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BWROG-93129

November 5, 1993

U. S. Nuclear Regulatory Commission
Washington, DC 20555Attention: G. Bagchi, Chief
Structural and Geosciences BranchSubject: **BWROG MODEL CONTAINMENT INSPECTION PROGRAM**

The BWR Owners' Group (BWROG) appreciates the opportunity to provide to you the attached Model Containment Inspection Program (CIP). The attached is provided for NRC consideration in response to your request for such information following submittal in February 1993 of our comments on the proposed generic communication (reference 57 Federal Register 54860, dated November 20, 1992). This topic was most recently discussed at the September 28, 1993, NRC/BWROG Management Meeting, at which you requested receipt of this information by November 1993.

As you know, at the NRC's initiative the BWROG and NRC have established a beneficial dialogue on this topic dating back to 1989. The BWROG shares the NRC's interest in maintaining containment integrity considering the importance of the containment to public health and safety. The BWROG goal, reflected in the attached CIP, is to establish an approach which is technically sound and cost-beneficial, and which recognizes plant-specific differences in containment design, circumstances, and actions already taken. It is the position of the BWROG that implementation of the CIP will assure identification for appropriate resolution of potential containment shell degradation well before it affects containment integrity.

The BWROG CIP addresses all of the containment integrity issues and is the preferred alternative to both the inspection requirements proposed by the NRC in 57 Federal Register 54860 and the requirements contained in Section XI, Subsection IWE of the ASME Code. The CIP is a stand-alone document which represents the current BWROG position and supplants our earlier communications on this topic.

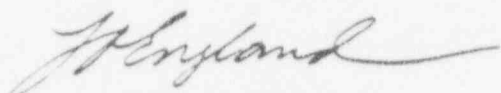
The BWROG and its member utilities have devoted a significant amount of time and energy to the development of the Model CIP. The Model CIP has undergone an extensive review by the BWROG Containment Inspection Committee.

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The BWROG would be happy to meet with you to discuss this topic further. Please contact either C. V. (Bud) Syx (Containment Inspection Committee Chairman, 205-877-7433), W. A. (Bill) Zarbis (GE - BWROG Projects, 408-925-5070), or the undersigned if you have any questions.

The comments/positions provided in this letter and the attachment have 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 for that position to become that member's position.

Very truly yours,



L. A. England, Chairman
BWR Owners' Group

WAZ/LAE/waz

Attachment

cc: R. A. Pinelli, BWROG Vice Chairman
W. T. Russell, NRC
S. J. Stark, GE
W. A. Zarbis, GE
BWROG Primary Representatives
BWROG Containment Inspection Committee
NRC Public Document Room