

September 9, 2008

MEMORANDUM TO: Stacey L. Rosenberg, Chief
Special Projects Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager **/RA/**
Special Projects Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 21, 2008, OPEN MEETING WITH THE
BOILING WATER REACTOR OWNERS' GROUP (BWROG)
(TAC NO. MD6697)

On August 21, 2008, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the BWROG at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville Maryland. The purpose of the meeting was to discuss the ongoing NRC staff review of Licensing Topical Report (LTR) NEDO-33349, Revision 1, "BWR Application to Regulatory Guide [(RG)] 1.97 Revision 4" (See Agencywide Documents Access and Management System (ADAMS) Accession No. ML072470741), including the NRC staff requests for additional information (RAIs) (ADAMS Accession Nos. ML081650030 and ML081650030). RG 1.97, Revision 4, "Criteria For Accident Monitoring Instrumentation For Nuclear Power Plants," is available in ADAMS at Accession No. ML061580448.

The BWROG representatives presented an overview of the LTR, including background on the BWROG's RG 1.97 committee, their understanding of the regulatory guidance, the objectives of the LTR, key findings and conclusions, and a review of the BWROG's plan for RAI responses. The BWROG's handouts are available in ADAMS at Accession No. ML082470378.

The NRC staff's main concern is that, if approved, the LTR as written could lead a licensee to believe that the NRC staff had approved a downgrade in the containment high-range radiation monitors system (CHARMS) and certain high range effluent radiation monitors to RG 1.97, Revision 4, Type E variables (i.e., commercial grade). However, regardless of the LTR approval, licensees will need to take into consideration NUREG-0737, "Clarification of TMI Action Plan Requirements," Item II.F.1, Enclosures 1 and 3 (ADAMS Accession No. ML051400209), which imposes additional criteria for instrumentation to monitor containment area high-range radiation. This criteria, includes, but is not limited to, two physically separated monitors, instrumentation that is developed and qualified to function in an accident environment, meets Category 1, and is included in Technical Specifications (TSs).

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301-415-1774

For the high range noble gas monitors, the criteria include, but are not limited to, instrumentation that is developed and qualified to function in an accident environment, meets Category 2, and is included in TSs. The Category 1 and 2 criteria are defined in RG 1.97, Revision 3, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions during and Following an Accident" (ADAMS Accession No. ML003740282). Therefore, the CHARMS and high range effluent radiation monitors must be maintained in accordance with NUREG-0737 and meet the requirements to follow and maintain in effect emergency plans in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54q.

The BWROG agreed to revise the wording in the LTR to make it very clear to all licensee's that although RG 1.97, Revision 4, might allow a downgrade of the CHARMS instrumentation, the criteria in NUREG-0737, Item II.F.1, Enclosure 3 would still need to be met and they would have to perform a rigorous 10 CFR 50.54q evaluation.

The NRC staff also had several RAI questions related to Table A-1, "Accident Monitoring Comparison." This table provides a comparison of the accident monitoring variables developed using the BWROG evaluation methodology to those in RG 1.97, Revision 3, and a typical BWR/4 plant. The BWROG agreed to add a note to this table to clarify that the typical BWR/4 plant listed in the table is for informational purposes only, and not for NRC approval.

It was agreed at the end of the meeting that a mark up of all changes made to the LTR will be provided with the RAI responses. The BWROG also committed to respond to the RAIs by the end of October 2008. Please direct any inquiries to me at 301-415-1774, or michelle.honcharik@nrc.gov.

Project No. 691

Enclosure: List of Attendees

cc w/encl: See next page

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ADAMS Accession Nos.: ML082420011 (Package); ML082390947 (Meeting Summary); ML082100301 (Meeting Notice); ML082470378 (Meeting Handouts) NRR-106

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8/6/08