



**Westinghouse**

DOCKETED  
USNRC

June 25, 2002 (1:33PM)

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12

DOCKET NUMBER

PETITION FILE # **50-75**  
**(67FR 16654)**

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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Attention: Rulemakings and Adjudications Staff

Our ref: LTR-NRC-02-32

June 18, 2002

Comments on NEI Petition for  
Large Break LOCA Redefinition Proposed Rulemaking (PRM-50-75 dated April 8, 2002)

Westinghouse Electric Company appreciates the opportunity to comment on the subject petition for rulemaking. Westinghouse supports the proposal in the NEI petition and views it as an important element in creating a regulatory structure that reflects today's state of knowledge and operating experience.

The double-ended break design basis required by the current regulations has far-reaching effects on plant design and operation. However, over 30 years of operating experience and improvements in engineering knowledge and methods have shown that a double-ended break of the largest reactor coolant system piping should no longer be a dominant LWR safety criterion. Adoption by the NRC of the proposed petition would enable more regulatory and industry resources to be focused on areas that are of more benefit to the safe and reliable operation of the nation's nuclear power plants.

Also, as described in the petition, the existing regulations are inconsistent in their treatment of the dynamic effects and other design effects of a postulated design basis pipe break. Adoption of the proposed petition would allow the NRC to make the regulations more consistent, which would increase public confidence in the regulatory process.

Westinghouse views the regulatory change proposed in the NEI petition as a cornerstone in the NRC's process to improve the regulatory structure.

If you have any questions, please contact me at 412-374-5282.

Sincerely,

Hank A. Sepp, Manager  
Regulatory and Licensing Engineering

cc: Girijah Shukla

A BNFL Group company

Template = SECY-067

SECY-02