

DOCKET NUMBER

PROPOSED RULE

PR-50 (50 FR 27006) ②

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Washington, D.C. 20555

August 29, 1985

MODIFICATION OF GENERAL DESIGN CRITERION 4
PROPOSED RULE 50FR27006

This letter is in response to the NRC request for comments on the subject proposed amendment to 10CFR Part 50 set forth in the Federal Register, 50FR27006, July 1, 1985.

Stone & Webster Engineering Corporation (SWEC) agrees that the intent of the proposed rule is correct, however, the implementation is wrong. SWEC strongly believes the rule should not be limited to PWR reactor coolant system piping but should be general and allow applicants the ability to exclude piping for any system that has adequate technical justification. It would seem appropriate to do it all now and make the GDC general, rather than leave it for continual future rulemaking.

With this in mind, SWEC recommends the proposed rule be revised by deleting... "of primary coolant loop piping in pressurized water reactors"... With this deletion, the rule is made general in that any piping could be excluded with acceptable analysis.

If applicants are able to demonstrate an extremely low probability of pipe rupture under design basis conditions, then dynamic effects associated with postulated pipe rupture need not be included as a design load for the design of restraints. If it cannot be demonstrated, then the revised regulation still requires restraints. The applicant has the burden of proof and the NRC still will have the opportunity to review and approve what is acceptable.

We appreciate the opportunity to comment on the proposed rule. We hope the comments will assist you in its finalization.

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