

BWR OWNERS' GROUP

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BWROG-94001
January 14, 1994

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

Attention: William T. Russell, Associate Director
for Technical Review and Inspection

Subject: ***BWR OWNERS' GROUP LICENSING TOPICAL REPORT "SYSTEM ANALYSES FOR ELIMINATION OF SELECTED RESPONSE TIME TESTING REQUIREMENTS" (GENERAL ELECTRIC REPORT NEDO-32291)***

The subject BWR Owners' Group (BWROG) Licensing Topical Report has been revised in response to NRC questions and to more clearly demonstrate that the elimination of selected response time tests is of no safety significance. While the BWROG has enhanced the approach to justify the elimination of specific response time testing, the FMEA results remain valid and these analyses of instrumentation failure modes confirm with reasonable assurance that failures which affect response times can be detected during other surveillance tests required by current Technical Specifications. Because this licensing change improves plant safety and reduces plant operation and maintenance costs, the proposed change represents a Cost Beneficial Licensing Action (CBLA) and should be reviewed by the NRC on a priority basis. Based on a conservative reduction of 1500 man-hours per outage and the potential reduction in outage length, cost savings are estimated to range from \$50,000 to \$100,000 per unit per year.

The report concludes that response times are maintained with the current practices and that response time testing is unnecessary based on plant operating history and experience. The other existing Technical Specification required surveillance tests (calibration tests, functional tests, and logic system functional tests) ensure instrumentation health. Results of this BWROG evaluation confirm that response time tests are of no safety significance, cause unnecessary personnel exposure, reduce availability of safety systems during shutdown, and are a significant burden to utility resources.

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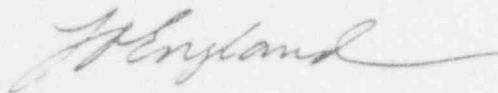
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This letter has been endorsed by a substantial number of the members of the BWR Owners' Group; however, it should not be interpreted as a commitment of any individual member to a specific course of action. Each member must formally endorse the BWROG position in order for that position to become the member's position.

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

Very truly yours,



L. A. England, Chairman
BWR Owners' Group

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cc: BWROG Primary Representatives
BWROG Executive Oversight Committee
BWROG Response Time Testing Committee
RA Pinelli, BWROG Vice Chairman
RC Jones, NRC
PJ Loeser, NRC
JL Mauch, NRC
JS Wermiel, NRC
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