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November 6, 1980  
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Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555  
ATTN: Docketing and Service Branch

Subject: Interim Requirements Related to Hydrogen Control and Certain Degraded Core Considerations

References: (A) 45 Federal Register 65466, October 2, 1980.  
(B) Letter from W. R. Stratton, A. P. Malinauskas and D. O. Campbell to J. Ahearne, dated August 14, 1980.

Gentlemen:

Combustion Engineering (C-E) has reviewed the subject Federal Register notice, Reference (A), and has participated in the formulation of AIF comments on the proposed interim rule. In general, C-E agrees with the AIF comments. We would like to take this opportunity to emphasize some of those comments and to provide some additional observations.

C-E believes that this rule should be the basis for licensing decisions until a final rule is issued. Therefore, the interim rule should clearly state that compliance is a sufficient basis for licensing approval. It should also be noted that it is beneficial to the public, the industry, and the NRC to encourage stability in regulatory requirements. Although we recognize that the Commission cannot, at this time, predict what additional features may be considered for implementation in the final rule, additional features should not be required unless they are clearly needed to achieve an acceptable level of safety and are justified by a rigorous cost/benefit analysis.

C-E believes that as written, this rule contains excessive detail which could prove to be counter-productive to the effective implementation of TMI-related requirements. On September 5, 1980 the NRC issued for comment a letter to all Applicants, Licensees, and holders of Construction Permits containing all TMI-related licensing requirements. It is our understanding that this letter is soon to be issued in its final form for implementation. Specifying implementation dates in the interim rule is, therefore, redundant and unnecessary. The inclusion of a rigidly defined schedule will leave little room to implement these requirements in a coordinated fashion. Considering the limited availability of both NRC and industry resources and the potential need for extended development programs for the required hardware, a coordinated implementation is necessary.

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Many of the proposed approaches to achieving the goals of the interim rule are still in the development stage. In view of this, we urge that the interim rule not be made overly prescriptive. It is quite likely that new approaches or new solutions will be developed. The language of the interim rule should not preclude incorporation of these advances.

In this regard there are several places where the interim rule could be improved by removing prescriptive requirements. Specifically, the goal of improving the operator's awareness of the approach to inadequate core cooling and his knowledge of appropriate corrective actions is a desirable goal. However, the detailed criteria for instrumentation presented in 50.44a(f) are inappropriate for the rule at this time. Similarly, it is overly prescriptive to designate the level of equilibrium halogens (50.44a(b)(1)(i)) in light of the concerns raised by Reference (B).

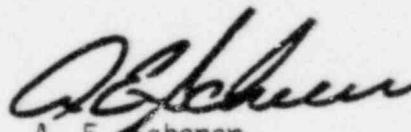
Finally, C-E recommends the deletion of 50.44(c)(3)(ii) from the proposed interim rule. This paragraph requires design analyses to evaluate measures which can be taken to mitigate the consequences of the generation of large amounts of hydrogen and the submittal of proposed designs to mitigate those consequences. We do not believe that the interim rule is an appropriate mechanism for implementing this design work. The need to evaluate measures to mitigate the consequences of generating large amounts of hydrogen should be considered as part of the long-term rulemaking proceedings.

In summary we believe that the interim rule should clearly state its goals and, if sufficient information is available, acceptable approaches to that goal. In areas still under development, no particular approach should be specified to the exclusion of others. Implementation dates should continue to be imposed through administrative actions of the Commission and not codified in the rule.

If I can be of any further assistance to you in this matter, please advise.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer  
Director  
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AES:dac