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Mr. Victor Stello, Jr. Executive Director for Operations U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Stello:

SUBJECT: ACRS COMMENTS ON PROPOSED REVISED STANDARD REVIEW PLAN SECTION 3.6.2, "DETERMINATION OF RUPTURE LOCATIONS AND DYNAMIC EFFECTS ASSOCIATED WITH THE POSTULATED RUPTURE OF PIPING," DATED OCTOBER 2, 1986

In our letter to you dated November 12, 1986 concerning NRC Staffproposed revisions to Standard Review Plan (SRP) Section 3.6.2, "Determination of Rupture Locations and Dynamic Effects Associated with the Postulated Rupture of Piping," we recommend that existing SRP requirements for postulating break sizes and locations should be retained where they relate to establishing compartment and subcompartment pressure buildup, particularly outside the primary containment.

We continue to put forth this recommendation but see no problem with the issuance of the revised SRP Section 3.6.2, provided the guidance stated in Mechanical Engineering Branch Technical Position 3-1, subpart B.1.c.(4) is implemented. This guidance states:

If a structure separates a high energy line from an essential component, that separating structure should be designed to withstand the consequences of the pipe break in the high-energy line which produces the greatest effect at the structure irrespective of the fact that the above criteria might not require such a break location to be postulated. [The "above criteria" are the criteria for postulating high-energy fluid systems pipe rupture in areas other than containment penetrations.]

The retention of this general provision should assure adequate protection of essential components against pipe whip, jet impingement, and the pressurization effects of high-energy line ruptures inside of compartments and subcompartments, even after the arbitrary intermediate breaks are eliminated. We believe this adequately complies with our recommendation and therefore approve publication of the Federal Register Notice on the revised SRP 3.6.2.

Sincerely,

William Kerr Chairman