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Subject: Pressurized Water Reactor Owners Group  
Comments on BAW-2441 Draft Safety Evaluation (PA-LSC-0235)

Reference:

1. Letter, Juan Peralta (NRC) to R. L. Gardner, (AREVA), "Draft Safety Evaluation for BAW-2441, Revision 2, 'Risk Informed Justification for LCO End-State Changes' (TAC No. MC6241)"

The purpose of this letter is to transmit comments on the referenced draft safety evaluation (Reference 1). These comments offer suggested editorial changes, provide recommended changes to ensure a clear interpretation of the safety evaluation, and provide corrections.

If there are any questions on our comments please feel free to contact Mr. Tom Laubham at 412-374-6788.

Very truly yours,

Frederick P. "Ted" Schiffley, II  
Chairman, PWR Owners Group

Enclosure

FPS:TJL:mjl

D048

cc: PWROG Steering Committee  
PWROG Management Committee  
PWROG Licensing Subcommittee (B&W Participating Members)  
PWROG Project Management Office  
G. Shukla, USNRC (via Federal Express)  
R. J. Schomaker, AREVA

**PWROG**  
**Comments on NRC Draft Safety Evaluation for BAW-2441**

1. Page 4, Line 12: adding the words, "...remaining in Mode 4 on SG cooling, has the advantage....." supports the remainder of the sentence.
2. Page 7, Line 3: typo- fail should be **fails**.
3. Page 7, Lines 31-34: This sentence is from page 21 of BAW-2441 but it is reproduced in an awkward manner. There are two thoughts, following a LOCA the reactor will remain shutdown, and, the LBLOCA accident analyses assume that all control rods remain withdrawn from the core. The SE attempts to put these into one awkward sentence. It should be written to eliminate the LBLOCA part and say something like, **"...(1) ensure the reactor will be maintained in a cold shutdown condition following a postulated LOCA."**
4. Page 8, Lines 9-13: This is an awkward sentence that is too long. However, at a minimum, it should add the missing article "a" as follows, "....the requested change to have a Mode 4 end state would have an ....."
5. Page 15, Lines 44-46: This sentence is awkward as the words "backup" and "reliable" are confusing. This sentence is based on words on page 11 of BAW-2441. It should say something like, **"Although it is possible to return to SG cooling (in either the forced or natural circulation mode), the ability to immediately use the SGs for core heat removal decreases as cooldown progresses and it may take some time to re-establish RC conditions that support SG cooling."**
6. Page 16, Lines 21-23: These lines are based on page 78 of BAW-2441. The list of Loss of inventory outside of the RB in Mode 4 should be relevant only when on SDC or going on SDC. (Important for Davis Besse only since they have to open their SDC valves.) This should be clarified.
7. Page 16, Line 31: typo- ooling should be **cooling**.
8. Page 16, Line 32: editorial- the line seems to wrap around incorrectly to the left of the page instead of staying on the right side of the page.
9. Page 19, Line 8: The % CDF decrease is 84.2 rounded down to **84** not the 83 listed.
10. Page 19, Line 10: The numbers for condition B and D for Mode 5 and Mode 4 are not consistent with page 12 of the official RAI response document, 43-2441Q-00 dated February 2005. Specifically for Condition B Mode 5 should be **1.1E-04** not 1.0E-04. Condition B Mode 4 should be **9.2E-05** not 9.1E-05. For Condition D Mode 5 should be **9.8E-05** not 1.1E-04. Condition D Mode 4 should be **8.9E-05** not 9.2E-05.

11. Page 19, Line 10: in the % CDF decrease block- the percentages for Condition B and Condition D are reversed. Condition B should be **16** and not 9. Condition D should be **9** and not 16.
12. Page 22, Line 16: in the % decrease block the value should be **29** and not 28.
13. Page 25, Lines 26 and 29: Use of term CDF is incorrect. It should be common cause failure or **CCF**. This occurs once in each line for a total of two times.