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January 29, 1986
RWW-86-05

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on "Primary Blowdown for Assured Core Cooling at PWRs"

References: (1) NRC letter, H. R. Denton to R. W. Wells, October 23, 1985
(2) AIF letter, M. R. Edelman to W. J. Dircks, August 21, 1985
(3) NRC letter, H. R. Denton to M. R. Edelman, September 26, 1985

Dear Mr. Denton:

In response to your letter dated October 23, 1985, Reference (1), the Combustion Engineering Owners Groups (CEOG) appreciates the opportunity to offer the following comments on Mr. Glenn Reed's paper entitled "Primary Blowdown for Assured Core Cooling at PWRs."

The CEOG applauds the staff's intention to solicit industry comments on the proposed concept. However, the nature of the subject paper seems to provide further evidence to indicate that the staff is continuing to focus on evaluating "alternative" (redundant) systems for decay heat removal (DHR) before clearly demonstrating the need for additional DHR capability. At best, it appears that efforts to determine the adequacy of existing DHR systems are being conducted in parallel with, rather than prior to, efforts to evaluate possible DHR alternatives. Particularly troubling is a statement in the paper itself that states that, "The main purpose (emphasis added) to Task A-45 is to 'investigate alternative means of decay heat removal in PWR plants' . . .". In fact, as stated in the AIF letter, Reference (2), ". . . the first stated objective of the task plan is to 'assess the adequacy of DHR systems on existing power plants' . . .". Subsequent objectives address evaluating the feasibility of alternate measures.

In that regard, the CEOG feels that it is inappropriate to comment on potential DHR alternatives before a case has been proven that existing DHR designs are less than adequate. Additionally, since industry in general has not been included in the review process for A-45 for some time, we are quite reluctant to provide more specific technical comments on one aspect, or one potential technical outgrowth of the A-45 program without clearly understanding the position of the proposed concept in the overall program plan. The CEOG would also like to reemphasize the industry's concern that the A-45 program does not appear to be meeting its original objective of first determining whether or not a need for additional DHR capability exists before considering hardware fixes.

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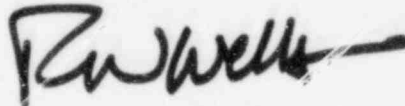
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With respect to your letter of September 26, 1986, to Murray Edelman of the AIF, Reference (3), the CEOG would like to acknowledge your offer to participate in a technical exchange of information with the AIF DHR Subcommittee and indicate our willingness to support an evaluation of the entire A-45 program through the appropriate industry organizations.

Again, the CEOG appreciates the opportunity to provide comments on this subject. If you have any questions or would like to discuss our comments, please feel free to contact me at (203) 665-3614.

Very truly yours,

A handwritten signature in black ink, appearing to read "RW Wells", followed by a horizontal line.

R. W. Wells, Chairman
CE Owners Group

RWW/drg
cc: F. Miraglia
R. Huston