

BWR OWNERS' GROUP

Oscar Limpias
Executive Chairman
Tel: (601) 368-5563
Fax: (601) 368-5394
olimpia@entergy.com

c/o GE Hitachi Nuclear Energy, P.O. Box 780, 3901 Castle Hayne Road, M/C A-70, Wilmington, NC 28402 USA

BWROG-13019
March 4, 2013

Project No. 691

Mr. Dan Dorman
Deputy Director
Engineering and Corporate Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: BWROG ECCS Suction Strainer Program Justification for Revised Resolution Schedule

REFERENCES:

1. BWROG Letter BWROG-09024 dated April 13, 2009, "Potential Issues Related to Emergency Core Cooling Systems (ECCS) Strainer Performance at Boiling Water Reactors"
2. Summary of March 28, 2012, Category II Public Meeting with the Boiling Water Reactor Owners' Group (ADAMS ACCESSION NO.: ML12095A326)
3. BWROG Letter BWROG-12021 dated May 18, 2012, "BWROG ECCS Suction Strainer Issue Resolution Schedule Update"
4. Summary of August 23, 2012, Category II Public Meeting with the Boiling Water Reactor Owners' Group (ADAMS ACCESSION NO.: ML12257A342)

Dear Mr. Dorman:

At a meeting on August 23, 2012 (Reference 4), the BWROG provided the Staff with a revised schedule for resolving methodology differences between BWRs and PWRs following NRC / PWR industry review of Generic Safety Issue 191. The revised schedule resulted in a delay of approximately two (2) years in the completion of the BWROG program, extending the completion date from 2015 to 2017. At this meeting, the NRC Staff requested that the BWROG provide operational safety assurances similar to what was provided in a 2009 letter from the BWROG.

In April 2009, the BWROG sent a letter (Reference 1) to the NRC justifying the BWROG schedule for resolving the lessons learned during the review of GSI-191. That letter provided considerations as to why BWRs could continue to operate safely while the BWROG project plan was being implemented.

BWROG-13019

March 4, 2013

Page 2

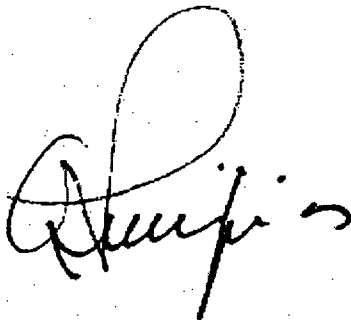
To date, all analyzed data suggest the previous considerations remain accurate and conservative. We are not aware of any reason that a two year delay in completing the BWROG ECCS Suction Strainer Program would render the 2009 letter invalid.

The BWROG continues to implement the tasks as scheduled and outlined in the revised Project Plan. While several issues have proven to be more time consuming than originally planned, the BWROG has regularly communicated with NRC Staff regarding progress and technical issue details.

While the viewpoint described in this letter represents the intent of the members of the BWROG, this letter should not be considered a commitment on the part of any specific licensee.

We look forward to continued progress and resolution of these issues.

Respectfully,

A handwritten signature in black ink, appearing to read "Limpas", with a large, stylized loop at the top.

Oscar Limpas
BWROG Executive Chairman
(601) 368-5563

cc: J. A. Golla, US NRC Project Manager
BWROG Executive Committee
BWROG Primary Representatives
BWROG ECCS SS Committee
K. A. McCall, BWROG Program Manager
E. L. Asbury, BWROG ECCS SS Committee Project Manager