

# GENERAL ELECTRIC

NUCLEAR POWER  
SYSTEMS DIVISION

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Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Attention: Docketing and Services Branch

Subject: NUREG 0610 "Draft Emergency Action Level Guidelines For Nuclear Power Plants" - General Electric Comments

- References:
- 1) NUREG 0610, "Draft Emergency Action Level Guidelines For Nuclear Power Plants", Office of Nuclear Reactor Regulation, September 1979.
  - 2) AIF Letter J.E. Ward to Samuel J. Chilk, dated November 28, 1979.
  - 3) S.H. Bush, "A Reassessment of Turbine-Generator Failure Probability", Nuclear Safety Volume 19, No. 6, November-December 1978.

The U.S. NRC Office of Nuclear Reactor Regulation developed draft emergency action level guidelines to improve the emergency preparedness capabilities of operating nuclear power plants. The draft guidelines were published as NUREG 0610 (Reference 1) and public comments were solicited. This letter is written to provide General Electric comments.

General Electric endorses the Atomic Industrial Forum's Committee on Reactor Licensing and Safety comments (Reference 2). In particular, we wish to support the AIF recommendation to include "in-plant occurrence" as an emergency action class rather than "notification of unusual event".

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Acknowledged by card... *d in 1/2/80*

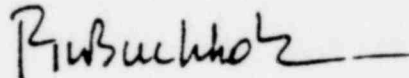
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U.S. Nuclear Regulatory Commission  
Samuel J. Chilk

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In addition, General Electric notes that "Turbine Failure" is identified as an example of an initiating condition (Item 14e, page 5). We believe that within the context of the document "Turbine Failure" is intended to mean the occurrence of an event that might lead to the ejection of external missiles so as to impair the safety of the reactor plant (see Reference 3). The use of the term "Turbine Failure" without a qualifying definition could be misconstrued to mean all turbine "forced outages". Since the vast majority of turbine forced outages are not related in any way to the safety of the plant, this would be an unwarranted reporting of irrelevant events. General Electric therefore suggests that "Turbine Failure" on page 5 is inappropriate and should be deleted.

We appreciate the opportunity to provide these comments and would be pleased to respond to any questions you may have.



R.H. Buchholz, Manager  
BWR Systems Licensing

/mac

cc: G.G. Sherwood  
J.E. Ward  
L.F. Gifford

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