Mr. B. Ralph Sylvia
Executive Vice President
and Chief Nuclear Officer
Niagara Mohawk Power Corporation
Generation Business Group D-2
300 Erie Boulevard West
Syracuse, NY 13202

June 24, 1996

SUBJECT: STAFF REVIEW OF MODIFICATIONS TO REVISION 4 OF THE BOILING WATER REACTOR (BWR) EMERGENCY PROCEDURE GUIDELINES

Dear Mr. Sylvia:

The NRC staff has issued its safety evaluation (SE) on the recent Boiling Water Reactor Owners Group proposed modifications to the BWR Emergency Procedure Guidelines. The staff is providing this information to ensure that licensees are aware of the conclusions of the staff's review. Both the staff and the Advisory Committee for Reactor Safeguards (ACRS) agree that, for BWRs injecting standby liquid control through a standpipe below the core, maintenance of level above top-of-active fuel (TAF) is the superior water control strategy in an anticipated transient without scram (ATWS) event. The staff recommends a level around TAF +5 feet (1.52 m), or as high as possible while still maintaining the level at least 2 feet (0.61 m) below the feedwater sparger. Although control at any level between the minimum steam cooling water level and 2 feet below the feedwater sparger was found to be acceptable, both the staff and ACRS urge that a high-water-level control strategy be adopted. Additional details are provided in the enclosed SE.

You should also note the staff's position on bypassing the Main Steam Isolation Valve (MSIV) high radiation closure interlock during ATWS. The staff agrees with the BWROG's qualitative arguments that keeping the MSIVs open significantly reduces containment loading and makes level control much simpler. However, the acceptability of this change is conditional on a plant-specific evaluation by each licensee to assure that, in the event of gross fuel failures, consideration has been given to such items as equipment accessibility, potential off-site radiological doses, and the appropriate time to manually close the MSIVs.

Sincerely,
ORIGINAL SIGNED BY:
Darl S. Hood, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and
50-410

Enclosure: Safety Evaluation

cc w/encl: See next page

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