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The Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: THE BABCOCK & WILCOX OWNERS GROUP SAFETY AND PERFORMANCE
IMPROVEMENT PROGRAM

During the 337th meeting of the Advisory Committee on Reactor Safeguards, May 5-7, 1988, we met with members of the Babcock & Wilcox Owners Group (BWO) and the NRC Staff to review the BWO Safety and Performance Improvement Program (SPIP) and the NRC Staff's assessment of this program. This program was also discussed during the 338th meeting of the ACRS, June 2-4, 1988. Our Subcommittee on Babcock & Wilcox Reactor Plants met on May 3 and 4, 1988 to discuss this matter. We also had the benefit of the documents referenced. The ACRS previously commented to the Executive Director for Operations on this matter in a letter dated July 16, 1986.

We generally agree with the NRC Staff findings and believe that the B&W SPIP recommendations will improve safety by reducing the frequency and complexity of transients. However, it is important to note that the SPIP and the Staff SER deal principally with trip frequency and transient complexity and not with design-basis accidents such as a small- or large-break LOCA or transients as the result of external events. Therefore, one should be careful not to draw any new conclusions from this work concerning the overall safety or response of B&W plants in accident situations.

On the basis of this reassessment, the NRC Staff has concluded that no additional regulatory requirements will be needed. Recommendations suggested by the BWO will be implemented voluntarily.

We believe that BWO should reconsider certain recommendations made by the NRC Staff. For example, the Staff suggested particular attention to a reexamination of plants as required by IE Bulletin 79-27, "Loss of Non-Class 1E Instrumentation and Control Power System Bus During Operation."

More than two hundred recommendations resulted from the BWO study. Although some of the utilities have acted promptly to schedule and implement these recommendations, others have not. The Staff has expressed concern about this. We share this concern.

A member of the NRC Staff identified several concerns related to the BWO reassessment program. In the Staff's SER each of these is identified and addressed. We reviewed this matter as you requested in Reference 5 and consider the Staff's handling of these concerns appropriate.

There are in progress a number of additional NRC Staff activities resulting from this effort. These include a study dealing with the more detailed

technical aspects of the Integrated Control System/Non-Nuclear Instrumentation (ICS/NNI) reassessment program and recommendations to develop programs to evaluate the balance-of-plant (BOP) systems at nuclear power plants. One objective of the latter effort is to determine if additional rules or regulations need to be developed in the BOP area. Where the failure or mal-operation of "non-safety systems" in the BOP can adversely affect the achievement of safety-related functions, these systems should be designed, operated, and maintained in such a manner that such adverse effects are eliminated or made highly unlikely. Criteria to achieve this should be developed but with care not to extend further into the BOP than necessary to ensure safety.

We wish to single out two additional BWOOG programs for special encouragement. The first is the BWOOG Valve Task Force which the Owners Group established on its own initiative to address problems with main steam safety valves, motor-operated valves, and check valves. The BWOOG should be encouraged to test the valves against a full spectrum of transient and accident conditions. The other is a program by the Owners Group that could result in developing an advanced control system based on modern digital technology for replacing the present ICS/NNI in B&W plants. We will continue to follow the progress of these programs.

Sincerely,

W. Kerr
Chairman

References:

1. Letter dated July 22, 1987 from G. R. Skillman, BWOOG, to D. M. Crutchfield, NRC, transmitting BWOOG Safety and Performance Improvement Program, BAW-1919, Revision 5, July 1987.
2. NUREG-1231, SER Related to Babcock & Wilcox Owners Group Plant Reassessment Program, November 1987.
3. NUREG-1231, Supplement No. 1, March 1988.
4. Memorandum dated August 14, 1987 from D. L. Basdekas, NRC, Office of Nuclear Regulatory Research, to W. Kerr, Chairman, ACRS, Subject: Chairman Zech's Memorandum to D. L. Basdekas, dated August 3, 1987.
5. Memorandum dated August 3, 1987 from L. W. Zech, NRC, to D. L. Basdekas, Office of Nuclear Regulatory Research, Subject: Your Request of July 20, 1987.
6. Letter dated August 14, 1986 from H. R. Denton, NRC Director, Office of Nuclear Reactor Regulation for David A. Ward, Chairman, ACRS, Subject: ACRS Comments on the Babcock & Wilcox (B&W) Owners Group Safety and Performance Improvement Program.
7. Letter dated January 24, 1986 from V. Stello, NRC, to H. Tucker, Chairman, BWOOG, Subject: Reassessment of B&W Reactors.

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