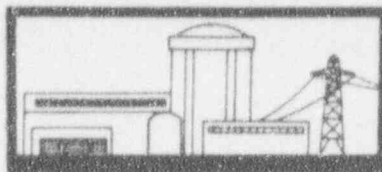


**THE OWNERS GROUP**  
B&W

Duke Power Company  
Energy Operations, Inc.  
Florida Power Corporation  
GPU Nuclear Corporation

Oconee 1, 2, 3  
ANO-1  
Crystal River 3  
TMI-1



Toledo Edison Company  
Tennessee Valley Authority  
B&W Nuclear Technologies

Davis Besse  
Belleville 1, 2

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March 23, 1994  
OG-1353

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn.: D. M. Crutchfield, Associate Director for  
Advanced Reactors and License Renewal

Subject: B&W Owners Group  
Generic License Renewal Program (GLRP)  
Response to Draft Safety Evaluation Report Open Item

Dear Mr. Crutchfield:

By letter dated January 12, 1994, the staff provided the Draft Safety Evaluation Report (DSEK) related to the B&WOG report "Integrated Plant Assessment System/Structure Screening Methodology." Within the DSEK, the staff identified one open item. Please find attached our response to this open item.

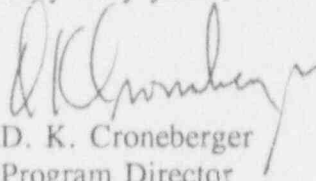
Following NRC staff review and acceptance of this response, the B&WOG GLRP will provide the staff the revised version of the above methodology that has incorporated all previously agreed upon changes. The B&WOG requests that the NRC complete their review and issue the final SER. This request is made since the current direction of the 10CFR54 rule making will continue to require system and structure screening making this document valid for future work.

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PDR TOPRP EMVBW  
C PDR

6003 /

We continue to look forward to working with the staff in the resolution of questions associated with the license renewal process. Should there be any questions concerning the attached response, please contact either Bob Gill or myself.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. K. Croneberger". The signature is fluid and cursive, with a prominent initial "D" and a long, sweeping underline.

D. K. Croneberger  
Program Director  
Generic License Renewal Program

DKC/DJF

cc: T. G. Hiltz - ONRR

DRAFT SAFETY EVALUATION REPORT (DSER) RELATED TO THE BABCOCK &  
WILCOX OWNERS GROUP (B&WOG) REPORT "INTEGRATED PLANT  
ASSESSMENT SYSTEM/STRUCTURE SCREENING METHODOLOGY"

dated January 12, 1994

**Open Item:**

*The staff is interested in understanding where the proposed system and structure screening process truncates consideration of non-safety related systems. For example, if a non-safety-related system (System A) is required for satisfactory accomplishment of one of the functions listed in Subsection (1) of the definition of SSC ITLR, would another non-safety system that supports System A be identified as ITLR?*

**Draft Response:**

The answer to this concern must be provided on a plant specific basis. For many plants, all support systems for safety-related systems have already been identified and established in plant documentation as safety-related. In these plants, the current licensing basis does not need to credit any non-safety-related systems that support safety-related systems.

For other plants, a plant specific evaluation would be necessary in order to determine which non-safety-related systems, if any, are required for the satisfactory accomplishment of one of the functions listed in Subsection (1) of the definition of SSC ITLR. This evaluation would include determining whether System A (as noted above) is required and if any other non-safety-related systems that support the capability of System A to perform its required functions are required. This plant specific evaluation would establish which additional non-safety-related systems should be identified as ITLR.