

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

E. A. BORGMANN
VICE PRESIDENT

Docket No. 50-358

February 27, 1980

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: WM. H. ZIMMER NUCLEAR POWER STATION -
UNIT 1 (ZPS-1), THE CINCINNATI GAS &
ELECTRIC COMPANY'S POSITION ON ATWS

Dear Mr. Denton:

This is in response to your October 17, 1979 letter seeking utility input on the ATWS issue. While CG&E concurs with the basic Staff objectives, at the same time, we believe that all other considerations should not be totally disregarded.

Consistent with this philosophy, we have concluded that Alternative II as set forth in NUREG 0460 meets all mitigation criteria for a hypothesized ATWS situation for the Zimmer reactor system, a BWR-5. Our review of your Staff's approach to the mechanisms leading to postulated failure to scram results in the identification of only two such triggering events: failure of the initiating logic or failure of the scram air header valves. Both of these are mitigated by the use of Alternative II as heretofore proposed. If your Staff has considered other initiating mechanisms, we would appreciate being apprised so that we can review the matter further. To repeat the commitment contained in our September 30, 1976 letter, upon receipt of your concurrence, we stand ready to begin implementation of Alternative II.

In response to the next to the last paragraph in your letter of October 17, 1979, no formal BWR ATWS owners group has been formed, but we have and will continue to participate in an ad hoc owners group. This group participated in the development and review of the General Electric Company December 1979 submittal regarding ATWS.

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To: Mr. Harld Denton, Director

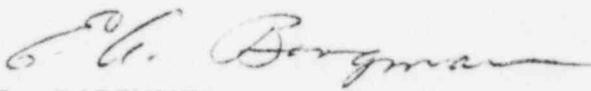
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Unit 1 (ZPS-1), The Cincinnati Gas &
Electric Company's Position on ATWS

Let me reemphasize the Company's commitment to work with the Staff to come to a mutually acceptable resolution of this matter.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E. A. BORGMANN
Senior Vice President

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