

November 12, 2004

Mr. Frederick P. Schiffley, II
Chairman, Westinghouse Owners Group
Exelon Nuclear
Engineering Design
Cornerstone II at Cantera
4300 Winfield Road
Warrenville, Illinois 60555

SUBJECT: NRC STAFF REVIEW OF THE WESTINGHOUSE OWNERS GROUP
REQUEST FOR ENFORCEMENT DISCRETION FOR REACTOR COOLANT
PUMP SEAL PERFORMANCE FINDINGS IN TRIENNIAL FIRE PROTECTION
INSPECTIONS (TAC NO. MC3865)

Dear Mr. Schiffley:

Thank you for your letter dated July 20, 2004, requesting enforcement discretion for reactor coolant pump (RCP) seal performance findings in triennial fire protection inspections. The NRC staff has reviewed the request and concluded that allowing the Westinghouse Owners Group (WOG) a finite time period to perform additional analyses concerning the risk associated with the loss of RCP seal cooling may be of benefit to both the NRC and industry.

Your letter stated that the WOG is currently working in several areas that will provide additional technical bases supporting the conclusion that the current inspection findings are not appropriate. You stated that you have:

- A program to obtain and assess the existing test data from Electricité de France (EdF) on the performance of RCP seals when seal injection is restored after a prolonged period without cooling,
- A program to provide a technical basis for exemption requests for the safe shutdown requirements in Appendix R (III.G.1.a and III.L.2.b) based on the level of conservatism in these requirements, and
- A program to quantify the conservatism in the probabilistic risk assessment (PRA) model for RCP seal performance that is being applied in fire protection inspections.

However, details of the above efforts including objectives, status, and scheduled were not provided.

You stated that a WOG resolution strategy is expected by the end of 2004, and that this schedule constitutes timely issue resolution given the relatively low preliminary risk significance assigned by the NRC for those plants where findings have been identified. We do not agree that these findings are necessarily of low risk significance for each affected plant, since each plant has a unique post-fire safe-shutdown plan with plant-specific post-fire capabilities. Thus, we emphasize the need to put compensatory actions in place while the issue is being resolved.

We have determined that allowing the WOG to perform additional analysis concerning the risk associated with the loss of the RCP seal cooling may be of benefit to both the NRC and industry. During this period, the NRC regional inspectors will continue to inspect to ensure that RCP seal cooling would be available to maintain RCP seal integrity after a postulated fire. However, we will consider any potential findings as "unresolved" until we have completed our evaluation of the WOG analysis. Mr. Paul Hijeck, WOG Project Manager has committed to Mr. Girija Shukla, NRC Project Manager to submit the analysis to the NRC by January 28, 2005.

For findings which have the potential to result in the loss of seal cooling identified during the specified period, we expect that appropriate compensatory actions, in accordance with guidance provided in Generic Letter 91-18, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions," will be put in place and maintained until the issue is resolved for that facility.

To streamline future efforts in addressing fire PRA modeling assumptions, we welcome additional industry information regarding RCP seal performance. However, we note that many years of research and discussion between the industry and the NRC have already occurred regarding one of the two dominant seal failure modes of interest to fire PRA modeling. Although Generic Safety Issue (GSI) 23, "Reactor Coolant Pump Seal Failure," did not specifically evaluate fire event initiators, RCP seal behavior under hot-shock conditions (total loss of seal cooling) was addressed and ultimately closed in RIS 2000-002, "Closure of Generic Safety Issue 23, Reactor Coolant Pump Seal Failure." The NRC staff has used the guidance provided as part of the GSI 23 resolution in its regulatory applications in the reactor oversight process's (ROP's) significance determination process (SDP) for fire protection-related inspection findings. Additional dialogue between the WOG and the NRC on this matter would not be an efficient use of staff resources unless the industry has recently completed a robust reliability test program that would establish a test-based RCP seal failure probability distribution or is capable of providing an equivalent alternative approach.

We are interested in the WOG's perspective on the issue of a consequential RCP seal loss-of-coolant accident from a cold thermal shock of the seals (i.e., re-establishing RCP seal cooling following heatup to full reactor coolant system temperature). Risk modeling may benefit from additional information beyond the EdF proprietary test information reviewed in the Surry Power Station submittal dated May 7, 2004.

F. Schiffley

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In accordance with your commitment, we expect submittal of the WOG analysis by January 28, 2005. If you have additional questions or if you need to meet with the NRC staff to discuss any issues, please contact Mr. Girija Shukla at (301) 415-8439.

Sincerely,

/RA/

Herbert N. Berkow, Director
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Project No. 694

cc:

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