

BWR OWNERS' GROUP

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RULES AND DIRECTIVES
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SUBJECT: Draft Regulatory Guide, DG-1199 - BWR Owners' Group Request for Supporting Documentation and Comment Period Extension (Docket ID NRC-2009-0453)

REFERENCE: Draft Regulatory Guide, DG-1199, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors". The NRC requesting public comments by January 13, 2010. *Reference 74 Fed. Reg. 52,822, 55,273.*

The BWR Owners' Group has performed a preliminary review of U.S. Nuclear Regulatory Commission (NRC) published Draft Regulatory Guide, DG-1199, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors" released on October 14, 2009. The NRC is requesting public comments by January 13, 2010. *Reference 74 Fed. Reg. 52,822, 55,273.*

We note from our review that substantive changes are being proposed to the modeling of MSIV leakage. Leakage through the steam line pathway currently represents a significant fraction of the postulated LOCA doses in the existing DBA analysis for BWRs, including plants that credit the alternate leakage pathway via the condenser. The proposed changes in DG-1199 would have the effect of increasing the source term concentration entering the steam line by up to 20 times that of the current Regulatory Guide 1.183 methodology and assumptions. In turn, this will significantly impact the LOCA dose analysis.

These increased postulated doses resulting from the proposed changes to the regulatory guide may cause BWR utilities to incur significant additional costs to maintain compliance with 10CFR50.67 in conjunction with future licensing actions. Because of the significant impacts, a thorough review of the basis behind the proposed revision of the Regulatory Guide is warranted.

To gain an understanding of the implications and potential consequences of the revision to the Regulatory Guide and provide substantive comments, the BWROG would need to perform a detailed review of the Staff research supporting the proposed changes to the modeling of MSIV leakage. To facilitate this possible review, the BWROG makes the following two requests:

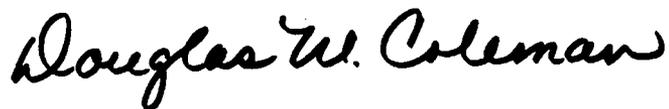
Source Review Complete
Template = ADM-013

E-RIDS = ADM-03
ADD = R. Carpenter (REC1)
M. Blumberg (WMB1)

1. The BWROG requests that the MELCOR input decks supporting the BWR MSIV leakage analyses in SAND2008-6601 be released to the BWROG. These inputs would expedite the technical review since the BWROG would not need to completely re-create the Staff's analysis.
2. Since this review may result in the generation of important technical comments to the MSIV leakage portion of DG-1199, the BWROG requests an extension of the comment deadline. Any BWROG comments are expected to be available within 90 days of the release of the MELCOR input decks. If the NRC chooses not to release the input decks, any BWROG comments are expected to be available within 180 days after the current comment deadline of January 13, 2010. This additional time is necessary in order to re-create and benchmark the underlying analysis.

The BWR Owners' Group requests that NRC delay final issuance of the Regulatory Guide until after completion of our analysis and NRC receipt of comments.

Respectfully,



Douglas W. Coleman, Chairman
BWR Owners' Group

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