



**Westinghouse
Electric Company LLC**

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December 14, 2001

LTR-NRC-01-42

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Attention: Ms. Undine Shoop
Reactor Systems Branch

Subject: Sensitivity Study Notification Letter

Dear Ms. Shoop:

The Dynamic Rod Worth Measurement (DRWM) sensitivity analysis was performed for all Westinghouse 4-loop plant types with the exception of one plant that had a unique rod pattern that required a full core prediction. This plant could not be evaluated using the design code versions in place in 1995, when the original analysis was performed to support the Topical Report (WCAP-13360-P-A, Revision 1). The plant was not identified by name in the Topical Report, however a review of the original analysis later determined that Millstone-3 is this unique plant.

In the Topical Report, Westinghouse committed to perform the analysis of this unique rod pattern prior to performance of the testing. This commitment was missed, however the results of the analysis demonstrated that Millstone-3 is not unique with respect to the validity of DRWM. This letter is to notify the NRC that the results of the analysis performed to determine the DRWM sensitivity for Millstone-3 demonstrated that no measurable differences exists between the other 4-loop plants and Millstone-3 with respect to DRWM application.

The relevant difference between Millstone-3 and the 4-loop plants in the original study is the additional four control rods assigned as Shutdown Bank E. FIGURE 1 shows the 57 RCCA Pattern B with the light D Bank layout that was fully analyzed in the Topical Report. Comparison of this figure with FIGURE 2 shows that the only differences occur in Shutdown Banks A, B, and E. Four RCCA's assigned to Shutdown Bank E in FIGURE 1 are assigned to Shutdown Bank A and B (two each) in FIGURE 2. An additional four rods have been added to the core and designated as Shutdown Bank E. All changes in the rod locations from the original studies are indicated on FIGURE 2 with the darkened background.

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Add: Undine
Shoop
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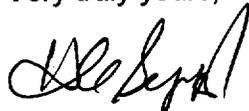
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The process used for the sensitivity study was identical to that described in the Topical Report with the exception of using the actual Millstone-3 Cycle 8 design and test data from the startup.

The results of the study demonstrated that Millstone-3's rod pattern results are essentially the same as for the other 4-loop plants, demonstrated by the original analysis in the Topical Report. Therefore, the measurement results for the Millstone-3 Cycle 8 startup are valid and the original conclusions in the Topical Report are applicable to Millstone-3.

Please contact Mr. Louis R. Grobmyer, Plant Operations and Evaluation, at 412-374-5604 if you have any questions on this transmittal.

Very truly yours,

A handwritten signature in black ink, appearing to read 'H.A. Sepp', written in a cursive style.

H.A. Sepp, Manager
Regulatory and Licensing Engineering

FIGURE 2: 4-Loop Core, 61 RCCA's

Millstone Unit 3

	R	P	N	M	L	K	J	H	G	F	E	D	C	B	A
1	+	+	+	+			SE								
2	+	+		SA		B		C		B		SA			
3	+				SD		SB		SB		SC				
4	+	SA		D			SA					D		SA	
5			SC		A						A		SD		
6		B				C		A		C				B	
7			SB										SB		SE
8		C		SB		A		D		A		SB		C	
9	SE		SB										SB		
10		B				C		A		C				B	
11			SD		A						A		SC		
12	-	SA		D				SA				D		SA	
13	-				SC		SB		SB		SD				
14	-	-		SA		B		C		B		SA			
15	-	-	-	-					SE						