



OG-00-097

WCAP-14572 Revision 1-NP-A Addendum 1
Project Number 694

October 12, 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
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Turkey Point 3 & 4
New York Power Authority
Indian Point 3
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Northern States Power Co.
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PSEG - Nuclear
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STP Nuclear Operating Co.
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Wolf Creek Nuclear
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Wolf Creek

International Members

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Tihange 1, 3
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Mihama 1
Takahama 1
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Kori 1 - 4
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Nuclear Electric plc
Sizewell B
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Krsko
Spanish Utilities
Asco 1 & 2
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Vattenfall AB
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Taiwan Power Co.
Maanshan 1 & 2

Mr. Steven Bloom
Project Manager for Westinghouse Owners Group
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Westinghouse Owners Group
Waiver of NRC Review Fees for WOG Topical Report "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP-5200)

- References:
1. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1 (MUHP-5200)" dated December 21, 1999
 2. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program" dated October 14, 1999.
 3. Letter from Stephen D. Floyd, Nuclear Energy Institute, to NEI Administrative Points of Contact containing "Example Submittal For Plants that Follow the WOG Methodology (WCAP-14572)," dated March 9, 1999.
 4. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to U.S. Nuclear Regulatory Commission, "Transmittal of Approved Topical Reports: WCAP-14572 Revision 1-NP-A (Non-Proprietary) "WOG Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report" and WCAP-14572 Revision 1-NP-A, Supplement 1 (Non-Proprietary) "Westinghouse Structural Reliability and Risk Assessment (SRRA) Model for Piping Risk-Informed Inservice Inspection"(MUHP-5091)" dated March 8, 1999.
 5. Letter from Thomas Essig, U.S. Nuclear Regulatory Commission, to Mr. Lou Liberatori, Chairman, Westinghouse Owners Group, "Safety Evaluation of Topical Report WCAP-14572, Revision 1, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report,"" dated December 15, 1998.
 6. Letter from Mr. Ronald M. Scroggins, U.S. Nuclear Regulatory Commission to Mr. Stephen D. Floyd, Nuclear Energy Institute, dated May 14, 1996.

Dear Mr. Bloom:

By letter dated December 21, 1999 (reference 1) the WOG submitted addendum to WCAP-14572, Revision 1-NP-A, for review. This addendum to the WOG RI-ISI process permits, as an option, the revision of selected augmented inspection regulatory requirements, including High Energy Line Break (HELB) exclusion examinations, where safety impacts can be shown to be maintained or enhanced. Changes to these augmented requirements would be evaluated using the appropriate regulatory change mechanisms (e.g. 10CFR50.55a, 50.59.) and would be submitted by individual utilities as part of the example submittal (reference 3).

As outlined in reference 5, the NRC waived any fees associated with the review of the WOG Topical report. The NRC agreed that the waiver request for this document met criterion three of Footnote 4 to 10 CFR 170.21. This footnote states that fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts.

We believe that this submittal of the proposed addendum and its review also falls under criterion three of Footnote 4 to 10 CFR 170.21 and requested a waiver of the review fees.

We have not received any response to our request for a waiver of the review fees. In addition, we have received and paid the following invoices associated with the review of this topical report:

<u>Invoice #</u>	<u>Date</u>	<u>Amount</u>
RL0390-00	5/13/00	\$8,601.00
RL0553-00	7/31/00	\$2,891.00

This letter is to reiterate our request for the waiver of review fees as requested in the submittal letter (reference 1) and a refund of the review fees paid to date.

Please direct any questions with regard to this request to Mr. Andrew Drake, WOG Project Manager at (412)-374-6207 or by mail at:

Mr. Andrew P. Drake
WOG Project Manger
Westinghouse Electric Company
PO Box 355 (ECE 5-16)
Pittsburgh, PA 15230

Very truly yours,



Karl Jacobs, Chairman
Westinghouse Owners Group