

# BWR OWNERS' GROUP

George J. Beck, Chairman  
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BWROG-9036  
July 9, 1990

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Office of Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Robert C. Jones, Jr., Chief  
Reactor Systems Branch

Subject: BWROG IN-SERVICE PRESSURE RELIEF TECHNICAL SPECIFICATION  
REVISION LICENSING TOPICAL REPORT, NEDC-31753P

Enclosed are 30 copies of the BWR Owners' Group's subject Topical Report for NRC review and approval. This report provides justification for a generic revision of the Technical Specification requirements for Main Steam Safety Relieve Valve (SRV) safety-mode pressure relief setpoints.

The current +1% tolerances on the nominal SRV setpoints is unnecessarily restrictive and has resulted in numerous failures to meet the acceptance criteria. When this occurs, Licensing Event Reports (LERs) must be prepared, the valves must be refurbished and restored and frequently additional valves must be tested. These actions are taken, although this LTR demonstrates that there is no safety significance if the setpoint is within an upper limit which is well above +1%. The current +1% tolerance has resulted in considerable personnel exposure, cost, and schedule impact to utilities and unnecessary taxing of NRC resources for LER reviews. To alleviate this situation this report presents justifications which not only will increase the allowable setpoint tolerance specification from +1% to +3%, but will also provide the bases for in-service setpoints in excess of +3% (up to an Upper Limit setpoint) which will not result in an adverse impact on plant safety. This change is also supported by the current ASME code (ANSI/ASME OM-1-81, Section XI, 1986 edition) which recognizing this situation has modified the in-service requirement from +1% to +3%.

After NRC review and concurrence of this topical report, it is expected that each utility will make a plant specific submittal referencing this report, providing supplemental evaluations to support application to its particular plant and incorporating plant specific needs. This topical report is expected to significantly reduce NRC review resources for these plant specific submittals.

There is significant benefit to the public, utilities and the NRC in revising the technical specification for the SRV pressure setpoint as justified in the NEDC-31753P submittal. Making these changes will reduce the number of valves requiring refurbishment each year and associated transportation of irradiated valves to offsite laboratories for recertification and refurbishment purposes. Hence this will contribute to ALARA by reducing radiation exposure to plant

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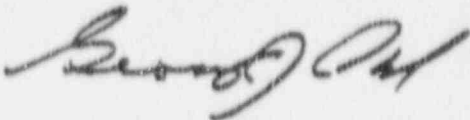
July 9, 1990

Page 2

personnel and the potential risk of exposing public to radiation while the valves are offsite. For the NRC, the number of LERs will be reduced thus reducing NRC's resources required for their reviews. Therefore, we request that the NRC place high priority on reviewing this submittal.

This report has been endorsed by a substantial number of the members of the BWROG; however, it should not be interpreted as a commitment of all members to a specific course of action. Each member must formally endorse the BWROG's position in order for that position to become the member's position. A list of utilities intending to implement this program in the near future is provided in the attachment. Other BWROG participants in this program are expected to implement later.

Very truly yours,



George J. Beck, Chairman  
BWR Owners' Group

Attachment  
EXEC1/GJB/rt

cc: J Calvo, Chief, Technical Specifications Branch, NRR-NRC  
FC Cherny, Section B, Engineering Issues Branch, NRR-NRC  
W Russell, Associate Dir. Inspection & Tech. Assessment, NRR-NRC  
RD Binz, BWROG Vice Chairman  
SD Floyd, RRG Chairman  
R Galer, EPRI  
EP Shankle, INPO  
R Simard, NUMARC  
LS Gifford, GE Rockville  
SJ Stark, GE  
BWROG Executive Oversight Committee  
BWROG SRV Setpoint Tolerance Committee  
BWROG Primary Representatives of Participating Utilities

Attachment to  
BWROG-9036  
July 9, 1990

Utilities intending to implement the BWROG IN-SERVICE PRESSURE RELIEF TECHNICAL SPECIFICATION REVISION Per Topical Report #NEDC-31753P (following receipt of favorable NRC SER):

| <u>Utility</u>                         | <u>Expected Date<br/>of Implementation</u> |
|--|--|
| 1. Cleveland Electric Illuminating Co. | 6 months after receipt<br>of NRC SER       |
| 2. Detroit Edison                      | June 1991                                  |
| 3. Iowa Electric Lighting & Power Co.  | Unknown                                    |
| 4. GPU-Nuclear                         | January 1991                               |
| 5. Pennsylvania Power & Light Co.      | October 1990                               |
| 6. Public Service Electric & Gas Co.   | January 1991                               |
| 7. Philadelphia Electric Co.           | Unknown                                    |
| 8. Tennessee Valley Authority          | After 1/4/91                               |
| 9. Northeast Utilities                 | 1993                                       |
| 10. Illinois Power                     | Unknown                                    |
| 11. Niagara Mohawk                     | Unknown                                    |