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RECIP.NAME RECIPIENT AFFILIATION
CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Submits comments on NRC 810727 draft evaluation of SEP Topic IX-4 re boron addition sys. Listed addl documents should be referenced.

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August 6, 1981

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch No. 5
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: SEP Topic IX-4, Boron Addition System
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

We have reviewed the draft evaluation of SEP Topic IX-4, provided by your letter dated July 27, 1981 and agree with the assessment and conclusions. We also offer the following comments:

1. We suggest that the second and third sentences of the Introduction be rewritten as follows: "In this initial injection mode, borated water is provided from the boric acid tanks, the refueling water storage tank, and the accumulators. After this initial period, which will last at least 20 minutes for a large break LOCA, and longer for smaller breaks, the Emergency Core Cooling System (ECCS) . . ."

2. The following additional documents should be referenced, although they do not change the conclusions of the assessment.

   a. Letter to B. C. Rusche, NRC, from L. D. White, Jr., RG&E, dated April 1, 1975.
   b. Letter to T. M. Novak, NRC, from C. L. Caso, Westinghouse, CLC-NS-309, dated April 1, 1975.
   c. Letter to B. C. Rusche, NRC, from L. D. White, Jr., RG&E, dated April 30, 1975.
   d. Letter to B. C. Rusche, NRC, from L. D. White, Jr., RG&E, dated May 13, 1975.

In addition, we have not previously obtained a copy of Reference 1 and would appreciate receiving a copy.

Very truly yours,

John E. Maier

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