

BWR OWNERS' GROUP

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November 15, 1999

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Document Control Desk
US Nuclear Regulatory Mail Stop 8 D1
Washington, DC 20555-0001
Attn: John N. Hannon,
Plant Systems Branch Chief

**SUBJECT: *BWR Owners' Group Appendix R Fire Protection Committee
Generic Guidance for BWR Post-Fire Safe Shutdown Analysis***

Attachment: GENE-T43-00002-00-02, *Generic Guidance For BWR Post-Fire Safe Shutdown Analysis*, Prepared by GE Nuclear Energy with BWR Owners' Group Appendix R Committee, November 1999

Reference: Stephen Dembek to Stuart A. Richards, *Summary of Meeting with the Boiling Water Reactor Owners Group (BWROG) Appendix R Committee on Post-Fire Safe Shutdown Circuit Analysis Issues (Fire-Induced Circuit Failures)*, September 3, 1999

Please find enclosed, the BWR Owners' Group (BWROG) Appendix R Fire Protection (FP) Committee's guidance document (Attachment) for NRC review and approval. The BWROG believes the document contains an acceptable methodology for performing post-fire safe shutdown circuit analysis. This document provides a comprehensive methodology and related guidance for BWRs to perform post-fire safe shutdown analysis. The approach outlined in the Guidance Document, when used in conjunction with the defense-in-depth features of the current Plant Fire Protection Programs, provides a plant design that is safe and consistent with regulatory requirements.

The FP committee has given extensive and deliberate consideration to the issues identified by the NRC staff during the development of the methodology. Some of the issues identified have been directly incorporated into the overall methodology document. For certain issues, however, the FP committee's evaluation has been unable to identify high safety significance associated with the issue. As a result of this, the Committee is unable to recommend any action by individual licensees relative to these specific issues. For these issues, the Committee's safety significance review is contained in the appendices.

The FP committee is fully aware of the NEI Circuit Failure Issue Task Force's (CF ITF) efforts to develop risk informed information and products that could be used to address the issues contained in the appendices. The BWROG FP committee has members that also participate on the NEI CF ITF and intends to monitor the NEI CF ITF's information and products. The FP committee expects the circuit analysis guidance in the BWROG Guidance document to be integrated with the probabilistic methods being developed by the NEI CF ITF. Until the NEI CF ITF work is complete, the attached guidance document will remain a stand-alone exposition of

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deterministic safe shutdown analysis guidance. If the NEI CF ITF's conclusions on the issues in the appendices are different from those of the BWROG FP committee, the committee will assess this information and act appropriately.

The BWROG FP committee will continue to review and comment on the NFPA Code 805 product, as well as the draft Fire Protection Regulatory Guide.

While the attached document has been endorsed by a substantial number of the members of the BWR Owners' Group, it should not be interpreted as a commitment of any individual member to a specific course of action. Each member must formally endorse the BWROG position in order for that position to become the member's position.

If you have any questions about the information provided here, please contact Tom Gorman (PP&L) at (610) 774-7762, or George Stramback (GE) at (408) 925-1913.

Sincerely,

Original signed by

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Attachment

cc: JM Kenny, BWROG Vice Chairman
BWROG Primary Representatives
BWROG Appendix R Committee
FA Emerson, NEI
TG Hurst, GE
GB Stramback, GE