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Mr. R. Logue, Chairman
 Mark I Owners Group
 Philadelphia Electric Company
 2301 Market Street
 Philadelphia, Pennsylvania 19101

JUL 15 1982

Dear Mr. Logue:

Subject: Concerns Regarding the Adequacy of the Design Margins of the Mark I Containment System

On May 8, 1982 a number of concerns regarding the adequacy of the General Electric (GE) Mark III containment design were raised by a former GE employee. After these concerns came to the attention of the staff on May 12, 1982, a series of telephone conference calls and meetings involving this former GE employee, the NRC, GE, and the Mark III plant owners occurred. These concerns were initially directed towards the Mark III containment design. However, the staff, has since determined that some of the issues may apply to the Mark I containment design.

The enclosure to this letter contains a list of issues based on the Mark III containment concerns that were identified as of June 21, 1982. Those items that are clearly not associated with the Mark I containment design have been eliminated. In some instances the original concern has been modified to make it more applicable to the Mark I containments and to generalize the concerns.

There is no direct evidence to substantiate the applicability of these concerns to the Mark I containments. However, to assure there are no significant safety implications to the Mark I containment design we request that the Mark I Owners Group respond within fourteen (14) days of receipt of this letter with your proposed schedule for submitting a program to address those concerns which we have identified as being potentially applicable to the Mark I containment. If you have any questions on this matter, please contact Byron Siegel (301-492-7534) the assigned Project Manager for operating Mark I facilities.

Since this request for information affects fewer than 10 respondents, ONB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by
 Darrell G. Eisenhut

Darrell G. Eisenhut, Director
 Division of Licensing
 Office of Nuclear Reactor Regulation

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Enclosure: *See previous NRC 318 for concurrence sheet concurred on by:

OFFICE	As Stated	ORB#2:DL	C-ORB#2:DL	AD-GR:DL	D:DL
SURNAME	cc w/enclosure: Service Lists	BSiegel/cab	DVassallo*	TNovak*	DEisenhut
DATE		7/12/82*	7/13/82*	7/13/82*	7/15/82

HUMPHREY CONTAINMENT CONCERNS

1. Effects of Local Encroachments on Pool Swell Loads

1.1

1.2

1.3 N/A for Mark I and Mark II Containments

1.4

1.5

1.6

1.7

2. Safety Relief Valve Discharge Line Sleeves

2.1

2.2 N/A for Mark I and Mark II Containments

2.3

3. ECCS Relief Valve Discharge Lines Below the Suppression Pool Level

- 3.1 The design of the STRIDE plant did not consider vent clearing, condensation oscillation and chugging loads which might be produced by the actuation of these relief valves.
- 3.2 The STRIDE design provided only nine inches of submergence above the RER relief valve discharge lines at low suppression pool levels.
- 3.3. Discharge from the RER relief valves may produce bubble discharge or other submerged structure loads on equipment in the suppression pool.
- 3.4 The RER heat exchanger relief valve discharge lines are provided with vacuum breakers to prevent negative pressure in the lines when discharging steam is condensed in the pool. If the valves experience repeated actuation, the vacuum breaker sizing may not be adequate to prevent drawing slugs of water back through the discharge piping. These slugs of water may apply impact loads to the relief valve or be discharged back into the pool at the next relief valve actuation and apply impact loads to submerged structures.
- 3.5 N/A for Mark I and II Containments.
- 3.6 If the RER heat exchanger relief valves discharge steam to the upper levels of the suppression pool following a design basis accident, they will significantly aggravate suppression pool temperature stratification.
- 3.7 The concerns related to the RER heat exchanger relief valve discharge lines should also be addressed for all other relief lines that exhaust into pool. (p. 132 of 5/27/82 transcript)

4. Suppression Pool Temperature Stratification

- 4.1 The present containment response analyses for drywell break accidents assume that the ECCS systems transfer a significant quantity of water from the suppression pool to the lower regions of the drywell through the break. This results in a pool in the drywell which is essentially isolated from the suppression pool at a temperature of approximately 135°F. The containment response analysis assumes that the drywell pool is thoroughly mixed with the suppression pool. If the inventory in the drywell is assumed to be isolated and the remainder of the heat is discharged to the suppression pool, an increase in bulk pool temperature of 10°F may occur. /1
- 4.2 The existence of the drywell pool is predicated upon continuous operation of the ECCS. The current emergency procedure guidelines require the operators to throttle ECCS operation to maintain vessel level below level 8. Consequently, the drywell pool may never be formed. /2
- 4.3 All Mark III analyses presently assume a perfectly mixed uniform suppression pool. These analyses assume that the temperature of the suction to the RER heat exchangers is the same as the bulk pool temperature. In actuality, the temperature in the lower part of the pool

where the suction is located will be as much as $7\frac{1}{2}$ °F cooler than the bulk pool temperature. Thus, the heat-transfer through the RHR heat exchanger will be less than expected.

- 4.4 The long term analysis of containment pressure/temperature response assumes that the wetwell airspace is in thermal equilibrium with the suppression pool water at all times. The calculated bulk pool temperature is used to determine the airspace temperature. If pool thermal stratification were considered, the surface temperature, which is in direct contact with the airspace, would be higher. Therefore the airspace temperature (and pressure) would be higher.
- 4.5 A number of factors may aggravate suppression pool thermal stratification. The chugging produced through the first row of horizontal vents will not produce any mixing from the suppression pool layers below the vent row. An upper pool dump may contribute to additional suppression pool temperature stratification. The large volume of water from the upper pool further submerges RHR heat exchanger effluent discharge which will decrease mixing of the hotter, upper regions of the pool. Finally, operation of the containment spray eliminates the heat exchanger effluent discharge jet which contributes to mixing. /3
- 4.6 The initial suppression pool temperature is assumed to be 95°F while the maximum expected service water temperature is 90°F for all GGNS accident analyses as noted in FSAR table 6.2-50. If the service water temperature is consistently higher than expected, as occurred at Kuosheng, the RHR system may be required to operate nearly continuously in order to maintain suppression pool temperature at or below the maximum permissible value.
- 4.7 All analyses completed for the Mark III are generic in nature and do not consider plant specific interactions of the RHR suppression pool suction and discharge.
- 4.8 Operation of the RHR system in the containment spray mode will decrease the heat transfer coefficient through the RHR heat exchangers due to decreased system flow. The FSAR analysis assumes a constant heat transfer rate from the suppression pool even with operation of the containment spray.
- 4.9 The effect on the long term containment response and the operability of the spray system due to cycling the containment sprays on and off to maximize pool cooling needs to be addressed. Also provide and justify the criteria used by the operator for switching from the containment spray mode to pool cooling mode, and back again. (pp. 147-148 of 5/27/82 transcript)
- 4.10 Justify that the current arrangement of the discharge and suction points of the pool cooling system maximizes pool mixing. (pp. 150-155 of 5/27/82 transcript)

5. Drywell to Containment Bypass Leakage

5.1 The worst case of drywell to containment bypass leakage has been established as a small break accident. An intermediate break accident will actually produce the most significant drywell to containment leakage prior to initiation of containment sprays.

5.2 Under Technical Specification limits, bypass leakage corresponding to $A/\sqrt{K} = 0.1 \text{ ft.}^2$ constitute acceptable operating conditions. Smaller-than-IBA-sized breaks can maintain break flow into the drywell for long time periods, however, because the RPV would be depressurized over a 6 hour period. Given, for example, an SBA with $A/\sqrt{K} = 0.1$, projected time period for containment pressure to reach 15 psig is 2 hours. In the latter 4 hours of the depressurization the containment would presumably experience ever-increasing overpressurization. /4

5.3 Leakage from the drywell to containment will increase the temperature and pressure in the containment. The operators will have to use the containments spray in order to maintain containment temperature and pressure control. Given the decreased effectiveness of the RER system in accomplishing this objective in the containment spray mode, the bypass leakage may increase the cyclical duty of the containment sprays.

5.4 Direct leakage from the drywell to the containment may dissipate hydrogen outside the region where the hydrogen recombiners take suction. The anticipated leakage exceeds the capacity of the drywell purge compressors. This could lead to pocketing of hydrogen which exceeds the concentration limit of 4% by volume. /5

5.5 Equipment may be exposed to local conditions which exceed the environmental qualification envelope as a result of direct drywell to containment bypass leakage.

5.6

N/A for Mark I and Mark II Containments

5.7

5.8 The possibility of high temperatures in the drywell without reaching the 2 psig high pressure scram level because of bypass leakage through the drywell wall should be addressed. (pp. 168-174 of 5/27/82 transcript)

6. RER Permissive on Containment Spray

- 6.1 We understand that GE has recommended for Mark III containments that the combustible gas control systems be activated if the reactor vessel water level drops to within one foot of the top of the active fuel. Indicate what your facility is doing in regard to this recommendation.
- 6.2 General Electric has recommended that an interlock be provided to require containment spray prior to starting the recombiners because of the large quantities of heat input to the containment. Incorrect implementation of this interlock could result in inability to operate the recombiners without containment spray. /5
- 6.3 The recombiners may produce "hot spots" near the recombiner exhausts which might exceed the environmental qualification envelope or the containment design temperature. /5
- 6.4 For the containment air monitoring system furnished by General Electric, the analyzers are not capable of measuring hydrogen concentration at volumetric steam concentrations above 60%. Effective measurement is precluded by condensation of steam in the equipment.
- 6.5 Discuss the possibility of local temperatures due to recombiner operation being higher than the temperature qualification profiles for equipment in the region around and above the recombiners. State what instructions, if any, are available to the operator to actuate containment sprays to keep this temperature below design values. (pp. 183-185 of 5/27/82 transcript) /5

7. Containment Pressure Response

- 7.1 The wetwell is assumed to be in thermal equilibrium with a perfectly mixed, uniform temperature suppression pool. As noted under topic 4, the surface temperature of the pool will be higher than the bulk pool temperature. This may produce higher than expected containment temperatures and pressures.
- 7.2 The computer code used by General Electric to calculate environmental qualification parameters considers heat transfer from the suppression pool surface to the containment atmosphere. This is not in accordance with the existing licensing basis for Mark III environmental qualification. Additionally, the bulk suppression pool temperature was used in the analysis instead of the suppression pool surface temperature. /6
- 7.3 The analysis assumes that the wetwell airspace is in thermal equilibrium with the suppression pool. In the short term this is non-conservative for Mark III due to adiabatic compression effects and finite time required for heat and mass to be transferred between the pool and containment volumes. /6

8. Containment Air Mass Effects

- 8.1 This issue is based on consideration that some Tech Specs allow operation at parameter values that differ from the values used in assumptions for FSAR transient analyses. Normally analyses are done assuming a nominal

containment pressure equal to ambient (0 psig) a temperature near maximum operating (90°F) and do not limit the drywell pressure equal to the containment pressure. The Tech Specs operation under conditions such as a positive containment pressure (1.5 psig), temperatures less than maximum (60 or 70°F) and drywell pressure can be negative with respect to the containment (-0.5 psid). All of these differences would result in transient response different than the FSAR descriptions.

- 8.2 The draft GGNS technical specifications permit operation of the plant with containment pressure ranging between 0 and -2 psig. Initiation of containment spray at a pressure of -2 psig may reduce the containment pressure by an additional 2 psig which could lead to buckling and failures in the containment liner plate.
- 8.3 If the containment is maintained at -2 psig, the top row of vents could admit blowdown to the suppression pool during an SBA without a LOCA signal being developed. /7
- 8.4 Describe all of the possible methods both before and after an accident of creating a condition of low air mass inside the containment. Discuss the effects on the containment design external pressure of actuating the containment sprays. (pp. 190-195 of 5/27/82 transcript)

9. Final Drywell Air Mass

- 9.1 The current FSAR analysis is based upon continuous injection of relatively cool ECCS water into the drywell through a broken pipe following a design basis accident. Since the operator is directed to throttle ECCS operation to maintain the reactor vessel water level to about the level of the steam lines, the break will be releasing saturated steam instead of releasing relatively cool ECCS water. Therefore, the drywell air which would have been purged and then drawn back into the drywell, will remain in the wetwell and higher pressures than anticipated will result in both the wetwell and the drywell.
- 9.2 The continuous steaming produced by throttling the ECCS flow will cause increased direct leakage from the drywell to the wetwell. This could result in increased wetwell pressures.
- 9.3 It appears that some confusion exists as to whether SBA's and stuck open SRV accidents are treated as transients or design basis accidents. Clarify how they are treated and indicate whether the initial conditions were set at nominal or licensing values. (pp. 202-205 of 5/27/82 transcript)

10. Drywell Flooding Caused by Upper Pool Dump

10.

N/A for Mark I and Mark II Containments

N/A for Mark I and Mark II Containments

11. Operational Control of Drywell to Containment Differential-Pressures

Mark III load definitions are based upon the levels in the suppression pool and the drywell weir annulus being the same. The GGNS technical specifications permit elevation differences between these-pools. This may effect load definition for vent clearing. /8

12. Suppression Pool Makeup LOCA Seal In

N/A for Mark I and Mark II Containments

13. Ninety Second Spray Delay

N/A for Mark I and Mark II Containments

14. RHR Backflow Through Containment Spray

A failure in the check valve in the LPCI line to the reactor vessel could result in direct leakage from the pressure vessel to the containment atmosphere. This leakage might occur as the LPCI motor operated isolation valve is closing and the motor operated isolation valve in the containment spray line is opening. This could produce unanticipated increases in the containment spray.

15. Secondary Containment Vacuum Breaker Plenum Response

The STRIDE plants had vacuum breakers between the containment and the secondary containment. With sufficiently high flows through the vacuum breakers to containment, vacuum could be created in the secondary containment.

16. Effect of Suppression Pool Level on Temperature Measurement

Some of the suppression pool temperature sensors are located (by GE recommendation) 3" to 12" below the pool surface to provide early warning of high pool temperature. However, if the suppression pool is drawn down below the level of the temperature sensors, the operator could be misled by erroneous readings and required safety action could be delayed.

17. Emergency Procedure Guidelines /9

The EPGs contain a curve which specifies limitations on suppression pool level and reactor pressure vessel pressure. The curve presently does not adequately account for upper pool dump. At present, the operator would be required to initiate automatic depressurization when the only action required is the opening of one additional SRV.

18. Effects of Insulation Debris /10

- 18.1 Failures of reflective insulation in the drywell may lead to blockage of the gratings above the weir annulus. This may increase the pressure required in the drywell to clear the first row of drywell vents and perturb the existing load definitions.
- 18.2 Insulation debris may be transported through the vents in the drywell wall into the suppression pool. This debris could then cause blockage of the suction strainers.

19. Submergence Effects on Chugging Loads

19.1

N/A for Mark I and Mark II Containments

19.2

N/A for Mark I and Mark II Containments

20. Loads on Structures Piping and Equipment in the Drywell During Reflood

N/A for Mark I and Mark II Containments

21. Containment Makeup Air For Backup Purge

Regulation Guide 1.7 requires a backup purge H₂ removal capability. This backup purge for Mark III is via the drywell purge line which discharges to the shield annulus which in turn is exhausted through the standby gas treatment system (SGTS). The containment air is blown into the drywell via the drywell purge compressor to provide a positive purge. The compressors draw from the containment, however, without hydrogen lean air makeup to the containment, no reduction in containment hydrogen concentration occurs. It is necessary to assure that the shield annulus volume contains a hydrogen lean mixture of air to be admitted to the containment via containment vacuum breakers. For Mark I and II facilities, discuss the possibility of purge exhaust being mixed with the intake air which replenishes the containment air mass.

22. Miscellaneous Emergency Procedure Guideline Concerns /2

The EPGs currently in existence have been prepared with the intent of coping with degraded core accidents. They may contain requirements conflicting with design basis accident conditions. Someone needs to carefully review the EPG's to assure that they do not conflict with the expected course of the design basis accident.

TABLE OF FOOTNOTES APPLICABLE TO
MARK I AND MARK II CONTAINMENTS

<u>Footnote</u>	<u>Comment</u>
1	This concern is related to the trapping of water in the drywell.
2	This issue applies only to those facilities for which EPG's are in effect.
3	For Mark I and II facilities, confine your response on this issue to those concerns which can lead to pool stratification (e.g., operation of the containment spray).
4	For Mark I and II facilities, refer to Appendix I to Section 6.2.1.1c of the Standard Review Plan (SRP).
5	This concern applies to those facilities at which hydrogen recombiners can be used.
6	This issue as phrased applies only to a Mark III facility. However, the concern can be generalized and applied to the earlier containment types. For Mark I and II facilities, indicate what methodology was used to calculate the environmental qualification parameters including a discussion of heat transfer between the atmosphere in the wetwell and the suppression pool.
7	Not applicable to Mark II facilities.
8	For Mark I and II facilities, consider the water in the downcomers.
9	This issue as phrased applies only to a Mark III facility. However, the concern can be generalized. Accordingly, discuss what actions the reactor operator would take in the event that the limitations on the suppression pool level and the pressure in the reactor vessel are violated.
10	This issue as phrased applies only to a Mark III facility. However, the concern can be generalized. Accordingly, discuss how the effects of insulation debris could perturb existing load definitions or could block suction strainers. In responding to this issue, you may refer to existing generic studies; e.g., the study done for the Cooper facility.