

Duke Energy Company
Entergy Operations, Inc.
Florida Power Corporation

Oconee 1, 2, 3
ANO-1
Crystal River 3



AmerGen Energy Company, LLC
FirstEnergy Nuclear Operating Company
Framatome ANP

TMI-1
D-B

Working Together to Economically Provide Reliable and Safe Electrical Power

January 14, 2005
OG :05:1860
NRC:05:003

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Request for Approval of BAW-2461, Revision 0, "Risk-Informed Justification for Containment Isolation Valve Allowed Outage Time Change"

On behalf of the B&WOG, Framatome ANP requests the NRC's review and approval for referencing in licensing actions the topical report BAW-2461, Revision 0, "Risk-Informed Justification for Containment Isolation Valve Allowed Outage Time Change." This report is an important part of an industry effort to make the requirements of plant Technical Specifications consistent with risk-informed insights. A copy of the report is provided on the enclosed CD, which is non-proprietary.

This report provides the justification for a longer allowed outage time for containment isolation valves (CIVs) and is applicable to penetration flow paths that have at least two CIVs, or one CIV and a closed loop system. The proposed Technical Specifications change will improve operational safety and reduce unnecessary burdens in complying with Technical Specifications requirements.

Once this report is accepted for formal review and acceptance, a Technical Specifications traveler in support of all owner group submittals will be submitted for parallel review.

Because this report is part of an industry initiative to apply risk-informed insights, the B&WOG respectfully requests that the usual NRC review fees be waived. The B&WOG anticipates that the provisions of this report will be accepted by its members when approved by the NRC.

The B&WOG requests that the NRC complete its approval of this topical report by September 30, 2005. This acceptance will permit the appropriate Technical Specifications to be modified by those licensees planning refueling outages in the Spring of 2006.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jerald S. Holm". The signature is written in a cursive, flowing style.

Jerald S. Holm, Director
Regulatory Affairs

Enclosure

cc: D. G. Holland
Project 693