

Presentation on Behave of the B&W Owner's Group

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- * **The BWOG Supports the Effort to Risk Inform Regulations Related to Large Break LOCA**
- * **BWOG is Pursuing Support for This Activity As an Industry Program**

Evaluation of Differing Programs to Risk Inform the Regulations

- * **Maintain Current Regulations**
 - No Gain or Risk Enhanced Direction of Industry Efforts
- * **Change of Evaluation Models**
 1. **Relax Appendix K**
 - Benefits Limited to Fuel Performance
 2. **Easier Best Estimate LOCA**
 - Benefits Limited to Fuel Performance
- * **Change Criteria**
 - Benefits Mostly Limited to Fuel Performance
 - Future Possibility for Small Breaks if Large Breaks Eliminated
- * **Change Design Basis Event**
 1. **Relax Simultaneous Failures**
 - Benefits Mostly Limited to Fuel Performance
 2. **Eliminate Large Break LOCA**
 - Provides Benefits Beyond 10CFR50.46
 - Not as Subject to Ever Increasing Complexity
 - Most Concrete and Decisive Approach
 - Supported by Risk and Leak-Before-Break Technologies
 - Favored by BWOG

Implementation Guidance

- * **Revision Must Consider Both Current Designs, Redesigns and New Designs**
- * **Clear Limits on the Extent (Systems, Operations, or Procedural Changes) of Implementation of This Regulatory Revision Should Exist**
- * **The BWOG Will Rely on the Concepts of Defense-in-Depth and Safety Margin to Recognize These Limitations**
- * **The Existing Industry Consortium Has Agreed to Documentation of Considerations of Defense-in-Depth and Safety Margin and the Implications of These Concepts**