

BWR OWNERS' GROUP

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BWROG-8817/BWR1
April 1, 1988

U.S. Nuclear Regulatory Commission
Division of BWR Licensing
Washington, D.C. 20555

Attention: T.E. Murley, Director NRR

SUBJECT: BWR OWNERS' GROUP LICENSING TOPICAL REPORT "POSITION ON NRC
REGULATORY GUIDE 1.97, REVISION 3 REQUIREMENTS FOR POST-ACCIDENT
NEUTRON MONITORING SYSTEM" (GENERAL ELECTRIC REPORT NEDO 31558)

Gentlemen:

The BWR Owners' Group (BWROG) has completed its analysis of requirements for BWR Post-Accident Neutron Monitoring instrumentation. The results are used to establish appropriate neutron monitoring post-accident functional design criteria. Deviations from RG 1.97 requirements are justified.

The BWROG approach and overall strategy has been previously discussed with the NRC (Joseph P. Joyce and others) at a meeting in Bethesda on January 27, 1988. At this meeting the NRC indicated their willingness to evaluate alternate approaches to RG 1.97 neutron monitoring system requirements to resolve this issue.

This letter submits 30 copies of the subject Licensing Topical Report for NRC review and approval. It is requested that this report receive priority review since several BWROG members have near term license actions associated with resolving the RG 1.97 requirements for post-accident neutron monitoring. In the interim, the BWR Owners' Group requests that all post-accident NMS implementation requirements be deferred until this report has been carefully evaluated by NRC reviewers. The total installed cost for an upgraded or independent post-accident NMS ranges from \$1 to \$5 million depending upon options selected (total replacement of SRM/IRM subsystem or addition of equipment specifically for post-accident use). Due to the high cost, installation dose significance, and cost benefit uncertainty associated with this plant modification, we do not recommend that installation decisions should be required prior to resolution of this Licensing Topical Report.

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This Licensing Topical Report has been endorsed by a substantial number of the members of the BWR Owners' Group; 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 member's position.

Very truly yours,



Robert F. Janecek, Chairman
BWR Owners' Group

/ta
Attachment

cc: BWR Owners' Group Primary Representatives
BWR Owners' Group Executive Overview Committee
M.W. Hodges (NRC)
J.P. Joyce (NRC)
R. Evans (NUMARC)
W.S. Green (INPO)
H. Wyckoff (EPRI)
D.N. Grace (BWROG Vice Chairman)
L.S. Gifford (GE, Bethesda)

