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# Bechtel Power Corporation

Engineers—Constructors



Fifty Beale Street

San Francisco, California

Mail Address: P.O. Box 3965, San Francisco, CA 94119

March 20, 1981

Mr. Robert Minogue  
Director, Office of Research  
National Research Council  
2101 Constitution Avenue, N. W.  
Washington, D.C. 20418

Subject: March 6th Draft, NRC Report on Technical Bases  
for Estimating Fission Product Behavior During  
LWR Accidents, (Received March 16, 1981)

Dear Bob:

In the limited time available, I have only been able to scan the reference report. However, even a preliminary scan indicates that it does not address the issues raised by our report and by others.

The technical issue can be categorized into two points. The first one is that the existing computer models and codes treat chemistry, aerosol physics and similar phenomena either inadequately or not at all. The second point is that the bulk of the available consequence data is a result of accidents and large experiments and that data does not confirm the calculated consequences.

The first point isn't addressed at all by the report. In the text, some of the shortcomings of the codes are acknowledged. But the codes and models being questioned were just used again. It is not too surprising that the results were substantially the same.

The draft report dismisses the second point by saying that the information from the accidents and large experiments is not what is required for model or code input (Just because the model doesn't fit what really happened doesn't mean it didn't happen.).

The bulk of the report (almost 300 pages) was clearly prepared in a hurry. It contains a number of inconsistencies, conflicts section to section, missing paragraphs (perhaps missing pages), etc., as one would expect from such a hurriedly prepared report. But since it is clear that the report does not address the basic questions, I have not provided detailed comments.

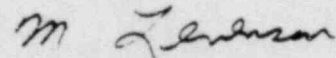
Bechtel Power Corporation

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March 20, 1981

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I agree with your statement to me that the report is more an outline of a proposed R&D program than it is a peer review of the issues. However, I believe that the issues are so important that an independent peer review should be undertaken and that the formulation of an R&D program should be delayed pending identification of what, if any, additional information is required.

Sincerely,



Milton Levenson

ML:ch

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March 20, 1981

Mr. Robert Minogue  
Director, Office of Research  
Nuclear Regulatory Commission  
Washington, D.C. 20555

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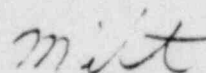
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Sincerely,



Milton Levenson

ML:ch





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

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MAR 12 1981

MEMORANDUM FOR: Mel Silberberg  
FROM: Long S. Tong  
SUBJECT: COMMENT ON NUREG-0772 "TECHNICAL BASES FOR ESTIMATING  
FISSION PRODUCT BEHAVIOR DURING LWR ACCIDENT"

In answering question number 3 of the Abstract of this report, it does not clearly state its answer as plant-specific or in general. If it is in general, then the answer should be given in the consequence value along with the probability of the accident sequence in a concept of risk and weighed by the number of plants in each type of design. For example, the consequence of an accident sequence which is specifically dominant in certain plant designs does not have same impact in other plants where this accident sequence is not dominant in a risk analysis. Perhaps question number 3 should be expressed in risk instead of consequence.

A handwritten signature in cursive script that reads "L. S. Tong".

L. S. Tong

cc: C. Kelber  
O. E. Bassett  
R. B. Minogue