



General Electric Company  
178 Fulton Avenue, San Jose, CA 95128

May 2, 1991  
MFN042-91

50-293

Mr. R. Eaton, Project Manager  
Div. Of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation  
Mail Stop: 1401  
U.S. Nuclear Regulatory Commission  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Dear Mr. Eaton:

Subject: SAFER/GESTR-LOCA Licensing Report Submittal for Pilgrim Nuclear Power Station

References:

1. Telecon on 4/24/91, Lambros Lois (NRC), Mohammad Razzaque (NRC), Mike McCoy (NRC), Ron Eaton (NRC) John Dietrich (BEC), Jim Gosnell (BEC), Richard Kelley (BEC), Gary Sozzi (GE), Larry Chi (GE) and P.T. Tran (GE).
2. "The GESTR-LOCA and SAFER models for the evaluation of the Loss-Of-Coolant Accident, Volume III, SAFER/GESTR Application Methodology," NEDE-23785-1-PA, General Electric Company, Revision 1, October 1984.
3. "Pilgrim Nuclear Power Station SAFER/GESTR-LOCA Loss-Of-Coolant Accident Analysis," NEDC-31853P, General Electric Company, September 1990.

This letter provides a response to the NRC question related to the SAFER/GESTR-LOCA Licensing report for Pilgrim Nuclear Power Station (Reference 3) per the reference 1 telecon.

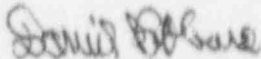
The generic SAFER/GESTR-LOCA analysis documented in Reference 2 demonstrates that for the BWR 3/4 plants, the most limiting LOCA event is the maximum recirculation suction line break coincident with the failure of the battery for both Nominal and Appendix K calculations. The results from the Pilgrim SAFER/GESTR-LOCA analysis (Reference 3) indicates that the maximum recirculation suction line break with battery failure is the limiting single failure for the nominal break spectrum. However, when the Appendix K models are applied simultaneously, the LPCI injection valve failure case is the limiting single failure for this break. The NRC was concerned that the switchover of the single failure between the nominal and Appendix K limiting break is due to a failure of the SAFER/GESTR-LOCA methodology.

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GE Response:

There is no failure of the methodology or differences in assumptions that lead to the switchover observed in the SAFER/GESTR-LOCA application for Pilgrim. The switchover of the single failure between the nominal and Appendix K calculations for the limiting break is due to plant specific result associated with the Pilgrim design.

Sincerely,



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Plant Licensing Services  
(408) 925-3141  
M/C 382

cc: John Dietrich (BEC0)  
Dr. Jim Gosnell (BEC0)  
H.C. Pfefferlen (GE)  
J.S. Charney (GE)  
G.L. Sozzi (GE)  
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