



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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JUL 13 1979

MEMORANDUM FOR: R. Vollmer, Acting Assistant Director for Systematic
Evaluation Program, DOR

FROM: B. Grimes, Acting Assistant Director for Systems
Engineering, DOR

SUBJECT: RESPONSES TO MOTION TO SUSPEND PROVISIONAL OPERATING
LICENSE DPR-45

Plant Name: LaCrosse Boiling Water Reactor
Docket No.: 50-409
TAC Nos.: 11840, 11835, 11837
Project Manager: J. Shea
Status: Complete

Enclosed is the Plant Systems Branch responses to two of the motions to suspend the LACBWR operating license (TACS 11840 and 11837).

In response to TAC 11835, we do not believe we are prepared to provide a technical response at this time. We are currently reviewing the licensee's justification for unlimited purging (or ventilation). Because the licensee did not comply with the generic letter directing them to cease purging or limit purging to an absolute minimum, not to exceed 90 hours per year, we may be required to take some interim action while we continue our review.

We would like you to arrange a meeting with the licensee for him to discuss his justification for not complying with the above.

B. Grimes, Acting Assistant Director
for Systems Engineering
Division of Operating Reactors

Enclosure:
As stated

Contact:
E. Lantz
X-27110

cc: See next page

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cc w/enclosure: for of the LFW (D. Eisenhut), which
primary D. Eisenhut comments for water cooled reactors

- G. Lainas
- MIPC
- T. Telford
- W. Russell
- G. Knighton
- D. Ziemann
- E. Adensam
- J. Shea
- E. Lantz
- E. Reeves
- Y.S. Huang
- O. Shum

Item 3:

Whereas, LACBWR remains in violation of 10 CFR 50.54(b), which requires that "primary reactor containments for water cooled reactors shall be subject to the requirements set forth in Appendix J", and

Whereas, LACBWR has by DPC's own admission failed to meet Appendix J requirements, as illustrated by at least ten reportable occurrences since September 1975, (Reference 4-13)¹ and

Whereas, DPC has been unable to arrive at any solutions to the electrical penetration leaks, and thus has no guarantee that such leaks will not continue, and

Whereas, we believe that said leaks represent another breach of the containment integrity and as such present substantial dangers inimical to the health and safety of the public,

We, therefore, request that the NRC order DPC to cease operation of LACBWR until such time as all leakage problems are permanently resolved.

Response to Item 3:

10 CFR 50.54(b) requires that primary reactor containments for water cooled reactors shall be subject to the requirements set forth in Appendix J. Appendix J to 10 CFR 50 specifies the requirements for testing procedures, testing frequency and testing method. Appendix J also specifies the leakage limits for determining test failures, and associated reporting procedures for such failures including corrective action plans to effect the repairs.

LACBWR has been conducting its containment leak test in accordance with the requirements contained in the Technical Specifications, which were approved by NRC. LACBWR has also been reporting all test failures and associated corrective actions for repairs. Appendix J recognizes test failures. Reporting test failures by the licensee is required by the Appendix J. It is not an admission by the licensee of failing to meet Appendix J requirements.

The specifically cited electrical penetrations have redundant leakage barriers. The leaks occurred only through one of the barriers at a small fraction of the allowable leakage limits. The said leaks resulted in a loss of redundant leak tight barriers but did not represent a total breach of containment integrity. As such, it had no significant adverse effect upon public health and safety.

Based on the above discussion, the NRC has concluded that LACBWR meets the regulation requirements and that the NRC can not arbitrarily order LACBWR to cease its operation.

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Item 7: presently employed as a Senior Engineering Systems Analyst in the Fuel Systems Branch, Division of Operating Reactors, Office of Nuclear

Whereas, the LACBWR spent fuel storage pool is presently filled to capacity, and

Whereas, there is no storage space available for the eight irradiated assemblies that are currently being stored at Morris, Illinois under a one-time-only three year temporary contract, and

Whereas, the irradiation of more assemblies without a guaranteed off-load capacity is generally regarded as irresponsible, and

Whereas, a DPC request for the expansion of the LACBWR spent fuel storage pool is currently under consideration by the NRC, and

Whereas, the production of any more spent fuel would only serve to increase the "sense of urgency" that DPC has in the past used as a justification for the speedy approval of their proposed spent fuel expansion plan,

We, therefore, request that the NRC order DPC to cease operation of LACBWR until such time as DPC's spent fuel pool expansion is approved by the NRC.

Response to Item 7:

It is the NRC's position that the health and safety of the public is not impaired by leaving a core in the reactor vessel. Thus, if some time in the future the Dairyland Power Cooperative does not have any other place to store spent fuel assemblies it can leave them in the reactor vessel. Because of this position, the NRC does not have regulations requiring licensees to maintain room in the spent fuel pool for a full core offload. Without such a regulation and without indication of a health and safety concern the NRC can not arbitrarily order the cessation of the operation of a plant because of an impending shortage of storage space for spent fuel.

PROFESSIONAL QUALIFICATIONS OF Y.S. HUANG

EDWARD LANTZ

DIVISION OF OPERATING REACTORS

I am presently employed as a Senior Engineering Systems Analyst in the Plant Systems Branch, Division of Operating Reactors, Office of Nuclear Reactor Regulation. My duties and responsibilities involve the review and evaluation of containment leak testing, post accident hydrogen controls inside containment, and associated containment systems.

I joined the Commission in February 1977, as a Nuclear/Mechanical Engineer in the Office of Standards Development where my duties were developing regulatory guides and regulations relating to containment system designs. From January 1974 to January 1977, I was associated with Gilbert/Commonwealth Associates, Inc. as a staff specialist responsible for the design of nuclear power plants, especially in the fluid and heat transfer areas relating to reactor containment designs.

From July 1971 to December 1973, I was associated with Stone and Webster Engineering Company as a mechanical engineer responsible for the design and performance evaluation of power plants including fossil and nuclear fueled plants. My job responsibilities also involved special studies concerning fluid dynamics, heat transfer, and feasibility evaluations.

I have a Ph.D. in Mechanical Engineering from Case Western Reserve University (1971), specializing in fluid and heat transfer. I am a member of the American Society of Mechanical Engineers.

700335

EDWARD LANTZ

DIVISION OF OPERATING REACTORS

U.S. NUCLEAR REGULATORY COMMISSION

PROFESSIONAL QUALIFICATIONS

As an Engineering Systems Analyst in the Plant Systems Branch, I am responsible for technical reviews and evaluations of component and system designs and operating characteristics of licensed nuclear power reactors.

I have a Bachelor of Science degree in Engineering Physics from the Case Institute of Technology and a Masters of Science degree in Physics from Union College and a total of 28 years of professional experience, with over 20 years in the nuclear field. My experience includes work on reactor transients and safeguards analysis, nuclear reactor analysis and design, research and development on nuclear reactor and reactor control concepts and investigations of their operational and safety aspects.

I have held my present position with the Commission since December 1975. My previous position, which I held for about two and one half years, was Project Manager in the Gas Cooled Reactors Branch, Division of Reactor Licensing, U. S. Nuclear Regulatory Commission, where I was responsible for the technical review, analysis, and evaluation of the nuclear safety aspects of applications for construction and operation of nuclear power plants. For about ten years prior to that I was Head of the Nuclear Reactor Section in NASA. My section was responsible for the development and verification of nuclear reactor analysis computer programs, conceptual design engineering, and development engineering contracting. Prior to my employment with NASA, I was a nuclear engineer at the Knolls Atomic Power Laboratory for about six years, where I worked on the safeguards and nuclear design of the S3G reactors and the initial development of the nuclear design of the S5G reactors. Previous experience includes system engineering and electrical engineering with the General Electric Company and electronic development engineering with the Victoreen Instrument Company.

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