NUCLEAR ENERGY INSTITUTE

John C. Butler
SENIOR DIRECTOR
ENGINEERING & OPERATIONS SUPPORT
NUCLEAR GENERATION DIVISION

June 14, 2011

Mr. William H. Ruland
Director, Division of Safety Systems
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Transmittal: BWROG 50.46(b) Margin Assessment Report

Project Number: 689

Dear Mr. Ruland:

In August 2009 the NRC published an advance notice of proposed rulemaking to modify acceptance criteria for Emergency Core Cooling Systems in 10 CFR 50.46.[1] As part of this rulemaking package, a change in the oxidation acceptance criterion was proposed. During a public meeting[2] on August 12, 2010, the Pressurized Water Reactor Owners Group (PWROG) and Boiling Water Reactor Owners Group (BWROG) proposed performing surveys of plant information and comparing against the proposed acceptance criterion. The purpose of this effort is to provide assurance that the current operating plants have margin to the proposed limits.

Attached is a copy of the BWROG Margin Assessment Report. The PWROG assessment report was provided to you on May 4, 2011. This completes the PWROG and the BWROG actions discussed during the August 12, 2010, public meeting.

If you have any questions, please feel free to contact me at 202-739-8108; jcb@nei.org or Gordon Clefton at 202-739-8086; gac@nei.org.

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[1] August 13, 2009, FRN 74FR40765, an advanced notice of a proposed rulemaking (ANPR) on "Performance-Based Emergency Core Cooling System Acceptance Criteria"; Document ID: NRC-2008-0332-0023.
[2] Summary of the Public Meeting to Discuss Plant Specific Emergency Core Cooling System Performance Assessments and Status of Title 10 of the Code of Federal Regulations Section 50.46(B) Rulemaking; ML102360406

Sincerely,

John C. Butler

Attachment

c: Mr. Paul M. Clifford, NRR/DSS, NRC

Mr. Melvin L. Arey, Jr., PWROG, Duke
Mr. Ted Schiffley, BWROG, Exelon
Mr. Ken Yueh, EPRI
Mr. Tom Eichenberg, FRP RegTAC, OPPD