

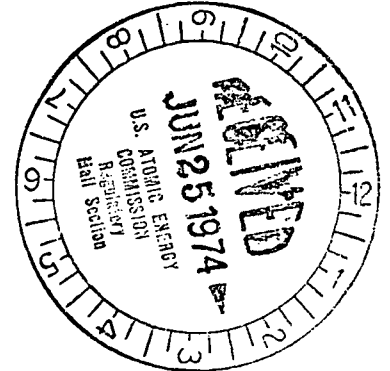
GENERAL ELECTRIC

NUCLEAR ENERGY
DIVISION

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIF. 95114
Phone (408) 297-3000, TWX NO. 910-338-0116

LEGAL OPERATION

June 18, 1974

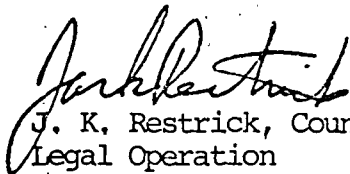


John F. O'Leary, Director
Directorate of Licensing
U. S. Atomic Energy Commission
Washington, D. C. 20545

Dear Sir:

Pursuant to the request of several utilities operating boiling water reactors, we are hereby filing the attached two affidavits to support statements being made by various utilities in their applications pursuant to 10 CFR § 50.46(a)(2)(iii) and/or (vi).

Respectfully yours,

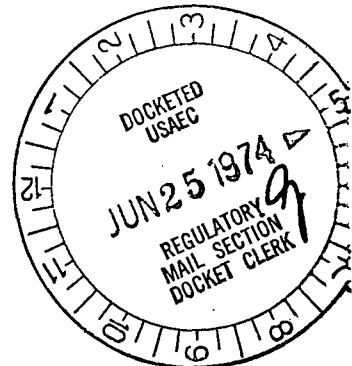

J. K. Restrict, Counsel
Legal Operation
General Electric Company
Mail Code 304, Ext. 3233

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cc: J. Murray, OGC
V. Stello

Enclosures

50-271
50-325
50-245
50-237-249
50-254-265
50-263
50-219
50-220
50-293
50-259-260-296
50-277-278
50-298
50-331
50-333
50-321
50-155
50-133
50-10



REGULATORY DOCKET FILE COPY

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AFFIDAVIT OF AARON J. LEVINE

I, Aaron J. Levine, being duly sworn, depose and state as follows:

1. My name is Aaron J. Levine. I am the manager of Project Licensing Unit-I for General Electric Company's Nuclear Energy Products Division. In this position, I have been involved in the AEC review of the General Electric emergency core cooling system (ECCS) evaluation models, on development of the schedules for completing calculation and in coordination with the operators of plants subject to new ECCS evaluation.
2. General Electric has been requested by the operators of the following plants to provide emergency core cooling system (ECCS) calculations for filing on August 5, 1974, pursuant to 10 CFR § 50.46:

	<u>DOCKET NO.</u>
Vermont Yankee	50-271
Brunswick-2	50-325
Millstone	50-245
Dresden-2 & -3	50-237 & 50-249
Quad Cities-1 & -2	50-254 & 50-265
Monticello	50-263
Oyster Creek	50-219
Nine Mile Point	50-220
Pilgrim	50-293
TVA-1, -2 & -3	50-259, 50-260 & 50-296
Peach Bottom-2 & -3	50-277 & 50-278
Cooper	50-298
Duane Arnold	50-331
Fitzpatrick	50-333
Hatch-1	50-321

3. In order to perform such calculations, it has been necessary for General Electric to develop a new evaluation model to conform to the requirements of Commission regulations and to secure Atomic Energy Commission (AEC) Staff concurrence in use of the new model. The calculations utilize new evaluation models in conjunction with the specific parameters for each of the 20 plants and are performed for a number of loss-of-coolant accidents for each plant of different sizes, locations and other properties sufficient to provide assurance that the entire spectrum of

postulated loss-of-coolant accidents (LOCA) is covered.

4. General Electric's new evaluation model consists of the following parts:
 - a. Short-Term Thermal-Hydraulic Model;
 - b. Transient Critical Power Model;
 - c. Long-Term Thermal-Hydraulic Model;
 - d. Core Heat-up Model.

5. The AEC Staff review of the individual models commenced in January 1974.

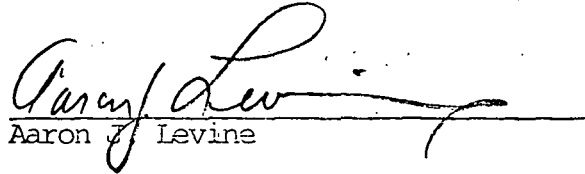
These models have been under intensive review by the Staff since that time and have been discussed with the Advisory Committee on Reactor Safeguards. Upon concurrence from the Staff with the first two parts of the model in April, specific plant calculations were commenced. The calculations for the last parts of the model will commence promptly at the time at which the necessary outputs from the first parts of the model are available.

6. The current schedule for completion of calculations for these 20 plants is July 15, 1974. The results of the calculations will be promptly compiled and distributed for use by the plant operators in their filings. Because of the sequential procedure of the calculational operation, the results of all 20-plant calculations will become available essentially simultaneously.

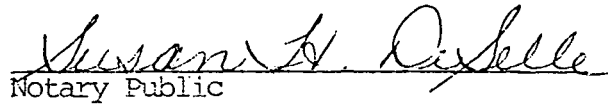
7. Each plant was furnished with preliminary estimates of the maximum average planar linear heat generation rate expected for it as a result of the application of the Appendix K criteria. These remain the best estimates of the calculated results at this time. It is General Electric's opinion that for most plants these estimates are accurate to about 10%. Because of the volume of calculational work and the sequential nature

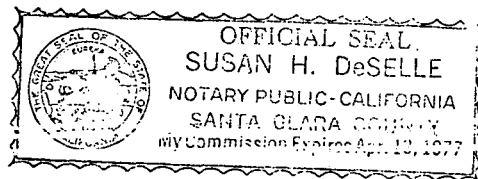
Affidavit of Aaron J. Levine, Continued

of the calculational operation, no better estimates will be available prior to the completion of the calculations.


Aaron J. Levine

Subscribed and sworn to before me this 17th day of June, 1974.


Notary Public



175 Curtner Avenue, San Jose, CA. 95114

AFFIDAVIT OF AARON J. LEVINE

I, Aaron J. Levine, being duly sworn, depose and state as follows:

1. My name is Aaron J. Levine. I am the manager of Project Licensing Unit-I for General Electric Company's Nuclear Energy Products Division. In this position, I have been involved in the AEC review of the General Electric emergency core cooling system (ECCS) evaluation models, on development of the schedules for completing calculation and in coordination with the operators of plants subject to new ECCS evaluation.

2. Each of the following plants is required to perform ECCS calculations pursuant to 10 CFR § 50.46:

Big Rock Point	-	Docket 50-155
Humboldt Bay	-	" 50-133
Dresden-1	-	" 50-10

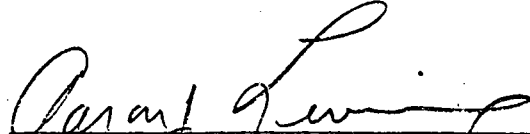
3. Each of these plants has unique design characteristics which make their ECCS analysis significantly different from that of the vast majority of boiling water reactor (BWR) plants analyzed by General Electric and make the analysis of each of these plants different from the analyses of the others. As a result, the new ECCS evaluation model developed by General Electric is not applicable to these plants without significant modification.

4. Because of the active involvement of General Electric technical personnel in developing the new evaluation model applicable to the majority of BWRs, applying the new model to these plants and performing their routine duties, General Electric will not be able to develop ECCS


Affidavit of Aaron J. Levine, Continued

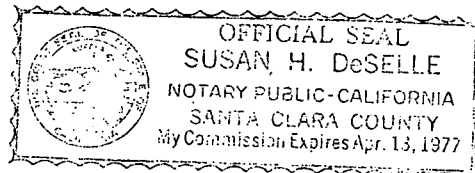
models applicable to these plants by the August 5, 1974 date prescribed in the AEC regulations. General Electric presently estimates that it would not be able to develop a model, or models, and complete calculations on these plants prior to February of 1975.

5. No present estimate of the impact on these plants of analyses pursuant to the new ECCS criteria are available at this time.


Aaron J. Levine

Subscribed and sworn to before me this 17th day of June, 1974.


Notary Public



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