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NO 5-3845

July 11, 1980

Mr. D. Ims
Advisory Committee on Reactor Safeguards
Nuclear Regulatory Commission
Washington, D.C. 20545

Re: GEM.

Dear Sir:

Here are my comments on the June 16-17 meeting on GEM.

1. I do not understand the presentation on the effect of combining vibratory motion with uplift. Since the SLL requirement was for a definite amount of uplift combined with a given level of acceleration it was not clear to me how probabilistic effects entered the picture. It would have been a great help if I had received beforehand a copy of the EAC report on this. Could I get one now? (EAC 117-853-01, Rev 1)

2. It seemed too much to hear two presentations on what was wrong with the Jack Benjamin Associates report on probability of uplift (surface rupture) under the GEM building.

3. Except for the possibility of something occurring to me after I see the EAC report requested above, I am satisfied with the analysis and conclusions that I have seen.

Yours sincerely,

Merit