



NUCLEAR ENERGY INSTITUTE

David J. Modeen  
DIRECTOR, ENGINEERING  
NUCLEAR GENERATION DIVISION

November 21, 2000

Mr. Gary M. Holahan  
Director, Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation  
Mail Stop O10-A1  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** NRC Review of Westinghouse Topical Report, WCAP-15604,  
*Limited Scope High Burnup Lead Test Assemblies*

**REFERENCE:** Westinghouse Owners Group letter OG-00-115, *Transmittal of WCAP-15604-NP, Rev. 0, Limited Scope High Burnup Lead Test Assemblies* (MUHP-1045), November 15, 2000

**PROJECT NUMBER:** 689

Dear Mr. Holahan:

The reference letter provided copies of Westinghouse Topical Report, WCAP-15604, "Limited Scope High Burnup Lead Test Assemblies," and requests NRC review and approval of a program designed to provide fuel performance data necessary to support fuel burnup licensing activities beyond current limits. The topical report and transmittal letter identify that broad segments of the nuclear industry contributed to the development of the report and that its use has generic applicability. On this basis, the Westinghouse Owners Group requests that all review fees associated with WCAP-15604 be waived under the provisions of 10 CFR Part 170.

NEI believes that the topical report covers a topic that has broad industry interest and applicability. We request that the NRC review of the topical report be expanded to address application to all fuel designs used in domestic reactors. We also support the WOG request that this review be exempted from the fee recovery provisions contained in 10 CFR Part 170.

The subject addressed by the topical report is of importance to over 75 domestic operating reactors. The NRC staff review of the report is considered to be relevant to the NRC performance goals as identified below.

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**(1) Maintain Safety**

Safety is maintained through the application and use of a process that clearly defines the review and modeling requirements necessary to support a high burnup lead test assembly program and enables this process to be consistently applied throughout the industry.

**(2) Maintain Public Confidence**

Public confidence will be maintained through the development, review and subsequent use of a more scrutable process that clearly identifies the design and licensing requirements for high burnup lead test assembly programs.

**(3) Improve Efficiency and Effectiveness of Regulation**

Efficiency and effectiveness of regulation will be improved through the establishment of a single comprehensive program document that can be referenced and used by all licensees.

**(4) Reduce Unnecessary Burden**

The development and approval of the topical report will reduce unnecessary regulatory burden. The upfront identification of the program requirements will enable licensees and fuel vendors to more easily factor these requirements into planning and development efforts and avoid costly surprises that could otherwise occur during the licensee specific review process.

Please include the individuals identified in the enclosure in your distribution of all future correspondence related to the review and approval of the topical report.

Please direct all questions on this letter to John Butler (202-739-8108, [jcb@nei.org](mailto:jcb@nei.org).)

Sincerely,



David J. Modeen

JCB/maa  
Enclosure

c: Mr. Peter Wen, U. S. Nuclear Regulatory Commission  
Mr. Jared Wermiel, U. S. Nuclear Regulatory Commission  
Ms. Margaret Chatterton, U. S. Nuclear Regulatory Commission  
Mr. Robert H. Bryan, Tennessee Valley Authority  
Dr. Rosa Yang, EPRI  
Dr. Terrance Rieck, Exelon

**Enclosure**

**Additions to Distribution for NRC Correspondence  
Related to Review and Approval of WCAP-15604**

Mr. David J. Modeen Nuclear Energy Institute 1776 I St. NW Washington, DC 20006	Mr. John Willse Framatome Technologies 3315 Old Forest Road Lynchburg, VA 24501
Mr. Jerald S. Holm Siemens Power Corporation 2101 Horn Rapids Road Richland, WA 99352	Mr. Robert A. Rand General Electric / GNF Mail Code F25 Castle Hayne Road Wilmington, NC 28401
Dr. Odelli Ozer EPRI P.O. Box 10412 Palo Alto, CA 94304	Dr. Rosa Yang EPRI P.O. Box 10412 Palo Alto, CA 94304