WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

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52 FR 11385
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July 9, 1987

Rules and Procedures Branch
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D. C.   20555

Dear Sir:

Subject: REVIEW OF DRAFT REGULATORY GUIDE
            "BEST-ESTIMATE CALCULATIONS OF EMERGENCY CORE
            COOLING SYSTEM PERFORMANCE" (TASK RS 701-4)

The Supply System has reviewed the subject draft Regulatory Guide and
finds that, in general, it represents a step forward toward a more
reasonable approach to regulation. We encourage the continued use of
Best Estimate Calculational Models, however, without the availability of
NUREG-1230, "Compendium of ECCS Research for Realistic LOCA Analysis",
(to be published), and a sufficient review time, it is difficult to
assess the impact or reasonableness of this Regulatory Guide. We would
urge you to delay issuance of this Regulatory Guide until NUREG-1230 is
available and reviewed.

Our detailed comments are noted on the attachment. Thank you for this
opportunity to participate in the NRC's standards development process.
Should you have any questions regarding these comments, please feel free
to contact me.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

cc: D Williams/BPA 399

ATTACHMENT I

• Page A-3, Section 1.3.1 - In the first sentence, the words are
  ". . . range 1,500-1,900°F . . ." whereas in the last sentence
  of this paragraph the words are ". . . greater than 1,900°F and
  less than 1,500°F . . ." It should be ". . . greater than
  1,500°F and less than 1,900°F . . ."

• Page B-5, Section 1.2.2 - In the first full paragraph, it is
  stated "In ECCS performance calculations, the break should be
  assumed to occur instantaneously." Finite break opening time
  should be allowed for ECCS performance as it is for other
  portions of LOCA analyses. Appropriate evaluation of
  uncertainties in break opening time would then be included in
  the overall model uncertainty evaluations.