

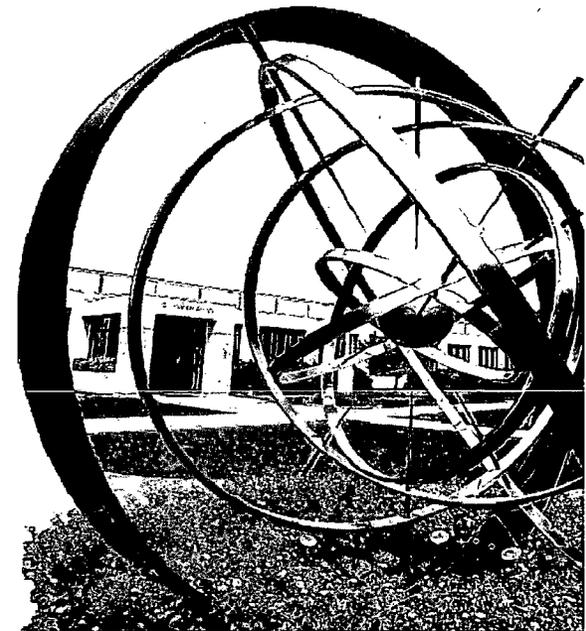


BWR Owners' Group

Rich Anderson (FPL Energy)

BWROG Executive Chair

BWROG / NRC Management
Public Meeting
June 4, 2008

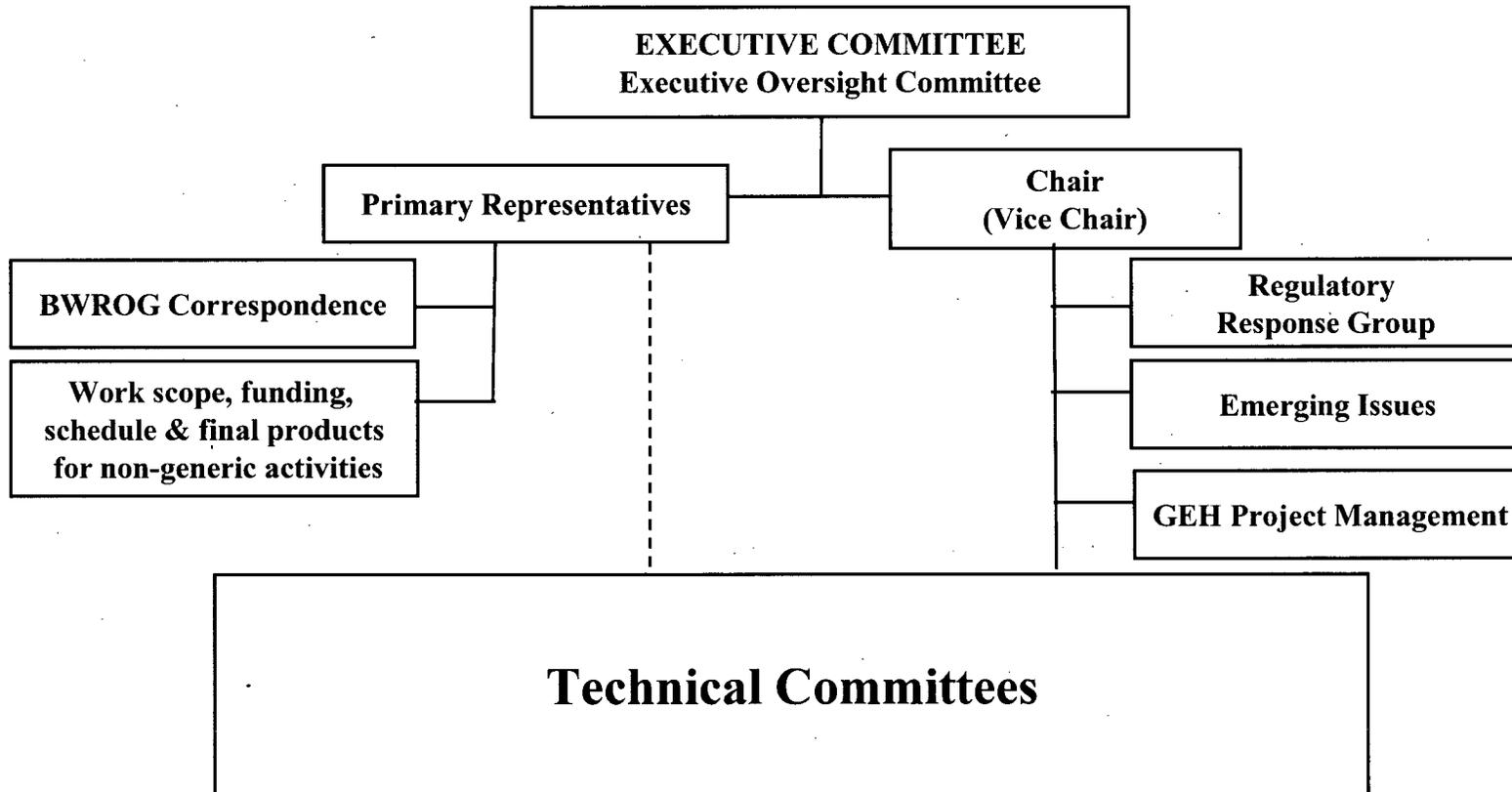


BWROG Mission

Provide a forum, in the spirit of partnership with General Electric - Hitachi, that allows its member utilities to:

- maintain and improve plant safety,
- achieve higher plant reliability,
- minimize and share costs,
- facilitate regulatory interaction,
- and effectively apply limited technical resources for mutual resolution of issues applicable to two or more members.

BWROG Organization



BWROG Leadership

Executive Oversight Committee

- Rich Anderson, FPL Energy (Chair BWROG Exec Committee)
- Rick Libra, Exelon (Vice Chair BWROG Exec Committee)
- Dennis Madison, Southern Company
- Paul Davison, PSEG Nuclear
- Joe Donahue, Progress Energy
- Oscar Limpias, Entergy

BWROG General Committee

- Chair: Randy Bunt, Southern Company
- Vice Chair: Doug Coleman, Energy NW (Chair Elect, July 2008)
- Vice Chair Elect: Ted Schiffley, Exelon (July 2008)

BWROG

Interactions

NEI and PWROG

- Fire Protection, Reg Guide 1.200, Gas Accumulation, ECCS Suction Strainers

EPRI

- Recirculation pump seals, SRVs, Equipment Obsolescence Issues, Terry turbines

International organizations

- Japan Owners' Group, European Owners' Groups, Workshops

INPO

- Review visits, Scram Frequency Reduction, Emergency Procedures, Fleet Performance

BWROG

Topical Reports

Recently Approved Topical Reports

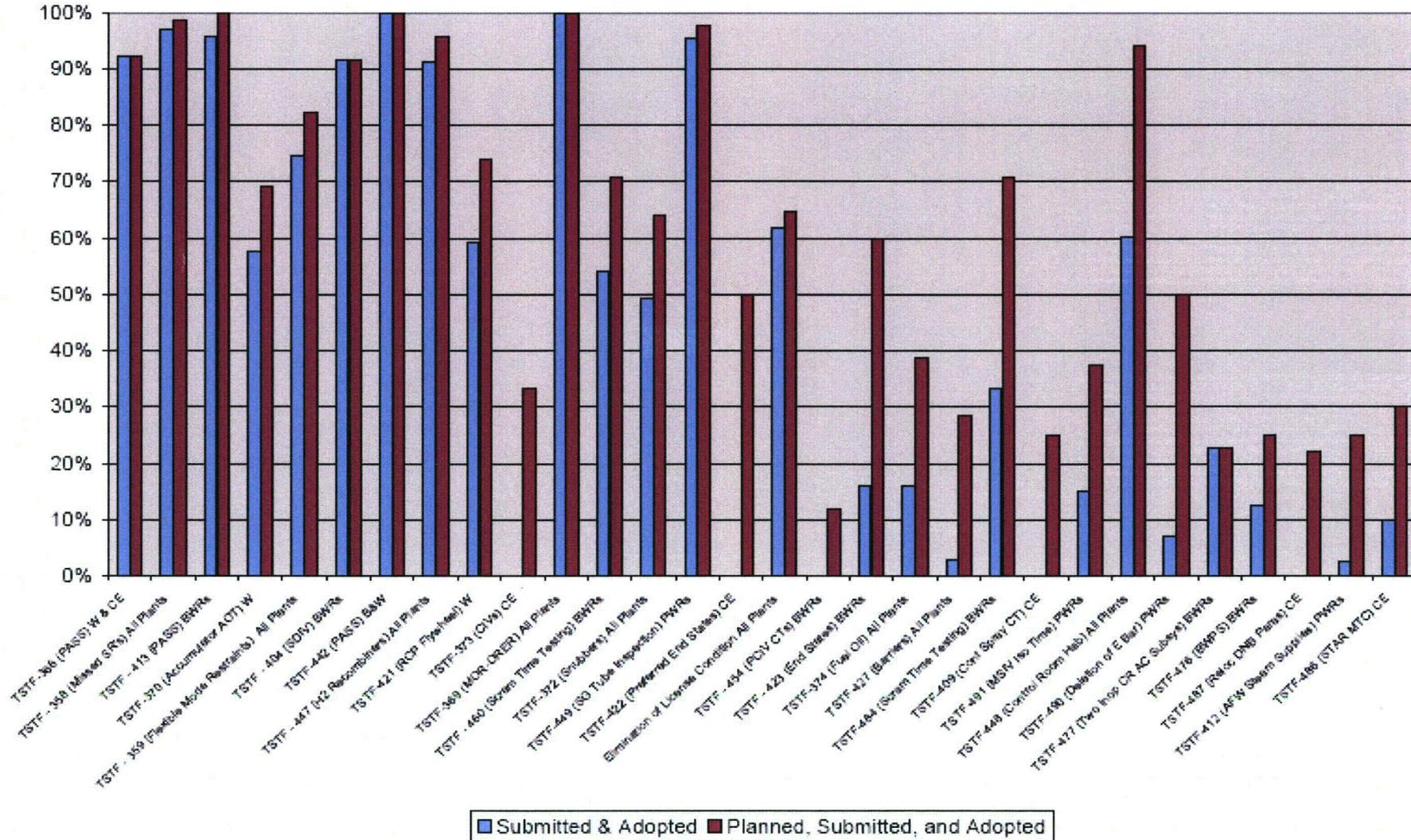
- SRV Position Indication System
- PT Curve Methodology (SIA)
- Risk Informed Tech Spec Surveillance Intervals (5b)

Consolidated Line Item Improvement Process (CLIIP)

CLIIP Adoption

- CLIIP amendments average 1/10th the cost of a normal amendment and are approved in an average of 6 months
- Since 2000, the NRC has approved 186 LARs based on CLIIP for BWROG plants, for a collective NRC review fee saving of ~ \$7M

CLIP Utilization



BWROG / BWRVIP

Rick Libra (Exelon)
BWROG Exec Vice Chair /
BWRVIP Exec Chair

BWROG and BWRVIP

Division of Responsibility

In general, the BWRVIP deals with materials issues in and around the primary system, and associated factors like fluence and water chemistry

In general, BWROG deals with operational issues and overall performance of the plants

Overriding principal is that issues will be assigned to the group with the best skills to complete the work in the most efficient manner

Schedule Review

BWROG Submittals

Randy Bunt (SNC)

BWROG Chair

Current BWROG Submittals

On Schedule

Containment
Overpressure (COP)

- NRC accepted – RAIs expected October 2008

TSTF-506 (Recombiner)

- Awaiting acceptance

ODYSY (Stability)

- Draft SE expected 6/30/08

Delayed Schedule

RITS 4a/6b

- BWROG resubmit July 2008

Reg Guide 1.97

- RAIs expected 6/16/08

Alternate Source Term

- NRC did not approve

Current BWROG Submittals

Technical Issue

TSTF-493 LSSS
methodology

- Approval expected by
September 2008

PTC – GE

- Teleconference to
discuss technical issues
June 2008

Significant Issue

Option 3 / Separation
LOOP-LOCA

- BWROG withdrawal
June 2008

LTR Submittal Process Improvements

Doug Coleman (Energy NW)

BWROG Vice Chair

LTR Submittal Process Improvements Issue Summary & Importance

- A number of BWROG topical report submittals have failed to be approved in a timely manner. This has resulted in additional work and associated costs to revise and resubmit the topical reports
- Topical reports are an important part of Owners' Group strategy to work collaboratively among the utilities. Delays or rejections of reports result in increased work and costs
- Actions taken by the BWROG Leadership team

LTR Submittal Process Improvements

BWROG Process Changes

- Select Primary Representatives designated as part of a Review Committee
 - Provide a Challenge Board for the Committee Chair and Project Manager prior to submittal of Topical Report and RAIs
- BWROG Chair or Vice Chair
 - Decision-maker regarding any conflicts or issues concerning NRC feedback.
 - Will be present at any meetings with the NRC
- BWROG Executives
 - More frequent drop-in meetings
- BWROG Committee
 - Must submit a CAR for any LTR rejections
 - Pre-submittal meetings must be documented in writing and agreement of NRC obtained regarding characterization of the issues
 - Must elevate issues to the BWROG Chair when differing opinions between the NRC and the Committee Chair/Project Manager arise

LTR Submittal Process Improvements

Industry Collaboration

The BWROG, PWROG, and NEI LATF are working together to address the generic process with the NRC

- NRC and Industry have formed a working group and meet every 4-6 weeks.
- Focus is in three major areas:
 - Understanding and support for the Topical Report Process
 - Work Management
 - Standardization

TSTF-493 Instrument Setpoint Methodology

Paul Davison (PSEG)

BWROG EOC

TSTF-493 “Clarify Application of Setpoint Methodology for LSSS Functions”

This issue has been open since 2002 and significant resources have been expended by industry and NRC to come to resolution.

NRC staff has consistently stated that this is not a significant safety issue.

TSTF-493 Rev 0 was submitted in January 2006 after extensive meetings and agreement with the staff on content.

Resolution to issue has been a moving target, 3 revisions to TSTF-493 have been submitted due to NRC staff changes in position or new issues.

Revision 3 was submitted on January 18, 2008.

TSTF-493 “Clarify Application of Setpoint Methodology for LSSS Functions”

On March 17, 2008 NRC staff issued letter stating that the Federal Register Notice of Availability will be issued by September 12, 2008.

Minutes of a May 1, 2008 internal meeting between the staff technical branches and OGC indicate another change in staff position that could prevent approval as scheduled and cause significant changes in TSTF-493.

Both BWROG and PWROG have exhausted all budgeted funding for this issue.

BWROG requests NRC management involvement to bring issue to resolution.

Option 3

Separation of LOOP & LOCA

Rick Libra (Exelon)

BWROG Exec Vice Chair

Option 3

Separation of LOOP/LOCA

At request of NRC, project was initiated in 2002

The BWROG has expended ~ three million dollars in this effort over the last six years

The NRC and the BWROG have been engaged in an ongoing series of interactions for the last 6 months intended to resolve regulatory issues

Despite the originally-perceived benefits to plants implementing the original version of the LTR, we have no confidence that adoption of this LTR improves plant risk profiles nor remains cost-effective

BWROG is withdrawing this submittal. This failure casts a shadow on risk informed changes in regulatory requirements

BWR ECCS Strainers

Dennis Madison (SNC)

BWROG EOC

BWR ECCS Strainers Background

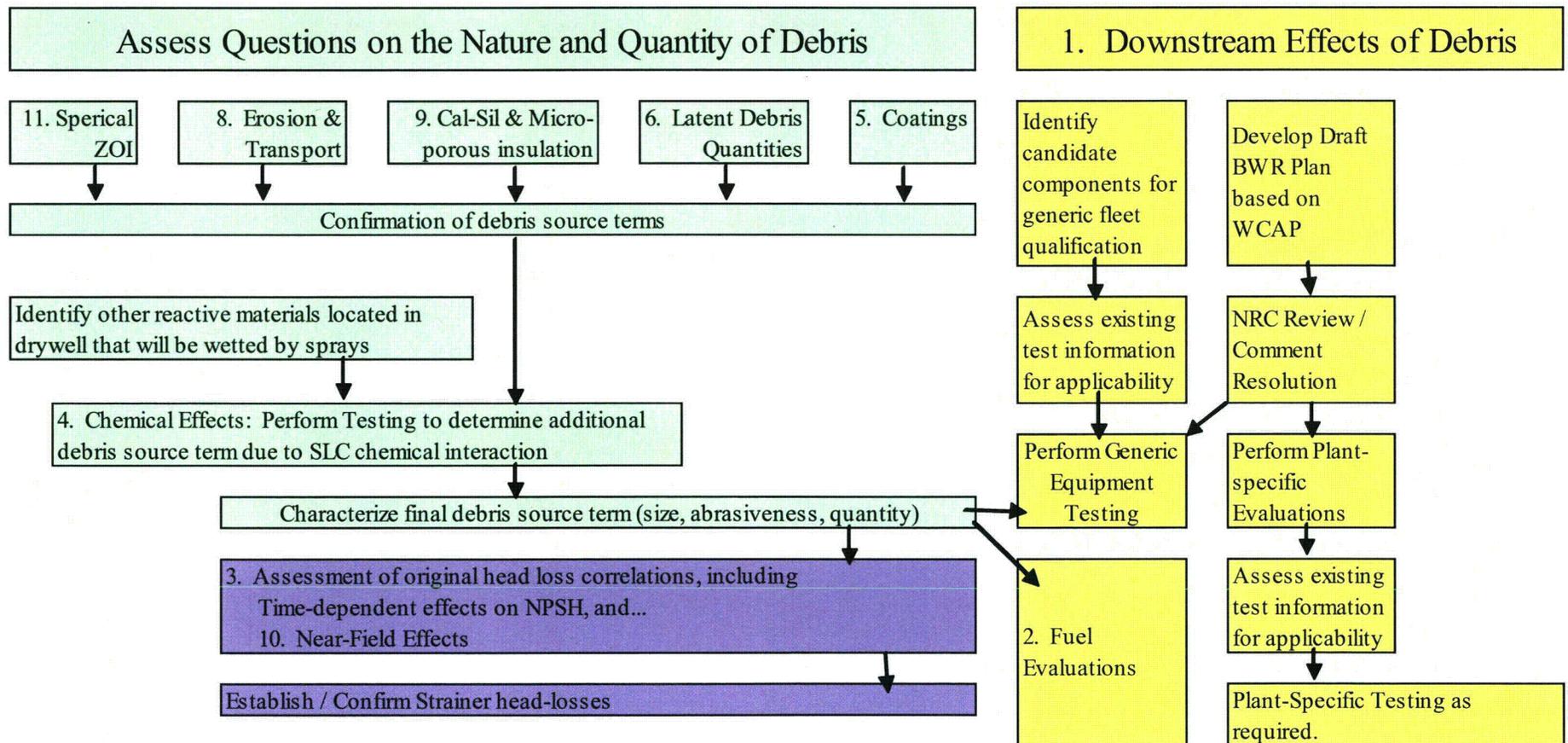
NRC

- Identified eleven Δ 's between BWR 1996 URG and Current PWR Response to GSI-191
- Sent letter April 10, 2008 to BWROG Exec Chair

BWROG

- Provided qualitative discussion on five of the eleven Issues with NRC
- Developed project plan to address issues over 3 year period and will be seeking Executive funding

Relationship of Strainer Issues & Resolution Logic



BWR ECCS Strainers

Potential activities

Surveys of industry practices (e.g. Latent Debris Quantities, Cal Sil / Micro-porous Insulation inventories, FME Practices vs. Latent Debris)

Coatings evaluations

Downstream Effects: Adapt WCAP 16406 for BWRs

Finalize Debris Source Terms

Chemical Effects Testing if required

Downstream Effects on components

Apply debris source terms (w/ chemical precipitates) to
Downstream Effects

BWROG ECCS Gas Intrusion

Joe Donahue (Progress Energy)

BWROG EOC

ECCS Gas Intrusion Background

BWROG committee formed to address:

- 2008-01, “Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems”
- SER 2-05 Revision 1 “Gas Intrusion in Safety Systems.”

ECCS Gas Intrusion Current Status

NEI is coordinating the industry response to the GL

Gas Accumulation Team is made up of leadership from the respective industry support groups including BWROG

Plants have submitted 3-month responses per the industry template

BWROG GL Evaluation Template was used as the basis for developing the short-term actions

Detailed piping system walk downs

- Major activity falling outside the 9-month response period
- Requires access during outage periods and work planning

ECCS Gas Intrusion Current Status

BWROG and PWROG coordinating work:

- Developed detailed short and long term actions
- Drafted a template to address work beyond the 9-month evaluation period
- Developing void acceptance criteria
- Performing survey for pump types and suction size, as well as generic letter system scope
- Evaluating need for additional pump testing
- Next workshop being planned for the week of July 28, 2008