## GENERAL S ELECTRIC

NUCLEAR POWER

SYSTEMS DIVISION

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125 RHB-057-80 MC 682, (408) 925-5722

MFN-124-80

July 11, 1980

U. S. Nuclear Regulatory Commission Division of Licensing Office of Nuclear Reactor Regulation Washington, D.C. 20555

Attention: Darrell G. Eisenhut, Director Division of Licensing

Gentlemen:

SUBJECT:

IMPLEMENTATION OF NUREG-0660 REQUIREMENT II.K.3.13

This letter documents the telephone conversations between R. A. Hill of my staff, T. Shannon representing the BWR Owners Group, and Wayne Hodges of the NRC on June 13 and 17. The subject of these telephone conversations was the definition and implementation of the NUREG-0660 II.K.3.13 requirement for modifying HPCI/RCIC setpoints. The conversations did not address the requirement to restart RCIC on low level.

During the conversations, it was agreed that the fundamental issue of this requirement is the potential benefit of reducing the thermal effects of cycling which result from HPCI operation. T. Shannon committed that the BWR Owners Group would assess this fundamental issue and recommend action as appropriate if any. It was specifically mentioned that any action recommended by the BWR Owners Group to address the thermal cycle issue would probably not include modifications to HPCI/RCIC initiation setpoints since it is Owners judgement that setpoint modifications would yield insignificant changes to the thermal cycle history. If this judgement is verified by the evaluation being performed by the Owners Group, the BWR utilities will not initiate actions to implement setpoint changes by April 1981 as specified by requirement II.k.3.13.

## GENERAL 🏶 ELECTRIC

USNRC July 11, 1980 Page 2

Mr. Hodges concurred that the objective of the recommended change in HPCI/RCIC setpoints is to reduce the thermal cycle history. Mr. Hodges further agreed that if it is anticipated by the Owners that setpoint changes will yield minimal reduction in the thermal cycle history that the basis for this conclusion should be documented by October 1980. Finally, Mr. Hodges indicated that the Owners plan to not implement the changes appeared to be appropriate if the evaluation of the change demonstrates negligible reduction in thermal cycles.

If you have further questions, please contact Mr. R. A. Hill at (408) 925-5388.

Very truly yours,

S.J. Stark for R.H. Buchhaly

R. H. Buchholz, Manager BWR Systems Licensing Safety & Licensing Operation

RAH: rm/2079-80

- cc: BWR Owners Group
  - T. D. Keenan
  - T. Shannon
  - W. F. Colbert
  - M. W. Hodges
  - P. W. Marriott