



Docket No. 50-346
License No. NPF-3
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Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactors Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Your letter of July 18, 1985 (Log No. 1782) requested a confirmatory response to several issues relating to NUREG-0737 Item II.K.3.30 and the use of the CRAFT2 code. B&W and the B&W Owners Group endorse the conclusion in NUREG-0565 concerning the amount of noncondensable gases which could accumulate in the primary system. Toledo Edison also concurs with the B&W position regarding the radiolytic decomposition of injected water, that the source of noncondensable gas does not alter the conclusion of NUREG-0565.

The IST Program is designed to obtain data relative to SBLOCA phenomena on B&W designed PWR's. The IST Program is not intended to provide integral test data for verification of the CRAFT2 SBLOCA-EM computer program. This was first stated in the B&W Owners Group Code Verification Plan letter dated July 6, 1984 to Mr. P. Kadambi and is restated in the NRC Safety Evaluation Report attached to your letter of July 18, 1985. It is the intention of the B&W Owners Group to use the RELAP5/MOD2 code for best estimate long term transient predictions. The RELAP5 code is undergoing benchmarking to the IST test data and use of this code will form the basis for future ATOG guidance. It is realized that present ATOG guidance in the area of SBLOCA is based on experience gained through CRAFT2 licensing analyses. In order to affirm the validity of present guidance in light of new best estimate codes and availability of IST data, the B&WOG has examined the merits of three alternatives to confirm the CRAFT2 modeling capabilities. These alternatives were presented in the B&W Owners Group Code Verification Plan letter of January 3, 1985 to Mr. P. Kadambi as (1) benchmark of CRAFT2 to an OTIS test, (2) comparison between predictions of the same transient performed in a best estimate mode using CRAFT2 and a verified RELAP5/MOD2 or (3) comparison between predictions of the same transient performed in an Appendix K type calculation using CRAFT2 and a verified RELAP5/MOD2. The B&W Owners Group plans to perform a comparison between CRAFT2 and RELAP5/MOD2 to affirm the validity of SBLOCA ATOG guidance.

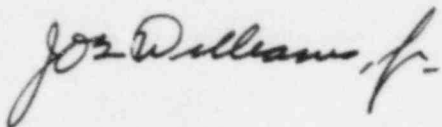
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This comparison will be performed after the benchmarking of RELAP5/MOD2 to MIST data is completed. The intention of the B&W Owners Group is to perform a comparison between predictions of the same plant transient (as opposed to a MIST test transient) performed in the "best estimate" mode using CRAFT2 and a verified RELAP5/MOD2. The purpose of the comparison is to demonstrate that CRAFT2 does provide a conservative representation of SBLOCA behavior in a B&W PWR. Toledo Edison, as a member of the B&W Owners Group, commits to participation in this program.

Toledo Edison also commits to the use of the approved Small Break LOCA Evaluation Model, currently utilizing CRAFT2, for SBLOCA analyses performed for Davis-Besse Unit 1 to resolve NUREG-0737 Item II.K.3.31, which is planned to be submitted through a B&WOG program in July, 1986. The intent of the analysis to be performed to resolve NUREG 0737 Item II.K.3.31 will be to affirm the validity of previously submitted SBLOCA analyses performed with the SBLOCA-EM.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Joe Williams".

JW:FYC

jh b/3

cc:

DB-1 NRC Resident Inspector