

BWROG-04024  
September 10, 2004

Bo Pham  
BWROG project Manager  
Office of Nuclear Reactor Regulation  
Washington, DC 20555-0001

**Subject: BWROG COMMENTS ON DRAFT SAFETY EVALUATION FOR NEDC-33046,  
“TECHNICAL JUSTIFICATION TO SUPPORT RISK-INFORMED PRIMARY  
CONTAINMENT ISOLATION VALVE AOT EXTENSIONS FOR BWR PLANTS”**

The BWROG appreciates this opportunity to review and comment on the draft Safety Evaluation (SE) for the subject NEDC. We also appreciate the discussion we had with the Staff via conference call on August 27, 2004. The major BWROG comments on the draft SE are included below; they are focused on Section 3.4. Attached is a table of additional comments that should be constructive in developing the final SE. These comments are numbered corresponding to the requirements of Section 3.4 of the draft SE:

1. Licensees will assess 1) their plant valve configurations for compliance with those of the topical report, and 2) their plant specific risk values against Tables 6.3-1 and 6.3-2 of the topical report. The BWROG suggests revising this requirement to read, “Because not all penetrations have the same impact on CDF, LERF, ICCDP, or ICLERP, a licensee’s application verifies the applicability of NEDC 33046, including verification that the PCIV configurations for the specific plant match the LTR and the risk parameter values used in the LTR are bounding for the specific plant. Any additional PCIV configurations or non-bounding risk parameter values not evaluated by the LTR should be included in the licensee’s plant specific analysis. (Note that PCIV configurations or non bounding risk parameter values outside the scope of the LTR will require staff review of the specific penetrations and related justifications for the proposed completion times).”
2. The BWROG agrees to provide either generic or plant specific evaluation of external event risk.
3. The BWROG pointed out to the Staff during the conference call that no components could be taken out of service for maintenance without a specific risk evaluation as required by current regulation [10CFR05.65 (a)(4)]. If the Staff desires a declarative statement regarding compliance to the maintenance rule and Regulatory Guide 1.182, licensees can accommodate such a statement. The BWROG understood as a result of the conference call that commitment to Regulatory Guide 1.182 was all that the Staff had in mind as a CRMP, and therefore, the concept of CRMP can be eliminated. It was also pointed out that PCIV AOT LERF assessments were not required of the CEOG, therefore it is suggested that the last sentence of this requirement be eliminated.
4. As discussed during the conference call, present Technical Specifications (3.6.1.1) already partially addresses this Staff request. The requirement is restated to be consistent with the CEOG requirement addressing Staff common cause concerns. The BWROG suggests revising the

wording of this requirement to read, "The licensee's application verifies the OPERABILITY of the remaining PCIV(s) in the applicable penetration flow path before entering the Completion Time for the inoperable PCIV:"

5. The SE states that the BWROG committed to assess the risk associated with PCIV maintenance and to develop unavailability targets for PCIVs within the scope of the maintenance rule. In fact compliance with the maintenance rule already requires this and the draft SE requirement for multiple valve assessments is already discussed in requirements #3 and #4. It appears to the BWROG that this requirement is redundant to existing requirements and the discussion of requirement #3 and #4. This was not required of the CEOG; therefore, this requirement should be eliminated.
6. As discussed during the conference call, uncertainty analysis is part of the topical report. An evaluation of uncertainties is part of the normal assessment done for risk by licensees. Based on the conversation during the conference call, the BWROG assumes that no new plant specific work is needed to accommodate this requirement. Also, this was not required of the CEOG. It is suggested that the requirement be eliminated.
7. During the conference call it was agreed that the draft SE could state that the licensee agreed to meet the requirements of Regulatory Guides 1.174 and 1.177. The BWROG suggests revising this requirement to read, "The licensee's shall verify the specific plant PRA quality is acceptable for this application." This would eliminate any confusion due to a reference to the internal SE Section 3.3.1.1.
8. During the conference call, it was agreed that valves with specific ECCS functions other than containment isolation have Technical specifications associated with the ECCS functions; therefore, this requirement can be eliminated.
9. During the conference call, it was pointed out that open piping systems outside of containment are addressed as configurations required by requirement #1 to be evaluated. There did not appear to be justification to call out these configurations for special mention. It is recommended that this requirement be eliminated.

Respectfully yours,



Kenneth S. Putnam  
BWR Owners' Group Chairman

Attachment: Additional Comments on Staff Draft SE

cc: J. E. Conen, BWROG Vice Chairman  
BWROG Primary Representatives  
BWROG RITS Committee  
B. Bradley, NEI

**ADDITIONAL COMMENTS ON THE NRC DRAFT SE FOR NEDC-33046,  
 “TECHNICAL JUSTIFICATION TO SUPPORT RISK-INFORMED PRIMARY  
 CONTAINMENT ISOLATION VALVE AOT EXTENSIONS FOR BWR PLANTS”**

Page #	Line #	Comment
1	28	“secondary containment PCIVs” is not correct. Change to “secondary containment isolation valves and dampers”.
2	11-23	The restrictions on Purge/Vent valves (Condition E) and limiting Condition D to only EFCVs are not listed in Sections 3.4 or 3.6. Will the LTR be revised as part of the “-A” version to reflect the RAIs? Otherwise, where is it documented that the LTR does not allow the extension on these valves.
2	26-31	The discussion of the differences between AOT and CT does not make sense, is not recognized by the TS community, and adds no value to the discussion and should be deleted. Retain only the first and last sentence in this paragraph.
3	15-16	The imbedded requirement for licensees to submit plant-specific information is not needed in this specific context and should be deleted.
8	31-33	Last bullet implies an implementation requirement that is not specifically listed anywhere else in the SE, such as Section 3.4. IF it was intended under Item 4 (“Regarding maintenance activities where the pressure boundary would be broken, a licensee confirms that the assumptions and results of the LTR remain valid.”), then Item 4 is too vague and needs to be made specific to this issue.