

# BWR OWNERS' GROUP

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September 4, 2002

U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attn: Rules and Directives Branch  
Office of Administration

Subject: BWR Owners' Group Comments to Draft Generic Letter (2002-XX),  
"Control Room Envelope Habitability"

**BWROG Project Number 691**

Encl: BWR Owners' Group Comments to Draft Generic Letter (2002-XX),  
dated September 2002

Attached is the BWR Owners' Group's (BWROG) comments on the subject Draft Generic Letter in accordance with instructions provided in the Federal Register.

It should be noted that, while these comments have been endorsed by a substantial number of the members of the BWROG, they should not be interpreted as representing any individual utility member. Each BWROG member utility must formally provide their own individual comments in order for those comments to represent that member utility.

Any questions can be directed to the undersigned or to Tom Mscisz (Exelon Nuclear), BWROG Control Room Habitability Committee Chairman at (610) 765-5971.

Sincerely,



JA Gray, Jr., Chairman  
BWROG Owners' Group

cc: K Putnam, BWROG Vice Chairman  
BWROG EOC  
BWROG Primary Representatives  
BWROG CRH Committee  
M Blumberg, USNRC

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Memphis = ADM-013

E-LIDS = ADM-03  
Add: W. Blumberg (WMB1)

**BWR OWNERS' GROUP**  
**COMMENTS TO DRAFT GENERIC LETTER (2002-XX)**  
*September 2002*

<b>DGL REFERENCE</b>	<b>COMMENT</b>	<b>RECOMMENDED CHANGE</b>
Background, Paragraph 4	<p>Regarding the sentence, "Unlike the dP test, the E741 test measures the total CRE leakage from all sources", it is believed that the E471 tests do not directly measure leakage. The leakage rate can only be inferred from test measurements.</p> <p>This sentence should be revised.</p>	<p>Revise the sentence as indicated:</p> <p>"Unlike the dP test, the E741 test <del>measures</del> provides a means for inferring the total CRE leakage from all sources."</p>

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<p>Background, Paragraph 6</p>	<p>The statement currently reads, "The E741 testing has helped to identify a spectrum of CREHS deficiencies that affect system design; construction, and quality; system boundary construction and integrity; and technical specification surveillance requirements."</p> <p>It is believed that E741 testing alone should not be identified as having helped to identify deficiencies as E741 testing does not identify the exact source of inleakage. In order to identify the actual sources of inleakage, a component test might be required. Furthermore, many of the examples that affect CRE and CREHS performance could be areas of exfiltration for positive pressure CREs that would more likely be identified as result of adverse dP surveillance results rather than E741 testing.</p>	<p>Revise the first sentence of the paragraph as indicated:</p> <p><del>The E741 testing</del> Testing has helped to identify a spectrum of CREHS deficiencies that affect system design, construction, and quality; system boundary construction and integrity; and technical specification surveillance requirements.</p>
<p>Background, Last Paragraph</p>	<p>The following statement is not believed to be consistent with habitability system design functions:</p> <p>"Smoke and other byproducts of fire within the CRE or in adjacent areas are among the contaminants that can have an adverse impact on CRE habitability."</p>	<p>The sentence should be revised, as indicated, to delete reference to hazards originating with the CRE:</p> <p>Smoke and other byproducts of fire <del>within the CRE or in adjacent areas</del> are among the contaminants that can have an adverse impact on CRE habitability.</p>

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<p>Discussion, First Paragraph</p>	<p>The paragraph expresses concern about operator confidence in control room habitability and errors that might occur due to lack of confidence. While it does appear that there is a basis for concern about the ability of licensees to demonstrate compliance with regulatory requirements, there appears to be no basis for making the claim that operator confidence in the control room would be or has ever been an issue due to habitability concerns.</p>	<p>Revise the paragraph as shown:</p> <p>The NRC is concerned that some licensees have not maintained adequate configuration control over their CREs and have not corrected identified design and performance deficiencies. <del>Errors of omission and commission are more likely if CREHSs and CREs do not properly perform as intended in response to challenges from off-normal or accident situations. The CRE must be safe so that operators remain in the CRE to monitor plant performance and take appropriate mitigative actions. This is an underlying assumption in both the design basis and severe accident risk analyses. It is, therefore, imperative to the health and safety of the public that operators are confident of their safety in the CRE at all times.</del> Configuration control must be maintained to ensure that operators respond to challenges from off-normal and accident situations without being exposed to a larger radiological dose or exposure to toxic gas than previously analyzed in their accident analyses.</p>
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