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July 31, 1985

NOTE TO: Harold R. Denton
 FROM: Themis P. Speis
 SUBJECT: ACRS COMMENTS ON SEISMIC PROGRAM FOR DIABLO CANYON

In a July 17, 1985 letter, the ACRS agreed with the staff's conclusion that the proposed licensee's seismic program was responsive to the license condition. Included in this letter were additional remarks by Kerr, Okrent, and Ward supporting containment/source term analyses that the staff did not endorse. In particular, it was asserted that "Diablo Canyon is sufficiently different from Zion and Indian Point, or other PWRs for which a relatively complete and recent full scope PRA exists, that there is no good surrogate for detailed evaluation of the effects of partial or full failure of various engineered safeguards...."

We do not agree with this characterization with respect to the Long Term Seismic Program at Diablo Canyon. The staff has developed considerable knowledge of large dry containments during the evaluation of the Indian Point and Zion plants. This knowledge was subsequently used to develop a staff perspective of the containment failure modes and source terms for Millstone, Unit 3, without performing extensive analyses. As part of the source term work, RES is performing additional calculations for Surry, Zion, and other plants that will provide surrogate containment failure probabilities and source terms for typical containment configurations. These results, which will include the most recent phenomenological concerns, should be issued in about a year as NUREG-1150. We believe this information is more than adequate to develop estimates of offsite consequences at Diablo Canyon which has a large dry containment. Such estimates using surrogates are customarily made by the staff for benefit-cost analyses required by the backfit policy.

Dr. Okrent identified a second concern related to the impact of structural degradation, short of failure. Our first impression is that potential containment structural degradation caused by an earthquake would not significantly affect the capability to handle subsequent containment overpressure conditions subsequent to a core melt. Any structural yielding associated with a seismic event would not likely occur in areas with the smallest margin for overpressure failures.

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/s/

Themis P. Speis, Director
 Division of Safety Technology

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 7/31/85

cc: D. Eisenhut

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DATE		7/25/85	7/25/85	7/26/85	7/31/85

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