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September 17, 1982

Mr. John F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing Nuclear Regulatory Commission Washington, DC 20555

Ref: Letter dated August 24, 1982, John F. Stolz, NRC, to E. G. Bauer, Jr., Philadelphia Electric Company

Dear Mr. Stolz:

This letter responds to the referenced letter regarding NUREG-0737 Item II.B.3 Post Accident Sampling System. The letter contained new guidelines for the post accident sampling system and analytical techniques, and requested a schedule from the licensee for a response describing how each guideline will be satisfied.

Some of the new guidelines appear to identify criteria that goes beyond that presented in NUREG-0737 and the licensee's commitments on this issue. As a result, a considerable amount of staff time will be necessary to assess the merits of the new criteria and provide a response. Additionally, many of the issues raised in the referenced letter are generic, and will require the combined efforts of other utilities and the General Electric Company in conjunction with the BWR Owners' Group.

Consequently, we are participating in a meeting later this month with other members of the BWR Owners' Group to address those items that are generic to the post-accident sampling system developed for BWR plants. The meeting is essential to the development of a program and schedule for responding to the

referenced letter. Therefore, we propose an October 15, 1982, submittal date for identifying a schedule for responding to the new guidelines.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

Ju Bullayten

cc: Site Inspector Peach Bottom