

# BWR OWNERS' GROUP

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BWROG-94004  
January 12, 1994

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Jared S. Wermiel, Chief  
Instrumentation and Controls Branch  
Division of Reactor Controls and Human Factors  
U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, DC 20555

Subject: **BWR Owners' Group Calibration Interval Extension Program**

Reference 1: C. L. Tully to William T. Russell; BWR Owners' Group Licensing Topical Report "Calibration Interval Extension" (General Electric Report NEDC-32160P, December 1992 transmitted via letter BWROG-93001, January 8, 1993)

Reference 2: Jared S. Wermiel to Donald Rockwell; Request For Additional Information in Support of the Staff Review of Topical Report NEDC-32160P "Calibration Interval Extension", September 7, 1993

The Licensing Topical Report (LTR) noted in Reference 1 was transmitted to the NRC in January 1993. This report provides technical justification for extending selected instrument calibration intervals based on analyses of installed instrument performance data using the General Electric Company setpoint methodology.

Preliminary review by the Staff resulted in a list of questions, and a formal Request For Additional Information (Reference 2) was transmitted to D.A. Rockwell in September 1993. The BWR Owners' Group Calibration Interval Extension Committee has prepared the attached responses to the 13 questions in the Request For Additional Information (RAI).

The LTR documents safety benefits of extending instrument calibration intervals. These benefits include the reduced potential for unnecessary safety system actuations, reduced radiation exposure to plant personnel, reduced test cycles on equipment, and increased safety system availability. As these proposed changes result in Cost Beneficial Licensing Actions, we request that you promptly continue your review of this LTR.

The Licensing Topical Report and the attached responses to the RAI have been endorsed by a substantial number of BWROG members; however, it should not be interpreted as a

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The Licensing Topical Report and the attached responses to the RAI have been endorsed by a substantial number of BWROG members; 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,



L. A. England, Chairman  
BWR Owners' Group

TAG94-1/LAE/TAG/jz  
Attachment

cc: BA Boger, NRC  
JL Mauck, NRC  
CK Doutt, NRC (6 copies)  
TA Green, GE  
JL Leong, GE  
NRC Document Management Branch (4 copies)  
BWROG Primary Representatives of Participating Utilities  
BWROG Calibration Interval Extension Committee  
RA Pinelli, BWROG Vice Chairman  
AL MacKinney, NUMARC  
B O'Donnell, INPO  
RC Torok, EPRI  
LS Gifford, GE/RCK