

BWR OWNERS' GROUP

Donald N. Grace, Chairman
(201) 316-71

BWROG-8887
December 8, 1988

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Frank Miraglia
Associate Director for Projects
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: BWR ATWS DIVERSITY DISCUSSIONS

Reference: (a) Ltr. T.E. Murley (NRC) to D.N. Grace (BWROG), "Diversity Requirement of ATWS Rule", dated 8/8/88
(b) Ltr. T.E. Murley to L.W. Eury (CP&L), "Diversity Requirement of ATWS Rule", dated 8/8/88

In my June 28, 1988 letter BWROG-8841 to Dr. Murley, it was stated that "The BWR Owners' Group has reviewed the diversity requirements of the ATWS rule and concurs with the CP&L conclusion that additional diversity is neither reasonable nor practicable." Contrary to this position, in Dr. Murley's August 8, 1988 letter to CP&L, it was stated that "If the alternate boards were used in the ARI system, sufficient diversity would exist between the ARI system and the RTS."

Subsequent to the above letters, I have had further conversation with the NRC Staff (F. Congel and J. Mauck) during the week of November 28, 1988, regarding additional technical and legal work that the BWROG has done regarding the subject issue. This letter documents these conversations.

The BWROG has reviewed the NRC position which was documented in the referenced letters to Carolina Power & Light Company and the BWR Owners' Group. Based on additional technical and legal review, the BWROG continues to believe the requirement to provide manufacturer diversity on Analog Transmitter Trip Unit (ATTU) circuit boards is not reasonable or practicable. Our review was conducted on a probability/reliability basis in addition to an assessment on the basis of rule interpretation. (10CFR50.62). The BWROG also believes that this issue is applicable to other BWR plants in addition to Brunswick, Units 1 and 2.

In my above mentioned conversation, I stated that the BWROG is considering requesting a meeting at the NRC branch level, for early 1989 to discuss this issue in more detail. If appropriate, the BWROG would consider pursuing this issue through T. Murley and/or the NRC legal staff.

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BWROG-8887
December 8, 1988
Page 2

We request that the Staff not press any BWR Owner into a commitment until the BWROG has been given the opportunity to submit results of our recent technical/legal review and the staff has amply reviewed this submittal.

If you have questions regarding this issue, please contact the undersigned at (201) 316-7153 or S.D. Floyd (CP&L), BWROG Vice Chairman at (919) 836-6901.



Donald N. Grace, Chairman
BWROG Owners' Group

WGF/vj 8887/wgf8

cc: Primary Representatives
S.D. Floyd, BWROG Vice Chairman
R.F. Janeczek, RRC Chairman
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