## BWR OWNERS' GROUP

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BWROG-8329

September 6, 1983

U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Division of Licensing Washington, D.C. 20555

ATTENTION:

D.G. Eisenhut, Director

SUBJECT:

SCHEDULE FOR SUBMITTALS IN RESPONSE TO NRC GENERIC LETTER 83-28

REFERENCE:

Letter, D.G. Eisenhut to All Licensees of Operating Reactors et al, "Required Actions Based on Generic Implications of Salem

ATWS Events (Generic Letter 83-28)," July 8, 1983

## Gentlemen:

The BWR Owners' Group (BWROG) has formed a committee to address selected issues identified in Generic Letter 83-28. The BWROG has determined that a generic response to the referenced letter along with individual member responses based on a generic effort would provide a uniform approach while minimizing unneeded duplication of efforts. This letter requests on behalf of the BWROG an extension of time for submittals on positions, plans and schedules in response to the referenced letter.

Because of the complexity of the evaluation, the 120 day response time is insufficient. The BWROG believes that a time extension is justified on the basis of uniformity and cost effectiveness in providing a response. The BWROG also believes that a time extension is acceptable because the BWR scram system does not utilize circuit breakers with undervoltage trip coil attachments similar to those which failed to function at the Salem plant and because many of the proposed actions are already being performed at BWR plants. Accordingly, the BWROG will develop a plan (work of the extent on the BWROG scope has already begun) and a schedule for plant evaluations in accordance with the NRC proposed actions of Generic Letter 83-28, and will identify any such proposed actions to which the BWROG takes exception. Development of this plan will consider the status and schedule of relevant work being undertaken by other industry groups.



This letter is supported by a substantial number of BWROG members. These members will provide individual letters which endorse this letter and which request specific dates to the extent possible (extending beyond the NRC-requested 120 days) for submittals in response to the reference letter. The individual member letters will be provided to the NRC on the 60-day schedule requested in the reference letter.

If you have any questions on this matter, please contact me.

Very truly yours,

Thomas J Dento

T.J. Dente, Chairman

BWR Owners' Group

cc: BWR Owners' Group Primary Representatives BWROG Committee on Salem Generic Issues

D.R. Helwig, BWROG Vice Chairman

T.W. Craig (GE) J.F. Quirk (GE)