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CABLE ADDRESS "EASCOE"

PROPOSED RULE - *Miss. Notice*  
*Reg. Guide*

Gentlemen:

Section C.3

Section C.4

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Section C.6

Ebasco suggests that the position be revised to reference ACI "Manual of Concrete Inspection", Publication SP-2 which incorporates ACI 311-74.

Section C.9

This regulatory position should be revised to reference applicable standard review plans in order to avoid confusion should the need to revise load combinations arise.

Section C.10

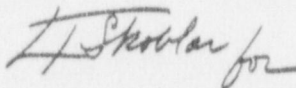
This regulatory position should be revised to reference applicable standard review plans as was suggested in Section C.9. Additionally, Section 9.2.7 of ACI 318-77 should be referenced. This section allows the inclusion of differential settlement effects in the service load condition with the dead load only or with the dead and live load only. A one-third increase in allowable stress is permitted for these load combinations.

Section C.11

Ebasco suggests the deletion of this position as an unwarranted increase in design conservatism and plant costs. Ebasco feels that considering a live load as having its full value or being completely absent satisfies the requirement of setting a transitory load to zero. However, Ebasco feels that applying the 0.9 coefficient to all mitigating loads, which are always present or occur simultaneously, would increase the number of load combinations to an impractical level with no meaningful increase in the overall conservatism of the governing load combinations. Ebasco's comment is consistent with ACI 318-77.

Ebasco appreciates the opportunity to comment on this guide and would welcome the chance to participate in any discussion the staff has on this subject.

Very truly yours,



E P O'Donnell  
Chief Engineer  
Nuclear Licensing

EPO:bs



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