

# BWR OWNERS' GROUP

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BWROG-8905  
January 26, 1989

Director of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555

Attention: A. Thadani, Assistant Director for Systems

Subject: NRC BULLETIN NO. 88-07, SUPPLEMENT 1 "POWER  
OSCILLATIONS IN BOILING WATER REACTORS"

Dear Mr. Thadani:

The BWR Owners' Group (BWROG) is continuing its effort to identify a permanent resolution to the Stability issue. As part of this activity, NRC Bulletin 88-07, Supplement 1 has been reviewed with respect to both its guidance for Interim Corrective Actions (included in the Bulletin as Attachment 1) and the BWROG long term resolution plan.

As a result of this review, the BWROG would like to provide the following comments and clarifications:

1. Various hardware and/or procedural options are being evaluated by the BWROG Stability Committee in a systematic and disciplined manner. It is our intention to identify viable options which fully resolve the stability issue (regional as well as core wide oscillations). In order to achieve this, a significant number of technical factors are being considered along with the variations in plant types and analytical needs. We believe it is vital to identify a technically sound and complete solution. Because of this we have placed a high priority on the adequacy of the solution.

We will keep you informed of our progress on a continuing basis and provide an update on the BWROG plans and direction in April 1989. The BWROG is willing to work with the NRC in developing the NRC Generic Communication to provide guidance for the long term resolution of the stability issue.

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2. During normal recirculation pump speed transfers at flow control valve plants neither of the motor power sources is energized for the pump(s) while they are being transferred.

This condition is not regarded as the pump(s) "not operating" since pump rotation still exists. The FCV plants do not intend to interpret these normal speed transfer conditions as a two pump trip. Therefore, a manual scram is not required.

3. Although our intention is to prevent planned entries into regions of potential instabilities, the Stability Committee recognizes that certain plant situations may require entry into these regions in order to protect fuel integrity and/or plant equipment. It is, therefore, our intention to extend the provisions of Interim Correction Action #4 to allow for entry into Regions B and C when a safety or fuel operating limit is challenged (e.g. PCIOMR violations). It is also our intention to allow for entry into regions A, B, and C in order to protect equipment which, were it to fail, could impact plant safety (e.g. tripping reactor recirculation pump upon high temperature indications). In these cases the appropriate actions for the region entered will be performed.
4. The BWROG interprets Interim Correction Action Item #5 as requiring procedures to use LPRM upscale or downscale alarms as triggers to check for instability. If instability is verified an immediate scram is required. The verification may consist of:
  - a) Observation of greater than 10% APRM peak-to-peak oscillations.
  - b) The presence of multiple periodic LPRM hi alarms.
  - c) Observation of abnormal flux oscillations indication on control room LPRM indicators.

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The comments/positions provided in this letter have been endorsed by a substantial number of the members of the BWROG; however, it should not be interpreted as a commitment of any individual member to a specific course of action. Each member must formally endorse the BWROG position in order for that position to become the members position.

We appreciate the NRC's consideration of these matters.

Regards,



Donald N. Grace, Chairman  
BWR Owners' Group

DNG/dls

cc: BWROG Primary Representatives  
BWROG Executive Oversight Committee  
BWROG Stability Committee  
SD Floyd, BWROG Vice Chairman  
L. Phillips, NRC  
M. Hodges, NRC  
F. Miraglia, NRC  
R Warren, INPO  
RC Evans, NUMARC  
R Galer, EPRI

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COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF LEHIGH )

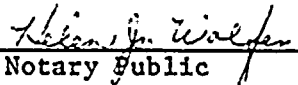
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I, HAROLD W. KEISER, being duly sworn according to law, state that I am Sr. Vice President - Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached response to Bulletin 88-07, Supplement 1 are true and correct to the best of my knowledge, information and belief.



Harold W. Keiser  
Sr. Vice President - Nuclear

Sworn to and subscribed  
before me this *6th* day  
of *March*, 1989.

  
Notary Public

NOTARIAL SEAL  
Helen J. Wolfen, Notary Public  
Lehigh County  
My Commission Expires April 4, 1989