

# BWR OWNERS' GROUP

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Project number 691

BWROG-07051

October 1, 2007

John A. Grobe

Associate Director for Engineering and Safety Systems

Office of Nuclear Reactor Regulation

Washington, DC 20555-0001

**Subject: BWROG comments on NRC Response to NEI Letter "Re: Industry Comments on Recent Guidance Document"**

**Reference: 1) NRC Response to NEI Letter Dated May 23, 2007, "Re: Industry Comments on Recent Guidance Document", dated August 22, 2007**

**2) Memorandum from Thomas Alexion to Christopher P. Jackson, Subject: Summary of November 8, 2006 Open meeting with BWR Owners Group..." dated December 1, 2006.**

**3) NRC letter to BWR Owners Group, "Comments on Industry Activities to Resolve Potential Adverse Flow Effects From Power Uprate Operation" dated January 12, 2005**

**4) BWROG Letter to NRC under Project Number 691, "Transmittal of BWR Owners Group Extended Power update (EPU) Lessons Learned and Recommendations (NEDO 33159)", Letter No. BWROG-04033, dated November 23, 2004**

**5) NRC Letter to BWROG, "Industry Activities to Resolve Potential Adverse Flow Effects from Power Uprate Operation", dated November 8, 2004**

The BWROG wishes to clarify that there are no open items or actions by the BWROG as stated in the above reference (1) letter, page 6 paragraph 4, line 5, "The staff is awaiting a response to its comments on the lessons learned document on extended power uprates prepared by the BWR Owners Group and..."

The BWROG addressed the comments from the NRC during the November 8, 2006 meeting. The following chronology of events and basis for our position provided for your benefit.

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- November 8, 2004     The NRC staff requested copies of the BWR Owners Group (BWROG) EPU committee documents. (Reference 5, "... we would appreciate if the BWROG would provide to the NRC staff copies of the documents mentioned...")
- November 12, 2004     The BWROG provided NEDO 33159, Rev 0, "Extended Power Uprate (EPU) Lessons Learned and Recommendations" for information only; there was no request for NRC approval of this document. (Reference 4)
- January 12, 2005     The NRC provided comments on NEDO 33159 Rev 0 and requested to meet to discuss. (Reference 3)
- November 8, 2006     Attended meeting with NRC Staff (Tom Scarbrough, NRR/DCI/CPTB, Tom Alexion, NRR/DPR, etc.) to discuss responses to NRC staff comments and revisions to topical report NEDO-33159, Rev 0. During this meeting, the NRC staff agreed that no formal response to the staff comments was necessary.
- December 1, 2006     NRC memorandum acknowledges that the BWROG transmittal letter for the NEDO 33159, Rev 0, states, "... BWROG was providing NEDO 33159 to the NRC for information and not for NRC approval." This document also states (page 2, paragraph 1), 'The BWROG addressed the staff's comments either identifying where NEDO 33159 already addresses the comment, or by clarifying the document and/or updating the staff on progress on the comment, as appropriate.' (Reference 2)

The BWROG issued NEDO 33159, Rev 1 in January 2007 to the BWROG members. This revision updated some information and addressed comments received on the Rev 0 document by Industry and NRC.

Based on the above the BWR Owners Group does not feel any further action is required. If the NRC desires additional information from the BWROG on this Lessons Learned NEDO, please send a letter to the Chair of the BWROG with details on the staff's intended use of the information.

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If you have any questions on this matter, please feel free to contact the undersigned at (205) 992-7475 or Ron Willems Project Manager of the Extended Power Uprate Committee (910) 675-6076.

Sincerely,

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

R. C. Bunt  
BWR Owners Group, Chair

Cc: Kamal Manoly, NRR  
Tom Alexion, NRC  
Document Control Desk, US Nuclear Regulatory Commission  
Michelle Honcharik, NRR  
Douglas Coleman, BWROG Vice-Chair  
Ken McCall, BWROG Program Manager  
BWROG Primary Representatives  
EPU Committee