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October 18, 1995

MFN 234-95
Docket No 52-004

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington DC 20555

Attention: Theodore E. Quay, Director
Standardization Project Directorate

Subject: SBWR - GIRAFFE As-Built Drawings, Report TOGE110-T19, May 20, 1995

- Reference:
1. Letter from S.Q. Ninh (NRC) to Mr. James E. Quinn (GE), The Simplified Boiling Water Reactor - Giraffe As-Built Drawings, Report TOGE110-T19, May 20, 1995, dated August 10, 1995.
 2. Letter, MFN 124-95, from James E. Quinn (GE) to Theodore E. Quay (NRC), SBWR - Giraffe As-Built Drawings, Report TOGE110-T19, May 20, 1995, dated July 24, 1995.
 3. Letter, MFN 045-95 from James E. Quinn (GE) to Richard W. Borchardt (NRC), SBWR Test and Analysis Program Description, NEDO-32391, Revision B, dated April 13, 1995.

Reference 1 requests that GE submit a non-proprietary version of the subject drawings transmitted by Reference 2. We have reviewed this with your staff and have concluded that it is highly impractical to develop a non-proprietary version of as-built drawings. For example, it would be possible to remove all of the as-built dimensions leaving an undimensioned but detailed layout of the GIRAFFE test facility. However, such a layout would still be considered as proprietary since it would retain all of the layout details of the original as-built drawings. The logical next step would be to simplify the undimensioned layout to eliminate any proprietary detail. Clearly, the resulting simplified layout would have little relationship to the original as-built drawings.

A logical and practical source of non-proprietary GIRAFFE test facility drawings would be the schematic drawings provided by Reference 3; specifically Figure A.3-20. Therefore, GE respectfully declines your request for GE to provide the requested drawings and suggests the NRC make reference to the above schematic as the non-proprietary version of the subject drawings.

Sincerely,

James E. Quinn

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cc: P. A. Boehnert (NRC/ACRS) (2 paper copies plus E-Mail)
I. Catton (ACRS) (1 paper copy plus E-Mail)
A. Drozd (NRC) (1 paper copy plus E-Mail)
S. Q. Ninh (NRC) (2 paper copies plus E-Mail)
D. C. Scaletti (NRC) (1 paper copy plus E-Mail)
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