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

Dear Mr. Vandenburgh:

Thank you for your letter of March 24, 1981 to Chairman Hendrie concerning containment inerting.

You mentioned the proposed interim requirements relating to hydrogen control. We are preparing a proposed rule on hydrogen control for Commission consideration. We expect to recommend to the Commission that an inerted atmosphere should be provided for each Mark I and II BWR containment.

We believe that designs such as your Mark I containment require additional protection from combustion of hydrogen in amounts and rates on the order of that experienced at TMI-2. We propose this position with the understanding that operators of BWR plants with inerted zones must provide and maintain a high level of training to their operating staffs on the risks of oxygen-deficient atmospheres. Your letter will be considered by the staff in its further preparation of a proposed hydrogen rule for Commission consideration.

We are encouraged by the development of alternative approaches for other designs. An igniter system has been found to be effective at the Sequoyah Nuclear Station. More recently, General Electric has indicated an interest in post-accident inerting for their Mark III containment designs.

If you continue to believe that a pre-inerted atmosphere is unacceptably dangerous, then you should be aggressively pursuing another solution to the hydrogen combustion concern. I suggest that your staff initiate discussions with the staff of the Office of Nuclear Reactor Regulation along these lines.

Sincerely,

(Signed) William J. Dircks

W. J. Dircks
Executive Director for Operations

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