

# BWR OWNERS' GROUP

James M. Kenny, Chairman  
Tel: (610)774-5362  
Fax: (610)774-6575

c/o PPL Susquehanna LLC • Two North Ninth Street • Mail Code GENA6-1 • Allentown, PA, 18101-1179

Project No. 691

BWROG-00086  
October 9, 2000

U.S. Nuclear Regulatory Commission  
Mr. Robert Pulsifer  
One White Flint North (Mail Stop 13D1)  
11555 Rockville Pike  
Rockville, MD 20852-2738

Subject: BWROG PILOT PROGRAM ON RISK INFORMING 10CFR50  
OPTION 2

At the September 13, 2000 BWROG/NRC management meeting, the subject of a BWROG pilot program was discussed. The purpose of this letter is to provide you with information on the pilot program that the BWROG proposes for Option 2.

It is recognized that the NRC and NEI are actively encouraging utility participants in this pilot effort. The initial concept was to have individual plants serve as pilots doing categorization and special treatment evaluations on the whole plant. It appears that there are few pilots of this nature because of the perceived cost may be substantial with uncertain benefit.

As a result, the BWROG developed a pilot concept by which the individual Owner investment could be reduced and the potential benefits of Option 2 could be tested. This concept involves formulating the appropriate risk informed classification and special treatment of components in selected BWR systems. The systems selected were the Low Pressure Core Spray system, Standby Gas Treatment system and Feedwater/condensate system.

The selection of these systems should provide a cost effective method of testing the Option 2 guidelines for both RISC-1 systems being classified as RISC-3 and RISC-4 systems being classified as RISC-2.

A draft schedule of activities is provided in Attachment 1. A brief summary of the work scope Phases are as follows.

- Phase 1: Conduct economic benefit analysis, develop a technical methodology, and select the appropriate systems. The economic benefit analysis and the ability to test the Option 2 guidelines will be a strong factors in determining the systems. (completed).

D044

BWROG-00086

October 9, 2000

Page 2

- Phase 2A: Conduct SSC categorization on the selected systems for a Lead plant to test the methods and evaluate special treatment for these systems. Phase 2A will be concluded with a report and a proposed exemption request for the Lead plant.
- Phase 2B: Conduct SSC categorization on the selected systems and special treatment evaluations for the remaining plants.
- Phase 3: Develop and submit a generic exemption request for all BWRs.
- Phase 4: Respond to NRC RAIs.

This program was originally planned to start in June and be completed by the end of 2000. Because of delays in Phase 1 the program is running about 2 months behind the original schedule. Attachment 1 will provide some schedule details.

It is hope that this information will be useful to the NRC Staff in their planning on Option 2 activities and that the Staff will welcome this program as a pilot.

Best Regards,



J. M. Kenny, Chairman  
BWR Owners' Group

Attachment

Cc: J. A. Gray, Jr., BWROG Vice Chairman  
E. R. Jebsen, BWROG Option 2 Pilot Chairman  
T. G. Hurst, GE  
R. A. Hill, GE

**BWROG OPTION 2 PILOT SCHEDULE**

<b>Task</b>	<b>Start Date</b>	<b>Finish Date</b>
<b>Phase 1: Benefit Determination</b>	<b>6/1/2000</b>	<b>9/12/2000</b>
<b>Phase 2A: Lead plant</b>	<b>9/12/2000</b>	<b>3/5/2001</b>
<b>Phase 2B: Remaining Plant Analysis</b>	<b>3/5/2001</b>	<b>10/8/2001</b>
<b>Phase 3: Documentation</b>	<b>10/8/2001</b>	<b>11/29/2001</b>
<b>Phase 4: NRC RAI</b>	<b>11/29/2001</b>	<b>1/31/2002</b>