

Norberg

P. O. BOX 913100, MIAMI, FL 33101



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PROPOSED RULE PR-50 (43FR 57157)

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

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Re: ECCS Acceptance Criteria - Proposed Rule
(43 F. R. 57157) December 6, 1978



Florida Power and Light Company has reviewed the proposed rule and makes the following comments:

Subsection 1.b under "Specific Considerations" discusses ECCS reanalysis requirements for OL applications and licensed plants. We suggest that Subsection 1.b be revised to read:

"The changes to 10 CFR 50.34 would dispense with ECCS performance recalculations in the event of corrections to vendor ECCS computer analysis codes if it is demonstrated, on a generic basis, that no change in plant technical specifications is involved and that adequate margin to established performance limits can be demonstrated."

As presented in 43 FR 57157, Subsection 1.b would not dispense with recalculations unless the code corrections demonstrated a reduction in peak clad temperature (PCT). It would be more proper to base the need for recalculation on the availability of margin to the PCT limit. If the "availability of margin" needs to be quantified, it could be done by means of a maximum allowable change (or percent change) in PCT, assuming of course that the PCT limit is not exceeded.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Robert E. Uhrig
Vice President

REU:JRP:cf

Acknowledged by card... 3/16/79

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