



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

July 31, 2015

CHIEF FINANCIAL OFFICER

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 16066

Dear Mr. Nowinowski:

The Nuclear Regulatory Commission (NRC) is in receipt of the Pressurized Water Reactor Owners Group (PWROG) February 13, 2015, letter requesting a fee exemption under Title 10 of the *Code of Federal Regulations* (CFR) for the review of topical report WCAP-17888-NP, "Comprehensive Analysis and Test Program for GSI-191 Closure" (Agencywide Documents Access and Management System (ADAMS) Accession Number ML15051A109) and any related activities such as prior or future meetings, audits, and witness of testing associated with the review of this report; specifically, activities associated under TAC code MF3408, "Evaluation of Long-Term Cooling Considering Particulate Fibrous and Chemical Debris Above 15 Grams." The NRC notes that PWROG submitted a second fee exemption letter dated February 27, 2015, (ADAMS Accession No. ML15077A109) requesting a fee exemption with the same justification using a different fee exemption criteria. Because the earlier letter effectively articulates the justification for the fee exemption using the correct criteria, my decision is based on the earlier letter.

The NRC has established regulations for granting fee exemptions under 10 CFR 170.11, "Exemptions." The NRC has reviewed your request based on the following regulation:

- *10 CFR 170.11(a)(1)(ii) No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC-(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;*

Your letter states this topical report was submitted to address a generic safety issue, GSI-191, "Potential of PWR Sump Blockage-LOCA and a Generic Letter, GL 2004-2, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," regarding sump block issues. Additionally, your letter mentions that WCAP-17888-NP will utilize a deterministic model to address GSI-191 concerns in accordance with Option 2a of the SECY 12-0093, "Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," (ADAMS Accession No. ML121310648) regarding maintaining adequate long-term cooling.

The NRC confirms that the contents of this report and associated activities (prior/future) meet the requirements under 10 CFR 170.11(a)(1)(ii) because it responds to SECY-12-0093 from the former Executive Director for Operations, Mr. R. W. Borchardt, which was approved by the Commission and allows licensees the flexibility of choosing from three options to resolve GSI-191. The NRC agrees this report could eliminate the need to develop plant specific methodologies.

Therefore, the NRC concludes that topical report WCAP-17888 and its associated activities, which includes TAC code MF3408, meet the criteria of 10 CFR 170.11(a)(1)(ii); thus, the fee waiver has been approved for topical report WCAP-17888 and its associated activities. If you have any technical questions regarding this matter, please contact Mr. Jonathan Rowley, at 301-415-4053. Please contact Ms. Arlette Howard, of my staff, at 301-415-1481 for any fee-related questions.

Sincerely,

/RA/

Maureen E. Wylie
Chief Financial Officer

The NRC confirms that the contents of this report and associated activities (prior/future) meet the requirements under 10 CFR 170.11(a)(1)(ii) because it responds to SECY-12-0093 from the former Executive Director for Operations, Mr. R. W. Borchardt, which was approved by the Commission and allows licensees the flexibility of choosing from three options to resolve GSI-191. The NRC agrees this report could eliminate the need to develop plant specific methodologies.

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Sincerely,

/RA/

Maureen E. Wylie
Chief Financial Officer

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JRowley, NRR VCusumano, NRR TMcGinty, NRR
AMendiola, NRR LKokajko, NRR GKulesa, NRR

Adams: ☒ Yes ☐ No Initials: AH SUNSI Review: AH
☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

ADAMS Accession No: ML15203A287

***via e-mail CFO-0009**

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