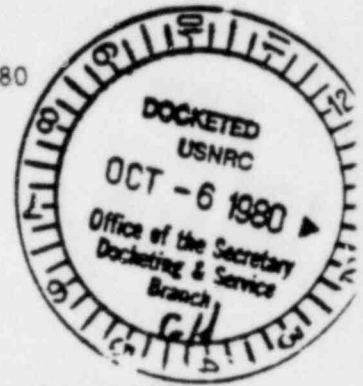


October 3, 1980



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

Attn: Docketing and Service Branch

Subj: Comment on Proposed Revision 1 to Regulatory Guide 1.23, Sept. 1980

Dear Sir:

Listed below are my comments on the subject guide.

Section B.5.

This section should agree with draft NUREG-0654 in that contact with the National Weather Service is an allowed alternative only until April 1, 1982, for input to the Class A plume exposure model. Class A, plume exposure EPZ, and Class B, ingestion EPZ model concepts should be mentioned here insofar as the kind of meteorological inputs that are required.

Section C.1.

The rationale for requiring ambient moisture measurements at plants that have no cooling towers, ponds, canals, etc., is not evident. This requirement at a plant that has only a simple once-through cooling system should be justified.

It is likewise not evident as to how more instrumentation on the primary tower is enough to document conditions due to non-uniform terrain or coastal effects. Please indicate if another tower is needed further away.

Section C.2.

Please clarify whether or not ambient moisture should be measured at the height where the measurements will represent the resultant atmospheric moisture content if only small auxiliary cooling towers are used to back up the ultimate heat sink.

Are the supplementary instrumented towers described in this section the same as the secondary towers described here and in NUREG-0654? If not, required features of this system had ought to be better defined.

POOR ORIGINAL

Acknowledged by card... *10/4/80*

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Comments*

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1000 Elm St., P.O. Box 330

Manchester, NH 03105

Telephone 603/689-4000

It would be informative to the industry for NRC to give an example of a meteorological system satisfying this Guide at a coastal site separated from the ocean by a lagoon. The primary, secondary, supplementary, and back up tower requirements would then be clearly illustrated.

Section C.3.

The data acquisition method of all towers except the primary tower is not specified and therefore is at the option of the utility. This interpretation should be made explicit in the Guide.

Section C.5. and Section C.6.

Please indicate if these sections are applicable to secondary and supplementary towers.

Section C.7.

What portion of the meteorological system and data is to be regarded as safety related? NRC should clarify in this Guide the required safety status of the system and data with respect to meeting seismic and climatic criteria in electrical and mechanical areas.

Section C.8.

If there is any commercially available mobile meteorological equipment that can be taken from storage, set up and made operational in five minutes, then this knowledge should be shared here.

Draft Value/Impact Statement Section 1.3.3.

For a valley site, please project the cost of the drainage conditions and inversion depth studies required in Section C.2. of the proposed Guide.

Very truly yours,

L. C. Frederick

L. C. Frederick
Principal Scientist

LCF:eps

POOR ORIGINAL