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



Attention: Docketing and Service Branch

Gentlemen:

I am concerned with understanding certain sections of your Regulatory Guide 1.63 Electric Penetration Assemblies in Containment Structures for Light-Water-Cooled Nuclear Power Plants, Revision 2, July 1978.

Position 1. of Section C. appears to address the wrong paragraph of IEEE 317. Paragraph 4.2.5 concerns loss of mechanical integrity and appears to say much the same as the first part of C.1.

However, it is the reference to the "criteria" of IEEE 279 which causes me the main concern. I can find no mention of criteria in that standard, apart from the title, and the standard does not in any way address the protection of electrical circuits. I would appreciate your clarification of the meaning of the sentence.

Position 2. gives values of x/r for low voltage circuits which, according to the footnote (number 2), have been based on data of ANSI C37.010 which refers only to high voltage circuits, since the low voltage breaker is applied on an instantaneous basis (x/r determining the offset) while in the high voltage case, x/r determines the symmetrical current based on delay in tripping.

I would be glad to know how the value of 8 for the x/r for low voltage circuits was determined and also if 8 (and 15) are acceptable. (The value of 15 is of course in line with the minimum value given in C37.010).

Very truly yours,

C. H. B. Richardson

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