

# MARK III CONTAINMENT HYDROGEN CONTROL OWNERS GROUP

c/o Mississippi Power and Light • P.O. Box 1640 • Jackson, Mississippi 39205

Sam H. Hobbs, Chairman

601-969-2458

October 31, 1985  
HGN-061

Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. Robert Bernero

Dear Mr. Bernero:

SUBJECT: Revision 4 of the  
Hydrogen Control  
Program Plan

Reference 1: Letter HGN-024 from Mr. S. H. Hobbs to Mr. H. R. Denton  
Dated December 14, 1984

Reference 2: Letter from Mr. R. M. Bernero to Mr. S. H. Hobbs Dated  
July 8, 1985

Reference 3: Letter from Mr. R. M. Bernero to Mr. S. H. Hobbs Dated  
August 16, 1985

Reference 4: Letter from Mr. R. M. Bernero to Mr. S. H. Hobbs Dated  
September 19, 1985

Reference 1 transmitted the Hydrogen Control Owners Group (HCOG) Hydrogen Control Program Plan to the NRC staff. HCOG has completed Revision 4 of the Hydrogen Control Program Plan and is enclosing 26 copies of the revised pages. This revision addresses NRC staff concerns delineated in References 2, 3, and 4, and discussions held during the July 17 and September 5, 1985 meetings.

In Reference 2 the staff had expressed concerns over the adequacy of the information presented to date justifying manual actuation of the hydrogen ignition system. In the September 5, 1985 meeting between HCOG and the staff, the staff stated a concern regarding the HCOG acceptance criteria for manual actuation which inadvertently addressed only the most probable hydrogen generation event (HGE). Acceptance criterion 6 under Task 3 has been revised to eliminate reference to the most probable HGE. HCOG will document in a future submittal the bases presented in the September 5 meeting for concluding that manual actuation of the igniter system is acceptable.

HCOG will make appropriate revisions to Subtask 8.9 concerning additional CLASIX-3 analyses and Subtask 10.9 concerning analysis of drywell and containment pressure using CLASIX-3 in a later update of the program plan, as these subtasks are still under review.

J16HCOG85103002 - 1

8511040310 851031  
PDR TOPRP EMVGENE  
C PDR

6008  
41

In Reference 2 the staff appeared to identify two conflicting definitions for the thermally limiting component. This was acknowledged by the staff in Reference 4 and in that reference a new definition was proposed. The position outlined by the staff in Reference 4 is still not clear. HCOG requests a more detailed clarification of the position of the staff concerning this issue.

This submittal was compiled by HCOG from the best information available for submittal to the Nuclear Regulatory Commission. The submittal is believed to be complete and accurate, but it is not submitted on any specific plant docket. The information contained in this letter and its attachments should not be used for evaluation of any specific plant unless the information has been endorsed by the appropriate member utility. HCOG members may individually reference this letter in whole or in part as being applicable to their specific plants.

Very truly yours,

*Sam H. Hobbs*

Sam H. Hobbs

SHH:bms  
Attachment

cc: Mr. Carl R. Stahle (w/a)  
Hydrogen Control Project Manager  
U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D. C. 20555

Mr. Charles G. Tinkler (w/a)  
Containment Systems Branch  
Office of Nuclear Reactor Regulation  
Washington, D. C. 20555

Sandia National Laboratories  
Attention: John C. Cummings  
Organization 1512  
P. O. Box 5800  
Albuquerque, New Mexico 87185