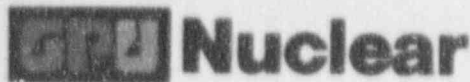


DS09

Robert Jones, Jr.
57 FR 6748
2/27/92



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MAY -4 P3:29

April 29, 1992
C300-92-2129

U. S. Nuclear Regulatory Commission
Attn: Chief, Regulatory Publications Branch
Washington, D.C. 20555

Dear Chief:

Subject: NUREG-1449 Draft Report for Comment February, 1992,
Shutdown and Low-Power Operation at Commercial
Nuclear Power Plants in the United States

GPUN has been involved in the Boiling Water Reactor Owner's Group (BWROG) Joint Outage Management - Shutdown Issues NUREG-1449 Review Working Group which has developed numerous comments on the draft NUREG. These comments are being consolidated by NUMARC for transmittal to NRC. GPUN endorses the BWROG and NUMARC comments on draft NUREG-1449.

Draft NUREG-1449, Section 6.12.1, incorrectly states that Oyster Creek declared an Alert for the March, 1991 event involving loss of both on-site AC power sources. An Alert was not declared for this event and no Emergency Action Level was entered. The Oyster Creek Emergency Plan would have required an Alert level declaration had off-site AC power also been lost, and a Site Area Emergency within 15 minutes, but this did not occur. However, it is true that these Emergency Plan requirements would have been overly conservative for the actual plant condition at that time since the reactor was defueled, the refueling cavity was flooded with water, and spent fuel pool boiling would not have occurred for approximately 72 hours.

Additionally, it should be noted that the reference in Sections 6.12.1 and 8.6 to NUMARC/NESP-007 should be Revision 2 not Revision 1.

Sincerely,

Michael Lopez for
James Knubel

Licensing and Regulatory Affairs, Director

9205080062 920429
PDR NUREG
1449 C PDR

JK/DJD/amk

cc: R. J. Barrett - Plant Operations, Director, OC
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