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BECO 84-194

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Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License DPR-35
Docket 50-293

Response to Updated Evaluation for NUREG 0737,
Item II.E.4.2.(7)

By letter of September 26, 1984, NRC conveyed to licensees an "update" of a safety evaluation which had been provided to the Boiling Water Reactor Owners' Group (BWROG) by letter of October 14, 1981. The September 26 letter also stated that "Our (NRC) intention is that each of the containment purge and vent isolation valves must close on a high radiation signal", and referred us to position (7) on page 3-90 of NUREG 0737.

This "update" is a substantial change from the October, 1981 position in that formerly lines less than 3 inches in diameter were specifically excluded on the grounds that valves 3" or less can be expected to operate quickly and reliably under accident conditions, and because of the low radiological consequences associated with small lines. In addition, page 3-93 of NUREG 0737 (II.E.4.2, Attachment 1) implies that valves less than 3" nominal diameter are excluded from the purview of II.E.4.2.

Because of the significance of this change, and because it was originally handled in a generic manner with the BWROG, Boston Edison believes this change should be communicated in a generic manner rather than to individual utilities. Further, we believe that an "update" such as this should be reviewed by the Committee to Review Generic Requirements prior to transmittal.

It is our understanding that the BWROG concurs with the position. Should this be the case, we will support the BWROG, and plan no further individual action on the September 26, 1984 letter.

Very truly yours,

W.D. Harrington

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