

Westinghouse Perspective on Vendor Considerations for Implementation of 10 CFR 50.46c

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Outline

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- Scope of Work
- Anticipated Schedule
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Background

- Westinghouse has been engaged as a stakeholder in the rulemaking process and has been performing scoping work in anticipation of the new rule and associated Regulatory Guides
 - Scoping work has provided a basis for extensive practical comments on the proposed Rule and Regulatory Guides
- Significant work remains to be done after the Rule and Regulatory Guides are finalized
 - Generic assumptions outlined in the opening presentation help define the scope of work, but considerable uncertainty remains

Scope of Work

- Scope of Work and number of topical report submittals depend on the details in the new rule
 - Applicability of generic clad oxidation limits
 - Availability / accuracy of generic clad hydrogen pickup models
 - Determination of oxidation limit based on best estimate or upper bound clad hydrogen content
 - Level of detail required on breakaway oxidation testing program

Scope of Work (continued)

Based on current information it is likely that two sets of submittals will be required (one each for BWR and PWR) to describe:

- Breakaway oxidation time and quality control program
- Hydrogen pickup model
- Update to LOCA methods

Depending on the applicability of the generic Post Quench Ductility (PQD) limits, submittals on PQD limits may also be made

Anticipated Schedule

- Target submittals to NRC one year after finalization of rule
- Anticipate at least 1 year review before final Safety Evaluation Reports (SERs) are issued
 - Schedule for preparation of submittals and NRC review is dependent on
 - level of detail required to demonstrate compliance
 - guidance provided to NRC reviewers on the scope of their review

Opportunity for NRC to reduce preparation time and review time by providing specific guidance regarding report content and review scope

Summary

- Ability to forecast submittals and schedule is limited due to uncertainty in technical content and regulatory requirements of 50.46c and associated Regulatory Guides
- Based on available information it's anticipated that
 - at least 6 submittals would be made by Westinghouse to NRC 1 year after rule and Regulatory Guide finalization
 - final SERs issued by NRC one year after submittal date
- Schedule might be streamlined / accelerated by clear guidance on submittal content and scope of NRC review