



Program Management Office
20 International Drive
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Project Number 694
PA-ASC-0679

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OG-14-324

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

Attention: Chief, Planning, Program and Management Support Branch

Subject: PWR Owners Group
Update on PWR Owners Group Position Paper on Incomplete Rod Insertion (PA-ASC-0679)

References:

1. OG-97-113, Westinghouse Owners Group Position Paper on Incomplete Rod Insertion, dated October 20, 1997
2. NRC Bulletin 96-01, "Control Rod Insertion Problems," U.S. Nuclear Regulatory Commission, March 8, 1996.

In Reference 1, the PWR Owners Group (PWROG) discussed the process by which the issue of Incomplete Rod Insertion (i.e. incomplete RCCA insertion) could be brought to closure for Westinghouse-style fuel through voluntary measures on the part of PWROG members and Westinghouse. The purpose of this letter is to inform the NRC that the process has been successful, that the actions identified in Reference 1 are no longer necessary, and that this issue can be considered closed.

The bases for closure of this issue includes:

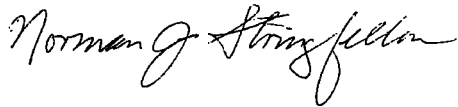
- Multiple fuel design hardware improvements that Westinghouse has introduced over the years to mitigate the likelihood of IRI events,
- The favorable operating experience with control rod insertion (no IRI) over the past 17 years, which includes many instances of placing high burn up fuel under control rods after analytical approval.
- Comprehensive field measurements of fuel/control rod parameters that demonstrate reduced potential for IRI events,

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- Advanced mechanical modeling of representative fuel (17x17 RFA-2) that demonstrates that high levels of margin exist to the potential for IRI at the maximum allowed burnups. This evaluation was performed as a PWR Owners Group sponsored project.

If you have any questions, please do not hesitate to contact me at (205) 992-7037, or Mr. Jim Molkenthin of the PWROG Program Management Office at (860) 731-6727.

Regards,



Jack Stringfellow, SNO
PWROG Chief Operating Officer & Chairman

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cc: PWROG PMO
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