

Portland General Electric Company

July 2, 1980

NUREG-0577 Comments

JWL-269-80

Mr. Richard P. Snaider
Generic Issues Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

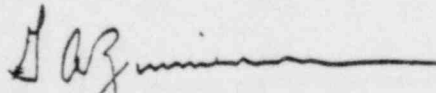
Dear Sir:

We have the following comments in response to Mr. Eisenhut's generic letter dated May 20, 1980 regarding additional guidance on NUREG-0577, Potential for Low Fracture Toughness and Lamellar Tearing on PWR Steam Generator and Reactor Coolant Pump Supports:

1. The proposed review procedure should be revised to reflect applicants of plants without a construction permit who have fabricated reactor coolant system component supports. These cases should be grouped with "applicants of plants with a construction permit".
2. We feel it may pose an undue hardship for applicants of plants with a construction permit (or applicants without a construction permit, but with fabricated component supports) to use materials defined in a forthcoming revision to the NRC Standard Review Plan. In lieu of the Standard Review Plan requirements, we believe that the operating reactor review procedure (Enclosure 1 of generic letter) should be singularly applied.

We would appreciate your serious consideration of these comments.

Sincerely,



for J. W. Lentsch
Manager of Generation Licensing & Analysis
Generation Engineering-Construction Division

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