

October 19, 2000

MEMORANDUM TO: Stuart A. Richards, Director
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Robert M. Pulsifer, Project Manager, Section 2
Project Directorate I */RA/*
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MANAGEMENT MEETING WITH THE BOILING
WATER REACTOR OWNERS GROUP (BWROG)

On September 13, 2000, the staff met with members of the Boiling Water Reactor Owners Group (BWROG) to discuss various activities affecting both the NRC and BWROG organizations. The subjects discussed are listed in Attachment 1. A list of attendees of the September 13, 2000, meeting and their affiliations is provided as Attachment 2. A copy of the handouts provided by the BWROG for their presentations can be found in ADAMS under the accession number ML003751047.

Mr. Collins, Director, Office of Nuclear Reactor Regulation, opened the meeting with a few remarks. Mr. Collins stated that the effectiveness of the Office of Nuclear Reactor Regulation (NRR) comes from looking forward with help from the other offices such as the Office of Nuclear Regulatory Research. The NRC needs good dynamics between the offices to be effective. Significant issues the staff is dealing with include, for example, decommissioning funding, license transfers on a 6-month schedule, and license renewal on a 30-month schedule. The most recent license renewal application received was Turkey Point. Aging degradation is a focus during these reviews. The staff is also investigating lessons learned from the Indian Point Unit 2 steam generator activities. The Regulatory Information Conference will be coming up again and the staff is reviewing the take-aways from the last meeting as well as input into the NRC web page to develop an agenda for the next meeting. The staff is working on a new work control effort to help prioritize work to make our process more effective. Mr. Sheron, Associate Director for Project Licensing and Technical Analysis, NRR, stated that the National Licensing Workshop has been scheduled for November 1 and 2, 2000, and encouraged the BWROG and its members participation. Mr. Sheron also stated the staff has been asked to review a new Westinghouse standard plant design, the AP-1000.

Mr. H. Lewis Summers, Chairman of the BWROG Executive Oversight Committee (EOC) stated that these meetings are beneficial and that the issues on the agenda are the BWROG's number one priorities.

Members of the BWROG continued the meeting as summarized below.

Appendix R

The BWROG has delivered products to the NRC including a post-fire safe shutdown guidance document and a SRV/LPS (safety relief valve/low pressure system) "redundant" safe shutdown document. Key points of the presentation were that the BWROG is looking for a safety evaluation (SE) on the BWROG position for SRV/LPS and the NRC should continue to hold on the expansion of inspection criteria pending completion of the Nuclear Energy Institute (NEI) document NEI-00-01. Also, the BWROG post-fire shutdown guidance document will now be reviewed along with NEI document NEI-00-01 to establish an integrated approach where open issues will be resolved through this integrated industry effort under NEI. NEI-00-01 is projected to be available to the NRC for review during the first quarter of 2001.

Loose Parts Monitoring

The BWROG submitted Topical Report NEDC-32975P, "Regulatory Relaxation for BWR Loose Parts Monitoring Systems," dated July 31, 2000 for staff review. The BWROG states that the median annual maintenance cost is \$45,000.00 for a loose parts monitoring system (LPMs) and that LPMs regulatory benefits may be eliminated from all BWRs with no impact on safety. The BWROG has requested NRC review to support Spring 2001 outages. The staff indicated that a target date for completion of the review is December 31, 2000.

Risk Initiatives

The BWROG provided the status of their on-going risk initiatives regarding the maintenance rule, industry standards, risk-informed Part 50 Option 2 pilot, and risk-informed technical specifications. The implementation of the BWROG maintenance plan risk-informed methodology is expected to occur in October of this year. The risk-informed Part 50 Option 2 pilot program schedule has slipped two months over the initial year-end schedule with the lead plant to be completed by mid-2001. Systems being considered by the BWROG for this review include the standby gas treatment system, low pressure core spray system, and the feedwater system. The Option 2 pilot plan will be submitted to the NRC by late October 2000. For the risk-informed technical specifications (TS), a generic BWR 4 model has been developed and work is continuing into 2001 with participation in the NEI risk-informed TS program.

DC Motors

The staff met with the BWROG on August 30, 2000, to discuss the BWROG effort regarding DC motor performance methodology. Representatives from the BWROG contractor, MPR Associates were present as well as a representative from the valve actuator vendor, Limitorque. Both the staff and BWROG stated that the meeting was productive. The staff indicated that NRC endorsement of the use of the BWROG DC motor methodology may be issued through a Regulatory Issue Summary (RIS) instead of an Information Notice or safety evaluation. The staff did state that this DC motor methodology effort by the BWROG was an example where industry is taking a good initiative. The BWROG said that an implementing schedule will be issued soon and that this methodology will be offered to all utilities.

PASS, H2 Recombiners, H2/O2 Monitors

The BWROG will be submitting separate topical reports for staff review during the fourth quarter of 2000 addressing: (1) elimination of unnecessary post-accident sampling system (PASS) and analysis requirements, (2) declassifying H2/O2 monitors to non-safety related, and (3) to relax requirements for H2 recombiners and containment air dilution systems to non-safety related status.

RCIC, Loss of Safety Function

The BWROG representatives stated that the NRC has been inconsistent in requiring BWR facilities to report reactor core isolation cooling (RCIC) unavailability. The BWROG understands the NRC staff is presently reviewing this issue and requests that the staff defer action to resolve this issue until a BWROG white paper currently scheduled for submittal in October is received and reviewed. The white paper will be faxed to the staff as soon as it is available.

Fluence Calculations

The BWROG stated that they are receiving mixed signals from the staff regarding what is needed with respect to fluence calculational methodology. This methodology is an issue with licensee submittals on P-T (pressure-temperature) curves, power uprates, and capsule deferrals. General Electric Nuclear Energy has submitted a Licensing Topical Report, "General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluations," dated August 2000, which the BWROG expects will resolve the NRC concerns for fluence calculations.

It was noted that the BWR Vessel and Internals Project (BWRVIP) is going to address fluence in 2001 as part of the Integrated Surveillance Program (ISP).

The BWROG requested NRC support for a review of the licensing topical report by the end of year 2000, accept P-T curves and power uprates with no restrictions, and grant deferral of capsule removal. The staff acknowledged the receipt of the topical report and indicated that the review will be initiated by a contractor in early October and that the staff will provide the BWROG with an estimated completion date for the review.

BWR VIP

Mr. Vaughn Wagoner from the BWRVIP provided a brief summary of the BWRVIP activities. He discussed the present BWRVIP organization, key activities of this year, and the structural organization for the BWRVIP starting in 2001. The BWRVIP base program guidelines have been submitted to the NRC and the staff stated that its review of the program issues match the schedule for the Hatch plant license renewal.

Issues discussed included the staff's review of the EPRI Report TR-113932, "BWR Vessel and Internals Project, Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (BWRVIP-75)," dated October 1999, submitted for staff review by letter dated

October 27, 1999. During this meeting, the staff agreed to contact the BWRVIP by Friday, September 15, 2000, to discuss the status of the BWRVIP-75 review. The staff had a conference call with the BWRVIP at 1:00 p.m. on September 15, 2000, and informed them that the staff has completed its review of the BWRVIP-75 report and the SE was issued and dated September 15, 2000 (ADAMS accession number ML003751105). The staff briefly discussed the open items with the BWRVIP, and stressed the need to modify the report to clearly state that the methodology used therein is deterministically based. The BWRVIP agreed to respond by letter regarding that issue in the immediate future, and to respond to the remaining open items in the near term.

It should be noted that the staff's SE for the BWRVIP-75 report finds that, with the exception of the open items discussed in the SE, the BWRVIP-75 guidance is acceptable for a licensee to reference as the technical basis for relief from, or as an alternative to, the ASME Code and 10 CFR 50.55a, in order to use the sample schedules and frequencies specified in the BWRVIP-75 report that are less than those required by the ASME Code. The findings and conclusions in the SE are not applicable to any welds or piping (e.g., socket welds, carbon steel piping, etc.) other than those within the scope of GL 88-01. The staff's approval of the as-revised BWRVIP-75 report also allows licensees to utilize the as-revised BWRVIP-75 guidance in lieu of licensees' commitments to GL 88-01 and NUREG-0313, Rev. 2, or as the technical basis for a plant-specific request for a license amendment to change technical specifications requiring GL 88-01 or NUREG-0313, Rev. 2 inspections. The open items discussed in the staff's SE represent areas in which the staff believes that the recommended revisions to the BWRVIP-75 report will provide needed safety margin to ensure the continued safe operation of the plant.

The staff has one request for relief/alternative in review, and, based on the call, expects as many as six additional requests in the immediate term for Fall 2000 outages.

The staff also stated they will contact the BWRVIP as to a potential technical meeting and expected completion of BWRVIP-78.

The BWRVIP representatives stated that BWRVIP-62 concerning hydrogen water chemistry needs to be completed.

Technical Specification Instrument Uncertainties

The BWROG provided a brief status of their TS instrument uncertainties committee activities. Their preliminary results show that for non-RG 1.105 parameters, BWR safety analysis margin is sufficient such that no additional instrument uncertainty evaluations are warranted. For RG 1.105 parameters, less than 10 percent of the setpoint evaluations are warranted. The staff has requested that a technical meeting be arranged to discuss the staff's concerns with instrument uncertainties and the results of the BWROG evaluations.

The staff at the end of the meeting reviewed the action items from the meeting (Attachment 3).

The afternoon of December 6 has been raised as the date of the next NRC and BWROG EOC management meeting.

Project No. 691

Attachments: 1. Meeting Agenda
2. Attendance List
3. Action Items

cc w/atts: See next page

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cc:

Mr. James M. Kenny, Chairman
BWR Owner's Group
PPL, Inc.
M/C GENA6-1
Two North Ninth Street
Allentown, PA 18101

Mr. H. Lewis Sumner
Southern Nuclear Company
40 Inverness Center Parkway
PO Box 1295
Birmingham, AL 35242

Mr. Carl D. Terry
Vice President, Nuclear Engineering
Niagara Mohawk Power Corporation
Nine Mile Point - Station
OPS Bldg/2nd Floor
PO Box 63
Lycoming, NY 13093

Mr. George T. Jones
PP&L, Inc.
MC A6-1
Two North Ninth Street
Allentown, PA 18101

Mr. John Kelly
New York Power Authority
14th Floor Mail Stop 14K
Centroplex Building
123 Main Street
White Plains, NY 10601

Mr. Thomas G. Hurst
GE Nuclear Energy
M/C 782
175 Curtner Avenue
San Jose, CA 95125

Mr. Thomas A. Green
GE Nuclear Energy
M/C 782
175 Curtner Avenue
San Jose, CA 95125

Mr. William H. Bolke
COMED
1400 Opus Place, Suite 400
Downers Grove, IL 60515

Mr. J. A. Gray, Jr. Vice Chairman
BWR Owners Group
New York Power Authority
123 Main Street
White Plains, NY 10601

Mr. James W. Langenbach
PECO Energy
965 Chesterbrook Blvd
MC 62C-3
Wayne, PA 19087

Mr. James F. Klapproth
GE Nuclear Energy
M/C 706
175 Curtner Avenue
San Jose, CA 95125

NRC/BRW OWNERS' GROUP MANAGEMENT MEETING

AGENDA

September 13, 2000

DISCUSSION TOPICS

PRESENTER

Introduction

BWROG

Appendix R

BWROG

Loose Parts Monitoring

BWROG

Risk Initiatives

BWROG

- *Option 2 - Risk Informed 10CFR50*
- *RITS - Transition Model*

DC Motors

BWROG

PASS, H2 Recombiners, H2/O2 Monitors

BWROG

RCIC, Loss of Safety Function

BWROG

Fluence Calculations

BWROG

BWR VIP

BWROG

NRC Items

NRC

MEETING BETWEEN BWROG AND NRC

LIST OF PARTICIPANTS

September 13, 2000

<u>NAME</u>	<u>AFFILIATION</u>
Fred Emerson	NEI
Bill Bohlke	Com Ed
Vaughn Wagoner	CP&L/BWRVIP
Jim Kenney	PPL/BWROG
Lewis Sumner	SNC/BWROG
John Kelly	NYP&A/BWROG
J. A. Gray, Jr.	NYP&A/BWROG
James W. Langenbach	PECO/BWROG
Greg Krueger	PECO/BWROG
Tom Green	GE/BWROG
Jim Klapproth	GE
Tom Hurst	GE
Leslie Collins	Westinghouse
Altheia Wyche	Serch Licensing - Bechtel
Michael Knapik	McGraw-Hill
Paul Gunter	NIRS
Robin Dyce	SNC
Charles Willbanks	NUS Info Services
Robert Pulsifer	NRC/NRR/DLPM
Charles Ader	NRC/NRR/DRIP
Jared Wermiel	NRC/NRR/DSSA
Jack Strosnider	NRC/NRR/DE
Brian Sheron	NRC/NRR/ADPT
Sam Collins	NRC/NRR/OD
Joe Williams	NRC/NRR/DLPM
Eric Weiss	NRC/NRR/SPLB
Steve Dembek	NRC/NRR/DLPM
Allen Notafrancesco	NRC/RES/SMSAB
William Beckner	NRC/NRR/RTSB
John Hannon	NRC/NRR/DSSA
Gene Carpenter	NRR/DE/EMCB
Bob Hermann	NRC/DE/EMCB
Mark P. Rubin	NRC/DSSA/SPSB
Peter Koltay	NRC/DIPM/IIPB

BWROG ACTION ITEMS FROM 09/13/00 MEETING

1. The staff is to provide to the BWROG an estimate for the completion of the licensing topical report on fluence calculation. (J. Wermiel)
2. The staff is to confirm to the BWRVIP the completion date for the review of BWRVIP-78. (Gene Carpenter)
3. The staff is to followup with the BWRVIP on the status of BWRVIP-75 on September 15. (Gene Carpenter - completed as stated in summary)
4. The BWROG is to provide a letter to the staff on the pilot plan for 10 CFR Part 50 Option 2. (J. Kenny)
5. The BWROG is to provide their RCIC white paper via fax to the staff in early October. (J. Kenny)
6. Set up a meeting date to have a technical meeting between the BWROG tech spec instrument uncertainties committee and the NRC staff. (R. Pulsifer & J. Kenny)