

YANKEE ATOMIC ELECTRIC COMPANY

Telephone 617 872-8100



1671 Worcester Road, Framingham, Massachusetts 01701

June 11, 1981
FCY 81-15

Mr. William J. Dircks
Executive Director for Operations
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Dircks:

I was pleased to receive your letter of May 1, 1980 suggesting that Vermont Yankee pursue an alternative to a pre-inerted containment. This is the first indication we have received that the NRC might entertain an alternative proposal.

The recent incident at Browns Ferry Unit III involving the leakage of many thousands of gallons of primary coolant into the primary containment over a relatively short period is particularly germane to the discussion of pre-inerting. The incident, later determined to be caused by a leaking valve packing, resulted in a site alert, a plant shutdown and, of course, some negative publicity. No radiation was released to the environment, and NRC officials were able to characterize it as being of minor importance. The fact that it took approximately 16 hours from the time excessive leakage was detected until the source of the leakage was identified seems anything but of minor importance to us. Had the source been identified, at the insipient stages the leak could have been reduced or stopped completely (eg. the valve backseated) and gross leakage could have been avoided. Early diagnosis of problems is of inestimable benefit in planning subsequent actions.

Through numerous communications to the NRC, including presentations to the ACRS Subcommittee on the TMI Action Plan and to the Commissioners themselves, Vermont Yankee has stressed the fact that access to the primary containment significantly increases the operator's ability to monitor and control leakage into the containment, thereby reducing unnecessary plant shutdowns and the resultant thermal cycling. It is a documented fact that, on several occasions, Vermont Yankee operators have made drywell entries to investigate drywell leakage and have found packing leaks on similar valves to the one that caused this incident. On these occasions, the leakage was reduced to an acceptable level or entirely eliminated in a very short time because the containment was accessible. Thus, the potential for a more serious incident was eliminated and a plant shutdown cycle avoided.

B107300223 B10714
PDR ADOCK 05000029
P PDR

Rec'd OH. EDO
Date. 6-15-81
Time. 11:30

Mr. William J. Dircks

June 11, 1981

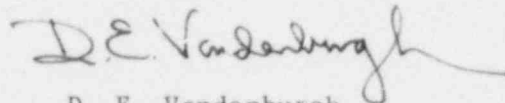
Page 2

The Browns Ferry III incident is only one example of the many significant countervailing safety disincentives to containment inerting which do exist in the real world of everyday plant operation. We must again state that we remain firmly convinced that, in the words of the NRC staff, "... [the] small ... decrease in theoretical risk ..." obtained through inerting is overwhelmingly outweighed by the very real gains in operational safety available through operator action in an accessible containment. We again strongly encourage you to seriously reconsider the NRC's position on the relative importance of the theoretical risk of pre-inerted operation and the documented gains in operational safety to be had by operating with a non-inerted containment.

With regard to your suggestion concerning alternatives, we would be happy to initiate discussions with the Staff (NRR) in order to pursue more acceptable solutions to your hydrogen combustion concern. However, over the last several months we have been under very heavy pressure from the NRC staff to prepare for mandatory containment inerting (via order or an interim rule on degraded cores). Recent informal contact with the staff has shown that there is essentially no serious interest in considering any alternative to pre-inerting. Before we could participate in activities relative to hydrogen control that could possibly provide a viable alternative, we must receive some assurance from the commission that no precipitous and perhaps irreversible action would be taken that would foreclose successful implementation of an alternate scheme. Such assurances must originate from your office or from the Commissioners themselves since the staff is uninterested.

We believe an effort of this nature holds considerable potential for practical, industry-wide safety benefits. We await your response in this very important matter.

Very truly yours,



D. E. Vandenberg
Senior Vice President

81-0448

No: ~~XXXXXXXXXX~~ 80-3149 Logging Date 3/30/81

NRC SECRETARIAT

TO: Commissioner _____ Date _____
 Exec. Dir./Oper. _____ ~~Gen. Counsel~~ _____
 Cong. Liaison _____ Solicitor _____
 Public Affairs _____ Secretary _____
 _____ Inspector & Auditor _____
 _____ Policy Evaluation _____

Incoming: D.E. Vandenburg
From: Yankee Atomic Electric Company

To: Hendrie Date 3/24/81

Subject: re the pro ~~xxx~~ interim requirements related to hydrogen control & certain degraded core considerations

Prepare reply for signature of:

Chairman ~~and Comm review~~
 Commissioner _____ Date due B&: April 17
 EDO, GC, CL, SOL, PA, SECY, IA, PE
 Signature block omitted

 Return original of incoming with response

- For direct reply*
- For appropriate action
- For information

Rec'd Off. EDO
Date... 4/6/81
Time... 1:03 PM

Remarks: Cops to: EDO, RF, D&SB

For the Commission: billie

*Send three (3) copies of reply to Secy Correspondence and Records Branch