



NRC 2005 Regulatory Information Conference



Session H1: Power Upgrades

State Perspective

March 8, 2005

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Public Perception

Certain segment of population does not understand how an older reactor can increase power up to 20%

Lessons:

- Important to consider public relations
- Explain how accomplished and why safe
- Rely on satisfactory uprate history
- Provide public points of input



State Regulation

VT process required a Certificate of Public Good. Licensee agreed to provide an estimated \$20 million over 9 years for the benefit of Vermont.

Lessons:

State utility law is an important factor.
Varies according to type of utility regulation.



Uprate Operating Experience

States are concerned about reliability as well as safety.

Lessons:

Be aware of the unsettling effect of trial and error operation

Primarily vibration effects - steam dryers, piping

VT required a Ratepayer Protection Plan



Independent Engineering Inspection

Risk-based pilot team inspection reported eight findings - four of which concerned topics within the scope of the power uprate review.

Lessons:

VT believes this inspection added value to the power uprate review.

Worthy of consideration as standard attribute of power uprate review.



ASLB Hearing on Containment Overpressure Credit

State questions lead to a hearing request

Issue:

Regulatory tradition – no credit for containment pressure in NPSH calculations (Safety Guide 1)

NRC began allowing limited overpressure credit for resolution of BWR ECCS suction strainer issues in the late 1990's



Current Containment Overpressure Credit Guidance: Reg Guide 1.82, Rev. 3

Predicted performance of the ECC and the containment heat removal pumps should be independent of the calculated increases in containment pressure caused by postulated LOCAs in order to ensure reliable operation under a variety of possible accident conditions. . . . However, for some operating reactors, credit for containment accident pressure **may be necessary**. This should be minimized to the extent possible. Page 8



Current Containment Overpressure Credit Guidance: Reg Guide 1.82, Rev. 3

2.1.1.2 For certain operating BWRs for which the design cannot be **practicably altered**, conformance with Regulatory Position 2.1.1.1 [i.e., no credit for containment overpressure] may not be possible. . . Page 20



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Lessons:

Important to have regulatory guidance
consistent with practice

