

BWR OWNERS' GROUP

T. J. Dente, Chairman

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BWROG-8260

October 28, 1982

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

ATTENTION: Darrell G. Eisenhut, Director

Gentlemen:

SUBJECT: NUREG-0737 Item II.K.3.18, "Modification
of Automatic Depressurization System Logic"

- References:
1. Letter, BWROG-8204, T. J. Dente (BWROG) to D. G. Eisenhut (NRC), "Schedule for BWR Owners' Group Compliance with NUREG-0737, Item II.K.3.18", February 5, 1982
 2. Letter, BWROG-8258, T. J. Dente (BWROG) to D. G. Eisenhut (NRC), "Revised Date for Submittal of Response to NUREG-0737, Item II.K.3.18," October 4, 1982
 3. Letter, BWROG-8143, D. B. Waters (BWROG) to D. G. Eisenhut (NRC), "BWR Owners' Group Evaluations of NUREG-0737 Requirements II.K.3.16 and II.K.3.18," March 31, 1981

Enclosed for your review is the BWR Owners' Group report on the subject requirement as committed to in References 1 and 2. This report supersedes the report on this same subject that was previously submitted to you under Reference 3.

As was explained in Reference 1, the revised report evaluates, on a conceptual basis, proposed modifications to the initiation logic of the Automatic Depressurization System (ADS) considering the effects of those modifications on proposed designs for ATWS mitigation and on execution of procedures developed from the BWR Emergency Procedure Guidelines.

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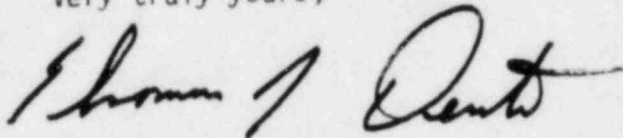
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This study concludes that the current ADS initiation logic, with implementation of the BWR Emergency Procedure Guidelines, is adequate for all design basis events which require RPV depressurization to maintain adequate core cooling. However, it also concludes that further assurance of adequate core cooling for events which do not directly produce a high drywell pressure signal may be achieved by modifying the ADS logic consistent with those options evaluated as "viable" in the report.

The enclosed report, including its conclusions, has been endorsed by a substantial number of the members of the BWR Owners' Group; 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 BWR Owners' Group position in order for that position to become the member's position.

Should you have any questions on the enclosed material, please feel free to contact F. R. Hayes of the General Electric Company at (408) 925-2140.

Very truly yours,



T. J. Dente, Chairman
BWR Owners' Group

TJD:JFS:na

Enclosure

cc: BWR Owners' Group
M. W. Hodges (NRC)
J. F. Schilder (GE)
S. J. Stark (GE)