

August 31, 2011

MEMORANDUM TO: John R. Jolicoeur, Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Ekaterina Lenning, Project Manager **/RA/**  
Licensing Processes Branch  
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JULY 28, 2011, CLOSED MEETING WITH  
WESTINGHOUSE ELECTRIC COMPANY (WESTINGHOUSE) TO  
DISCUSS WESTINGHOUSE SETPOINT METHODOLOGY  
(TAC NO. ME6690)

On July 28, 2011, a closed meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Westinghouse at the NRC Headquarters in Rockville, MD.

The NRC staff outlined its positions with respect to the establishment of an adequate margin between limiting safety system settings and process analytical limits, as well as the staff's guidelines for establishing the magnitude of tolerances for "as-left" settings, and "as-found" allowable deviation limits. The NRC staff also summarized its concerns raised during recent licensing actions for licensees that reference the use of a topical report describing Westinghouse setpoint methodology as well as licensees that did not reference a specific Westinghouse setpoint methodology, but used Westinghouse contracting support for developing setpoint calculations attached to License Amendment Requests affecting Technical Specification settings. These concerns relate to the manner of accounting for the setting tolerance established as a component of the "as-left" tolerance term.

Westinghouse representatives outlined some of the fundamental differences between its approach to a "standard" setpoint methodology and the specific wording described within NRC setpoint guidance documents. In describing these fundamental differences, Westinghouse personnel outlined their interpretation of the intent and assumptions made within the NRC guidance documents, and related this interpretation to its field experience regarding the actual calibration practices of its client licensees. Westinghouse personnel also described the technical basis of its methodology for establishing recommended nominal trip settings and "as-left" and "as-found" tolerances, regarding how the magnitude of these terms relate to the term identified as "Rack Calibration Accuracy" within its standard methodology program. Also, Westinghouse personnel described their experience and analyses regarding the basis and conditions which are assumed when it identifies certain instrument channel performance terms as random variables. Westinghouse representatives provided a description regarding under what conditions and circumstances may the "as-left" setting allowance be considered and treated as a random term to be accounted for under the square root term of an estimate of total

loop uncertainty, rather than selected as a non-conservative limit of a bias term to be algebraically added to the square root term when estimating total loop uncertainty.

A discussion was held between NRC staff and Westinghouse personnel as to whether or not the concept of a "leave-alone zone" referenced during the calibration process as applied by some licensees adequately addresses the concept of an "as-left tolerance" as described by NRC staff within its guidance documents.

Finally, Westinghouse personnel presented its understanding of the guidance addressing the concepts identified as the "Option B" Setpoint Control Program identified within Technical Specification Task Force (TSTF) Action TSTF-493, and presented its conceptual recommendations regarding a possible licensee approach for meeting this guidance.

The list of attendees for July 28, 2011, is available in the Agencywide Documents Access and Management System as Accession No. ML112140468.

Project No. 700

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List of Attendees ADAMS No. **ML112140468**

OFFICE	PLPB/PM	PLPB/LA	PLPB/BC
NAME	ELenning	DBaxley	JJolicoeur
DATE	8/16/11	8/ 18 /11	8/31/11

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