

BWR OWNERS' GROUP

T. J. Dente, Chairman

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BWROG-8254

August 23, 1982

U. S. Nuclear Regulatory Commission
Division of Licensing
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Attention: Darrell G. Eisenhut, Director

Gentlemen:

SUBJECT: Analysis of Scram Discharge Volume System Piping Integrity
NEDO-22209 (prepublication form)

Reference: NUREG-0803: Generic Safety Evaluation Report Regarding
Integrity of BWR Scram System Piping, August 1981

The enclosed report, "Analysis of Scram Discharge Volume System Piping Integrity", NEDO-22209, documents the results of a BWR Owners' Group study to determine the probability of the loss of SDV piping integrity, and to evaluate the contribution of such a loss to a core melt.

It is the position of the BWR Owners' Group, substantiated by the results of these analyses, that the probability of core damage initiated by a failure of the scram discharge volume piping integrity is sufficiently low so as to preclude the necessity of qualifying equipment to detect and/or mitigate the consequences of such an integrity loss. Consistent with these conclusions, it is also the position of the BWR Owners' Group that no further action is required as regards the equipment qualification and system design modification recommendations of the reference NUREG.

The enclosed document and the conclusions drawn from the results of these analyses have been endorsed by a substantial number of the members of the BWR Owners' Group; however, it should not be interpreted as a commitment of any individual member to a specific course of action. Each member must formally endorse the BWR Owners' Group position in order for that position to become the member's position.

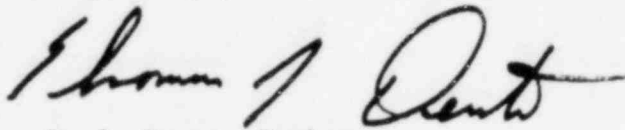
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Should you have any questions on the enclosed material, please feel free to contact F. R. Hayes of the General Electric Company at (408) 925-2140.

Sixty copies of the published version of the subject report will be transmitted to you shortly under separate cover.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Thomas J. Dente".

T. J. Dente, Chairman
BWR Owners' Group

TJD:WHP:na

Enclosure

cc: BWR Owners' Group
K. Eccleston (NRC)
J. F. Schilder (GE)
S. J. Stark (GE)