator, Region I
United States Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION
DOCKET NO. 50-387
LICENSE NO. NPF-14
SUPPLEMENT TO 10CFR21 REPORT OF SUBSTANTIAL SAFETY HAZARD

Dear Mr. Martin:

On November 27, 1992, pursuant to the requirements of 10CFR21, Reporting of Defects and Noncompliance, the undersigned submitted to the NRC a report of a "substantial safety hazard" that exists in the design of the Susquehanna Steam Electric Station (SSES) with regard to cooling of the spent fuel pool. During the past week, one of the undersigned, Mr. Prevatte, in the course of performing his assigned duties in the licensee's engineering offices in Allentown, Pennsylvania, discovered documents which are pertinent to the condition that was reported. This letter is to bring these documents to your attention so that they may be considered in your evaluation of this condition.

One of the main points of contention between Pennsylvania Power & Light Company (PP&L) (the licensee) Nuclear Department managers and ourselves regarding this condition has been the accessibility of the reactor building post-LOCA. We have contended that the radiation levels in the reactor building must be considered per the requirements of Regulatory Guide 1.3 and NUREG-0737, and that if they are so considered, the reactor building is inaccessible for at least the first several days of a design basis LOCA event, as stated in the SSES FSAR, Chapter 18. PP&L has taken the position that they do not have to consider accessibility per these requirements, and that the reactor building is accessible, and therefore, the operators can enter the building to take the actions required to provide makeup water to the fuel pool upon loss of normal fuel pool cooling and to mitigate the effects of the boiling spent fuel pool on the safety-related equipment in the reactor building. They have also taken the position that the airborne contributor of post-LOCA reactor building dose does not have to be considered since it was not included in their FSAR submittal. The documents discovered this week directly relate to these points of contention.

In an NRC letter to the licensee dated April 23, 1984 transmitting inspection reports numbered 50-387/84-10 and

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50-388/84-11, in Section 6.0, Sampling and Analysis of Plant Effluent, Item II.F.1-2, pages 12 and 14, the NRC position with regard to accessibility for post-LOCA sampling was stated as follows:

"NUREG-0737, Item II.F.1-2, requires the provision of a capability for the collection, transport, and measurement of representative samples of radioactive iodines and particulates that may accompany gaseous effluents following an accident. It must be performable without exceeding specified dose limits to the individuals involved.

"The sampling units are presently located in the fuel handing area in the 818' level of the reactor buildings. In an accident situation, high air contamination levels could make the area uninhabitable for retrieving the filters. The shielding study by Bechtel did not consider air contamination from an accident...

"Samplers should be located in an assured habitable area so that necessary procedures can be conducted within the dose limits established in NUREG-0737."

PP&L acknowledged these requirements and committed to change their design accordingly in their letter PLA-2219 of June 4, 1984. In a one page discussion, PP&L stated that "...under a post-LOCA environment the high radiation levels on the reactor building refueling floor (elevation 818'/SPING monitor location) would not permit personnel access...", that the peak airborne dose rates on the refueling floor were 600 rem/hr and would remain above 100 rem/hr for the first 100 hours post-LOCA, that the exposure rate would prevent meaningful access, and that as a result of their reevaluation new sampling equipment would be installed in a low radiation area. Regulatory Guide 1.3 and NUREG-0737 assumptions were used as required in their reevaluation of accessibility,

These documents clearly convey the NRC's position with regard to the standards which must be followed in performing post accident accessibility evaluations and whether airborne contamination must be considered. They also clearly convey PP&L's understanding of those requirements, their commitment to conform with those requirements, and their understanding that in applying those requirements, the reactor building is inaccessible for considerable time post-LOCA. PP&L's current position regarding accessibility relative to the fuel pool cooling issues is contrary to these requirements, understandings, and commitments.

We appreciate your consideration of these concerns, and we trust that this additional information will be useful in your

evaluations. Should you require any additional information, please do not hesitate to contact us.

Yours very truly,

Donald C. Prevatte for
David A. Lochbaum

Donald C. Prevatte
Donald C. Prevatte

cc:

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