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JUL 16 1981

NRC/TMI-81-040

Docket No. 50-320

Mr. Gale K. Hovey
Vice President and
Director of TMI-2
Metropolitan Edison Company
P.O. Box 485
Middletown, Pennsylvania 17057



Dear Mr. Hovey:

On June 17, 1981 (LL2-81-0159), you submitted for our review and approval the design criteria for the Hot Chemistry Laboratory. The Hot Chemistry Laboratory (HCL) will be used to support the recovery efforts of TMI-2. Our comments on the design criteria for the HCL are enclosed, and need satisfactory resolution prior to our approval of the design criteria.

Sincerely,

Lane H. Barrett
Acting Deputy Program Director
TMI Program Office

Enclosure: As Stated

cc: See Service Distribution List

Handwritten: 7/14/81

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NRC STAFF COMMENTS ON
MET-ED'S DESIGN CRITERIA
FOR HOT CHEMISTRY LABORATORY (HCL)

1. Section 3.0 Scope

All applicable and pertinent sections in the referenced General Project Design Criteria document should be incorporated in specific HCL design criteria in order to prevent overlooking any specific design features or equipment requirements in implementation of the overall criteria.

2. Section 4.4 Fire Protection

The HCL fire detection system should directly interface with the existing fire detection system in the main control room.

3. Section 4.5 Radioactive Drainage and Section 6.12 Liquid Waste Disposal Requirements

These sections should state that drain lines from the HCL shall be provided with adequate radiation shielding to minimize personnel exposure in those areas through which those drain lines pass enroute to the Unit 2 miscellaneous waste holdup tank. In addition, the criteria should state that other applicable ALARA design features for those drain lines per Regulatory Guide 8.8 shall be incorporated (i.e., avoid sharp bends, low point dead-legs, provide flushing connections, etc.).

4. Section 6.3 Codes, Standards and Regulatory Requirements

This section should state the criteria to implement the effluent release requirements per Appendix R of the EIS and Section 2.1. "Radioactive Discharges" of the Appendix B Technical Specifications of Operating License DPR-73. Additionally, consideration should be given to the criteria in Regulatory Guide 8.10 and Standard Review Plans (SRP chapters 3, 11, 12, 16, and 17).

5. Section 6.9 HVAC Requirements

- (a) Criteria should be established for assurance of adequate exhaust air flow from collection hoods and glove boxes. Items to take into consideration should include minimum hood face velocities, negative pressure in glove boxes and alarms if the pressure differentials are not maintained.
- (b) Positive commitments should be made to provide and test HEPA and charcoal exhaust filters. These commitments will become technical specification requirements during HCL operation.

- (c) Airborne effluents radiation monitoring criteria should be specified. The radiation monitoring requirements for effluents together with alarm and isolation functions should be established to assure that Appendix R requirements of the PEIS can be satisfied.

6. Section 6.1.6.3 Radiation Monitoring Devices

- (a) The lower limit of detection requirements should be specified for the area radiation monitors and the continuous airborne contamination monitors.
7. Based on previous discussions with your staff, additional design analysis/criteria are needed to bound the effects of the HCL on the connecting seismic structures. We believe these analysis are important, especially the load impact on the existing Emergency Steam Generator Feedwater Pump area structure. These analyses (with any change to the proposed design criteria) should be completed in order that the staff can complete their reviews.
 8. Considering the Hot Chemistry Laboratory will eventually house the Unit 2 Nuclear Sample Station, and provide the backup laboratory facilities for Unit 1 during emergency conditions, provide your basis for not routing the HCL airborne effluents through the auxiliary building and/or the stack release point.

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