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J. O'Brien

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Nov. 24, 1999

(15)

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

January 7, 2000

Mr. David L. Meyers, Chief
Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Meyers:

NUCLEAR REGULATORY COMMISSION (NRC) - REVISED CRITERIA FOR POST-ACCIDENT SAMPLING SYSTEM (*Volume 64 Federal Register 66213*)

TVA is pleased to provide comments related to elimination of post-accident sampling at commercial nuclear power generating stations. These comments are in response to the NRC's request published in the *Federal Register* on November 24, 1999 in Vol. 64, No. 226, pp. 66213 and 66214.

TVA endorses the elimination of post-accident sampling system (PASS). Our endorsement for PASS elimination is based on its current lack of contribution to emergency planning activities at TVA nuclear facilities in relation to the costs associated with maintaining the system to meet current regulatory requirements.

In particular, all emergency planning decisions and recommendations at TVA nuclear facilities 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 (based on the recently revised Westinghouse Owners Group (WOG) methodology) 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.

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.

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TVA 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.

TVA has recently discussed the planned elimination of PASS with the state and local emergency response organizations that interface with our facilities located in the state of Alabama and Tennessee. As a result of those discussions, we have not identified any situations where the elimination of PASS might degrade the effectiveness of TVA's emergency response.

Based on these considerations of the current role of PASS in emergency planning, TVA can confidently endorse its elimination from the plant design. Consequently, TVA supports NRC's proposed endorsement of the WOG and Combustion Engineering Owners Group topicals.

If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

Mark J. Burzynski
Manager
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission
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