



UNION ELECTRIC COMPANY

1901 Gratiot Street, St. Louis

DOCKET NUMBER **PR-50**
PROPOSED RULE
(50 FR 27006)

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August 22, 1985

DOCKETED
USNRC

'85 AUG 29 A11 54

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

OFFICE OF SECRETARY
OF SERVICE
NCH

Attn: Docketing and Service Branch

ULNRC- 1161

Gentlemen:

MODIFICATION OF GENERAL DESIGN CRITERION AND
REQUIREMENTS FOR PROTECTION AGAINST DYNAMIC
EFFECTS OF POSTULATED PIPE RUPTURES

References: Federal Register, Vol. 50, No. 126 dated May 20, 1985
pp. 27006-27009

Union Electric has reviewed the Proposed Rule dealing with
Modification of General Design Criterion 4 Requirements for
Protection Against Dynamic Effects of Postulated Pipe Ruptures
and offers the following comments.

Protective devices, such as pipe whip restraints and jet
impingement shields have been added to nuclear power plants to
forestall events which are now regarded as extremely unlikely.
These protective devices due to their massiveness result in
considerable expense from an initial construction and maintenance
standpoint. In addition, these devices complicate the inservice
inspection work and cause increased radiation exposure for plant
personnel performing required examinations or plant maintenance.

Licensees have been allowed to request exemptions from the
requirements of GDC 4 with respect to asymmetric blowdown loads
resulting from discrete breaks in the primary coolant loop (USI
A-2). This use of exemptions, however, is limited and indicates
a need to address the issue in rulemaking.

In summary, Union Electric is very much in favor of the
proposed rule and would like the Commission to proceed
expeditiously on this issue.

Very truly yours,

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AUG 29 1985
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