

# BWR OWNERS' GROUP

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## NRC Project 691

BWROG-02010  
March 19, 2002

US Nuclear Regulatory Commission  
Mr. Joseph E. Donoghue  
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SUBJECT: ***BWR OWNERS' GROUP LICENSING TOPICAL REPORT  
NEDO-33003 "REGULATORY RELAXATION FOR THE H<sub>2</sub>/O<sub>2</sub> MONITORS  
AND COMBUSTIBLE GAS CONTROL SYSTEMS***

- References:
- (1) NEDO-33003, "Regulatory Relaxations for the H<sub>2</sub>/O<sub>2</sub> Monitors and Combustible Gas Control Systems" dated July 2001
  - (2) TSTF Standard Technical Specification Proposed Change Number 428, "Relocate PAM H<sub>2</sub>/O<sub>2</sub> Analyzers and Hydrogen Recombiner Specifications" (currently in preparation)
  - (3) Letter from Anthony R. Pietrangelo (NEI) to NRC, "NEI Comments on the Draft §50.44 (ref. 66 Fed Reg. 57001, dated November 14, 2001" dated December 20, 2001

In consideration of the late 2002 / early 2003 expected revision of 10 CFR 50.44, the BWR Owners' Group (BWROG) requests that the NRC suspend the review of NEDO-33003, "Regulatory Relaxations for the H<sub>2</sub>/O<sub>2</sub> Monitors and Combustible Gas Control Systems" (Reference 1). The NRC may retain this BWROG topical report for information and use by the NRC staff. The BWROG may later request the NRC to proceed with the review of this BWROG Licensing Topical Report if the 10CFR50.44 rulemaking activities do not progress as expected.

With regard to the 10CFR50.44 rulemaking, the BWROG requests that the NRC re-evaluate their position with respect to maintaining O<sub>2</sub> monitor Tech Spec requirements for BWRs with inerted containments. We recommend that these requirements be relocated to a licensee-controlled document such as the Technical Requirements Manual. This position is consistent with References 1, 2 and 3 above. Note that the Reference 2 traveler currently in preparation will provide supplementary information that supports removal of the O<sub>2</sub> monitors from the Technical

Specifications. BWR 4 Standard Technical Specifications (3.6.3.3) contain other provisions that require the primary containment oxygen concentration be maintained less than 4% by volume.

The BWROG also has a comment on the Tech Spec markups that accompanied the draft rule language released by the NRC on October 26, 2001. The BWR 4 Standard Tech Spec markup shows two drywell O<sub>2</sub> analyzers and two containment O<sub>2</sub> analyzers. Typical BWRs have a total of two O<sub>2</sub> analyzers. One samples the drywell and the other samples the wetwell. Piping is configured such that either of these analyzers can sample the drywell and wetwell on an alternating basis should one analyzer become inoperable.

If you desire to discuss this information in more detail, please contact the General Electric Project Manager, TA Green at (408) 925-1308 or the undersigned.

Very truly yours,



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cc: BWROG Primary Representatives  
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