

BWR OWNERS' GROUP

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BWROG-8833
June 13, 1988

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, DC 20555

Attention: Thomas T. Martin, Associate Director
for Technical Review and Inspection

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) submitted the subject Licensing Topical Report (LTR) to the NRC on April 1, 1988. This document proposes functional criteria for post-accident neutron monitoring that represent an acceptable alternate to the Category 1 requirements specified in Regulatory Guide 1.97. The report concludes that a fully qualified 1E post-accident Neutron Monitoring System is not appropriate or justifiable from a cost-benefit basis.

The NRC was formally notified of the BWROG effort on August 25, 1987 (BWROG-8745) and shortly thereafter assigned an NRC contact. The BWROG committee had a program briefing meeting with the NRC in January 1988 and completed the document in March 1988. Recently System Energy Resources, Inc. has been informed that the NRC review of this LTR will not be complete until December 1988, and that the NRC is unwilling to give additional extensions at this time unless effected utilities provide commitment to specific modifications. We believe that because of plant specific licensing conditions, it is extremely important that NEDO-31558 be expeditiously reviewed by the NRC. In addition, we believe the existence of this report gives cause to extend license conditions for the upgrading of neutron monitoring equipment until the NRC has completed its review. If selected BWRs are required to proceed with this plant modification and the NRC staff later concurs with the NEDO-31558 conclusion, very expensive instrumentation will have been purchased without cost benefit justification.

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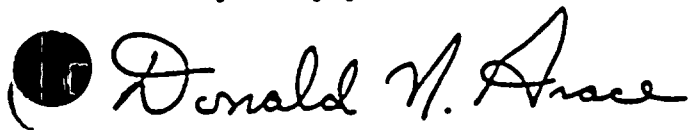
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The BWROG strongly encourages the expeditious technical review of this document to meet the needs of the affected BWRs and recommends additional extensions until the NRC has completed its review. In order to satisfy the current license conditions, several affected BWRs will have to initiate procurement of qualified instruments in the next month or two.

This letter 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.

If you desire to discuss this request in more detail, please contact me at your convenience.

Very truly yours,



D. N. Grace, Chairman
BWR Owners' Group

DNG/dls
Attachment

cc: BWR Owners' Group Primary Representatives
BWR Owners' Group Executive Overview Committee
SD Floyd, BWROG Vice Chairman
RF Janecek, CECO
GC Lainas, NRC
SA Varga, NRC
AC Thadani, NRC
S Newberry, NRC
MW Hodges, NRC
JP Joyce, NRC
R Evans, NUMARC
WS Green, INPO
H Wyckoff, EPRI
LS Gifford, GE/Bethesda

