

August 20, 2001

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

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

SUBJECT: SUMMARY OF MEETING WITH THE BOILING WATER REACTOR
OWNERS GROUP

On August 13, 2001, members of the staff met with the Boiling Water Reactor Owners Group (BWROG) to discuss the BWROG topical report (TR) NEDO-33003, "Regulatory Relaxation for the H₂/O₂ Monitors and Combustible Gas Control System," dated June 22, 2001 (ADAMS accession number ML011900211.) A list of attendees and their affiliations is provided as Attachment 1. A copy of the handouts provided by the BWROG for their presentation can be found in ADAMS under accession number ML012260070.

In their presentation, the BWROG discussed the applicable regulations, estimated cost savings per plant if equipment is downgraded from safety to non-safety-related, and the benefits of using commercial grade equipment. Existing monitors using newer technologies can be maintained easier and are more reliable, however the newer designs are typically not qualified for safety-related use. The BWROG employed deterministic calculations to determine the need and benefit of combustible gas control systems (CGCS) using maximum power levels and the smallest containment volume. The BWROG also stated that the H₂/O₂ monitors and the CGCS is not needed for realistic design basis accidents.

Their conclusions were to eliminate the requirements for O₂ monitors for Mark III containments. They also stated that the H₂/O₂ monitors should be downgraded to non-safety-related because they are only needed for severe accidents and that commercial grade equipment is acceptable. The H₂ and O₂ analyzers should be removed from the post accident monitoring standard technical specification (TS) requirements. The BWROG also concludes that the CGCS safety classification should be removed and that for Mark III containments the CGCS requirements should be eliminated.

Because this topical report addresses the removal of limiting conditions for operation (LCO) from the TSs, the staff requested that the BWROG address Section 50.36 of Title 10 of the *Code of Federal Regulations* as to why it is okay to delete these LCOs from the TS. The BWROG asked whether it should be addressed in this TR or be requested later. The staff has

S. A. Richards

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since told the BWROG that it was the BWROG's decision on where it is addressed as long as it is discussed and justified.

Project No. 691

Attachment: Meeting Attendees

cc w/attachment: See next page

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Attachment: Meeting Attendees

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MEETING NOTICES: ML012130048, ML012200470

PACKAGE: ML012330231

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MEETING WITH BOILING WATER REACTOR OWNERS GROUP

AUGUST 13, 2001

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