

# GENERAL ELECTRIC

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SULLIVAN  
NUCLEAR ENERGY  
PROJECTS DIVISION

MFN-127-79

May 1, 1979 DOCKET NUMBER  
PROPOSED RULE PR-Misc Notice  
Reg Guide



U. S. Nuclear Regulatory Commission  
Secretary of the Commission  
Washington, D. C. 20555

Attention: Chief, Docketing and Service Section

SUBJECT: GENERAL ELECTRIC COMMENTS ON REGULATORY GUIDE 1.75  
"PHYSICAL INDEPENDENCE OF ELECTRICAL SYSTEMS," REVISION 2,  
DATED SEPTEMBER 1978

Revision 2 of the subject Regulatory Guide, issued in September 1978, combines a postulated cable tray fire along with LOCA and loss of off-site power as the design basis accident. This is a departure from current practice and existing NRC position on fire protection. The departure is unjustified and Regulatory Guide 1.75 should be revised.

Specifically, Regulatory Guide 1.75, Revision 2, is inconsistent with the Regulatory Guide 1.120, Revision 1, dated November, 1977, "Fire Protection Guidelines for Nuclear Power Plants".

Regulatory Guide 1.75, Revision 2, Regulatory Position C1, which refers to Section 3 "Isolation Devices" of IEEE Standard 384-1974 assumes the basis that "Under the postulated conditions of loss-of-coolant accident, loss of off-site power, and a Cable Tray fire, the proximity of circuits energized from redundant class IE power sources could....."

Regulatory Guide 1.120, Revision 1, Regulatory Position C.1.d(1) states that, "Fires need not be postulated to be concurrent with non-fire-related failures in safety systems, other plant accidents, or the most severe natural phenomena." Thus a fire and loss-of-coolant accident should not be postulated to occur concurrently.

The NRC should change Regulatory Guide 1.75, Revision 2, to be consistent with Regulatory Guide 1.120. A rewording of Regulatory Guide 1.75 which would be consistent with both current practice and Regulatory Guide 1.120 follows:

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"Under the postulated conditions of either a fire and its consequential damage limited to a single division (no single failure need be assumed, see Regulatory Guide 1.120) or a loss-of-coolant accident, loss of off-site power, and a single failure, the proximity of circuits.....etc."

If you have any questions regarding this letter, please contact Vic Kovacevic of my staff, (408) 925-2996.

Very truly yours,



Glenn G. Sherwood  
Safety and Licensing Operation

GGs:pes/932-933

Attachment

cc: L. S. Gifford

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