



# BWROG Perspectives on 10 CFR 50.46a Rulemaking

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# Briefing to the NRC Commissioners

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Summary of BWROG Participation in  
Rulemaking Process

Primary BWROG Issue with Originally  
Proposed Rule

Concerns with Final Proposed Rule

Summary

# Summary of BWROG Participation in Rulemaking Process

## BWROG Actively Engaged in Rulemaking Process

### **Attended Key Public Meetings**

- May 2002 (ML021430330)
- July 2003 (ML032130059)
- Nov 2004 (ML043270641)
- 2005 RIC Discussion Panel
- Nov 2005 (ML053260255)
- Feb 2006 (ML060590307)
- Aug 2006 (ML062350597)
- ACRS Oct - Nov 2006

### **Submitted Comment Letters as Requested**

- BWROG-02-052 (ML021550219)
- BWROG-04-023 (ML042680077)
- BWROG-06-002 (ML060180289)
- BWROG-06-006 (ML060680299)
- BWROG-07-032 (ML071700342)

# Primary BWROG Issue with Originally Proposed Rule

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Transition Break Size (TBS) too large/overly conservative

- Originally identified benefits (DG start times, ECCS load sequence) no longer viable
  - Large majority of pipe break sizes remain in the deterministic rules
- Ability to apply risk insights was minimized
  - Risk profile remains focused on mitigating lower probability events (LOCA), not higher probability events (Station Blackout)

# Concerns with Final Proposed Rule

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## Most BWROG Concerns Remain in Final Proposed Rule

- No change in TBS; remains overly conservative
- Plant-specific TBS demonstration (DG-1216) onerous
- New Operating Restrictions on mitigation equipment are deterministic, not risk informed

# Summary

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Why is the BWROG not interested in adopting new 50.46a?

- After 5+ years of dialog, TBS remains overly conservative
- Too much uncertainty left in the implementation details
- No Clear Success Path to Cost-Beneficial Adoption

What could be done differently?

- Revisit Expert Elicitation to remove excessive bias and conservatisms in TBS determination
- Retain original SECY concept for risk informing this rule