

# CEOG COMBUSTION ENGINEERING OWNERS GROUP

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ABB Inc.	Baltimore Gas & Electric Calvert Cliffs 1, 2	Entergy Operations, Inc. ANO 2 WSES Unit 3	Korea Electric Power Corp. YGN 3, 4 Uchin 3,4	Omaha Public Power District Ft. Calhoun
Arizona Public Service Co. Palo Verde 1, 2, 3	Consumers Energy Co. Palisades	Florida Power & Light Co. St. Lucie 1, 2	Northeast Utilities Service Co. Millstone 2	Southern California Edison SONGS 2,3

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March 30, 2000  
CEOG-00-085

Project 692  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

**Subject: Submittal of CE NPSD-1157 Revision 1, Joint Application Report Regarding Elimination of PASS Requirements**

**Reference: R. Phelps (CEOG Chairman) to NRC, CEOG Letter CEOG-99-137, Transmitting CE NPSD-1157, dated May 5, 1999**

On behalf of the Combustion Engineering Owners Group (CEOG), ABB Combustion Engineering Nuclear Power, Inc. (ABB CENP) prepared a Joint Application Report, CE NPSD-1157, "Technical Justification For The Elimination of the Post-Accident Sampling System from the Plant Design And Licensing Bases for CEOG Utilities." This report was forwarded to the NRC for review and approval in our letter of May 5, 1999 (reference). Through subsequent discussion with the staff, ABB CENP has received input regarding changes to the subject Joint Application Report that will enable the staff to complete its review and approval. Enclosed with this letter is Revision 1 to CE NPSD-1157, with all proposed changes indicated by change bars on the affected pages. Twelve (12) copies of the revised report are enclosed for your use.

The CEOG respectfully requests that the staff review the enclosed changes and complete the safety evaluation so as to support license amendment requests that have been submitted or are forthcoming from CEOG licensees. In addition to the docketed license amendment request by Entergy Operations that references the Joint Application Report for relief from PASS requirements at their ANO site, several other CEOG licensees also plan to seek license amendments to eliminate PASS requirements at their sites. In support of an efficient process to allow NRC to approve future license amendment requests, ABB CENP and Westinghouse are working on a Technical Specification change template that follows that developed by the NEI Technical Specification Task Force, as we had discussed during our telephone call of February 7, 2000. This template will be finalized, once the Safety Evaluations have been issued that approve both the CEOG and WOG PASS elimination Topical Reports.

ABB CENP and the CEOG utilities are prepared to discuss the proposed changes to the JAR and meet with the staff, if necessary, in order to complete this review. If you have any questions concerning this matter, please do not hesitate to call me at 402-533-7210 or call Gordon Bischoff, CEOG Project Office, at 860-285-5494.

Very truly yours,



Ralph Phelps  
Chairman, CE Owners Group

Enclosure: As stated

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