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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G. 05000244  
 AUTH. NAME: MAIER, J.E. AUTHOR AFFILIATION: Rochester Gas & Electric Corp.  
 RECIP. NAME: CRUTCHFIELD, D. RECIPIENT AFFILIATION: Operating Reactors Branch 5

SUBJECT: Submits comments on NRC 810727 draft evaluation of SEP. Topic  
 IX-4 re boron addition sys. Listed addl documents should be  
 referenced.

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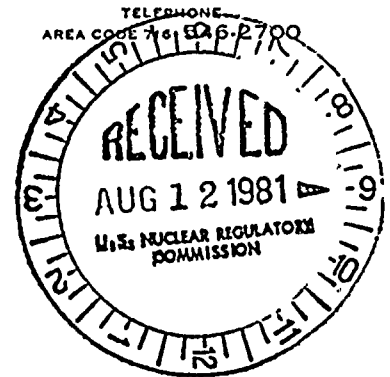


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JOHN E. MAIER  
VICE PRESIDENT



August 6, 1981



Director of Nuclear Reactor Regulation  
Attention: Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: SEP Topic IX-4, Boron Addition System  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Crutchfield:

We have reviewed the draft evaluation of SEP Topic IX-4, provided by your letter dated July 27, 1981 and agree with the assessment and conclusions. We also offer the following comments:

1. We suggest that the second and third sentences of the Introduction be rewritten as follows: "In this initial injection mode, borated water is provided from the boric acid tanks, the refueling water storage tank, and the accumulators. After this initial period, which will last at least 20 minutes for a large break LOCA, and longer for smaller breaks, the Emergency Core Cooling System (ECCS) . . ."
2. The following additional documents should be referenced, although they do not change the conclusions of the assessment.
  - a. Letter to B. C. Rusche, NRC, from L. D. White, Jr., RG&E, dated April 1, 1975.
  - b. Letter to T. M. Novak, NRC, from C. L. Caso, Westinghouse, CLC-NS-309, dated April 1, 1975.
  - c. Letter to B. C. Rusche, NRC, from L. D. White, Jr., RG&E, dated April 30, 1975.
  - d. Letter to B. C. Rusche, NRC, from L. D. White, Jr., RG&E, dated May 13, 1975.

In addition, we have not previously obtained a copy of Reference 1 and would appreciate receiving a copy.

Very truly yours,

*John E. Maier*  
John E. Maier

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