

December 20, 2004

Mr. Kenneth Putnam, Chairman
BWR Owners Group
Nuclear Management Company
Duane Arnold Energy Center
3277 DAEC Rd.
Palo, IA 52324

SUBJECT: REQUEST FOR THE REVIEW OF LICENSING TOPICAL REPORT
NEDO-33150-NP, "BWR RESIDUAL HEAT REMOVAL SYSTEM
POTENTIAL FOR WATER HAMMER" (TAC NO. MC3869)

Dear Mr. Putnam:

On July 19, 2004, the Boiling Water Reactors Owners Group submitted Licensing Topical Report (LTR) NEDO-33150-NP, "BWR Residual Heat Removal [RHR] System Potential for Water Hammer," Revision 0, dated July 2004 to the NRC staff for review.

We notified you during a teleconference call on September 7, 2004, that we have completed our review of your application and all of the supporting information in accordance with the topical report program criteria and have concluded that your report is not acceptable for review for the reasons discussed below.

The July 19, 2004, submittal uses a risk argument based on a generic probabilistic risk assessment model to calculate an allowable time period for RHR to be lined up in the suppression pool cooling mode while a plant is at power, however, it does not follow Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," nor does the submittal address why exceptions are acceptable. Other than the probabilistic numbers, the submittal also does not present enough information to support a deterministic evaluation review of the RHR system to justify your request. Therefore, your request for the review of LTR NEDO-33150-NP is denied.

If you have any questions regarding this matter, please contact me at 301-415-8450.

Sincerely,

/RA/

Bo Pham, Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Project No. 691

cc: See next page

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