

GENERAL ELECTRIC

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NUCLEAR POWER
SYSTEMS DIVISION

MFN-088-81

May 1, 1981

Dr. T. E. Murley, Director
Division of Safety Technology
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555



Dear Dr. Murley:

SUBJECT: ANTICIPATED TRANSIENTS WITHOUT SCRAM -
EVALUATION MODEL APPROVAL

- References:
- 1) "Assessment of BWR Mitigation of ATWS, Volume I." NEDE-24222, General Electric Company, December 1979
 - 2) "Assessment of BWR Mitigation of ATWS, Volume II," NEDE-24222, General Electric Company, December 1979
 - 3) "Assessment of BWR/3 Mitigation of ATWS," NEDE-24223, General Electric Company, December 1979
 - 4) Letter from R. J. Mattson to G. G. Sherwood, Guidelines for Generic ATWS Analyses, February 15, 1979
 - 5) Letter from G. G. Sherwood to H. Denton, "Anticipated Transients Without Scram (ATWS) - General Electric Comments on NUREG-0460 (Volume 4)," May 23, 1980
 - 6) Letter from G. G. Sherwood to J. F. Ahearne, "NRC Report on Anticipated Transients Without Scram," October 24, 1980

This letter is to provide you General Electric's views on the BWR ATWS evaluation models. In 1979, we submitted ATWS evaluations (References 1, 2 and 3) in response to a NRC request and in accordance with the NRC guidelines of Reference 4. The submittals contained generic assessments of BWR response to an ATWS event using GE ATWS evaluation models. These models can also be applied to any BWR for plant-unique calculations. In Reference 5 we provided responses to the NRC Staff's comments on these evaluations. Since then, the Staff has identified no unresolved modeling issues.

As indicated in Reference 6, GE considers that preventive measures (Alternative 2/2A) are all that is necessary to resolve the ATWS issue. However, given the NRC Staff proposed rule with its difficult schedule, it is necessary to now begin the extensive design work if we are to be able to respond to the NRC Staff proposed requirements. The BWR evaluation models establish the basis for our design activities, and we believe these models are a technically sound basis for design.

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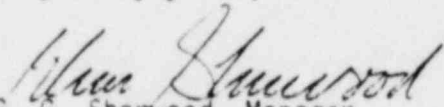
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It has been approximately a year since the GE evaluation models have been submitted to the staff and no open modeling issues have been identified. Because of this, we are proceeding on the basis that the staff finds the GE models acceptable. Note, that any future perturbations to the evaluation model would adversely affect the cost and schedule to implement the requirements contained in the NRC Staff's proposed rule.

Please feel free to call me (408) 925-5040 or Mr. R. H. Buchholz (408) 925-5722 if you or your staff would like to discuss this matter with us.

Very truly yours,


G. G. Sherwood, Manager
Nuclear Safety and Licensing Operation

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cc: W. Minners
L. S. Gifford