

BALTIMORE GAS AND ELECTRIC COMPANY

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April 10, 1980

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VICE PRESIDENT
SUPPLY

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Mr. D. G. Eisenhut, Acting Director
Division of Operating Reactors

Subject: Nuclear Data Link (NDL)

Reference: a) D. G. Eisenhut letter of March 12, 1980
b) Nuclear Data Link Specification (2/21/80)

Gentlemen:

We appreciate the opportunity to comment on the referenced NDL Specification dated February 2, 1980. The paragraph numbers below correspond to the same section in this NDL Specification.

Our first comment is to urge caution in the implementation of the overall objective. Although this objective is admirable, we do not think it is practical, safe, or prudent to provide this level of overview to accomplish this objective. Under these conditions we feel it would be very difficult to resist the temptation to "advise and/or issue orders" that carry the weight of Law and that may, due to information anomalies, be improper. The plant control room should remain the source of orders affecting operations.

3.1 Time Lag

This one minute maximum time is inconsistent with section 4.2, Data Collection, scan rates, i.e. no time is allowed for processing and transmission.

4.2 Data Collection & Sampling Rate

What advantage is to be gained by collecting the Neutron Flux and Containment Pressure signals at a 100 mS frequency.

Transmission rates to update the NRC Operation Center with this amount of data may preclude the use of normal telephone lines and may require more expensive techniques. The justification for this additional expense is questionable.

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Data collection at this rate is not required because: 1) The fast power transient occurs very much faster than 100 mS, so data at 100 mS or at one second will give effectively the same results. 2) the slow power transients (rod drop, rod withdrawal, or boron dilution) take a minimum of several seconds to reach a peak, and 3) the containment pressure spikes for LOCA's are ten second peaks and for a H₂ burn the duration is several seconds (5-6).

4.5.1 Neutron Flux

Does "period" mean reactor period?

What frequency is required at other times?

4.7 What is the purpose and intent of this requirement as far as the Licensee is concerned? It would appear to be a function of the NRC system.

6.2 Data Display

If CRT's are the only means of data display, and if the intent of the display is to show real time data, then the 100 mS data will effectively be lost. CRT display systems can not be reasonably updated at this frequency.

7.1 Transmission Format

It is suggested that the NRC system be designed to accept three pieces of information: Point ID and corresponding engineering values and time. When will the conversion table be generated and by whom?

A.1 Primary Coolant System

Why is boron concentration required on a continuous basis. Under what conditions would a lab type analysis not be more meaningful?

We note that no in-core neutron detector data is required. Is this deliberate?

A.5 Radiation Monitoring

Environmental Radiation Monitors - This is not a presently installed system. It would be very expensive to install and wire it to the NDL. Maintenance costs in the outside environment would be very high for such a permanently installed system. It is suggested that a survey system be used with the appropriate data telephoned when required. TLD's are adequate for lmR range and the need to continuously monitor lower is questionable.

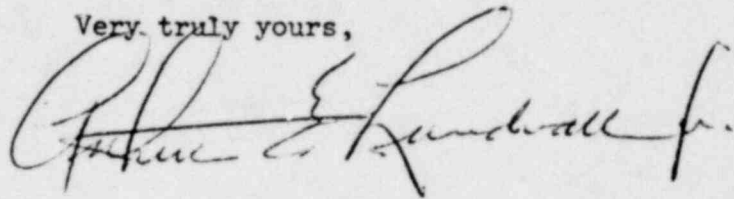
Primary coolant activity via the letdown line monitor would not be a useful NDL input, because this line would be isolated during an accident. A report from an appropriate lab type analysis would be more meaningful.

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Why are local radiation levels adjacent to essential equipment desired in Washington?

If there are any questions or comments on this matter, please contact our Mr. J. M. Dahlquist, Jr. at 301-234-7316.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Arthur E. Lundwall, Jr.", written in dark ink.

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Mr. E. L. Conner, Jr. - NRC