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June 25, 2002
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DOCKET NUMBER

PETITION RULE PRM 50-75
(67 FR 16654)

DOCKETED
USNRC

Docket No. 50-397

June 25, 2002 (1:33PM)

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemakings and Adjudications Staff

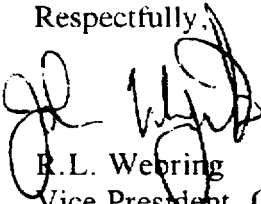
Subject: **COMMENTS ON NEI PETITION FOR RULEMAKING (PRM-50-75)
ACCEPTANCE CRITERIA FOR ECCS DESIGN**

Energy Northwest strongly endorses the Petition for Rulemaking filed by the Nuclear Energy Institute to amend 10 CFR 50.46 and Appendices A and K to 10 CFR 50. This petition is consistent with the commitment by the industry to expand the use of probabilistic risk assessment (PRA) to reduce unnecessary conservatism and yet provide adequate margin to safety limits through the use of probabilistic fracture mechanics and leak-before-break methodology.

We agree with the position as stated in the petition that the probability of the double-ended break is extremely low and presents a negligible risk to public health and safety. This is consistent with the position adopted by the NRC to use the leak-before-break approach in the design requirement for the reactor coolant system primary piping. The petition would allow the option to use alternative break sizes in addition to the double-ended break of the largest pipe to meet the requirements specified in Appendix A to 10 CFR 50. These alternative break sizes will focus the system design and operation on safety significant events as determined through the PRA process. It will also result in improved plant reliability by avoiding rapid cold start and loading sequences of ECCS equipment.

Accordingly, Energy Northwest endorses the NEI position and encourages the NRC to approve the petition. Should you have any questions regarding these comments, please contact Mr. Mike Humphreys at (509) 377-4025.

Respectfully,

 for RLW

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Templatr = SECY-067

SECY-02