

BWR OWNERS' GROUP

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BWROG-13050
September 11, 2013

Project No. 691

Mr. John Stang
Safety Issues Resolution Branch Chief - Acting
Division of Safety Systems
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Communicated Delay of Approximately Six Months in Reviewing BWROG Submittal Associated with NEDC-33608P S2 RAI Responses

REFERENCE:

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)
5. BWROG Letter BWROG-13019 dated March 4, 2013, "BWROG ECCS Suction Strainer Program Justification for Revised Resolution Schedule"

Dear Mr. Stang:

In an email sent on August 29, 2013 from Joseph Golla – NRC Project Manager and received by Michael Iannantuono – BWROG Project Manager, it was communicated that NRC review of submittal BWROG-13032 dated June 28, 2013, Submittal of Responses to Supplemental RAIs Associated with Boiling Water Reactor Owners' Group (BWROG) Licensing Topical Report NEDC 33608P, "Boiling Water Reactor Emergency Core Cooling Suction Strainer In-Vessel Downstream Effects," would be delayed up to six (6) months based on the assigned reviewer being reassigned to higher priority review assignments.

The BWROG was anticipating receipt of a Safety Evaluation Report (SER) associated with BWROG-13032 / NEDC-33608P by the end of 4Q 2013. While we appreciate the advanced notice of potential delays associated with its review, we respectfully request a reassessment of prioritization associated with submittal reviews, as not to potentially incur a six-month critical path delay in our ECCS Suction Strainer Fuels Testing Program. Regarding BWROG-13032 / NEDC-33608P, a limited review of the Attachment B – Benchtop Test Program Description and referenced RAIs would be an acceptable option

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with interim approval communicated prior to the end of 2013. Interim approval associated with the Benchtop Test Program would assist the BWROG in mitigating the anticipated six-month delay associated with NRC reviewer resources.

Finally, in the spirit of regular communication with the NRC Staff, on August 29, 2013 the BWROG requested a meeting at your offices in Rockville, MD on December 4, 2013 to discuss the following ECCS Suction Strainer project topics:

1. Review project tasks / work in progress
 - a. 12-month deliverables forecast / NRC review resources assessment
 - b. Fuel Test Program status
2. BWROG Presentation: Coatings Damage with Revised BWR ZOI Pilot Plants Study
3. BWROG Presentation: Strainer Bypass Test Results
4. BWROG Presentation: Head Loss Issues Update
5. BWROG Presentation: Debris Source Term – Chemical Effects Issues Update

At your convenience, please provide confirmation for the acceptability of the December 4 meeting request.

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

We look forward to continued cooperation regarding ECCS Suction Strainer project scope.

Respectfully,



Frederick P. "Ted" Schiffley, II
Chairman
BWR Owners' Group

cc: S.N. Bailey, US NRC Safety Issues Resolution Branch Chief
J. A. Golla, US NRC Project Manager
BWROG Executive Committee
BWROG Primary Representatives
BWROG ECCS SS Committee
K. A. McCall, BWROG Program Manager
M. A. Iannantuono, BWROG ECCS SS Committee Project Manager