

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

June 14, 1996

Mr. D. L. Farrar Manager, Nuclear Regulatory Services Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

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PDR

SUBJECT: STAFF REVIEW OF MODIFICATIONS TO REVISION 4 OF THE BWR EMERGENCY PROCEDURE GUIDELINES

Dear Mr. Farrar:

The staff has issued its safety evaluation (SE) on the recent BWROG-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-ofactive 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 two 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 plantspecific evaluation by each licensee to assure that, in the event of gross

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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,

John F. Stang, Project Manager Project Directorate III-2 Division of Reactor Projects - III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-373, 50-374, 50-254, 50-265

Enclosure: Safety Evaluation

cc w/encl: See next page

D. L. Farrar Commonwealth Edison Company

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Sincerely,

Original signed by:

John F. Stang, Project Manager Project Directorate III-2 Division of Reactor Projects - III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-373, 50-374, 50-254, 50-265

Enclosure: Safety Evaluation

cc w/encl: See next page

Distribution: w/o encl. Docket File PUBLIC J. Roe, JWR R. Capra C. Moore (3) OGC, 015B18 ACRS, T2E26 B. Clayton, RIII w/encl. PDIII-2 r/f D. Skay R. Pulsifer J. Stang

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