

BWR OWNERS' GROUP

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BWROG-01034

May 29, 2001

Project No. 691

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Attention: Farouk Eltawila, Acting Director
Division of Systems Analysis and Regulatory Effectiveness
Office of Nuclear Regulatory Research

Reference: NUREG/CR-5500, Vol. 3, Reliability Study: General Electric Reactor
protection System, 1984-1995, dated May 1999.

Subject: **BWROG COMMENTS ON DRAFT REPORT, "REGULATORY
EFFECTIVENESS OF THE ANTICIPATED TRANSIENT
WITHOUT SCRAM RULE"**

The BWROG has reviewed the subject report and wishes to provide the following high level comments regarding it. We appreciate the opportunity to provide these comments. The comments have been reviewed and approved by the participating utilities of the BWROG.

The report indicates that the ATWS rule has been effective because it required hardware to reduce the consequences of an ATWS event. Reference 1 provides an analysis and data that supports a long time contention of the industry that reactor protection system (RPS) reliability is an order of magnitude higher than that assumed by the NRC and thus used in the determinations of the ATWS rule. With this information, the hardware modifications required by the ATWS rule, likely would not have been necessary.

Since RPS reliability is directly linked to the initiating event frequency for ATWS sequences in PRAs, it is reasonable to judge that the ATWS contribution to BWR core damage frequency is over estimated by about a factor of ten. When considering the fact that there is now a significant margin available for ATWS sequence events, it is reasonable to assume that licensees would be able to consider some or all of the following at their plants. These are sample changes which could be justified based on risk information.

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- Extension of allowed outage times for standby liquid control system (SLC) components
- Reevaluation of the need for highly enriched boron to avoid requiring two SLC pump operation
- Elimination of alternate boron injection from emergency procedures and the requirement to maintain a significant supply of boron available on site for mixing to complete this procedure.

It is the position of the BWROG that the acceptance criteria of the rule should be examined under the risk informed part 50 option 3 program and will be recommending this to the NRC staff during industry/NRC meetings on this regulatory reform program.

If you would like to discuss our comments further, please contact Greg Krueger (Exelon) at (610) 765-5973, BWROG Integrated Risk Informed Regulation Committee Chairman or Rick Hill (GE) (408) 925-5388, Project Manager.

Sincerely



Jim Kenny, Chairman
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cc: Robert Pulsifer, NRC
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