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

September 26, 1980

Mr. David P. Hoffman Nuclear Licensing Administrator Consumers Power Company 212 West Michigan Avenue Jacison, Michigan 49201

Dear Mr. Hoffman:

By letter dated November 16, 1979, we sent you the list of topics which would not be reviewed by your plant in the Systematic Evaluation Program (SEP). These topics were deleted from the SEP review because they were not applicable to your plant or they were being reviewed as part of an ongoing generic issue outside the SEP. The following topics should be added to the November 16 listing. Removal of these additional topics from the SEP review results from 1) related generic NRC activities and 2) non-applicability of topics to certain facilities. The following is a list of such topics and indicates their disposition:

Topic	Categorization	Disposition
11-2.8	Generic	Compliance with Appendix E is being evaluated under the Emergency Prepardness Program Office (EPPO) effort. Compliance with Appendix I is being evaluated as part of the NRC Appendix I review effort.
II-2.D	Generic	Compliance is being evaluated under the EPPO effort.
€ III-8.8	Deleted	The review published as NUREG-0479, "Report on BWR Control Rod Drive Failures" fulfills the intent of this topic.
•VI-8	Generic	Will be reviewed by NRC as part of TMI Task Action Plan (NUREG-0660) as specified in May 7, 1980 letter to all operating reactor licensees.

Those parts of Topic II-1.B "Population Distribution" relating to emergency plans will be evaluated by EPPO. In addition, the original DBE review list indicated that DBE group VI events "Uncontrolled Rod Assembly Withdrawal at Power and "Uncontrolled Rod Assembly Withdrawal - Low Power Startup" are a

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part of Topic XV-13. However, the topic of reference should be Topic XV-8, "Control Rod Misoperation" and accordingly the references for Topic XV-8 should include Standard Review Plans 15.4.1 and 15.4.2. Also, the November 16, 1979, letter states that DBE Group X, "Inadvertent Operation of ECCS or CVCS Malfunction that Causes an Increase in Reactor Coolant Inventory" should be deleted as it applies only to PWR's. However, Group X will be included in the SEP review since inadvertent operation of ECCS should be evaluated for BWR's.

Enclosure 1 to this letter includes a revised listing of the DBE Accident and Transient Groups applicable to BWR's. Of note should be the inclusion of Group XI, "Inadvertent Loading and Operation of a Fuel Assembly in an Improper Position", revision to Group III to include "Radiological Consequences Of a Main Steam Line Failure Outside Containment", and the Inclusion of Fuel Handling Accidents in Group VIII.

Sincerely,

nnis M. Crutchfield, O Operating Reactors Branch #5 Division of Licensing

Enclosure: As stated

cc w/enclosure: See next page

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BWR DBE TOPIC LIST

Accident and Transient Groups

	RELATED TOPIC	DESIGN BASIS EVENT	SRP
Group I (BWR)	XV-1 XV-1 XV-1 XV-9	Decrease in Sedwater temperature Increase in feedwater flow Increase in steam flow Start-up of inactive loop and flow controller malfunction	15.1.1 15.1.2 15.1.3 15.4.4, 5
	XV-3	Inadvertent closure of main steam isolation valve	15.2.4
Group II	XV-3 XV-3 XV-3 XV-3 XV-5	Loss of external load Turbine trip Loss of condenser vacuum Steam presture regulatory failure Loss of feedwater flow	15.2.1 15.2.2 15.2.3 15.2.5 15.2.7
Croup III	XV-18	Radiological Consequences of a Main Steam Line Failure Outside Containment	15.6.4
Group IV	XV-4	Loss of AC power to station auxiliaries	15.2.6
	XV-24	Loss of all AC power	
Group V	XV-7 XV-7 XV-7	Loss of forced coolant flow Primary pump rotor seizure Primary pump shaft break	15.3.1 15.3.3 15.3.4
Group VI	XV-8	Uncontrolled rod assembly withdrawal at power	15.4.2
	XV-8	Uncontrolled rod assembly withdrawal low power start-up	15.4.1
	XV-8 XV-13	Control rod misoperation Spectrum of rod drop accidents	15.4.3 15.4.9
Group VII	XV-19	Spectrum of loss of coolant accidents	15.6.5
Group VIII	XV-21 XV-20	Drop of cask or heavy equipment Radiological Consequences of Fuel Damaging Accidents (inside and outside containment)	15.7.5 15.7.4
Group 1X	XV-15	Inadvertent opening of BWR safety/ relief valve	15.6.1
Group X	XV-14	Inadvertent operation of ECCS	15.5.1
Group XI	XV-11	Inadvertent loading and operation of a fuel assembly in an improper position	15.4.7
Group XII		Not applicable to BWRs	

BWR DBE LIST (continued)

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GROUP	RELATED SEP TOPIC	DESIGN BASIS EVENT	SRP SECTION
-	VV Q	Uncontrolled rod assembly withdrawal	15.4.2
٧I	XV-8	at power Uncontrolled rod assembly withdrawal	
	XV-8	low yower start-up	
	XV-8	Control rod misoperation	15.4.3
	XY-13	Spectrum of rod drop accidents	
YII	XY-19	Spectrum of rod drop accidents	15.6.5
YIII	XV-20	Radiological consequences of fuel damaging accidents (inside and outside containment)	15.7.4
	XV-21	Drop of cask or heavy equipment	15.7.5
IX	XV-15	Inadvertent opening of BSR safety/ relief valve	15.6.1
X	XY-14	Inadvertent operation of ECCS	15.5.1
XI	XY-11	Inadvertent loading and operation of a fuel assembly in an improper position	15.4.7
XII		Not applicable to BWR's	
		PWR DBE LIST	
GROUP	RELATED		SRP
GROOF	SEP TOPIC	DESIGN BASIS EVENT	SECTION
1	XV-1	Decrease in feedwater temperature	15.1.1
	XV-1	Increase in feedwater flow	15.1.2
	XV-1	Increase in steam flow Inadvertent opening of steam	15.1.3
	XV-1	generator relief/safety valve	
	XV-9	Start-up of inactive loop	15.4.4
	XV-10	System malfunction causing a decrease in boron concentration	15.4.6
II	XV-3	Loss of external load	15.2.1
	XV-3	Turbine trip	15.2.2
	XV-3	Loss of condenser vacuum	15.2.3
	XV-3	Steam pressure regulatory failure	15.2.5
	XV-5	Loss of feedwater flow	15.2.8
	XV-6	Feedwater system pipe break	10.010