

BWR OWNERS' GROUP

Donald N. Grace, Chairman
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BWROG-8941
May 5, 1989

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Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: BWR OWNERS' GROUP (BWROG) IMPROVED BWR TECHNICAL SPECIFICATIONS

REFERENCE: "Technical Specification Screening Criteria Application and Risk Assessment," NEDO-31466, November 1987

Dear Dr. Murley:

Enclosed is the Improved BWR Technical Specifications (NEDC-31681) for NRC review and approval. This report implements the recommendations of the NRC Interim Policy Statement on Technical Specification Improvements for the BWR/4 and BWR/6 product lines. A Safety Evaluation is requested by the first quarter of 1990 which is consistent with the schedule cited by your Staff.

The report consists of seven volumes:

<u>Volume</u>	<u>Topic</u>
1	Introduction
2	Improved BWR/4 Technical Specifications
3	BWR/4 Technical Specifications Bases
4	BWR/4 Standard Technical Specifications Comparison
5	Improved BWR/6 Technical Specifications
6	BWR/6 Technical Specifications Bases
7	BWR/6 Standard Technical Specifications Comparison

The Improved BWR/4 and BWR/6 Technical Specifications and Bases reflect the systems/parameters of the lead plants (Hatch Unit 2 and Grand Gulf) as well as the current Standard Technical Specifications as screened by the referenced report. Consequently, the technical specifications and bases associated with the lead plant submittals will be very similar.

The result of the BWROG program will be Improved BWR Technical Specifications which address all product lines and provide guidance for plant specific applications. Due to the diversity of the BWR product lines, there are a small number of existing technical specifications which are unique to only a few plants. Consistent with the BWROG approach discussed with your Staff on several occasions, we are continuing to develop these additional technical specifications. In addition, the BWROG will be providing by June 1989 proposed revisions to the Design Features and Administrative Controls section of the Technical Specifications. A mode dependent listing of the applicable Limiting Conditions for Operation will also be provided.

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To assist in the Staff's review, a Standard Technical Specification (STS) comparison is provided. This comparison identifies all differences between the proposed BWR STS Revision 4 and the Improved BWR Technical Specifications. The location of the various requirements and justifications for the proposed technical improvements are discussed.

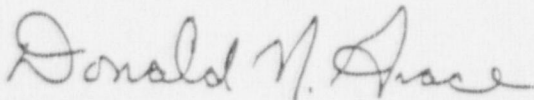
The BWROG is a principal participant in the NUMARC coordinated Technical Specification Improvement Program. The conventions, format and level of detail in the Bases are based upon the Technical Specification Writer's Guide.

The enclosed report represents an investment in excess of \$2.5M by the participating utilities. In addition, significant contributions have been made by the utility representatives. It is believed that the program will result in a significant improvement to current Standard Technical Specification requirements. The BWROG agrees with the Commission that conversion to the enclosed Improved BWR Technical Specifications will enhance plant safety.

With respect to review fees for this report, it is our understanding (based on discussions with NRC representatives) that the review of this report is currently budgeted to be funded from monies generated by license fees collected in accordance with 10CFR171. Therefore, it is our understanding that no review fee is required for the attached report because the NRC considers this effort as a regulatory improvement.

The Improved BWR Technical Specifications 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 in order for that position to become the member's position.

Very truly yours,



D.N. Grace, Chairman
BWR Owners' Group

Enclosure
JFK/js

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