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November 15, 1979

Mr. Darrell G. Eisenhower, Acting Director
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20014

Subject: BWR Owners' Group Positions on NUREG-0578

Reference: Letter, T. D. Keenan to D. G. Eisenhower, same subject,
October 17, 1979

Dear Mr. Eisenhower:

In my October 17, 1979, letter to you (Reference 1), it was indicated that General Electric Boiling Water Reactor Owners' Group positions on three of the requirements of NUREG-0578 were still under development and would be submitted to you on November 15, 1979. The purpose of this letter is to notify you that those three positions are being transmitted to you today by the General Electric Company on behalf of the Owners' Group.

These positions should be inserted into the document, "NUREG-0578 and Implementation Letter Requirements - BWR Owners' Group Implementation Criteria," October, 1979, which was submitted by the Owners' Group on October 17, 1979. All of the provisions of my October 17, 1979, letter apply to these positions as well.

Sincerely,

Thomas D. Keenan, Chairman
General Electric Boiling
Water Reactors Owners' Group

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