



**KANSAS**  
**DEPARTMENT OF HEALTH & ENVIRONMENT**  
BILL GRAVES, GOVERNOR  
Clyde D. Graeber, Secretary

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December 8, 1999 U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station: P1-137  
Washington, D.C. 20555

R.E. NRC Federal Register Notice- Criteria for PASS, November 24, 1999

Dear Sirs;

My staff and I have reviewed a variety of material concerning the potential elimination of major portions of the Post Accident Sampling Systems (PASS) for nuclear power plants.

In addition to reviewing materials from the Combustion Engineering Owners Group (CEOG) and the Westinghouse Owners Group (WOG), we discussed the status of the PASS with staff from the Wolf Creek Nuclear Operating Corporation (WCNOC).

Based upon that review we offer the following comments on NRC's Federal Register Notice- Revised Criteria for Post Accident Sampling Systems, November 24, 1999:

1. It appears that the PASS, as implemented following the incident at Three Mile Island, has not and is not currently meeting its required goals in either core damage assessment or providing timely information for Protective Action Recommendations. If this assumption is correct, it is imperative that the NRC immediately implements regulatory changes to upgrade the current PASS or replace it at nuclear power plants.
2. A variety of methods for assessing core damage have been proposed using current nuclear plant instrumentation. These methods provide timely information for most decisions needed to determine actions under Severe Accident Mitigation Guidelines situations. Portions of the PASS that supported these decisions may reasonably be eliminated.

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3. Although simulation and modeling over the past decade have provided a better understanding of core damage sequences, any determination of radioisotopes in the Reactor Coolant System (RCS), Sump, or Containment is still subject to large uncertainties.

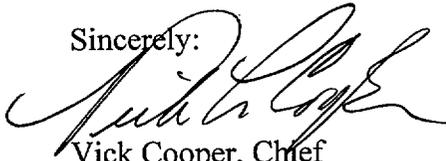
Uncertainties in the PASS methods to sample RCS, Sump, or Containment radioisotope concentrations have not been shown to exceed those of proposed new methods.

Methods proposed in CEOG and WOG documents rely heavily on high range radiation detectors in the Containment and provide no direct measurement of radioisotope ratios or quantities in those areas. Such information can be critical in properly protecting members of the public beyond the typical 10-mile Emergency Planning Zone.

Therefore, portions of PASS that provide radioisotope data for the RCS, Sump, and Containment must be retained and improved to provide near-real-time data essential for Off-Site Protective Actions.

Thank you for the opportunity to comment on this important issue.

Sincerely:



Vick Cooper, Chief  
Bureau of Air and Radiation  
Radiation Control Program