

BWR OWNERS' GROUP

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BWROG-06017
July 26, 2006

Project Number 691

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington DC 20555

Attention: Thomas Martin, Director, Division of Safety Systems
Michael Case, Director, Division of Inspection and Regional Support

Subject: BWR Owners' Group Request for Review of TSTF -478 "BWR Technical Specification Changes that Implement the Revised Rule for Combustible Gas Control"

References: 1) 68 FR 54123, Final Rule – Combustible Gas Control in Containment, September 16, 2003.

2) 68 FR 55416, Notice of Availability of Model Application Concerning Technical Specification Improvement to Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, September 25, 2003.

3) Technical Specification Task Force Letter dated April 25, 2005.

The Boiling Water Reactor (BWR) Owners Group (BWROG) formed the Combustible Gas Control Amended Rule Implementation (CGCARI) Committee in 2004 to assist BWR Owners in the implementation of the Combustible Gas Control Amended Rule (10 CFR 50.44) (Ref. 1). One of the issues included in the scope of the CGCARI Committee was the need to resolve issues with the amended Rule that had the impact of preventing BWR Owners from fully implementing the provisions of the amended Rule.

Noticed as part of the amended rule package was a Consolidated Line-Item Improvement Process (CLIIP) package for a Technical Specification Task Force (TSTF) Traveler TSTF-447 Rev 1, which addressed certain Technical Specification (TS) changes associated with the subject rulemaking, including elimination of hydrogen recombiners (Ref. 2). However, a number of BWR Owners with Mark I containment designs use a dedicated containment atmosphere dilution (CAD) system, which performs the same function as hydrogen recombiners. CAD system elimination was not included in the CLIIP for TSTF-447.

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In addition to the need to address elimination of CAD, other TS changes were not included in TSTF-447, including addressing TS action statements for the hydrogen igniter system. This has the effect of preventing those BWR Owners who have hydrogen igniters from proceeding with the elimination of hydrogen recombiners contrary to the findings of the amended Rule.

The need to address additional BWR TS changes, including eliminating the CAD system, were identified as part of the BWROG review of the CLIIP. However, it was resolved with the NRC Staff at that time that a follow-up TSTF Traveler would be submitted to capture these additional BWR changes to avoid potential delays in the issuance of the 10CFR50.44 Rule package, including the CLIIP for TSTF-447.

The identified Technical Specification changes needed to fully implement the provisions of the amended Rule for BWR Owners were included in TSTF-478 (Reference 3). Although TSTF-478 was submitted for NRC review in April 2005, there have been repeated delays in the scheduled review of TSTF-478, due to a lack of NRC Staff resources to complete the review. It is currently our understanding there is no established date for NRC issuance of the final Safety Evaluation and CLIIP notice for TSTF-478.

BWR Owners are under hardship to maintain these systems and are expending resources on equipment which the original rule package concluded are not risk significant and can be eliminated. For example, one Owner was recently in the process of preparing for an Emergency TS change, including preliminary NRC notifications, due to CAD system equipment problems. While that plant subsequently repaired the system within the TS allowable time without the need of the Emergency TS, the "near miss" has lead that plant to request permanent TS changes in advance of the CLIIP on TSTF-478, owing to the continuing delays in the review schedule for this TSTF.

The BWROG supports plant-specific submittals to address needed TS changes which are included in TSTF-478 and requests NRC expedited review of such submittals and of TSTF-478. Such expedited reviews are needed to resolve previously-identified issues with the original rulemaking and associated CLIIP, to preclude continued expenditure of resources on non-risk significant equipment, and to avoid the potential need for Emergency TS actions in the interim.

We offer to meet with members of your Staff to discuss this matter further at your convenience.

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Please call the undersigned should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Bunt". The signature is written in a cursive, flowing style.

Randy Bunt
BWROG Chair

Cc:

James Dyer, Director, Office of Nuclear Reactor Regulation
Bruce Boger, Associate Director for Operating Reactor Oversight and Licensing
Timothy Kobetz, Chief Technical Specifications Branch
Michelle Honcharik, BWROG Project Manager
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