

EBASCO SERVICES INCORPORATED

Two World Trade Center, New York, N.Y. 10048

PROPOSED RULE PR-50 (22)  
(50 FR 27006)

EBASCO

'85 SEP 12 A10:25

August 30, 1985

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
U S Nuclear Regulatory Commission  
Washington, DC 20515

Attention: Docketing and Service Branch

Subject: PROPOSED RULE - MODIFICATION OF GENERAL  
DESIGN CRITERION 4 REQUIREMENTS FOR  
PROTECTION AGAINST DYNAMIC EFFECT OF  
PIPE RUPTURE - 50 FR 27006

Dear Secretary:

Ebasco is in full agreement with the proposed rule modifying General Design Criterion 4 Requirements For Protection Against Dynamic Effects of Postulated Pipe Rupture. Ebasco further believes that the demonstration of piping integrity analysis to serve as a basis for excluding consideration of dynamic effects associated with certain pipe ruptures should also be extended to other high energy systems. It would also follow that the requirements that structures, systems and components be compatible with the environmental conditions associated with the subject pipe rupture be eliminated. This position should be applicable to all plants both near term operating license as well as operating plants.

Ebasco appreciates the opportunity to offer these comments.

Sincerely,

*J C Saldarini*

J C Saldarini  
Chief Engineer -  
Nuclear Licensing

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PDR PR  
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EJB:maa

D210  
add John O'Brien, 113055  
William Almstead, 9604 MALL  
Jim Shea, 314 Phil

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Acknowledged by car.....