



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

June 10, 1980

Honorable John F. Ahearne  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: ADDITIONAL INFORMATION CONCERNING NTOL ITEMS FROM DRAFT 3 OF  
THE NRC ACTION PLAN

Dear Dr. Ahearne:

In your letter of April 1, 1980 to the Advisory Committee on Reactor Safeguards, you requested additional information on some of the Committee's comments in its letter to you of March 11, 1980 concerning near-term operating license (NTOL) items from Draft 3 of the NRC Action Plan. The following is in response to your inquiry:

Question

- "1. Which of the items from the list in Part 1, Requirement (11), Item II.K.1 does the Committee consider to be useful, which to be of marginal merit, and which to be wrong?" and
- "3. Which of the items from Part 2, Requirement (4), Item I.C.1 does the Committee consider to be useful, which to be of marginal merit, and which to be wrong?"

The Committee did not wish to imply that the referenced conclusions were wrong, but only that they "... may, upon deeper analysis, turn out to have been wrong." The Committee believes that only after the recommended deliberate study will it be possible to appraise the merit of these proposals.

Question

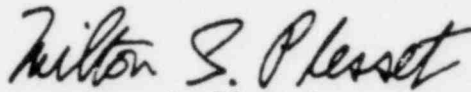
- "2. In commenting on Part 1, Requirement (13), Item III.D.3.4 the Committee noted, 'The TMI incident indicates that existing requirements to protect the occupants of the control room against radiation may not be adequate, particularly with respect to leakage control and arrangement of air intakes.' Does the Committee have any specific suggestions as to how these requirements should be upgraded?"

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Item III.D.3.4 deals with, "Control Room Habitability" and Table A.1 gives the following charge to NTOL applicants: "Confirm compliance with existing Regulatory Guides and Standard Review Plan or establish schedule for necessary modifications to achieve compliance." The general sense of the Committee's comment was to encourage a look beyond existing criteria to protect the occupants of the control room against radiation. Consideration of the effects of greater than currently assumed containment leakage and/or a larger source term due to a degraded core was envisaged. In the area of control room ventilation, the Committee would encourage the placing of air intakes in such a way that they could be used selectively during an accident to take advantage of prevailing wind direction and radiation source locations. Recall that during the TMI-2 accident, control room operators actually used respirators for a time. The Committee takes note of Item 7 in William Dircks' April 1, 1980 memorandum to you in response to the ACRS NTOL letter in which concerns like those mentioned above are scheduled for review in the longer term.

Sincerely,



Milton S. Plesset  
Chairman