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

Dear Mr. Stello:

SUBJECT: ACRS COMMENTS ON THE INTERPRETATION OF 10 CFR PART 50, GENERAL  
DESIGN CRITERION 4, "ENVIRONMENTAL AND MISSILE DESIGN BASES"

It has come to our attention that the NRC Staff is interpreting GDC 4 to mean that the capabilities of component supports can be substantially reduced in existing plants as a consequence of the elimination of the requirement to consider dynamic effects of pipe ruptures (Reference 1). As you may know, NRC-funded research at Lawrence Livermore National Laboratory on the seismic risks to piping failure had as a principal conclusion that the failure of component supports constituted the largest single risk of pipe failure. The proposed Rule, "Modification of General Design Criterion 4 Requirements for Protection Against Dynamic Effects of Postulated Pipe Ruptures," (Reference 2), under "Scope of Rulemaking," states,

"The use of ASME code allowables in component support redesign is judged sufficient for preventing pipe rupture due to component support failure."

However, it goes on to say,

"Redesigned component supports must have sufficient margins such that component support failure is a remote cause of pipe rupture."

It is the opinion of two of the NRC's principal consultants in this area that the ASME Code allowable values do not provide sufficient margin to make such failure a remote cause of pipe rupture.

We are concerned about this difference of opinion regarding the required level of safety, and we recommend that you stop approving such requests for the reduction in supports until there has been an opportunity for these differences to be resolved.

We will be happy to work with you on the resolution of this matter. We plan to meet with the NRC Staff on this and other related matters on January 15 and/or 16, 1987.

Sincerely,

David A. Ward  
Chairman

References:

1. Safety Evaluation by the Office of Nuclear Reactor Regulation, Supporting Amendment No. 89 to Facility Operating License No. DPR-72, Florida Power Corp., et al. Crystal River Unit No. 3 Nuclear Generating Plant, Docket No. 50-302, transmitted May 23, 1986
2. Federal Register Notice, Proposed Rule, "Modification of General Design Criterion 4 Requirements for Protection Against Dynamic Effects of Postulated Pipe Ruptures," Vol. 51, No. 141, July 23, 1986

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