



OG-00-080

Project Number 686  
10 CFR 170.21

July 18, 2000

**Domestic Members**

**AmerenUE**  
Callaway  
**American Electric Power Co.**  
D.C. Cook 1 & 2  
**Carolina Power & Light Co.**  
H.B. Robinson 2  
Shearon Harris  
**Commonwealth Edison**  
Braidwood 1 & 2  
Byron 1 & 2  
**Consolidated Edison**  
**Company of NY, Inc.**  
Indian Point 2  
**Duke Power Company**  
Catawba 1 & 2  
McGuire 1 & 2  
**First Energy Nuclear**  
**Operating Co.**  
Beaver Valley 1 & 2  
**Florida Power & Light Co.**  
Turkey Point 3 & 4  
**New York Power Authority**  
Indian Point 3  
**Northeast Utilities**  
Seabrook  
Millstone 3  
**Northern States Power Co.**  
Prairie Island 1 & 2  
**Pacific Gas & Electric Co.**  
Diablo Canyon 1 & 2  
**PSEG - Nuclear**  
Salem 1 & 2  
**Rochester Gas & Electric Co.**  
R.E. Ginna  
**South Carolina Electric**  
**& Gas Co.**  
V.C. Summer  
**STP Nuclear Operating Co.**  
South Texas Project 1 & 2  
**Southern Nuclear**  
**Operating Co.**  
J.M. Farley 1 & 2  
A.W. Vogtle 1 & 2  
**Tennessee Valley Authority**  
Sequoyah 1 & 2  
Watts Bar 1  
**TXU Electric**  
Comanche Peak 1 & 2  
**Virginia Power Co.**  
North Anna 1 & 2  
Sunny 1 & 2  
**Wisconsin Electric Power Co.**  
Point Beach 1 & 2  
**Wisconsin Public Service Corp.**  
Kewaunee  
**Wolf Creek Nuclear**  
**Operating Corp.**  
Wolf Creek

**International Members**

**Electrabel**  
Doel 1, 2, 4  
Tihange 1, 3  
**Kansai Electric Power Co.**  
Mihama 1  
Takahama 1  
Ohi 1 & 2  
**Korea Electric Power Co.**  
Kori 1 - 4  
Yonggwang 1 & 2  
**Nuclear Electric plc**  
Sizewell B  
**Nuklearna Elektrarna Krsko**  
Krsko  
**Spanish Utilities**  
Asco 1 & 2  
Vandellos 2  
Almaraz 1 & 2  
**Vattenfall AB**  
Ringhals 2 - 4  
**Taiwan Power Co.**  
Maanshan 1 & 2

To: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Mr. Samuel L. Collins  
Operations Director, Nuclear Reactor Regulations Branch

Subject: Westinghouse Owners Group (WOG)  
**Request for Waiver of WOG License Renewal Generic Technical Reports**  
**NRC Review Fees**

At the June 2000 WOG General Session, the current status of those License Renewal Generic Technical Reports submitted for NRC review was presented to the membership, highlighting the following:

- Draft Safety Evaluation Reports for two of the GTRs were received in February 2000
- Three additional GTRs remain under review with expected DSER dates unknown
- Two invoices for NRC Review Fees were received since the February WOG General Session, bringing the total invoiced amount to \$470,000. The latest invoices already exceed the budget increase authorized for this purpose at the February 2000 General Session. See attached table for NRC review cost details.

Because of the significant cost incurred by the review effort to date, and because of the unknown extent of further review and comment by NRC and their consultants, the WOG hereby requests that all further review fees for the 3 documents awaiting DSERs be waived. This can be accomplished under the provisions of 10CFR170.21 Schedule of Facility Fees, footnote 4, criterion 2 as recognized in your letter to the WOG dated November 7, 1996. The three documents are:

- WCAP-14574, "License Renewal Evaluation: Aging Management Evaluation for Pressurizers," (Westinghouse Non-Proprietary Class 3), July, 1996 (Transmitted via OG-96-052, July 3, 1996)
- WCAP-14756, "Aging Management Evaluation for Pressurized Water Reactor Containment Structure," (Westinghouse Non-Proprietary Class 3), December, 1996 (Transmitted via OG-96-103, December 11, 1996)
- WCAP-14577, "License Renewal Evaluation: Aging Management for Reactor Vessel Internals," (Westinghouse Non-Proprietary Class 3), June, 1997 (Transmitted via OG-97-088, September 2, 1997)

Also, with similar considerations, the WOG requests that a 10 CFR 170.21 fee waiver be granted for the review of future responses to the open items in the two DSERs issued to date.

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OG-00-080  
July 18, 2000

The DSERs were issued for:

- WCAP-14422, Revision 2, "License Renewal Evaluation: Aging Management for Reactor Coolant System Supports," (Westinghouse Non-Proprietary Class 3), February, 1997 (Transmitted via OG-97-024, March 4, 1997)
- WCAP-14575, "License Renewal Evaluation: Aging Management for Class 1 Piping and Associated Pressure Boundary Components," (Westinghouse Non-Proprietary Class 3), August, 1996 ( Transmitted via OG-96-071, August 28, 1996)

We feel there is significant generic benefit to both the industry and the NRC to complete the review of these WCAPs, to reach agreement through resolving issues, and to issue SERs on these WCAPs. With NRC approval, these WCAPs with SERs can be referenced by WOG members in their license renewal applications resulting in significant savings to the NRC in review time.

We would like to meet with you concerning this request and determine the best means for completing a successful and efficient review of these WCAPs.

If you have any questions regarding this request, please contact H. B. Barron at Duke Power (704) 875-4800 or Roger Newton at Wisconsin Electric Power Company, (414) 221-2002.

Very truly yours,



H. B. Barron, Chairman  
Executive Advisory Committee  
Westinghouse Owners Group



Roger A. Newton, Chairman  
License Renewal Working Group  
Westinghouse Owners Group

Attachment: NRC Review Fees Table

cc: R.K. Anand, Project Manager, USNRC License Renewal and Standardization Branch (1L, 1A)  
C.I. Grimes, Director, USNRC License Renewal and Standardization Branch (1L, 1A)  
WOG License Renewal Working Group (1L, 1A)  
WOG Steering Committee (1L, 1A)  
A.P. Drake, W (1L, 1A)  
C.E. Meyer, W (1L, 1A)

**TABLE**  
**SUMMARY OF NRC REVIEW FEES**  
**INCLUDING 1Q 2000**

| <u>WCAP</u> | <u>REPORT TITLE</u> | <u>DEV. COST</u> | <u>REVIEW FEES</u> | <u>STATUS</u> | <u>NRC TAC #</u> |
|-------------|---------------------|------------------|--------------------|---------------|------------------|
| 14422       | RCS SUPPORTS        | \$ 252,539       | \$ 143,690         | DSER REC'D    | M92937           |
| 14574       | PRESSURIZER         | \$ 147,337       | \$ 59,701          | IN REVIEW     | M96110           |
| 14575       | CLASS 1 PIPING      | \$ 297,717       | \$ 46,343          | DSER REC'D    | M96439           |
| 14756       | CONTAINMENTS        | \$ 379,306       | \$ 192,361         | IN REVIEW     | M97446           |
| 14577       | RV INTERNALS        | \$ 343,150       | \$ 28,716          | IN REVIEW     | M99519           |
|             | TOTALS              | \$ 1,420,049     | \$ 470,811         |               |                  |

\* Fees as invoiced to WOG Project Office