

CT-2078

PDR 3/25/94

cc: Paul Boehmert

5/12/93

To: Ivan Catton, THP subcommittee chairman
From: Dave Ward, ACRS consultant

1 1993

Comments on BWR stability program:

1. The issue of accurate level measurement is important if the ATWS EOPs are to have credibility. The Owners Group testing program was not especially sophisticated, but seems to have explained the cause of both noisy ["notched"] signals and the signal error for extended periods. The staff believes they understood it a year ago and that the Millstone backfit is the way to fix it. The Millstone approach, to maintain a small back purge, does seem the most sensible of the suggestions. I agree that licensees should be required to make some sort of fix, unless they can show an extraordinary circumstance that makes it unnecessary in a particular case. Not having experienced a problem so far should not be an excuse, however. The staff should permit licensees a reasonable amount of time to make their modifications. The word iatrogenic comes to mind. Plants should have sufficient time to plan and execute their changes so the cures are not worse than the disease.

2. I agree with the Chairman that the assumption that a heavy solution of boron salt, possibly sitting in the bottom plenum, will actually be picked up and circulated through the core by some small flow needs to be more firmly based than it now appears to be.

3. The Rogers analysis seemed to be reasonable, but he made an over elaborate presentation. He really had just a couple of points to make. His analytical model is quite simple, probably that is good. But, there should be more bench marking of his results than was shown to us. Also, he was locked into just two "strategies", A and B. I am not sure these are a big enough part of the universe of possibilities. I am not purposing that the issue be studied to death, but additional options might be explored to advantage.

4. I believe the overall approach being taken by the OG and being gradually agreed-to by the staff is appropriate. There was a suggestion that the ATWS EOP will be too difficult and unreliable. The alternatives would be to pretend that ATWS cannot happen or to insist on a completely new backup scram system. The former is unwise and the latter unwarranted. The combination of analysis, procedure development, and training in the industry program appears commensurate with the risk in this case.

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