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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

August 14, 1979

Docket No. 50-320

Robert Arnold, Vice President for Generation General Public Utilities

RETURN TO RESULATORY CENTRAL FILES

Dear Mr. Arnold:

Having attended the August 8, 1979 working meeting with you and B&W regarding the MDHR system and given further consideration to the system criteria, we believe the following items should be addressed:

- 1. Overpressure Protection: The current criteria calls for providing only several gpm relief capacity (~1.6 gpm for the system). Further work is being done to evaluate the effect of low pressure injection actuation. We agree with this effort. We would also think that consideration should be given to providing relief protection based upon heat input from pressurizer heaters unless they can be removed from service. Unavailability of heaters may not be desirable.
- 2. Electrical power: It is our understanding that this system will be used extensively in the recovery effort and we, therefore believe that redundant power supplies should be provided to the system (pump motors). The isolation valves must have redundant power supplies as well. (We understand that this is the case.)
- 3. System seismic design criteria: We understand that, with the exception of the system isolation valves, the MDHR system is not currently designed to any seismic criteria (OBE or SSE). The effect of a seismic event when utilizing this system must be considered. Therefore it is our position that the system be:
 - a. qualified for an operating basis earthquake, and
 - b. evaluated for the effects of a pipe failure caused by a seismic event. Such an evaluation must include:
 - (1) detection of break/leak (sensitivity of radiation monitors),
 - (2) action by operator to isolate break. The results must show that the DHR system (original system) would be available in all respects and the resultant dose levels would be acceptable (10 CFR 100).

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4. Collection of debris: We believe that the presence of debris in the IAR drop line from the RCS hot leg is a valid concern and concur that action should be taken to deal with it.

We would be happy to discuss these areas with you.

Sincerely,

John T. Collins, Deputy Director

TMI-2 Support

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