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 AUTH. NAME AUTHOR AFFILIATION
 SORENSEN, G.C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Requests confirmation of CRGR review re specific
 uncertainties conservatively treated in GE instrument
 setpoint methodology for BWRs. Concern should be treated as
 generic.

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August 2, 1984
G02-84-445

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PDR ADOCK 05000397
P PDR

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PLANT NO. 2
REQUEST FOR CONFIRMATION OF CRGR REVIEW

Reference: Letter, T. M. Novak (NRC) to J. F. Carolan (PECO)
with blind copy to Supply System Docket No. 50-397,
"Transmittal of NRC Staff Report on Setpoint
Methodology for GE Supplied Protection System
Instrumentation", dated May 15, 1984

The reference letter requested twelve utilities, constructing or operating Boiling Water Reactors, to provide additional confirmatory information to affirm that specific uncertainties have been conservatively treated in the General Electric instrument setpoint methodology.

The Supply System objects to the manner in which this concern has been brought to the attention of the utilities addressed by the letter. In the latter part of 1982, various utilities received inquiries with regard to instrument setpoint methodology via several routes: formal Requests for Information addressed to a specific docket, informal copies of similar requests for information either provided by hand or telecopied to utility employees, approved licensing conditions addressed in staff Safety Evaluation Reports or proposed licensing conditions.

A review of the inquiries to date and other documentation applicable to this concern readily leads to the conclusion that the concern, as expressed by the staff, is generic. It is the Supply System position that the issue is generic to all utilities supplied protection system instrumentation by General Electric and not restricted to the twelve utilities addressed by the reference.

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A. Schwencer
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REQUEST FOR CONFIRMATION OF CRGR REVIEW

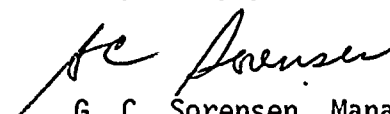
The Supply System has been unable to confirm that this concern has received formal review by the Committee to Review Generic Requirements (CRGR) and considers the methodology of implementation to date, to be contrary to the policies of the Nuclear Regulatory Commission and in particular the spirit, if not the letter, of the CRGR charter. As stated in revision 1 to the CRGR charter, the CRGR "has the responsibility to review and recommend to the Executive Director for Operations (EDO) approval or disapproval of requirements to be imposed by the NRC staff on one or more classes of power reactors". Additionally, the CRGR is charged to develop controls to "make sure that requirements in place or to be issued (a) do in fact contribute effectively and significantly to the health and safety of the public, and (b) do lead to utilization of both NRC and licensee resources in as optimal a fashion as possible in the overall achievement of protection of public health and safety". The Supply System can not confirm that this concern has been subject to these controls.

The referenced letter states that "the staff considers the Technical Specifications for instrument channel setpoint allowable values for licensed GE/BWR plants (and those specifications in preparation for NTOL plants in the licensing review process), established based on the GE setpoint methodology developed to date, to be sufficiently conservative to permit continued licensing of the NTOL plants and operation of licensed plants until this issue is resolved . . .". This statement confirms the generic applicability of this concern. Additionally the perceived method of implementing this concern on the twelve utilities in question without appropriate CRGR review casts doubt that the concern has indeed had appropriate analysis. Also no verification exists that implementation of the concern will affect an effective and significant contribution to the health and safety of the public. Based on the significant costs, presented by the NSSS supplier to the utilities in question for obtaining the requested information, without CRGR review it is not evident that the staff has evaluated the burden placed on the utilities nor the consequences on the public supporting those utilities.

Accordingly, the Supply System requests that confirmation of the CRGR review of this concern, with the attendant information package described in the CRGR charter, be provided. Additionally, there is no clear indication that this request to over ten utilities has received an Office of Management and Budget approval per public law: Paper Work Reduction Act of 1980, PL 96-511.

Should you have any questions regarding this request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh

cc: R Auluck - NRC
WS Chin - BPA
AD Toth - NRC Site
V Stello - NRC
R Grunseich - LILCO

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Dear Mr. [Name Redacted]:

I am writing to you regarding the [Subject Redacted] matter.

[The following text is heavily redacted and mostly illegible. It appears to be a letter of correspondence.]

Sincerely,
[Signature Redacted]