DCS-046

FEB 15 1983

Docket No. STN 50-470

MEMORANDUM FOR: Frank J. Miraglia, Assistant Director
for Safety Assessment
Division of Licensing

THRU: Cecil O. Thomas, Chief
Standardization & Special Projects Branch
Division of Licensing

FROM: Gary C. Meyer, Project Manager
Standardization & Special Projects Branch
Division of Licensing

SUBJECT: REQUEST BY CE FOR AN APPEALS MEETING

The CESSAR System 80 Safety Evaluation Report (NUREG-0852) listed a confirmatory item on containment sprays that now, over a year later, still remains unresolved and has recently reached an impasse. As a result, CE has requested an Appeals meeting to argue against our position on this issue. I intend to schedule the requested meeting with CE and the A/D for Radiation Protection within the next two weeks.

In the CESSAR SER, we questioned the capabilities of the long term iodine control system proposed by CE. CE supplies for CESSAR an Iodine Removal System which, when operated, adds hydrazine to the containment sprays to enhance iodine removal. As an interface requirement for this system, CESSAR specified that post-LOCA sump pH should be maintained greater than 7.0. SRP Section 6.5.2 states, "A pH value exceeding 8.5 (for the sump solution) provides assurance that significant evolution of iodine does not occur." Therefore, we stated that either the interface requirement had to be changed from 7.0 to 8.5 or we would have to evaluate the LOCA radiological consequences for each reference plant using the lower pH value.

After the SER was issued in November 1981, AEB and CE continued discussions on the technical merit of the CE proposal. However, they were unable to resolve the issue and CE requested an Appeals meeting. A meeting was held with AEB on March 9, 1982 but meeting minutes were not issued so the discussions and resulting agreements were not documented. In any case, CE, as a result of the Appeals meeting, submitted on August 19, 1982, a report with containment spray operating guidelines and supporting chemical analyses, which they claimed would resolve

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concerns over the effectiveness of the hydrazine system in controlling airborne iodine inside containment. In addition, CE revised the CESSAR FSAR analyses and interface requirements to include provisions for: 1) periodic restart of the Iodine Removal System (every four hours); 2) access to the Spray Chemical Storage Tank for refill within four hours of a LOCA; and 3) the potential use of containment atmosphere samples to measure iodine levels to optimize the use of hydrazine.

AEB has reviewed the analyses provided by CE and found the results to be inconclusive. Hence, AEB's position is that the use of the spray system with hydrazine additive is acceptable "... provided that periodic post accident sampling of iodine in the containment atmosphere is included in the procedure...". CE's position is that the system is adequate for long term iodine control without a requirement for post accident sampling. Their concern is that this requirement might necessitate hardware changes to upgrade the iodine sampling capabilities of the post accident sampling system.

/s/

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