

BWR OWNERS' GROUP

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BWROG-94034
March 24, 1994

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Ashok C. Thadani
Associate Director for Inspection
and Technical Assessment
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 2055

Subject: **SUBMITTAL OF BWROG INTERIM SAFETY ASSESSMENT AND OPERATOR GUIDANCE IN RESPONSE TO NRC BULLETIN 93-02 SUPPLEMENT 1 ("DEBRIS PLUGGING OF EMERGENCY CORE COOLING SUCTION STRAINERS")**

Dear Mr. Thadani:

On February 10, 1994, the BWROG met with you to discuss our plans to resolve ongoing concerns relative to the potential for post-LOCA debris plugging of ECCS suction strainers in BWRs. At that time, we explained that we were developing two generic documents for use by BWR utilities: 1) an operator guidance document that heightens operator attention to the potential issue and discusses mitigation options in accordance with Revision 4 of the BWROG Emergency Procedure Guidelines, and 2) an interim safety assessment which evaluates the condition on a generic basis pending final resolution of the issue.

On February 18, 1994, the NRC issued Bulletin 93-02 Supplement 1, which requested certain actions of BWR utilities. Since that time the aforementioned operator guidance and safety assessment have been transmitted to each BWROG member for their use in evaluating the issue and in developing their plant-specific responses to the Bulletin.

The purpose of this letter is to transmit these documents to you for NRC information and use, as promised in our February 10 meeting. The operator guidance is provided as Attachment 2 of the safety assessment.

Please note that the attached safety assessment provides a technical evaluation of BWR plant safety relative to the ECCS debris blockage concerns. It explores a number of technical considerations that provide a basis for demonstrating continued plant safety pending final resolution of the issue. The assessment does not address the various regulatory considerations that also bear on the ultimate resolution of this issue. Those considerations are being explored separately from this assessment.

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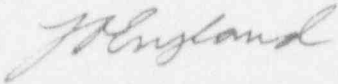
The BWROG is currently working to finalize an appropriate Regulatory Guide 1.82-type evaluation methodology for BWRs given the new information outlined in the bulletin supplement. We plan to provide this information to each BWROG member for use in plant-specific evaluations. In parallel, the BWROG is also developing optional resolutions based on potential evaluation outcomes. As we discussed on February 10, a single generic resolution to this issue is highly unlikely due to its strong dependence on plant-specific design features.

We will continue to keep the NRC informed of our progress on this important issue on a regular basis.

The enclosed information has been endorsed by a substantial number of the members of the BWROG; 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 have any questions regarding the enclosed information, please contact R. Sgarro (ECCS Suction Strainer Committee Chairman) at (610) 774-7914 or the undersigned.

Very truly yours,



L. A. England, Chairman
BWR Owners' Group

PJK4/RS/PJK/ds
Attachment

cc: NRC Document Control Desk
WT Russell, NRC
MJ Virgilio, NRC
RJ Barrett, NRC
RM Lobel, NRC
AW Serkiz, NRC
ML Marshall, NRC
BWROG Executives
BWROG Primary Representatives
BWROG Emergency Procedures Committee
RA Pinelli, BWROG Vice Chairman
LS Gifford, GE
SJ Stark, GE