



COMBUSTION ENGINEERING OWNERS GROUP

Arizona Public Service Co.
Palo Verde 1, 2, 3
Baltimore Gas & Electric
Calvert Cliffs 1, 2

Consumers Power Co.
Palsades
Florida Power & Light Co.
St. Lucie 1, 2

Entergy Operations
ANO 2
WSES Unit 3

Maine Yankee Atomic Power Co.
Maine Yankee
Northeast Utilities Service Co.
Millstone 2

Omaha Public Power District
Fl. Calhoun
Southern California Edison Co.
SONGS 2, 3

John J. Hutchinson, Chairman
c/o Florida Power & Light/700 Universe Boulevard/Juno Beach, FL 33408

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December 19, 1991
CEOG-91-753

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Document Control Desk

Subject: C-E Owners Group Submittal of CEN-415 Revision 1, "Modification of
Post Accident Sampling System Requirements"

Gentlemen:

This letter submits twenty-three (23) copies of C-E Owners Group Topical Report CEN-415 Revision 1, "Modification of Post Accident Sampling System Requirements". While reliance on Post Accident Sample Systems (PASS) has been the traditional method for meeting the intent of NUREG-0737 II.B.3, CEN-415 Revision 1 provides justification for the use of alternative methods. These alternatives employ existing plant safety grade equipment and take credit for analyses in plant FSARs.

The C-E Owners Group requests that the NRC generically review this report and issue a SER that would support relaxation of PASS requirements for CEOG plants as presented in CEN-415 Revision 1.

Maintenance of the PASS is both man-rem and resource intensive. The CEOG requests that in keeping with NRC, industry, and CEOG specific goals to reduce unnecessary radiation exposure, (ALARA), the NRC Staff assign a high priority to the review of CEN-415 Revision 1. Further, to permit the CEOG to budget for review fees, the NRC is requested to provide an estimate of the effort which will be required by the NRC Staff and its contractors (if applicable) to review CEN-415 Revision 1, and the anticipated timetable for that review.

The NRC should address technical questions related to CEN-415 Revision 1 to the Chairman, C-E Owners Group. Invoices for review fees should also be directed to the Chairman with a copy to:

Mr. J. W. Pfeifer
C-E Owners Group Project Office
ABB Combustion Engineering Nuclear Power
P. O. Box 500
Windsor, CT 06095-0500

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If you have any questions, please do not hesitate to contact me.

Very truly yours,

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John J. Hutchinson for
John J. Hutchinson, Chairman
C-E Owners Group

PWR/rn

Enclosure: CEN-415 Revision 1, 23 Copies
cc: Mr. J. W. Pfeifer, ABB
Mr. F. Witt, USNRC

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