



444 South 16th Street Mall
Omaha NE 68102-2247

DOCKET NUMBER
PETITION FILE # 50-75
(67FR16654)

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DOCKETED
USNRC

June 20, 2002 (3:59PM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

June 19, 2002
LIC-02-0067

Secretary, U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

- References:
1. Docket No. 50-285
 2. Nuclear Energy Institute (NEI) Petition to Redefine Large-Break Loss-of-Coolant Accident Pipe-Break Size, Federal Register Volume 67, Number 67, 16654, dated April 8, 2002.

SUBJECT: Comments on Petition For Rulemaking Concerning Introduction of an Alternative Pipe-Break Size For the Large-Break Loss of Coolant Accident

In Reference 2, the NRC requested public comment on NEI's petition for the introduction of an alternative pipe-break size for the large-break loss of coolant accident (LBLOCA) event that is defined in 10 CFR 50.46, and Appendices A and K of Part 50. This letter forwards the Omaha Public Power District (OPPD) comments on this petition.

OPPD supports the adoption of the amendment proposed by NEI to allow use of an alternative maximum pipe size for the largest pipe in the reactor coolant system in Emergency Core Cooling System (ECCS) evaluation models.

OPPD believes that the need to analyze for a double-ended guillotine break currently in the regulations is unnecessarily restrictive in light of the extremely low probability of such an event occurring. The resources spent by the industry and NRC on analyses for such a low probability event could be better invested in more risk-significant scenarios, such as a branch-line pipe break. This concentration would result in more focused plant procedures and recovery scenarios.

Removal of the need to analyze for a double-ended guillotine break would allow for more flexibility in maintenance of plant equipment, additional design margin for plant safety systems, and more efficient plant operation.

Plant safety analyses would be simplified by not having to maintain a separate code base for LBLOCA scenarios. The amendment proposed by NEI is consistent with current industry knowledge and technical advances.

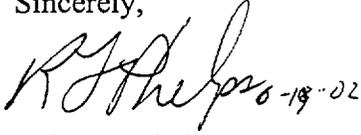
U. S. Nuclear Regulatory Commission

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If you have any questions or require additional information, please contact Mr. H. A. Hackerott of my staff at 402-533-7276.

Sincerely,

Handwritten signature of Ralph L. Phelps in cursive, with the date "6-18-02" written at the end of the signature.

Ralph L. Phelps
Division Manager
Nuclear Engineering

RLP/TRB/trb