

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET  
P.O. BOX 8699  
PHILADELPHIA PA. 19101

(215) 841-4502

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

DEC 04 1980

Mr. Robert L. Tedesco  
Assistant Director for Licensing  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 & 2  
NRC Position on Clad Swelling and Rupture Models for LOCA  
Analyses

- References:
1. NRC letter of October 9, 1980 from Robert L. Tedesco to Edward G. Bauer, Jr. "Staff Position on Cladding, Swelling and Rupture Models for LOCA Analyses."
  2. GE letter MFN-268-79 of November 2, 1979 from R. H. Buchholz to Darrell G. Eisenhut, "ORNL Cladding, Swell and Rupture Data - BWR Evaluation."
  3. GE letter MFN-278-79 of November 16, 1979 from R. H. Buchholz to Darrell G. Eisenhut, "GE Cladding Hoop Stress at Perforation."
  4. GE letter MFN-066-80 of March 24, 1980 from G. G. Sherwood to Richard P. Denise.
  5. GE letter MFN-294-79 of December 7, 1979 from R. H. Buchholz to Richard P. Denise, comments on the draft report "Cladding, Swelling and Rupture Models for LOCA Analyses," NUREG-0630 dated November 8, 1979."
  6. ACRS letter of September 9, 1980 from Milton S. Plesset to William J. Dircks, "Cladding, Swelling and Rupture Models for LOCA Analysis - NUREG-0630."

Dear Mr. Tedesco:

Your October 9, 1980 (Reference 1) letter requested supplemental calculations to the Limerick ECCS analyses in accordance with the materials models of NUREG-0630. It is our position, supported by General Electric, that the Appendix K analyses, that will soon be tendered in FSAR Section 6.3.3, conservatively bound the clad swelling and rupture model concerns of NUREG-0630 and that additional analyses would be of little value in the ECCS Performance Evaluation Review. In any case, since General Electric has not been required, under NRC direction, to develop the model changes suggested by NUREG-0630, the schedule for performing such an analysis for Limerick cannot be firmly established.

Boo!  
s  
1/0

8012100 493 A

DEC 04 1980

Mr. Robert L. Tedesco  
Assistant Director for Licensing  
Division of Licensing  
U.S. Nuclear Regulatory Commission

- 2 -

Please note the following references in support of this position. GE letters defending existing model suitability (References 2, 3, and 4). GE letter providing comments on NUREG-0639 (Reference 5) and finally a September 9, 1980 letter from the ACRS to the NRC (Reference 6) which states in the final paragraph "The ACRS recommends that implementation of the NUREG-0630 models and other significant changes in the evaluation models be held in abeyance until a thorough revision of the Appendix K requirements can be undertaken by the NRC staff."

Very truly yours,

*John S. Kempner*