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RULES & DIR. BRANCH
US NRC

January 7, 2000

Mr. David L. Meyer
Chief, Rules and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

SUBJECT: COMMENTS ON REVISED CRITERIA FOR POST ACCIDENT SAMPLING SYSTEMS

REF: (1) 64 FR 66213 - November 24, 1999

Dear Mr. Meyer:

TXU Electric has reviewed the referenced Federal Register Notice and is pleased to provide comments related to elimination of post accident sampling at commercial nuclear power generating stations. TXU Electric endorses the detailed comments that are being submitted by the Nuclear Energy Institute (NEI) on this Notice and the elimination of the post accident sampling system (PASS).

TXU Electric's endorsement for PASS elimination at the Comanche Peak Steam Electric Station (CPSES) is based on the current lack of contribution of PASS to emergency planning activities in relation to the costs associated with maintaining the system to meet current regulatory requirements. In particular, all emergency planning decisions and recommendations at CPSES made in the first few hours of an event are made without reliance on PASS. The declaration of Emergency Action Levels, the formulation of Protective Action Recommendations, Offsite Dose Projections and Core Damage Assessment are based on established guidance. This guidance considers the loss / potential loss of fission product barriers, measured plant parameters, measured radiation releases, and offsite field monitoring. The input to these activities is from instrumentation and not sampling.

Add:
J. O'Brien

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The emergency response guidance includes the use of results from PASS "if" and "when" such results are available for potential longer term recovery purposes. As a result, information obtained from PASS is only used in a confirmatory mode.

TXU Electric does not believe that PASS could realistically play a significant role in formulating emergency planning decisions based on the following:

- PASS samples may not be available in a timely manner
- PASS samples may divert resources from other important emergency response activities, especially early in an event
- PASS samples, although designed to minimize radiation exposures to plant personnel, result in significant radiation exposures and therefore requests for PASS would only be made under extreme circumstances
- After the initial PASS sample is taken, personnel access to certain portions of the plant auxiliary building may be limited or restricted, potentially hampering the implementation of certain recovery / mitigation activities
- PASS samples that may be taken in the longer term after a core damage accident (i.e., during a subsequent recovery/cleanup phase) to provide information related to offsite emergency activities are believed to be unnecessary and could provide unmeaningful results; more specific comment on this aspect is described in the NEI comment letter

TXU Electric has contacted officials from the Texas Bureau of Radiation Control (BRC) and discussed the planned elimination of PASS at CPSES. As a result of those discussions, we have not identified any situations where the elimination of PASS might degrade the effectiveness of the CPSES emergency response. The BRC officials concur that the CPSES PASS could be eliminated without degrading offsite emergency response activities.

Based on the above discussion and other comments being provided by NEI, TXU Electric can confidently endorse the PASS elimination from the CPSES plant design. Consequently, TXU Electric supports NRC's proposed endorsement of the Westinghouse Owners Group and Combustion Engineering Owners Group topicals.

Sincerely,

C. L. Terry

By: D R Woodlan

D. R. Woodlan
Docket Licensing Manager

CLW/clw

c - Mr. Alan Nelson, NEI
- Mr. Scott Flowerday, Texas Department of Health - Bureau of Radiation Control