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REMARKS

TO BE PLACED IN NRC PDR

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post,	P-1122B	
Robert L. Tedesco, L ² Task	Force, TMI-2	Phone No. X28090
5041-102	OPTIONAL FORM 41 (Rev. 7-7) Prescribed by GSA FPMR (41 CFR) 101-11.206	

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

JUN 1 5 1979

NOTE TO: R. Tedesco

FROM: T. Speis, Acting Chief, Reactor Systems Branch, DSS

SUBJECT: ITEM 13 OF LL TASK FORCE, "PROVIDE DEDICATED AND REDUNDANT PENETRATIONS FOR HYDROGEN RECOMBINERS"

Regarding the discussions on the above subject by the LL Task Force (during the morning of 6/15/79) I am providing you with the following comments/observations that you may find useful.

- Even though I agree with your recommendation, as you know the use of recombilers is "effective" only when the rate of hydrogen production is low, i.e., the recombiners will only keep up with a very slow evolution of hydrogen.
- The amount of hydrogen in the TMI-2 containment following the 3/28/79 accident exceeded the design basis - i.e., based on the amount of Zr-H2O reaction allowed; it should be noted though that Reg. Guide 1.7 talks about hydrogen that could be as high as five (5) times the amount calculated for margin purposes (see pg. 1.7-3 of Reg. Guide 1.7).
- Purging of hydrogen with the concurrent release of activity, even though within 10 CFR 100 guidelines might not be publicly acceptable anymore.
- 4. I recommend that the LL Task Force look very carefully at this problem and consider, (a) hydrogen detection in the containment, (b) means of igniting (burning) before explosive limits are reached, or even before reaching limits that could threaten containment integrity (including protecting features inside containment that are required for eventual reactor cooldown).

In conclusion, the protection of containment - even on a near-term basis, should not be inhibited by any "legal constraints" of the DBA theology.

I would happy to discuss this further with you and provide you additional information developed by the staff during the review of advanced reactors (including the reaction of the ACRS).

in V. Pres

Themis P. Speis, Acting Chief Reactor Systems Branch Division of Systems Safety

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cc: R. Mattson R. Denise