

Mr. D. E. Vandenburgh Senior Vice President Yankee Accomic Electric Company 1671 Worcester Road Framingham, Massachusetts 01701

Dear Mr. Vandenburgh:

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In your letter of June 11, 1981, you indicated a strong desire to pursue alternative schemes for mitigating the hydrogen combustion concern associated with a degraded core accident. However, you also expressed concern that the staff was not seriously considering concepts other than containment pre-inerting for the Mark I containments. Therefore, you saw a need for further assurance from the staff that no irreversible action would be taken to foreclose successful implementation of an alternative scheme.

To clarify our position, we believe that containment designs such as your Mark I containment require provisions for dealing with the potential for the combustion of hydrogen released in large amounts in short time periods. Furthermore, in view of the potential consequences of the postulated degraded core event, we believe that a mitigation device or system should be installed and made operational within a timeframe of some 6 to 9 months. This is consistent with staff and ACRS concern that actions be taken promptly on the hydrogen mitigation capability of other small containments.

Within these constraints, as stated above, the staff has viewed a pre-inerted atmosphere as the only known approach for the Mark I BWR containment for dealing with the hydrogen that might be evolved during degraded core accidents. This does not preclude the existence of alternative schemes. However, the staff is unaware of such alternative systems. The approaches or systems that are known to exist are felt by the staff to be too advanced to satisfy the early installation date.

Accordingly, if you believe an alternative scheme can be developed and made available in time to satisfy our requirements, we strongly urge that you meet with the staff as soon as possible.

Sincerely,

(Signed) William J. Diroks

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NOTE: J. SCINTO CHANGE ACCOMMODATED.

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