

EM 006-1



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JOHN S. KEMPER
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November 18, 1980

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

RECORDED FILE 52
45FR65466

Attention: Docketing and Service Branch
Subject: Comments on Proposed Rule: Interim Requirements
Related to Hydrogen Control and Certain Degraded
Core Considerations

Dear Mr. Chilk:

We have the following additional comment concerning the subject proposed rule. Our previous comments were sent you in my November 3 letter.

- 1.) Page 65472, addition of 50.44a(a); The proposed addition of section 50.44a(a) adds a requirement that boiling water reactors should have the capability to vent the reactor coolant system. The proposed requirement states that a single failure should not cause inadvertent actuation of a vent. The BWR Owners' position, which was endorsed by Philadelphia Electric Company, is that the currently installed, power-operated, safety-grade, relief valves, the high pressure coolant injection (HPCI) system, and the reactor core isolation cooling (RCIC) system provide the necessary vent capability and that the imposition of a single failure criterion for prevention of inadvertent operation of this vent capability is not applicable to boiling water reactors. The inapplicability of the single failure criterion in this manner is based on the following:
 - a.) The relief valves serve an important function in mitigating the effects of transients and in many plants provide ASME code overpressure protection. Therefore, the addition of a second "block" valve to the vent lines could result in a less safe design and in some cases a violation of the ASME code. Also, inadvertent opening of a relief valve in a BWR is a design basis event and is a controllable transient.

11/24/80

L-4-1, Pt. 50

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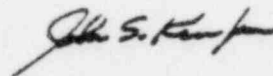
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- b.) The HPCI and RCIC systems function automatically to ensure adequate core cooling. It is not desirable to interfere with emergency core cooling functions in order to prevent venting.

The proposed addition to 50.44a should be modified to reflect the above BWR Owners' position.

Sincerely,

A handwritten signature in black ink, appearing to read "John S. Kemp". The signature is written in a cursive style with a prominent initial "J".