



General Electric Company
175 Dartmouth Avenue, San Jose, CA 95125

September 20, 1993

Docket No. STN 51-001

Chet Poslusny, Senior Project Manager
Standardization Project Directorate
Associate Directorate for Advanced Reactors
and License Renewal
Office of the Nuclear Reactor Regulation

Subject: Submittal Supporting Accelerated ABWR Schedule - P&R Comments on
Section 5.0, Administrative Controls

Dear Chet:

Enclosed find our markup comments on Technical Specification Section 5.0 of the P&R version dated 7/29/93. Only the pages with markup comments are included.

Subsection 5.7.2.13, Explosive Gas and Storage Radioactivity Monitoring Program should be deleted because it is not applicable to the ABWR. The bases for this program is Branch Technical Position ETSB-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure", and SRP 15.7.3, "Postulated Radioactive Release due to Tank Failures". SRP 15.7.1, "Waste Gas System Failure", that ETSB-5 references has been deleted. Mr. Chandrasekaran of your staff indicated that the requirements of SRP 15.7.1 has been relocated to SRP 11.3. We could not find such requirements.

In the ABWR, there are no liquid waste storage tanks outside of the Radwaste Building and hence elements of Subsection 5.7.2.13 that refers to liquid waste storage tanks are not applicable.

A related issue to the SRP 15.7.1 is that an LCO for Main Condenser Offgas should not be included in the technical specification. The basis for this LCO in the Standard Technical Specification is to maintain the initial conditions assumed in transient analysis of 15.7.1, which then satisfies Criterion 3 of the NRC Policy Statement on Technical Specifications. This is not applicable to the ABWR.

Please provide a copy of this transmittal to Mark Reinhart.

Sincerely,

Jack Fox

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Jack Fox
Advanced Reactor Programs

cc: Alan Beard (GE), Norman Fletcher (DOE), Cal Tang (GE)

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