



# COMBUSTION ENGINEERING OWNERS GROUP

Arizona Public Service Co.  
Palo Verde 1, 2, 3

CE Nuclear Power LLC

Entergy Operations, Inc.  
ANO 2 WSES Unit 3

Korea Electric Power Corp.  
YGN 3, 4 Uchin 3,4

Omaha Public Power District  
Fl. Calhoun

Baltimore Gas & Electric  
Calvert Cliffs 1, 2

Consumers Energy Co.  
Palisades

Florida Power & Light Co.  
St. Lucie 1, 2

Northeast Utilities Service Co.  
Millstone 2

Southern California Edison  
SONGS 2,3

June 14, 2000  
CEOG-00-174

Document Control Desk  
US Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Attn: William S. Raughley

Project 692

Subject: CE Owners Group Comments on Draft Report "Regulatory Effectiveness of the Station Blackout Rule"

The CE Owners Group appreciates the opportunity to review the Draft Report "Regulatory Effectiveness of the Station Blackout Rule," and we applaud the staff's initiative to review existing regulations to determine if the requirements are achieving the desired outcomes. We feel that this initiative, together with the other NRC initiatives such as risk informing 10CFR part 50, will lead to more effective use of both NRC and industry resources.

We agree with the approach taken to perform the evaluation of the effectiveness of the SBO rule by comparing regulatory expectations to outcomes. A set of baseline expectations was established from the SBO rule and related regulatory documents in the areas of coping capability, risk reduction, emergency diesel generator reliability, and value impact. These expectations were then compared to the actual costs and benefits.

The CEOG also agrees with the report's conclusions that:

- The SBO rule was effective and the industry and NRC costs to implement the SBO rule were reasonable considering the outcomes
- No additional generic actions are warranted
- SBO rule risk reduction objectives have been exceeded
- Further investigation of strategies for reducing SBO frequencies are not needed

One of the key issues that had stymied earlier wide use of risk-informed regulation had been the question "how safe is safe enough?" We believe the NRC has largely answered that question in its policy statements, and most recently in RG 1.174. The

D047

subject draft report points out that 97% of operating plants have a unit average EDG reliability of better than .95, and that the mean core damage frequency (CDF) from SBO has been reduced by approximately 3.2E-05 per reactor year. The report notes that this reduction in CDF is better than the NRC's expectation. It is important that the regulatory process recognize when a safety issue, such as SBO, has been adequately addressed.

The draft report identifies SBO related regulatory guides, including RG 1.155, RG 1.9, and RG 1.160, that could benefit from being revised to clarify guidance on the scope and meaning of the EDG numerical reliability requirements. We agree that this is entirely appropriate. However, the draft report also recommends that these regulatory guides be revised to "establish common EDG start and load-run criteria for guidance." We urge the Staff to proceed with caution to assure that no new requirements are established in this regard without a rigorous value-impact evaluation.

As the NRC moves forward in eliminating the very large break LOCA from the design basis, based on leak-before-break considerations, the NRC should consider relaxing the EDG start time requirements. We believe the current requirements, which are based on LBLOCA, are unrealistic and may be leading to an underestimate of current EDG reliability. Additionally, a longer allowed start time is easier on the equipment, thereby contributing to better long term reliability.

As described in the summary, the NRC's original value impact analysis underestimated the cost to the industry by a factor of four owing to the unanticipated costs of adding 19 power supplies. We urge the staff to study this example in an effort to gain a better understanding of the implementation costs of regulation, and to apply lessons learned in estimating future costs.

Again, the CEOG thanks the NRC for the opportunity to comment on this regulatory effectiveness report and commends your openness in soliciting industry comments. We look forward to continuing NRC efforts to gauge regulatory effectiveness.

If you have any questions or comments, please contact me, or Mr. Gordon Bischoff, the CEOG Project Director, at 860-285-5494.

Sincerely,



Ralph Phelps  
Chairman, CE Owners Group

cc: CE Owners Group  
CEOG Licensing Subcommittee  
CEOG PSA Subcommittee  
Mr. Jack Cushing, USNRC  
Mr. Gordon Bischoff, W

## **C-E OWNERS GROUP MANAGEMENT COMMITTEE**

R. Bernier, APS (Palo Verde)	R. Phelps, OPPD (Omaha)
T. Buczwinski, CEC (Covert)	D. Pilmer, SCE (San Clemente)
J. Holman, EO-WSES (Killona)	R. Puckett, EO-ANO (Russellville)
C. Maxson, NU (Waterford)	P. Leombruni, <u>W</u> (Windsor)
T. Patterson, FPL (Jensen Beach)	Mr. Min, Seock-Kwan, KEPCO (Korea)
G. Pavis, BGE (Lusby)	R. Etling, <u>W</u> (Pittsburgh)

## **LICENSING SUBCOMMITTEE**

M. Brandon, EO-WSES (Killona)	B. S. Montgomery, BGE (Lusby)
M. T. Frans, OPPD (Omaha)	A. E. Scherer, SCE (San Clemente)
N. Haskell, CEC (Covert)	D. Smith, NU (Waterford)
D. James, EO-ANO (Russellville)	E. J. Weinkam III, FPL (Jensen Beach)
A. Krainik, APS (Palo Verde)	I. C. Rickard, <u>W</u> , (Windsor)

## **PROBABILISTIC SAFETY ASSESSMENT SUBCOMMITTEE**

H. Brodt, EO - WSES (Killona)	B. Mrowca, BGE (Lusby)
C. Guey, FPL (Juno Beach)	G. Sowers, APS (Palo Verde)
A. Hackerott, OPPD (Ft. Calhoun)	B. White, CEC (Covert)
T. Hook, SCE (San Clemente)	M. Greene, <u>W</u> , (Windsor)
Y. Khalil, NU (Berlin)	R. Schneider, <u>W</u> , (Windsor)
M. Lloyd, EO - ANO (Russellville)	