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STONE & WEBSTER ENGINEERING CORPORATION



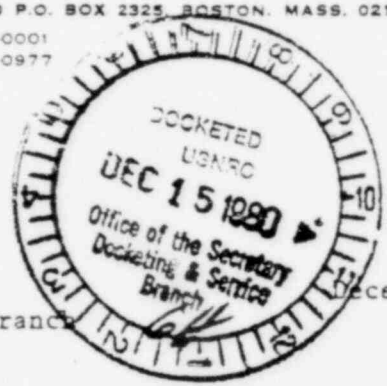
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December 9, 1980

Secretary of the Commission
Attention Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20558

Dear Sir:

We are pleased to submit our comments on proposed Revision 1 to Regulatory Guide 1.23, "Meteorological Programs in Support of Nuclear Power Plants," NRC Task SS 926-4, September 1980.

The proposed revision is a significant improvement over the version of the guide currently in effect. There are, however, several points listed below which could be clarified. The numbers preceding the comments correspond to section numbers in the proposed guide.

C.2 paragraph 4: The term "thermal internal boundary layer" is usually applied to discussions of onshore flow and/or sea breeze conditions. Perhaps the terms "inversion layer" or "ground-based inversion layer" would be more appropriate for valley-induced flows.

C.8 paragraph 2: The terms "backup system" and "independent system" are used interchangeably; only one term should be used. The five minute changeover from the primary system to the backup system could be difficult to implement, particularly when the data is transmitted directly into a computer.

Draft Value/Impact Statement, Section 1.3.3: The costs of backup and supplementary meteorological data collection systems, which will run into the hundreds of thousands of dollars per nuclear plant site, have not been included.

Stone & Webster Engineering Corporation appreciates this opportunity to contribute to the improvement of Regulatory Guide 1.23.

Very truly yours,

R. B. Bradbury
R. B. Bradbury
Chief Licensing Engineer

Acknowledged by card... *12/13/80*

KMK:mra

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