



Program Management Office
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PWROG-16043-P, Revision 2
Docket Number 99902037

January 16, 2019

OG-19-13

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: PWR Owners Group
PWROG Comments on the NRC Draft Safety Evaluation for PWROG-16043-P, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" (PA-ASC-1169)

Reference:

1. Draft Safety Evaluations by the Office of Nuclear Reactor Regulation for topical report PWROG-16043-P, Revision 2, "PWROG Program to Address NRC Information Notice 2012-09, "Irradiation Effects on Fuel Assembly Spacer Grid Crush Strength for Westinghouse and CE PWR Fuel Designs" Pressurized Water Reactor Owners Group (PWROG), (ML18186A634), dated August 22, 2018.

At the October 17, 2018 meeting between the PWROG and NRC to discuss the major comments on the NRC Draft Safety Evaluation (DSE) for PWROG-16043, the PWROG agreed to provide formal comments on the NRC DSE for PWROG-16043-P.

The PWROG has the following major comment on the Draft Safety Evaluation (DSE):

Section 4.6 of the DSE discusses "known" legacy issues associated with NRC approved NSSS vendor analytical methods that are unrelated to the purpose of this Topical Report (TR).

The discussion of legacy issues also includes concerns associated with the NRC approved NSSS vendor analytical methods that are used for beginning of life (BOL) conditions. If there are concerns with these methods at BOL, they would apply to all licensees who used the methods to support their current licensing basis. The TR only addresses the end of life (EOL) conditions, and only the PWROG members that funded the project, have access to it. The PWROG is the applicant requesting approval of the TR, not the NSSS vendor. In addition, as discussed in the TR, the NSSS vendor analytical methods are not being revised as part of the PWROG program documented in the TR. Therefore, the Safety Evaluation for the TR is not the appropriate vehicle to communicate to an NSSS vendor any potential issues associated with NRC approved analytical methods.

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Addressing legacy issues is outside the scope of the TR review and the PWROG should not be billed for NRC review fees associated with these potential issues. The NRC has a process for addressing potential issues associated with NRC-approved NSSS vendor analytical methods that should be followed, if an issue is identified.

Neither the Final Safety Evaluation Report (FSER) for the AP1000 Core Reference Report, nor the APR1400 FSER contained any Limitations and Conditions regarding the effects of EOL conditions nor did it contain legacy issues associated with the NRC approve NSSS vendor analytical methods.

Therefore, the PWROG requests that the NRC delete the specific text in Section 4.5, Section 4.6 in its entirety and the associated Limitations and Conditions, Number 3 and 4 in the DSE.

Section 1.4 of the Topical Report (TR) identified the seven (7) specific items for which NRC approval was requested. The PWROG requests that these 7 items be identified in Section 1.0, "Introduction," and their approval discussed in Section 6.0 "Conclusions," in the DSE.

The DSE has been revised in several locations to clarify the use of the terminology "method," and "methodology." Where appropriate, these terms were replaced with "test protocol," "technique," and "approach," to reflect the purpose of the TR and to provide consistency with other sections of the DSE that use the appropriate terms.

The PWROG requests that the Staff revise the DSE to address these comments and provide a copy of the revised DSE for PWROG review, and that the NRC contact the PWROG with any questions or concerns regarding the PWROG comments.

Correspondence related to this transmittal should be addressed to:

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If you have any questions, please do not hesitate to contact me at (805) 545-4328 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,



Ken Schrader
Chief Operating Officer & Chairman
Pressurized Water Reactor Owners Group

Enclosures (1):

1. Proprietary markups of Draft Safety Evaluation for PWROG report "PWROG-16043-P, Revision 2.

cc: PWROG Steering Committee Representatives
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