UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 21, 1987

MEMORANDUM FOR: Lawrence Shao, Director
Division of Engineering and Systems Technology

FROM: Steven A. Varga, Director
Division of Reactor Projects I/II

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE - PILGRIM 2.206 PETITION

On July 15, 1986, William B. Golden and others filed a 2.206 Petition regarding the Pilgrim facility. One of the contentions in the Petition concerned inadequacies in the facility's containment structure. An initial draft response to the containment allegations in the Petition was prepared by the Division of BWR Licensing and issued by P. Bernero on October 3, 1986. Principal contributors were J. Kudrick and Jerry Hulman.

On April 30, 1987, Dr. Murley directed the staff to proceed with developing a reply to the Petition, even though some of the Petitioners' concerns cannot be fully assessed (management and emergency planning issues). R. Wessman, the Pilgrim Project Manager, and W. Paton, OGC, have been developing a reply that provides current status in the management and emergency planning areas and provides the Director's Decision in the containment area.

Initial OGC review indicates that, although technically correct, the draft containment input prepared in October 1986 will require substantial additional staff effort to provide the requisite detail and to withstand the expected legal scrutiny. On May 18, 1987, W. Paton and R. Wessman met with J. Kudrick and A. Thadani to discuss in general terms some of the additional needs on the containment input. General comments are summarized in the enclosure to this memorandum.

Commitment of staff resources on a high priority basis is requested. Based on the discussion with A. Thadani and J. Kudrick, June 5, 1987 was set as a target date for providing a draft of the Petition response to Dr. Murley.

TAC No. 62080 has been assigned. Please contact R. Wessman (x24937) if you have questions.

Steven A. Varga, Director
Division of Reactor Projects I/II

Enclosure:
As stated

cc: W. Paton
J. Craig
A. Thadani
J. Kudrick
F. Miraglia
R. Starostecki
W. Kane, RI

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Enclosure

Comments Regarding Draft Containment Response

1. The document needs to be understandable by non-technical readers, such as the Petitioners. For this purpose, we should:

   a. Provide a general description of the Mark I containment.

   b. Explain in simple terms what the concerns are with the Mark I containment.

   c. Explain what constitutes a severe accident.

2. Describe in more detail the status of the Mark I and severe accident generic actions.

3. Provide additional detail on Pilgrim voluntary enhancements and bases for why the Pilgrim containment is acceptible if none of these are implemented at this time

4. Develop a clear correlation beteen the Hanauer issues alluded to in the Petition and the individual portions of the staff response. (We must deal issue by issue with Petitioners' concerns).

5. [illegible] ioners raise concerns regarding the Chernobyl accident. The [illegible] response needs to provide additional detail explaining why [illegible] l has no relation to Pilgrim.

6. O[illegible] has raised a number of specific questions regarding individual statements in the draft response. These will be discussed on an item by item basis between OGC, the PM, and the assigned reviewer.