



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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AUG 31 1987

Mr. Robert F. Janecek, Chairman
BWR Owners' Group
c/o Commonwealth Edison Company
Rm. 34 FN East
P.O. Box 767
Chicago, IL 60690

30-254/265

Re: BWROG-8737 Inerted Containment Systems

Dear Mr. Janecek:

You recently sent me a letter requesting my review and written comments about whether or not a technically acceptable inerted containment system could satisfy the provisions of 10 CFR 50.44(g). In that letter you stated that "BWROG maintains that paragraph 50.44(g) does not preclude the use of a technically acceptable inerted containment system to satisfy combustible gas control requirements" and that "BWROG submits that 10 CFR 50.44(c)(1) may be satisfied by an inerted containment system."

We have reviewed your analysis and are prepared to agree that, on balance, it is reasonable to interpret 10 CFR 50.44(g) and 50.44(c)(1) so as not to preclude an inerted containment system from satisfying these regulations, provided the inerted containment system is indeed found to be technically acceptable. The measure of "acceptability" must be high, however -- as I explained to you a few days ago over the phone, a "bare bones" measure will not suffice -- because the staff's evaluations of the technical merits of licensee's submissions involve plants that are not of the most recent vintage as well as some of the most complex and difficult issues in the prevention and mitigation of accidents highlighted by the accident at Three Mile Island.

With respect to the issue of technical acceptability, staff members of the Office of Nuclear Reactor Regulation held a meeting on January 20, 1987, in Bethesda, Maryland, with representatives from GPU Nuclear, Commonwealth Edison, Northeast Utilities, and Nebraska Public Power District on the systems used in their Mark I containment plants for combustible gas control. I believe a summary of that meeting was sent to each participant in late April, 1987. The summary called for each licensee to submit its plant-specific position about its compliance with 10 CFR 50.44(g) on a schedule to be determined with NRR's project managers; that position, by the way, was supposed to be the licensee's justification of the reliability of its containment inerting system. The submittal was to include a discussion of the assumptions made by the licensee to justify its position on 10 CFR 50.44 (the staff's position was and continues to be that Regulatory Guide 1.7 should be used to calculate the generation of combustible gases during a loss of coolant accident and that the submittal of Northeast Utilities is unacceptable at present), the information discussed during the meeting on the reliability and

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capability of the containment inerting system and on the window of accident sequences for which this system would be effective in controlling combustible gases, and an analysis of the time period and the licensee's actions needed for the existing system to respond to the increasing combustible gas concentrations in the containment from radiolysis of water before the acceptable limits are exceeded.

I have discussed this matter with the cognizant NRR staff, and we are now awaiting the licensees' submissions.

I hope that this addresses your concerns. If you have any questions or wish to discuss the matter further, please feel free to call me at (301) 492-8690.

Sincerely,

Thomas F. Dorian
Office of the General Counsel

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Do you want to discuss with J. Craig w/ on 8/22/87. See copy of letter in file.

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