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BWROG16-1-003
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Project Number 691

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Kevin Hsueh, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Subject: Boiling Water Reactor Owners' Group (BWROG) comments on September 23, 2016, NRC Draft Safety Evaluation for Topical Reports NEDC-33347P Revision 1 (Proprietary Version) and NEDO-33347 Revision 1 (Non-Proprietary Version), "Containment Overpressure Credit for Net Positive Suction Head (NPSH)"

References: 1. Letter from NRC to BWROG dated September 23, 2016, "Draft Safety Evaluation for BWROG Topical Report NEDC-33347P/NEDO-33347, Revision 1, "Containment Overpressure Credit for Net Positive Suction Head (NPSH)" (TAC No. MF6708) (ADAMS Accession No. ML15302A118)

2. Letter from Boiling Water Reactor Owners' Group (BWROG) to NRC dated November 21, 2014, "Submittal of Revised BWROG Topical Reports NEDC-33347P, Revision 1 (Proprietary Version), and NEDO-33347, Revision 1 (Non-Proprietary Version), "Containment Overpressure Credit for Net Positive Suction Head (NPSH)" (ADAMS Accession No. ML 14325A626).

Dear Mr. Hsueh:

As requested in the NRC letter noted in reference 1, the BWROG has reviewed the NRC draft Safety Evaluation for NEDC-33347P/NEDO-33347, Revision 1, for factual errors and for BWROG proprietary information.

The following are two BWROG comments on the draft Safety Evaluation:

- Draft Safety Evaluation reference 31 (page 17 of draft SE), the BWROG letter title should not include "– CVIC Pumps" at the end of the title.
- For the Table 1 header, third column (page 20 of draft SE), we suggest the header refer to the Draft Safety Evaluation Figure 1 instead of referencing ML13015A437.

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With regard to BWROG Proprietary Information, the NRC Draft Safety Evaluation has designated proprietary information on pages 7, 8, 12 and 24 using bold texts enclosed in square brackets. We agree with the text indicated as proprietary information in the draft Safety Evaluation with no additions.

If you have questions or desire further discussion, feel free to contact me or Kenneth Welch, BWROG Containment Accident Pressure Committee Project Manager, at 910-819-7904 (Kenneth.Welch@ge.com).

Sincerely,

A handwritten signature in cursive script that reads "Lesa P. Hill".

Lesa P. Hill
Chairman
BWR Owners' Group

cc: Jason Drake, NRR Project Manager, Licensing Processes Branch (PLPB)
J. C. Grubb, BWROG Vice Chairman
M. A. Iannantuono, BWROG Program Manager
BWROG Primary Representatives
BWROG Executive Committee