

July 2, 2015

MEMORANDUM TO: Anthony J. Mendiola, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Jason J. Drake, Project Manager **/RA/**
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 9, 2015, DROP-IN MEETING WITH THE
BOILING WATER REACTOR OWNERS' GROUP FINITE BREAK
OPENING TIME COMMITTEE

On March 9, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of the Boiling Water Reactor Owners' Group (BWROG) Finite Break Opening Time (FBOT) Committee in a drop-in meeting at NRC headquarters in Rockville, Maryland. The enclosure provides a list of those in attendance.

The FBOT project stems from the discovery by General Electric Hitachi (GEH) of a non-conservative error in the method used for calculating annulus pressurization (AP) loads generated from pipe break accident events. This was the subject of a GEH proprietary Safety Communication (SC) in 2009. On June 12, 2014, the BWROG provided updates on the FBOT project at an NRC public meeting (Agencywide Documents Access Management System (ADAMS) Accession No. ML14141A494).

The BWROG representatives requested the March 9, 2015, drop-in meeting to provide updates to the NRC staff on the progress to questions raised by the NRC staff during the June 12, 2014, meeting. The BWROG representatives indicated that a FBOT Committee meeting was held in November of 2014. The November meeting established an action plan to review and discuss the FBOT Committee's Regulatory Basis Report drafted in response to the SC issue from a Title 10 of the *Code of Federal Regulations* (10 CFR) 50.59 perspective. The BWROG representatives indicated that their action plan was developed using the assumption that dynamic loads were not considered for BWRs in NUREG-0609 ("Asymmetric Blowdown Loads on PWR Primary Systems – Resolution of Generic Task Action Plan A-2", January 1981), and were subsequently evaluated for BWR/6 plant design in 1978. The BWROG representatives noted that a comprehensive ADAMS search was conducted for associated regulations, and

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added that no NRC safety evaluations (SEs) were found for any Boiling Water Reactors after 1975. The BWROG representatives indicated that it is proceeding forward with the assumption that AP and acoustic circuit (AC) load changes are considered to be modified design inputs; therefore, changes to the Final Safety Analysis Report (FSAR) are allowed per 10 CFR 50.59.

The NRC staff expressed concern that treating AP/AC modifications as a change in design inputs per 10 CFR 50.59 may not be appropriate. The BWROG representatives identified that an independent contractor (Excel) had performed a validation of the 10 CFR 50.59 approach.

The BWROG representatives concluded the presentation with a summary of their four part plan to conclude the FBOT Committee's efforts: Part 1: The NRC and BWROG FBOT Committee public meeting (June 2015); Part II: Finalize Methodology (mid-2015); Part III: Sample Calculations (end-2015); Part IV: Implementation of a "Handbook" to plants under generic grouping (2016). The NRC staff requested for the scheduled June 2015 meeting, that the BWROG present the details of their 10 CFR 50.59 approach.

At the conclusion of the meeting, the NRC staff facilitated a summary discussion and meeting closeout.

No members of the public were present for this meeting.

Project No. 691

Enclosure:
List of Attendees

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List of Attendees

**Drop-In Meeting with the Boiling Water Reactor Owners' Group (BWROG) Finite Break
Opening Time (FBOT) Committee**

and

U.S. Nuclear Regulatory Commission (NRC) Staff

March 9, 2015

<u>NAME</u>	<u>Organization</u>
Lesa Hill	BWROG/SNC
George Inch	BWROG/Exelon
Jerald Head	BWROG/GEH
Garold Carlisle	BWROG/GEH
Jason Drake	NRC
Jeremy Dean	NRC
Stacey Rosenberg	NRC
Brian Benney	NRC
Gary Stevens	NRC
Peter Snyder	NRC

ENCLOSURE