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B. Grimes

60FR39021
7/31/95

**Detroit
Edison**

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RULES REVIEW & DIR. BR.
USNRC



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Nuclear
Operations

October 2, 1995
NRC-95-0103

Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Proposed NRC Bulletin, "Potential Plugging of Emergency Core Cooling Suction Strainers for Debris in Boiling Water Reactors," and Draft Regulatory Guide, DG-1038, "Water Sources for Long-Term Recirculation Cooling Following Loss-of-Coolant Accident," 60 FR 39021, dated July 31, 1995

Subject: Detroit Edison Comments on the Proposed NRC Bulletin and Draft Regulatory Guide on Potential Plugging of ECCS Suction Strainers

The purpose of this letter is to endorse the BWR Owners' Group comments on Reference 2, and specifically support the following points made in that response:

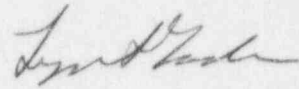
1. The bulletin should specifically include the option of justifying the operability of currently installed passive strainers (possibly in combination with use of mostly reflective metallic insulation).
2. The implementation date needs to be revised and extended, if modifications are shown to be necessary, to the second refueling outage after the final bulletin response is due, as opposed to the 1997 date currently in the draft bulletin.

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If you have any questions, please contact Mr. Girija S. Shukla at (313) 586-4270.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

cc: T. G. Colburn
H. J. Miller
M. P. Phillips
A. Vogel