



**Entergy  
Operations**

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(57FR 44513)

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USNRC

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December 16, 1992

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USNRC

OCAN129203

Secretary of the Commission  
Attn: Docketing and Service Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Proposed Rulemaking on Acceptability  
of Plant Performance for Severe Accidents

Gentlemen:

On September 28, 1992, the NRC published an advance notice of proposed rulemaking in the Federal Register (50FR57188) concerning acceptability of plant performance for severe accidents for future light water reactors. The NRC requested comments on the proposed regulations. Please find our following two comments:

Specific Considerations, Item 5: Asks about future LWR design features beyond those described in Alternative 1. One of the aspects of Alternative 1 deals with controlled elevated venting (if provided in the design) after the initial 24 hour period.

Comment:

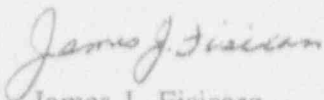
While there is no requirement for Containment Venting capability in this proposed rule, this feature should be encouraged due to its importance as a strategy in the severe accident environment.

Specific Considerations, Item 7: Asks for what reason would any of the criteria proposed in the three alternatives not be fully applicable.

Comment:

RCS depressurization capability. While the capability to rapidly depressurize the RCS may be applicable in some cases, it may not be the best option for all scenarios. MAAP runs have shown that RCS depressurization can cause earlier containment failure and at the same time not provide any benefit to accident mitigation.

Very truly yours,



James J. Fisicaro  
Director, Licensing

JJF/NBM/sjf

cc: U. S Nuclear Regulatory Commission  
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