

BWR OWNERS' GROUP

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Proprietary Notice

This letter transmits proprietary information in accordance with 10CFR2.390. Upon removal of Enclosure 1, the balance of the letter may be considered non-proprietary.

Project Number 691

BWROG-06020
July 28, 2006

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Submittal of GE BWROG Topical Report NEDC-33178P, Revision 0, "General Electric Methodology for Development of Reactor Pressure Vessel Pressure-Temperature Curves"

ENCLOSURE: Licensing Topical Report NEDC-33178P

Attention: Chief, Information Management Branch
Division of Program Management:

Enclosed please find the GE BWROG Topical Report NEDC-33178P, Revision 0, "General Electric Methodology for Development of Reactor Pressure Vessel Pressure-Temperature Curves."

The BWROG is providing this LTR to support the ability of BWR licensees to relocate their Pressure-Temperature (P/T) curves and numerical values of the other P/T limits (such as heatup/cooldown rate) from Technical Specifications to a Pressure Temperature Limits Report (PTLR), a licensee-controlled document, using the guidelines provided in Generic Letter 96-03 (Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits). The attached LTR details the methodology developed by GE for use by BWR licensees in preparing their P/T curves and limits. It is intended that this methodology can be used with any of the current NRC-approved methods for calculating reactor pressure vessel fluence for deriving the requisite P/T curves and limits.

To preclude licensees from having to re-perform the GE engineering analysis that developed their currently-approved P/T curves/limits solely for the purposes of complying with the PTLR requirement to have been performed using an "NRC-approved method," i.e, have an analysis whose date is subsequent to that of the NRC's approval of this LTR, we request that the NRC allow "grandfathering" by licensees who have used this GE method in the past. GE has used the methodology described in this LTR for

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generating P/T curves/limits for its clients who have adopted ASME Code Cases N-640 and N-588 prior to their incorporation into the ASME Code. Many BWR licensees have adopted these Code Cases and have submitted their GE analysis and P/T curves/limits to the NRC for approval. In order to qualify for this "grandfathering," these licensees can certify that the P/T curves/limits in their PTLR submittal are not changed from those derived from their previously-approved analysis using this GE methodology, including a reference to their previous NRC review and approval for Staff validation. We request that the Staff include this grandfathering allowance in the final Safety Evaluation for this LTR. We also request that the referenced Safety Evaluation be completed within 12 months.

Please note that Enclosure 1 contains proprietary information of the type that GE maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GE as indicated in its affidavit, also included in the report. The affidavit contained in Enclosure 3 identifies that the information contained in Enclosure 1 has been handled and classified as proprietary to GE. GE hereby requests that the information in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

Enclosure 1 is the proprietary version of Revision 2 and Enclosure 2 is a non-proprietary version. Enclosure 3 contains the affidavit.

Should you have additional questions please contact Fred Emerson (BWROG Project Manager) at 910-675-5615 or Tony Browning (BWROG PTC-GE Committee Chairman) at 319-851-7750.

Sincerely,

A handwritten signature in black ink, appearing to read "R. C. Bunt". The signature is stylized with a large, flowing "R" and "B".

R. C. Bunt
BWR Owners' Group Chair

cc: Ms. Michelle Honcharik
Mr. Douglas Coleman, BWROG Vice Chair
BWROG PTC-GE Committee