

ANALYST NUMBER PR-50 (24)  
PROPOSED RULE (50 FR 27006)

**Nuclear**

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September 11, 1985

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Chilk:

Subject: Request for Comments on Proposed  
Rule Dealing With Modification of  
GDC 4 Requirements

The staff of GPU Nuclear Corporation herewith submits comments on the subject proposed rule. Comments were requested in a July 1, 1985 Federal Register notice (50 FR 27006).

We believe that the NRC is to be commended for this modification to GDC 4 which permits the use of analyses to exclude dynamic effects of certain pipe ruptures. This proposed change not only makes GDC 4 more realistic but also is a pioneering move which hopefully will guide the way for more GDC changes that will eliminate conservative requirements and results in more realistic, yet safe designs. Consequently, nuclear construction cost will decrease at the same time increasing plant reliability.

Sincerely,

*J. R. Thorpe*

J. R. Thorpe  
Director  
Licensing & Regulatory Affairs

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Acknowledged by card. *pa*