BWR OWNERS' GROUP

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PROJECT NUMBER 691

BWROG-03049
September 30, 2003

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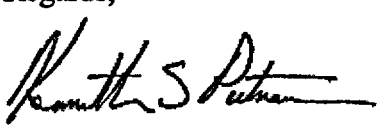
SUBJECT: **UTILITY COMMITMENT TO NRC FOR OPRM OPERABILITY AT OPTION III PLANTS**

Please find attached a copy of a letter sent to all BWROG utility members. The attached letter recommends to each utility that they need to make a commitment to the NRC relative to OPRM operability at Option III plants.

If you have any questions about this attached letter, please contact me.

Regards,



K. S. Putnam
BWR Owners' Group Chairman

cc: BWROG Executives
BWROG Primary Representatives
BWROG Detect and Suppress Committee
A. Wang, NRC
T. G. Hurst, GE
R. A. Hill, GE

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BWROG-03048
September 30, 2003

To: BWR Owners' Group Primary Representatives

Subject: **Utility Commitment to NRC for OPRM Operability at Option III Plants**

Reference: BWROG-03036, "Detect and Suppress Committee Recommendation," from H. Lewis Sumner to BWR Owners' Group Executives, August 13, 2003.

The Executive Oversight Committee (EOC) reviewed and approved the reference recommendation from the Detect and Suppress Committee on July 25, 2003 to suspend efforts to develop a new safety limit for stability and to pursue the use of plant-specific Oscillation Power Range Monitor (OPRM) setpoints based on plant-specific regional mode DIVOM calculations. This change in direction was communicated to all member utilities in the reference letter.

The Detect and Suppress Committee informed the NRC staff on August 15, 2003 of the BWROG plans to use plant-specific regional mode DIVOM curves to develop OPRM setpoints, instead of the current approach of using a generic regional mode DIVOM curve. The Committee believes this is an acceptable way to resolve the open Part 21 Reportable Condition, which was issued against the use of a generic regional mode DIVOM curve. The generation of plant-specific regional mode DIVOM curves and setpoints will be consistent with the process described in NEDO-32465-A, which was approved by the NRC in 1996. Implementing the GE stability solution DSS-CD, pending NRC approval, is also an acceptable resolution of the Part 21 Reportable Condition. DSS-CD is a modified Option III solution, but does not use a DIVOM curve in its licensing methodology. DSS-CD was developed for application to MELLLA+, but is applicable to all licensed operating domains. Plants may elect to use DSS-CD if the operational restrictions of their OPRM setpoint based on their plant-specific DIVOM curve are impractical.

The NRC staff agreed that the BWROG proposed disposition is acceptable and resolves a very long-term issue. The NRC also stated that the proposed disposition reduces the licensing resources that would have been required to support the development and review of the new safety limit for stability. They requested that the BWROG formally document the disposition of the Part 21. Additionally, they requested that the BWROG provide a commitment that the remaining plants with inoperable OPRMs will be made operable as soon as practical. They also requested that an implementation schedule be provided. It was stated that the BWROG cannot make commitments for its members, but the Committee would work with the BWROG Executives to provide individual implementation schedules.

The purpose of this letter is inform those plants utilizing the Option III solution of the NRC staff requests and to encourage your utility to respond individually to the NRC within 90 days of the date of this letter with a plan to support OPRM operability. The formal communication documenting the disposition of the Part 21 Reportable Condition for the generic regional mode DIVOM curve will be issued by the BWROG in the form of a letter to the NRC.

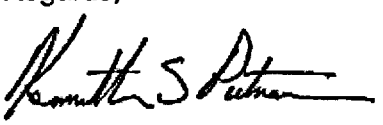
Some Option III plants have made their OPRMs operable by calculating the trip setpoint with an interim plant-specific regional mode DIVOM curve. The technical procedure used to generate the interim DIVOM curve may be different from the final technical procedure that will be used to develop the plant-specific regional mode DIVOM curve. The Detect and Suppress Committee is working with the U.S. BWR fuel vendors to develop this procedure. When the procedure becomes available, plants that have elected to pursue the Option III solution will use their plant-specific DIVOM curve to calculate their OPRM trip setpoint, or confirm that their existing setpoint is still acceptable. These plants may continue to use their interim plant-specific regional mode DIVOM curve to calculate their setpoint until the final technical procedure is available.

For plants that elect to pursue the DSS-CD stability solution, they can continue to use their current interim stability protection until the DSS-CD solution is implemented. This avoids unnecessary costs. The NRC staff agreed that this is acceptable.

Option III plants that are not yet armed and operable may consider arming the OPRM with an interim setpoint by a certain date and implementing a final setpoint for operability within a specified period of time after final calculations are completed and any associated licensing actions are approved.

If you have any questions, please contact the Detect and Suppress Committee Chairman, Mike May (Exelon) at (610) 765-5828 or Rick Hill (GE), Committee Project Manager at (408) 925-5388.

Regards,



K S. Putnam
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cc: J. E. Conen, BWROG Vice Chairman
BWR Owners' Group Executives
BWROG Detect and Suppress Committee
T. G. Hurst, GE
R. A. Hill, GE