

EDO Principal Correspondence Control

FROM: DUE: 07/19/05 EDO CONTROL: G20050452  
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FINAL REPLY:

David Lochbaum  
Union of Concerned Scientists

TO:

Chairman Diaz

FOR SIGNATURE OF : \*\* GRN \*\* CRC NO: 05-0327

Dyer, NRR

DESC:

ROUTING:

Unaddressed Regulatory Implications of "TMI SLIME"

Reyes  
Virgilio  
Kane  
Silber  
Dean  
Cyr/Burns  
Collins, RI  
Paperiello, RES  
Wallis, ACRS

DATE: 06/23/05

ASSIGNED TO: CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

Add EDO and the Commission for concurrence. EDO  
and Commission to review response prior to  
dispatch.

**OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET**

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**ACTION OFFICE:** EDO

**AUTHOR:** David Lochbaum  
**AFFILIATION:** UCS  
**ADDRESSEE:** Nils Diaz  
**SUBJECT:** Unaddressed regulatory implications of "TMI SLIME"

**ACTION:** Direct Reply  
**DISTRIBUTION:** RF, SECY to Ack

**LETTER DATE:** 06/17/2005

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**NOTES:** Commission should review response prior to dispatch

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**DATE DUE:** 07/21/2005 **DATE SIGNED:**

EDO --G20050452



# Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

June 17, 2005

Dr. Nils J. Diaz, Chairman  
Mr. Edward McGaffigan, Jr., Commissioner  
Mr. Jeffrey S. Merrifield, Commissioner  
Dr. Gregory B. Jaczko, Commissioner  
Dr. Peter B. Lyons, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

## SUBJECT: UNADDRESSED REGULATORY IMPLICATIONS OF "TMI SLIME"

Dear Mr. Chairman and Commissioners:

In 2003, the Advisory Committee on Reactor Safeguards (ACRS) raised a concern about the potential for chemical effects to adversely affect the head loss across the debris bed forming on the containment sump screens at pressurized water reactors during the recirculation phases of accidents. The ACRS was reviewing the NRC staff's resolution plan for Generic Safety Issue 191 (GSI-191). The ACRS became aware of the memo dated September 14, 1979, from the Oak Ridge National Laboratory to the GPU Service Corporation reporting the presence of a gelatinous material in a water sample taken from the Three Mile Island Unit 2 containment sump following its accident. This "TMI slime" issue prompted a series of chemical effects and head loss testing to answer the ACRS's question.

I attended a public meeting on January 8, 2004, between the NRC staff and industry representatives about GSI-191.<sup>1</sup> During that meeting, a representative from the Los Alamos National Laboratory working under contract to the NRC to answer the ACRS's question reported that his inquiry into the source and nature of the TMI slime indicated that approximately one-third of the water residing in the reactor containment after the accident was untreated water from the Susquehanna River and that the most likely source of this river water was leakage from the containment chillers.

The recent release of reports on the chemical effects and head loss testing address the ACRS's question about the potential impact from gelatinous materials on the resolution plan for GSI-191. There are at least two other regulatory implications of the "TMI slime" that remain to be addressed. These implications are unrelated to GSI-191, but warrant addressing nonetheless. Those two implications are:

1) Impact on release pathways: The regulatory requirements governing containment penetrations do not mandate automatic isolation valves be installed for a closed-loop system such as water-filled piping used to cool components inside the containment. The underlying assumption is that a closed-loop system does not represent a pathway for radioactive materials to escape from containment. Apparently, one of the leading candidates for the significant amount of Susquehanna River water found in the TMI containment is leakage from a closed-loop system. In

<sup>1</sup> The NRC staff summarized this meeting in a memo dated February 2, 2004.

general, leak(s) in a closed-loop system inside containment cannot pose a potential release pathway for radioactive material as long as the system is operating because pressure of the fluid inside the leaking pipe will likely exceed the containment pressure. When a closed-loop system is not operating, reduced pressure inside its piping could create the potential for a release pathway. The questions raised by this implication include: Are operating procedures sufficient to prevent the creation of a release pathway when an operating system with a closed-loop portion inside containment is removed from service?

- 2) Impact on environmental qualifications: Certain equipment, mostly electrical devices, may not function properly when submerged in water. The NRC has issued numerous generic correspondence documents on this subject (e.g., Bulletin 79-01B, Information Notice 89-63 and Information Notice 2002-12). To demonstrate compliance with the requirements for environmental qualification of equipment inside containment, the submergence level is calculated based on the containment geometry, volume of the make-up water tank, and projected leak rates from systems inside containment. The potential for a significant volume of water to leak into containment, as may have happened in 1979 to produce the TMI slime and certainly happened in 1980 to submerge the lower section of the reactor vessel at Indian Point Unit 2, poses a challenge to environmental qualification of equipment.

On behalf of the Union of Concerned Scientists, I respectfully ask that you direct the NRC staff to either verify that both of these implications are fully addressed by existing regulatory requirements or undertake steps to address these implications.

Sincerely,



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