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BWROG-14030
June 5, 2014

Project No. 691

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

SUBJECT: 2014 BWROG Submittal Intentions Update and Summary of the
April 30, 2014 NRC-BWROG Public Meeting (ML14090A352)

REFERENCE:

1. Summary of October 20, 2010 Public Meeting with the Boiling Water Reactor Owners' Group (BWROG), November 4, 2010 (ML103010393)
2. BWROG Letter BWROG-14004 dated January 23, 2014, "2014 BWROG Submittal Intentions and Summary of the December 4, 2013 NRC-BWROG Public Meeting (ML13309A287)"
3. BWROG Letter BWROG-13050 dated September 11, 2013, "Communicated Delay of Approximately Six Months in Reviewing BWROG Submittal Associated with NEDC-33608P S2 RAI Responses"
4. BWROG Letter 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"

Dear Mr. Cusumano:

This letter provides a revision summary of the 2014 BWROG submittal intentions as communicated and understood by NRC Staff members in attendance during the public meeting (ML14090A352) held on April 30, 2014 at your offices in Rockville, MD. The aforementioned public meeting was scheduled to document mutually agreeable adjustments to original and adjusted project progression in accordance with References 1 and 2. Providing context for NRC Staff review support of 2014 BWROG submittals,

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pending 2013 submittals requiring review (Reference 3) were also discussed at the April 2014 public meeting.

Mutually Agreeable Revision and Status of Remaining 2014 BWROG ECCS Suction Strainers Expected Submittals for NRC Review and/or Approval

- BWROG-ECCS-TP-3-2, "Debris Head Loss Thin Bed Test Plan" (ETA 2Q 2014)
- BWROG-ECCS-TP-4-1-X, "Responses to NRC Commentary on Material Dissolution Test Plan (BWROG-14003) Submittal" (New for 2014 - ETA 2Q 2014)
- BWROG-ECCS-TP-10-X, "Debris Characteristics" (ETA 3Q 2014)
- BWROG-ECCS-TP-2-X, "Fuel Test Plan for Tests 3 & 4" (ETA 3Q 2014)
- BWROG-ECCS-TP-9-X, "Debris Transport and Erosion Position Paper" (ETA 3Q 2014)
- BWROG-ECCS-TP-2-X, "Transit Time Calculations Report" (ETA 3Q 2014)
- BWROG-ECCS-TP-2-X, "Debris Source Term Specification" (ETA 3Q 2014)
- BWROG-ECCS-TP-2-X, "Benchtop Testing Results – BT1 through BT4" (ETA 4Q 2014 – Rescheduled based on Benchtop Testing content not having been reviewed, with commentary provided to BWROG, as of the 4/30/14 public meeting)
- BWROG-ECCS-TP-5-1, "Assessment of Coatings" (Rescheduled for 1Q 2015)
- BWROG-ECCS-TP-8-X, "Coatings Zone of Influence Calculation and Closure Letter" (Rescheduled for 1Q 2015)

NRC Request for Review of BWROG-TP-11-006: ECCS Containment Walkdown Procedure (Rev.1) (January 2011)

- During the April 30, 2014 public meeting, NRC Staff requested review of BWROG-TP-11-006, to better understand utility administrative controls and mitigating strategies related to Debris Source Term
- The BWROG agreed to submitting BWROG-TP-11-006 to NRC Staff at the April 30, 2014 public meeting, with expected delivery to occur in / before July 2014

NRC – BWROG Agreement to Extend Overall ECCS Suction Strainers Project

- Based on the following circumstances, the BWROG proposed and the NRC agreed to extending the ultimate project completion date from approximately 4Q 2018 to approximately 4Q 2020

- August 2013 NRC Staff resource realignment to support Mitigation Strategies Directorate (MSD) scope which contributed to the creation of a submittal review backlog associated with the ECCS Suction Strainers project
- May 2014 BWROG resource realignment to support Fukushima Response Committee (FRC) scope, and new efforts related to Finite Break Opening Time (FBOT) assessment, associated with Design Basis LOCA (DBA) analysis

NRC Staff Review Support Expectations in Response to BWROG-13050 (Reference 3)

- The NRC communicated understanding with regard to the importance of reviewing and providing comments / feedback on Benchtop Testing (BT) content associated with LTR RAI responses submitted on June 28, 2013 (Reference 4)
- The NRC communicated understanding with regard to the Benchtop Testing (BT) chronological review order to mitigate adverse project schedule impact associated with fuels testing: BT4, BT2, BT1 then BT3 (review order request superseded by results of the May 15, 2014 outcome – next bullet)
- NRC – BWROG held a 3-hour and 45-minute teleconference on May 15, 2014 to support NRC Staff review of BWROG-13032 (Reference 4)
 - Summary / BWROG Intentions
 - Request revised order of Benchtop Testing (BT) review from that previously discussed – new order: BT2, BT4, BT1 then BT3
 - BWROG intends to submit to NRC Staff via formal Chairman's Letter in 3Q 2014, results expectations associated with the individual Benchtop Tests, and a plan for coordinating BTs with the full-scale fuel testing program

Request for Additional 2014 NRC Public Meetings

- In the spirit of continued communication and cooperation, the BWROG respectfully requests public meetings on Wednesday September 10, 2014 and Wednesday November 12, 2014 to review and discuss the following preliminary agenda topics:
 - Review status / commentary of currently pending 2013 / 2014 ECCS SS submittals
 - BWROG Letter BWROG-13032 (Reference 4) Benchtop Testing (BT) review status / commentary, as necessary
 - BWROG Letter BWROG-13032 (Reference 4) content other-than-Benchtop Testing (BT) review status / commentary, as necessary
 - Status of Safety Issues Resolution Branch personnel realignment impacting ECCS Suction Strainers, as affected by the Mitigation Strategies Directorate (MSD)

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- Present to NRC Staff, and obtain concurrence on 2015 BWROG ECCS Suction Strainers Submittals for NRC Review and/or Approval

Requested Action

The BWROG requests Nuclear Regulatory Commission (NRC) Staff's written feedback regarding the content of this letter within seven weeks (35 working days) following receipt.

This is an interval agreed upon during the public meeting held on October 20, 2010 (Reference 1). Future tasks depend upon receiving timely feedback from the Staff.

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 the ECCS Suction Strainer project scope.

Respectfully,

A handwritten signature in black ink that reads "Lesa P. Hill". The signature is written in a cursive, flowing style.

Lesa P. Hill
BWROG Chairman
(205) 992-5727

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

Commitments: None