

Issue #1 - Gap Modeling

- W proposed model
 - Gap based on plant specific barrel and vessel temperatures at 75 seconds after BOC.
 - Applied throughout reflood.
- NRC proposed change
 - Gap applied at 75 seconds after BOC.
- W Response
 - Gap size is conservative relative to transient response.
 - 75 second restriction has minimal effect on PCT.
 - Unnecessary complication to analysis.

Issue #2 - Downcomer Boiling

- Staff concerned about effect of downcomer boiling on reflood transient.
- As discussed by Rich Schoff, the effect of downcomer boiling has been addressed.

Issue #3 - Overall Appendix K Conservatism

- Staff requests
 - Restriction of future applications for model improvements in the Appendix K evaluation model.
- W Response
 - EM is conservative relative to Best Estimate Methodology.
 - Generic industry issue that should not be tied to a specific vendor.
 - Future model enhancements must be defensible based on individual merits.