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**BWR OWNERS' GROUP**

Ronald Eaton  
57FR54860  
11/20/92  
Cynthia L. Tully, Chairperson  
(205) 877-7357

c/o Southern Nuclear Operating Company • P.O. Box 1295, Bin B052 • Birmingham, AL 35201

BWROG-92121

December 17, 1992

Chief, Rules and Directives Review Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: REQUEST TO EXTEND COMMENT PERIOD REGARDING 57FR54860

References: 1) J. E. Richardson (NRC) to D. N. Grace (BWROG), "Inservice Inspection of Mark I Drywell Steel Shells," June 23, 1989  
2) S. D. Floyd (BWROG) to G. Bagchi (NRC), "BWROG Recommendations on Drywell Inspections," December 22, 1989

In 57FR54860 dated November 20, 1992, the NRC requests public comments on a proposed Generic Letter (GL) which will contain recommended actions regarding augmented inservice inspections of BWR Mark I and Mark II steel containments. The comment period expires on December 21, 1992.

At the NRC's initiative, the BWR Owners' Group (BWROG) and NRC have established an ongoing dialogue on this topic dating back to 1989. The BWROG welcomed the opportunity to share relevant information with the NRC and believes that the exchange of information on this topic was very valuable. At the NRC's request (Reference 1), the BWROG submitted comments (Reference 2) on containment inspections proposed by the NRC, and also met with the NRC on two occasions to discuss the topic in more detail.

An initial review of the proposed GL indicates significant differences between the NRC proposed program, the BWROG comments in Reference 2, and earlier NRC recommendations (for example, those discussed with the BWROG in the meeting of December 4, 1990). The BWROG is concerned that some of the recommended actions are not justifiable from a safety or cost-benefit perspective, and that adequate flexibility has not been included in the proposed GL for exceptions for plants with mitigating design features (e.g., absence of a sand cushion or liner gap, use of corrosion resistant materials). The BWROG also questions whether the planned GL considers other potential NRC actions pertaining to ASME Subsection IWE, which provides inspection guidance for metal containments. The BWROG therefore desires to undertake a detailed review of the recommended actions contained in the proposed GL, to determine to what extent they are actually needed and whether they can be reasonably implemented. However, to accomplish this review, more time is needed than is permitted by the comment period deadline.

RETURN TO REGULATORY CENTRAL FILES

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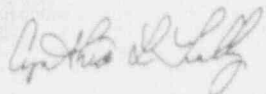
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The BWROG hereby requests that the comment period be extended by a minimum of 60 days, to February 19, 1993. The reasons for requesting the extension are summarized below:

- The recommended actions provided in the proposed GL appear to be substantially different from those previously discussed. To understand their potential impact, additional time is needed.
- The BWROG has been extensively involved with this topic for a number of years and therefore believes the comments it will make as a result of a detailed review of the proposed GL will be essential to proper resolution of this issue. To accomplish a review of the required detail and prepare comments, additional time is needed.
- A significant portion of the BWROG resources are currently focused on the water level instrumentation issue. Additional time is needed to undertake the required review of the proposed GL in parallel with that issue and other ongoing BWROG activities. The BWROG views each of these activities as important, but requests that the NRC comment deadline recognize the precedence of the activities on water level and the commitment of BWROG resources to those activities.
- Given the longevity of this topic and the desire for seeing that proper actions are taken to close it, a minimum of 60 days is a reasonable amount of time for extending the comment period.

Please contact me if I can be of assistance. Because the current comment period deadline is imminent, an expeditious response to our request would be appreciated.

Very truly yours,



Cynthia L. Tully, Chairperson  
BWR Owners' Group

WAZ13/CLT/waz

cc: W. T. Russell, NRC  
R. B. Eaton, NRC  
L. A. England, BWROG Vice Chairman  
R. W. Bishop, NUMARC  
D. F. Stenger, Winston & Strawn  
L. S. Gifford, GE  
S. J. Stark, GE  
W. A. Zarbis, GE  
BWROG Primary Representatives  
BWROG Containment Inspection Committee