

GENERAL  ELECTRIC

NUCLEAR POWER
SYSTEMS DIVISION

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MFN-101-80

May 21, 1980

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

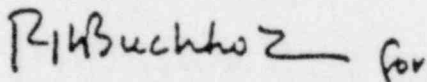
Gentlemen:

This letter is to request the participation of General Electric at the meeting of the Commissioners wherein the NRC Position Paper regarding Anticipated Transients Without Scram (ATWS) will be discussed.

General Electric believes that the proposed requirements in NUREG 0460 Vol. 4 are not necessary considering BWR capability to mitigate ATWS through utilization of existing equipment and systems modified to respond to the ATWS event. This capability has been discussed with the NRC staff and the ACRS and is reflected in the April 16, 1980 ACRS letter on this subject. Furthermore, we are concerned that the schedule proposed in NUREG 0460 Vol. 4 does not permit an orderly implementation of the proposed ATWS modifications and could prove counterproductive to the overall risk reduction goals of this effort. It is General Electric's intent to present the basis for these conclusions at the meeting of the Commissioners.

Please contact the undersigned concerning schedule and arrangements for the participation of General Electric at this upcoming meeting.

Very truly yours,

 for

Glenn G. Sherwood, Manager
Safety and Licensing Operation

GGs:gmm/104J

cc: L. S. Gifford (Wash. Liaison Office)
H. Denton
R. Mattson
Commissioner Ahearne
Commissioner Bradford
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Hendrie

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