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March 19, 1985

Mr. Leonard N. Olshan, Project Manager
Byron Station Units 1 & 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Comments of Supplement 6 to NUREG-0876,
Byron Station Units 1 & 2 Safety Evaluation
Report

In Reply Please Refer To: DOE-85-038

Dear Mr. Olshan:

After a review of subject document, the following comments are offered for your consideration:

- 1) 3 design criteria for structures, systems, & components
 - 3.6 Protection Against Effects Associated with the Postulated Rupture of Piping
 - 3.6.2 Determination of break locations and dynamic effects associated with the postulated rupture of piping.

Comment: NUREG/CR 2913, "Two Phase Jet Loads" was used in Byron design verification, although it is not currently approved for general use and is under review by NRC.

NRC states that NUREG/CR 2913 use was an acceptable alternative provided the separation distance is at least 8 pipe diameters (source pipe size).

IDNS questions the use of NUREG/CR 2913 since it is not currently approved by NRC. Although it was not used directly for design purposes, rather design verification, it would appear unacceptable even for that purpose.

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2) 4 Reactor

4.4 Thermal & Hydraulic Design

4.4.1 Departure from nucleate boiling methodology

Comment: The method of detecting venturi fouling, "by reaching through the inspection port & touching the venturi surface", appears to be a too subjective method and in relation to the visual methods proposed should be expanded to be more definitive as to acceptance criteria.

3) 6 Engineered Safety Features

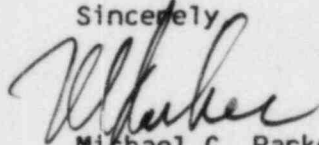
6.5 Fission Production Removal & Control System

6.5.1 Engineered Safety Features Atmospheric Cleanup System

Comment: There should be a better explanation regarding the three ventilation systems which traverse the upper cable spreading room not affecting the control room.

Thank you for the opportunity to review the Byron Unit 1 & 2 safety evaluation report. Your consideration of the above comments are appreciated.

Sincerely



Michael C. Parker, Chief
Division of Engineering

MCP:RRM:bkw

cc: T. Lash
G. Wright
J. Keppler, NRC Region III
R. Lickus, NRC Region III