



Program Management Office
1000 Westinghouse Drive
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PWROG-14001-P/NP Revision 1
Project Number 694

September 29, 2014

OG-14-347

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

Subject: PWR Owners Group
**Response to NRC Staff Questions in the August 28, 2014 Meeting
Regarding the Submittal of PWROG-14001, "PRA Model for the
Generation III Westinghouse Shutdown Seal," (PA-RMSC-0499R4)**

During the August 28, 2014 meeting between the Pressurized Water Reactor Owner's Group (PWROG) and the Nuclear Regulatory Commission (NRC) to discuss the Probabilistic Risk Assessment (PRA) model for the Generation III Westinghouse SHIELD® Passive Shutdown Seal (SDS), which is documented in Topical Report (TR) PWROG-14001, the NRC staff requested the following:

1. Provide clarification relative to whether a post operational test of the Generation III (Gen III) SDS is considered part of the qualification test program that is discussed in TR-FSE-14-1-P, Revision 1.
2. Provide the status of the two open items discussed in TR-FSE-14-1-P, Revision 1, and provide a determination of whether those open items are also applicable to TR PWROG-14001.
3. Provide a reference linking TR-FSE-14-1-P, Revision 1 to TR PWROG-14001.

With respect to item (1), a post operational test of the Gen III SDS is planned for October 2015 following the removal of the first installed Gen III SDS in an RCP in Beaver Valley Unit 2. As stated regarding the post operational test on page D-15 of TR-FSE-14-1-P, Revision 1, "this test is not required for qualification, but indicates intent to verify successful product rollout." Thus, the post operational test is not a requirement for qualification of the Gen III SDS. This is consistent with PWROG statements made

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during the August 28, 2014 meeting that the post operational test is considered to be confirmatory, and should not be required for the NRC to issue a Final Safety Evaluation for TR PWROG-14001 or to allow credit for the Gen III SDS in risk-informed applications.

With respect to item (2), due to the proprietary nature of the open items and associated technical details, the closure of the open items that are contained in TR-FSE-14-1-P, Revision 1 and the applicability of those items to the PRA model of TR PWROG-14001 is addressed in Enclosure 1. Following receipt of the Final Safety Evaluation for TR PWROG-14001, Revision 1, the NRC approved TR will be issued as TR PWROG-14001, Revision 2, and will incorporate the changes identified in Enclosure 1.

With respect to item (3), TR-FSE-14-1-P, Revision 1 (ML14084A496) is referenced in TR PWROG-14001, Revision 1. TR-FSE-14-1-P, Revision 1 documents the design and qualification test information that forms the basis for the PRA model provided in TR PWROG-14001, Revision 1.

Sincerely yours,



Jack Stringfellow, Chairman
PWR Owners Group

TZ:NJS:rfn

cc: PWROG Risk Management Committee
PWROG Licensing Committee
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Enclosure 1: Status of Open Items from TR-FSE-14-1-P, Revision 1
Enclosure 2: PWROG Slides from August 28, 2014 Meeting

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