



Program Management Office
1000 Westinghouse Drive
Cranberry Township, Pennsylvania 16066

WCAP-17788-NP, Revision 0
Project Number 694

February 13, 2015

OG-15-63

Maureen Wylie
Chief Financial Officer
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: PWR Owners Group
Request for Exemption from NRC Fees to Review WCAP-17788-NP
"Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090),"

References:

1. OG-14-146, "Transmittal of WCAP-17788-NP Volume 2, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Phenomena Identification and Ranking Table (PIRT) for GSI-191 Long-Term Cooling" (PA-SEE-1090)" April, 2014.
2. Generic Safety Issue, GSI-191, "Potential of PWR Sump Blockage Post-LOCA," 1998.
3. Nuclear Regulatory Commission Generic Letter GL 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized Water Reactors," September 2004.
4. SECY 12-0093, "Closure Options for Generic Safety Issue -191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," July 2012.
5. OG-15-1, "Transmittal of WCAP-17788-NP Volume 3, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) - Cold Leg Break (CLB) Evaluation Method for GSI-191 Long-Term Cooling" (PA-SEE-1090)" January 2015.

Dear Ms. Wylie:

The Pressurized Water Reactor Owner's Group (PWROG) is requesting an exemption from NRC fees to review WCAP-17788-NP "Comprehensive Analysis and Test Program for GSI-191 Closure". The final WCAP is currently projected to be completed in the second quarter of 2015. The NRC identified a concern regarding maintaining adequate long-term core cooling following a LOCA in GSI-191 (Reference 2). Generic Letter (GL) 2004-02 (Reference 3) identified actions that utilities must take to address the sump blockage issue. The NRC requires

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confirmation that debris transported to the containment sump screen after a LOCA will not lead to unacceptable head loss for the recirculation pumps, will not impede flow through the emergency core cooling system (ECCS) and containment spray system (CSS), and will not adversely affect the long-term operation of either the ECCS or the CSS.

This Topical Report (TR) provides a method of addressing the issues that are identified in both References 2 and 3. The TR will utilize a deterministic model to address GSI-191 concerns in accordance with Option 2a of Reference 4. Generic approval of WCAP-17788-NP will provide an approved methodology for numerous plants to utilize to close the GSI-191 issue. Based on recent projections, approximately 30 units plan to follow the methodology submitted in WCAP-17788-NP. NRC approval of this generic methodology will significantly reduce the impact on both licensee and NRC resources by eliminating the need for the development of plant specific methodologies, and NRC review of these plant specific methodologies.

Additionally, a number of meetings between the NRC Staff and the PWROG have been held to date (including but not limited to those that were held on April 1, 2014 {ML14077A547} and April 16, 2014 {ML14092A410}). It is anticipated that additional meetings will be held in the future to discuss the methodology in the TR with the goal of obtaining NRC feedback until WCAP-17788-NP is submitted for NRC review and approval. For example, the NRC is planning to witness program hydraulic testing at the Westinghouse Churchill site on February 26-27, 2015. It is expected that this visit and similar visits would also be covered by this request as it will facilitate a more streamlined review of the TR.

It is requested that the review fees associated with the review of WCAP-17788-NP be exempted from NRC fees including reimbursement of any fees associated with MF3408, "Eval. Of Long-Term Cooling Considering Particulate Fibrous and Chemical Debris Above 15 grams". It is also requested that any future meetings, audits and witness of testing associated with the review of the WCAP also be exempted from NRC fees. Additionally, the staff informally requested advance copies of WCAP Volumes during the April 1, 2014 NRC Meeting (ML14077A547); Volume 2 and Volume 3 of the WCAP have been made available to the NRC (Reference 1 and 5). Future Volumes of the WCAP will be provided as they are completed, consistent with the NRC's request during the April 1, 2014 meeting. A review fee waiver for any meetings, advance reviews, and the final NRC review of WCAP- 17788-NP is requested pursuant to the provisions of 10 CFR 170.11 since the purpose of this TR addresses the issues identified in Reference 3 and satisfies criterion 10 CFR 170.11(a)(1)(ii):

(ii) In response to an NRC request from the Associate Office Director level or above to resolve an identified safety, safeguards, or environmental issue, or to assist NRC in developing a rulemaking, regulatory guide, policy statement, generic letter, or bulletin

Thank you in advance for consideration of our request for exemption from NRC review fees associated with WCAP-17788-NP.

If you have any questions, please do not hesitate to contact me at (205) 992-7037 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,

A handwritten signature in cursive script, reading "Norman J. Stringfellow". The signature is written in black ink and is positioned below the "Sincerely yours," text.

Jack Stringfellow, Chief Operating Officer and Chairman
PWR Owners Group

JDB:NJS:rfn

cc:

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