

BWR OWNERS' GROUP

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Project 691

Document Control Desk
US Nuclear Regulatory Commission
Mail Stop 8 D1
Washington, DC 20555-0001
Attn: John N. Hannon,
Plant Systems Branch Chief

SUBJECT: *BWR Owners' Group Appendix R Fire Protection Committee
Position on SRVs + Low Pressure Systems Used as "Redundant"
Shutdown Systems Under Appendix R*

- Attachments:** 1) *GENE T43-00002-00-03-R01, BWROG Position on the Use of Safety Relief Valves and Low Pressure Systems as Redundant Safe Shutdown Paths, Revision 1, August, 1999*
- 2) *GENE T43-00002-00-01-R01, Original Safe Shutdown Paths for the BWR, Revision 1, August, 1999*

Reference: *Michael J. Davis to Cynthia A. Carpenter, Summary of May 19, 1999, Meeting Between the NRC Staff and the Boiling Water Reactor Owners Group (BWROG) on Appendix R Committee, June 23, 1999*

Find enclosed, Revision 1 of, "GENE T43-00002-03-R01, BWROG Position on the Use of Safety Relief Valves and Low Pressure Systems as Redundant Safe Shutdown Paths". Revision 0 of this document was submitted, April 12, 1999, via letter BWROG-99030.

The BWROG considers the position, presented in the enclosed paper, to be a fundamental basis for performing fire protection safe shutdown analysis in all models of BWRs. The conclusion of this revised paper is unchanged:
For BWRs,

The use of SRVs and Low Pressure Systems is an acceptable methodology for achieving redundant and /or alternative safe shutdown in accordance with the requirements of 10 CFR 50 Appendix R, Sections III.G. 1, 2 and 3.

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On May 19, 1999, members of the BWR Owners' Group (BWROG) Appendix R Fire Protection (FP) Committee met with the NRC Fire Protection Section to discuss staff comments on Rev 0 of the document.

Based on NRC comments, the enclosed revision includes a qualitative risk insight comparison of high and low pressure shutdown methods, including a comparison of the potential for human error. The BWROG has clarified their intent, which is not to justify the elimination or abandonment of existing plant fixed suppression and detection systems previously installed to meet the requirements of Section III.G.3 of Appendix R. A regulatory burden discussion has been added, along with additional introductory information and other editorial and format changes.

The BWROG also is providing a copy of, "GENE T43-00002-00-01-R01, *Original Safe Shutdown Paths for the BWR*, Revision 1, August, 1999" (Attachment 2) which is referenced in the BWROG position report.

If you have any questions about the information provided here, please contact Tom Gorman (PP&L) at 610-774-7762, or George Stramback (GE) at 408-925-1913.

Sincerely,



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Attachments

cc: JM Kenny, BWROG Vice Chairman
BWROG Primary Representatives
BWROG Appendix R Committee
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