



Project Number 694

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November 18, 2004

WOG-04-589

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Michael Mayfield, Director
Division of Engineering Technology
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Westinghouse Owners Group
Integrated Chemical Effects Testing Program for PWR ECCS
Recirculation (PA-SEE-0166)

The purpose of this letter is to inform the NRC that any further slippage of schedule for Chemical Effects Testing is likely to impact the ability of licensees to provide the information requested in GL2004-02 by September 1, 2005. The Westinghouse Owners Group (WOG) appreciates the potential importance of post-accident chemistry effects in the containment sump and the possible impact of those effects on head loss across the containment sump screen. This appreciation is clearly demonstrated in our support for and participation in the joint NRC Research/Industry Integrated Chemical Effects Testing Program for PWR ECCS Recirculation. This cooperative effort is currently being conducted under an addendum to the Memorandum Of Understanding (MOU) between the Electric Power Research Institute (EPRI) and NRC Research for performing cooperative nuclear safety research, dated October 4, 2004 (ADAMS Number ML 0428804020). Our participation as an industry team member in the chemical effects testing program to date includes the following:

1. The development of the test plan in concert with NRC and EPRI, including the collection and evaluation of plant data to identify the values of test parameters.
2. Participation in and support of the conduct of the test program under the addendum to the EPRI/NRC MOU.

We note, however, that the schedule for performing the test program has slipped by at least two months. The initial program schedule called for testing to begin in early August, 2004. The current schedule estimates testing to begin the week of November 8, 2004.

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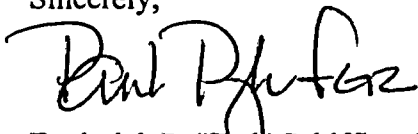
While some of this slippage has been unavoidable and due to circumstances beyond anyone's control (e.g., the LANL security stand-down), we believe this slip impacts our mutual efforts to support decision-makers and licensees as they plan and respond to the GSI-191 issues. NRC's Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," requires licensees to consider "chemical precipitants caused by chemical reactions in the pool." The GL identified September 1, 2005 as the date for the submittal of detailed evaluations, including chemical effects, as well as corrective actions planned by licensees if warranted by the detailed evaluations.

As indicated by the NRC communications identified above, accountability associated with addressing the effects of pool chemistry on head loss across a PWR containment sump screen resides with the licensee. Clearly, data from the chemistry test program is needed to determine the significance, if any, of potential chemical effects on post-accident sump performance.

Obtaining data from this test program is important to industry, but is not the final step in applying this research to licensee actions. The tests themselves will take a set amount of time; thirty days for the first test, and at least 15 days for each of the remaining three tests in the test matrix. Allowing for facility clean-up and set-up between tests, the test program will require several months to complete. Considering the time needed for preparation of a data report and additional industry guidance documents to assist licensees with implementation of actions, if any, resulting from that data, additional schedule slippages will challenge the ability of licensees to use the chemistry test data in evaluations and corrective actions to be submitted to NRC by September 1, 2005 as required by GL 2004-02.

This test program is a joint effort. We are all accountable for its timely and successful completion. We want to offer our help, working with NRC Research and EPRI, to ensure no additional slippage occurs in this test program.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Schiffley", written over a horizontal line.

Frederick P. "Ted" Schiffley, II, Chairman
Westinghouse Owners Group

mjl

WOG-04-589
November 18, 2004

cc:

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Systems & Equipment Engineering Subcommittee
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