

BWR OWNERS' GROUP

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Proprietary Notice

This letter transmits proprietary information in accordance with 10CFR2.390. Upon removal of Enclosure 1, the balance of the letter may be considered non-proprietary.

Project Number 691

BWROG-08009
February 15, 2008

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

SUBJECT: Submittal of GEH BWROG Topical Reports NEDC-33347P Revision 0 (Proprietary Version) and NEDO-33347 Revision 0 (Non-Proprietary Version), "Containment Overpressure Credit for Net Positive Suction Head (NPSH)"

ENCLOSURE: Licensing Topical Reports NEDC-33347P and NEDO-33347

Attention: Chief, Information Management Branch
Division of Program Management:

Enclosed please find the GEH BWROG Topical Reports NEDC-33347P Revision 0 (Proprietary Version) (Enclosure 1) and NEDO-33347 Revision 0 (Non-Proprietary Version) (Enclosure 2), "Containment Overpressure Credit for Net Positive Suction Head (NPSH)." We request your timely acceptance and review of these Topical Reports.

The BWROG is providing this LTR to provide a standard process and consistent approach for licensees to request Containment Overpressure Credit. Historically, both during original licensing and by subsequent license amendments, the NRC has granted several BWR plant requests to take credit for containment overpressure to ensure adequate NPSH for ECCS pumps. Over the past decade, several requests have been approved in conjunction with power uprates and suction strainer issues (e.g., NRC Bulletin 96-03 and Generic Letter 97-04). The regulations governing BWR design and operation do not prohibit taking credit for containment overpressure; however, there is no regulatory guidance for use by utilities in requesting credit for containment overpressure.

This topical report contains a methodology to be utilized by utilities needing to request containment overpressure credit (COP) to provide adequate NPSH for its ECCS pumps. It addresses the following elements:

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- The risk and safety impacts of taking credit for containment overpressure
- ECCS pumps' ability to withstand sustained periods of cavitation without identifiable internal damage
- Those issues generic to the BWR fleet that do not require additional review by the NRC staff for future applicants

Elements of a license amendment request are also provided to provide licensee applicants with guidance on information to be included in their submittals. It is intended that these applications will be submitted only as needed. Analyses discussed in the topical report demonstrate that granting credit for anticipated containment overpressure involves no undue risk to the health and safety of the public. The same conclusion can be drawn for special events other than a Design Basis Accident, such as Loss of Coolant Accident (DBA - LOCA), an Anticipated Transient Without Scram (ATWS), an Appendix R fire, or a Station Blackout.

Enclosure 1 contains the affidavit and the proprietary version of the LTR. Enclosure 2 is a non-proprietary version. Enclosure 1 contains proprietary information of the type that GEH maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GEH as indicated in its affidavit, also included in the report. The affidavit contained in Enclosure 1 identifies that the information in Enclosure 1 has been handled and classified as proprietary to GEH. GEH hereby requests that the information in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

Please also note that in a letter dated December 4, 2007, the NRC Chief Financial Officer granted a waiver of NRC review fees for this topical report under 10 CFR 170.11(a)(1)(iii).

Should you have additional questions please contact Fred Emerson (BWROG Project Manager) at 910-675-5615 or Alan Wojchowski (BWROG Containment Overpressure Credit Committee Chairman) at 763-295-1335.

Sincerely,



R. C. Bunt
BWR Owners' Group Chair

cc: Michelle Honcharik
Douglas Coleman, BWROG Vice Chair
BWROG Primary Representatives
BWROG COP Committee