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November 13, 2015

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

Subject: Request for Exemption from NRC Fees to Review PWROG-15060, "Pump Suction Gas Accumulation Operability Criteria Guidance"

References:

1. NEI 09-10, Revision 1a-A, "Guidelines for Effective Prevention and Management of System Gas Accumulation," Accession No. ML13136A129, April 2013.
2. Final Safety Evaluation for Nuclear Energy Institute Topical Report NEI 09-10, Revision 1a "Guidelines for Effective Prevention and Management of System Gas Accumulation", January 2013.
3. Westinghouse WCAP-17271-P, Revision 1, "Testing and Evaluation of Gas Transport to the Suction of ECCS Pumps," Volume I, November 2010.
4. Westinghouse WCAP-17276-P, Revision 1, "Investigation of Simplified Equation for Gas Transport," January 2011.
5. ML15167A077, "January 15, 2015 Summary of NEI Meeting to Address Issues Involving Potential Gas Accumulation in Systems That Are Important to Safety", June 2015.

Project Number: 689

Dear Ms. Wylie:

The Nuclear Energy Institute (NEI) is requesting an exemption from NRC fees for the review of the "Pump Suction Gas Accumulation Operability Criteria Guidance" document, preliminarily identified as PWROG-15060. This is the latest in a series of documents that have been developed to guide the industry and NRC's management of the issues identified in Generic Letter (GL) 2008-01, "Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems".

The first document submitted as guidance for the response to GL 2008-01 was NEI 09-10 Revision 1a-A, "Guidelines for Effective Prevention and Management of System Gas Accumulation" (Reference 1). This document provided guidance for the prevention and management of gas intrusion and accumulation in plant systems. The NRC endorsed NEI 09-10 Revision 1a-A in a Safety Evaluation (Reference 2), however, questions regarding the guidance in NEI 09-10 remained. The SE qualified the use of two of NEI 09-10's main references (WCAP-17271 and WCAP-17276, References 3 and 4) that provide suitable correlations for calculating gas volume acceptance criteria. In addition, recent NRC inspections and audits have expressed concern that licensees may not have adequate guidance to apply the correlations in WCAP-17271 in a manner consistent with the limitations and conditions in the SE.

In an attempt to resolve this issue, representatives of NEI, PWROG, and BWROG met with the NRC on January 15, 2015. During that meeting, the NRC concurred with use of the correlations in WCAP-17271 and WCAP-17276, but requested that additional guidance be provided to licensees to ensure the correlations are used within the limitations imposed by the SE; specifically, the NRC's meeting minutes (Reference 5) contained the following action:

"SRXB follow-up actions included"... "(3) provide in-depth support for an ongoing NRC inspection that addresses use of the Purdue correlations. NRC Item 3 will be combined with applicable generic information when received from industry."

The purpose of submitting PWROG-15060 is to complete the above action by documenting a means of applying the correlations so that the limitations imposed by the SE are met. We believe that the NRC will be the primary beneficiary of PWROG-15060's review, since the information in this document will be used to guide NRC inspection activities and will also be used in an anticipated NRC report on this subject.

Therefore, the review of PWROG-15060 meets the fee waiver provisions of 10 CFR 170.11(a)(1)(iii), which permit an exemption from fees for exchanging information between industry and the NRC for the specific purpose of supporting NRC's ongoing generic regulatory improvements. In addition, PWROG-15060 is one of the series of guidance documents intended to address the issues in GL 2008-01 and therefore also meets the requirements in 10 CFR 170.11(a)(1)(i):

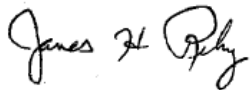
(i) In response to a Generic Letter or NRC Bulletin that does not result in an amendment to the license, does not result in the review of an alternate method or reanalysis to meet the requirements of the Generic Letter, or does not involve an unreviewed safety issue;

We therefore request a fee waiver for the review of PWROG-15060.

Ms. Maureen Wylie
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If you have any questions on this matter, please contact me at 202-739-8137 or jhr@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "James H. Riley". The signature is fluid and cursive, with the first name "James" and last name "Riley" being more prominent than the middle initial "H".

James H. Riley

c: Jack Stringfellow, Chair, PWROG
Lesa Hill, Chair, BWROG
Christopher Jackson, NRR/DSS/SRXB, NRC