

Presentation on Behave of the B&W Owner's Group

by Bert M. Dunn
Framatome Technologies

- * The BWOG Supports the Effort to Risk Inform Regulations Related to Large Break LOCA
- * BWOG is Pursuing Support for This Activity As an Industry Program

Evaluation of Differing Programs to Risk Inform the Regulations

- * Maintain Current Regulations
 - No Gain or Risk Enhanced Direction of Industry Efforts
- * Change of Evaluation Models
 - 1. Relax Appendix K
 - Benefits Limited to Fuel Performance
 - 2. Easier Best Estimate LOCA
 - Benefits Limited to Fuel Performance
- * Change Criteria
 - Benefits Mostly Limited to Fuel Performance
 - Future Possibility for Small Breaks if Large Breaks Eliminated
- * Change Design Basis Event
 - 1. Relax Simultaneous Failures
 - Benefits Mostly Limited to Fuel Performance
 - 2. Eliminate Large Break LOCA
 - Provides Benefits Beyond 10CFR50.46
 - Not as Subject to Ever Increasing Complexity
 - Most Concrete and Decisive Approach
 - Supported by Risk and Leak-Before-Break Technologies
 - Favored by BWOG

Implementation Guidance

- * Revision Must Consider Both Current Designs, Redesigns and New Designs
- * Clear Limits on the Extent (Systems, Operations, or Procedural Changes) of Implementation of This Regulatory Revision Should Exist
- * The BWOG Will Rely on the Concepts of Defense-in-Depth and Safety Margin to Recognize These Limitations
- * The Existing Industry Consortium Has Agreed to Documentation of Considerations of Defense-in-Depth and Safety Margin and the Implications of These Concepts