

7/15/2010

75 FR 41241



NRCREP Resource

From: Patricia L. Campbell [patriciaL.campbell@ge.com]
Sent: Wednesday, September 08, 2010 12:21 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Patricia L. Campbell (patriciaL.campbell@ge.com) on Wednesday, September 08, 2010 at 12:21:14

Document Title: DG-1234, "WATER SOURCES FOR LONG-TERM RECIRCULATION COOLING FOLLOWING A LOSS-OF-COOLANT ACCIDENT"

Comments: GEH provides the following comments on DG-1234, "WATER SOURCES FOR LONG-TERM RECIRCULATION COOLING FOLLOWING A LOSS-OF-COOLANT ACCIDENT," as suggestions for NRC consideration in finalizing the regulatory guidance. These comments are not intended to represent an official GEH position on the issues, but may include information of interest in finalizing the regulatory guidance.

Page 12, first full paragraph and page 26, item 1.3.12:

These paragraphs include a statement that "strainer testing methodology should be similar to that used for the testing performed for the resolution of GSI-191 and GL 2004-02." Extensive testing of BWR strainers was performed in the late 1990's and the results of these tests were used as the design basis for BWR strainers. For example, GEH conducted a series of tests with a large-scale optimized stacked disk test article using various debris mixtures and flow rates. The test methods used by GEH to perform the optimized stacked disk strainer tests have many similarities to the methods used in response to GSI-191, except chemical effects tests were not included in the debris mixtures and the testing for thin bed formation was less extensive.

The GEH test methods and test results are documented in a proprietary Licensing Topical Report ("LTR") that was reviewed and approved by the NRC. GEH believes the test results contained in the approved LTR remain an acceptable basis for strainer designs without chemical effects and which do not have thin bed conditions. The BWROG is pursuing the characterization of the added head loss associated with BWR chemical effects. Once the BWROG efforts on chemical effects are complete, GEH will determine how to incorporate the chemical effects head loss into the total strainer head loss. Also, GEH will work with BWR licensees to identify any BWR plants with debris mixtures that may require additional tests concerning the potential to develop thin bed conditions.

On this basis, GEH requests that this paragraph be re-written to clarify that previously approved GEH optimized stack disk strainer tests remain valid provided any adjustments to the strainer head loss associated with chemical effects and thin beds are accounted for properly.

Page 13, Item 1.1.1.8:

This paragraph, as well as several others in the draft RG, uses the term "debris blockage" as a cause of increased head loss. The term "debris accumulation" may be better suited than "debris blockage" for this cause-and-effect relationship.

Page 19, item 1.3.2.2:

*SUNSI Review Complete
Template = ADM-013*

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*E-REDS = ADM-03
Addr = R.A. Jarvey (RAJ)
M. Corso (MJC)*

It is suggested that the word "sump" be replaced with "strainer."

Page 20, item 1.3.3.1, b:

If a wall or other object prevents passage of the jet, the protected portion of the zone of influence ("ZOI") does not need to be considered in determining debris generation.

Page 21, item 1.3.4.2:

It is suggested that the word "sump" in the first sentence be replaced with "containment."

Page 27, item 1.3.12, b:

It is suggested that the word "box" be replaced with "schematic."

Page 32, item 3.2.1:

The BWROG Utility Resolution Guidance ("URG") contains a generic BWR sludge size distribution. There is no need for each BWR to generate a plant-unique sludge size distribution, as the URG developed generic size distribution should be acceptable.

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