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**Docket:** NRC-2019-0177

Proposed Revisions to Draft Branch Technical Position 8-8, Onsite and Offsite Power Sources Completion Time Extensions

**Comment On:** NRC-2019-0177-0001

Proposed Revisions to Draft Branch Technical Position 8-8 Onsite (Emergency Diesel Generators) and Offsite Power Sources Completion Time Extensions; Request for Comment on Draft Section of Standard Review Plan

**Document:** NRC-2019-0177-DRAFT-0004

Comment on FR Doc # 2019-24551

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## Submitter Information

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**Submitter's Representative:** Ken Schrader

**Organization:** PWR Owners Group

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## General Comment

Please see attached.

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## Attachments

OG-20-9



**Program Management Office**  
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Project 99902037

January 13th, 2020

OG-20-9

Office of Administration  
Mail Stop: TWFN-7-A60M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: PWR Owners Group, Risk Management Committee  
**PWROG Comments on Draft Revision to Branch Technical Position (BTP) 8-8, “Onsite and Offsite Power Sources Completion Time Extensions;” 84 FRN 61082-61083; Docket ID NRC-2019-0177**

Ms. Jennifer Borges,

The PWR Owners Group has developed on behalf of its members the attached comments on BTP 8-8 “Onsite and Offsite Power Sources Completion Time Extensions”. This letter serves to transmit the PWR Owners Group comments to the NRC. The PWROG appreciates the opportunity to comment on BTP 8-8. The PWROG would also like to endorse the comments provided by the Nuclear Energy Institute (NEI).

Attached to this letter are:

- PWROG Comments on BTP 8-8 (Non-Proprietary). (Appendix 1)

If you have any questions, please do not hesitate to contact me at (805) 550-4168 or Mr. W. Anthony Nowinowski, Executive Director of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,

Ken Schrader  
Chairman and COO  
PWR Owners Group

DSM:am

Appendix 1: PWROG Comments on BTP 8-8 (Non-Proprietary)

cc: PWROG PMO  
PWROG Risk Management Committee  
R. Linthicum, PWROG  
K. Schrader, PWROG  
D. Mirizio, PWROG  
W. Nowinowski, PWROG  
L. Fields, US NRC

Appendix 1: PWROG Comments on BTP 8-8

The revision states that BRP 8-8 is not applicable to Risk Informed Applications following using SRP 19.2 which discusses applications using RG 1.174. No mention is made of the applicability to applications that use risk insights but are not full RG 1.174 submittals. (Background)

The applicability to Exigent TS changes should be explicitly stated (Background)

The original BTP 8-8 was develop based on concerns related to grid reliability degradation due to deregulation and insights identified in NUREG-1784 regarding the probability and duration of loss of offsite power events as well the consequential LOOP probabilities following a plant trip. The NUREG was issued in 2003. Over 15 years of operating experience has been accumulated since the issuance of the NUREG. This data should be reviewed to determine if there is still a need to have the BTP. (Section B, 2nd paragraph)

A basis (including cost benefit) should be provided for the new language in the 4th paragraph on page 8-8-3 for the additional requirements for related to shared service water, component cooling water, or HVAC systems for extending a completion time.

A basis (including cost benefit) should be provided for the new discussion about protecting feeders from offsite power sources (like hydro units) as supplemental power sources, including against external events. (Page 8-8-3 last paragraph)

A basis (including cost benefit) should be provided for changing the connection time to “within one hour” from “within approximately one hour.” (Page 8-8-4 2nd paragraph)

A basis (including cost benefit) should be provide for changing the verification of availability of the supplemental source to within 5 days from within 30 days. (Page 8-8-4 2nd paragraph)

A basis (including cost benefit) should be provided for the requirement to have adequate fuel for 24 hours full-load operation. (Page 8-8-4 2nd paragraph)

A basis (including cost benefit) should be provided for expanding the scope of to battery chargers, batteries, and inverters.

A basis (including cost benefit) should be provide for imposing RG 1.155 QA Guidance for non-safety systems and equipment”. (Page 8-8-6)