

BWR OWNERS' GROUP

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BWROG-8255

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

ATTENTION: Darrell G. Eisenhut, Director

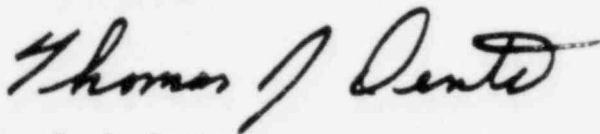
Gentlemen:

SUBJECT: BWR Owners' Group Comments on Proposed
NUREG-0737 Technical Specifications

Your invitation to the BWR Owners' Group to provide comments on the proposed NUREG-0737 Technical Specifications is appreciated. In response to this offer, I have solicited comments from members of the BWR Owners' Group, the results of which are enclosed.

The comments of the BWR Owners' Group should not be interpreted as a formal position of any individual member or as a commitment to a specific course of action. Each member must individually respond to any future Technical Specification requirements in order for a BWR Owners' Group comment to become the member's position.

Sincerely,



T. J. Dente

TJD:JFS:na

cc: J. F. Schilder (GE)
S. J. Stark (GE)
BWR Owners' Group

Enclosure

Good

BWR OWNERS' GROUP COMMENTS ON
NUREG-0737 TECHNICAL SPECIFICATIONS

1. STA Training (I.A.1.1.3)

No comment.

2. Limit Overtime (I.A.1.3)

Plant administrative procedures should be adequate to provide the means for controlling nuclear power plant staff working hours, without detailing the specific requirements in the plant's Technical Specifications. Reference to an NRC Policy Statement would be an acceptable specification. However, generic letter 82-12, dated June 15, 1982, revised Item I.A.1.3 of NUREG-0737 to require implementation of a policy on working hours which differs from the policy stated in generic letter 82-02. Additionally, the proposed rule published in Federal Register Volume 47 #61, March 30, 1982, pp 13369-13376, "Technical Specifications for Nuclear Power Reactors," clearly indicates a desire to reduce Technical Specification changes. Incorporation of a Technical Specification similar to that proposed for I.A.1.3 would be counter to the intent of this proposed rule.

3. Dedicated Hydrogen Penetrations (II.E.4.1)

No comment.

4. Containment Pressure Setpoint (II.E.4.2.5)

No comment.

5. Containment Purge Valves (II.E.4.2.6)

The intent of the wording "except for safety-related activities" is not clear, may be subject to wide variance as to interpretation, and is a criteria against which it would be difficult to audit.

Additionally, purging the containment (for BWR Mark I and Mark II plants) to control oxygen concentration is a normal evolution conducted routinely during power operation. Any requirement that containment purge valves be locked closed during normal plant operations unnecessarily complicates routine shift activities.

The description of the proposed Technical Specification requirement does not appear to reflect the unique configuration of BWR Mark III containments which provide a continuous purge of the containment atmosphere for personnel access during normal plant operations and after reactor shutdown to reduce air-borne radioactivity levels below the limits specified in 10CFR20, Appendix B, Table 1.

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5. Containment Purge Valves (II.E.4.2.6) (cont)

The Mark III containment/drywell purge system is classified as non-nuclear safety with the exception of the isolation valves. The containment/drywell purge system typically performs no safety-related function for Mark III configurations.

Placing the Mark III containment purge valves in a lock-closed position may require frequent operator action to purge the containment for unlimited personnel access. This requirement does not appear to comply with the alara concept; a continuous purge will keep radiation levels inside containment as low as reasonably achievable.

6. Radiation Signal on Purge Valves (II.E.4.2.7)

Changes should not be considered until technical resolution of this issue is completed. The technical position taken by the BWR Owners' Group is documented in the following transmittals previously submitted to the NRC:

1. BWROG letter 8149, Dente (BWROG) to Eisenhut (NRC), "BWR Owners' Group Evaluation of NUREG-0737 Item II.E.4.2(7)," dated June 29, 1981.
2. BWROG letter 8222, Dente (BWROG) to Eisenhut (NRC), "Supplement to BWR Owners' Group Evaluation of NUREG-0737 Item II.E.4.2(7)", dated June 14, 1982.

It is further noted that a stringent Technical Specification requirement for these radiation monitors, if ultimately required, is not appropriate for BWR Mark I and Mark II containment plants since their function is not safety related. The monitors' intended function is to provide information sufficient to limit potential offsite doses rather than function as a source of safety-grade containment isolation signals.

7. Reporting SV and RV Failures and Challenges (II.K.3.3)

No comment.

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8. RCIC Restart (II.K.3.13)

Specifically identifying, in the Technical Specification Surveillance Requirement, the "restart" feature may be redundant in that the functional test of "simulated automatic actuation" already is intended to require functional testing of all automatic features associated with RCIC startup and injection.

9. Isolation of HPCI and RCIC Modification

As in the other response times listed, the isolation times for the RCIC System on high steam flow and for the HPCI System on high steam flow are plant-unique values, and as such, the values included in the model Technical Specification should be bracketed:

$$(A^{(a)}) \leq \text{Isolation Time} \leq (7)$$

"(a)" is already used to reference a note to the Table for Response Times of other Trip Functions. Thus, for RCIC and HPCI Trip Function Response Times, the appropriate Note should be referenced as "(b)".

As an alternate to including the basis for the value of "A" as a note within the Table, it should be acceptable to provide this detail in the associated BASES discussion.

Since many operating plants (BWRs) do not currently have isolation system response times as part of their Technical Specifications, any Technical Specification addition for such plants should be limited to that relating to the setting of the time delay relay.

10. Interlock on Recirculation Pump Loops (II.K.3.19)

No comment.

11. Common Reference Level (II.K.3.27)

No comment.

12. Manual Depressurization (II.K.3.45)

It is appropriate to await technical resolution of this item before determining Technical Specification changes. The BWR Owners' Group maintains its conclusions that the small improvement in reactor vessel fatigue usage resulting from a lower depressurization rate is not sufficient, in light of the corresponding reduction in core cooling capability, to justify a change in depressurization rate. Therefore, the current ADS depressurization scheme for reactor pressure vessel depressurization should not be altered.