



**Westinghouse**

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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**DOCKET NUMBER**

**PETITION RULE PART 50-73A  
(67FR 04214)**

Ms. Annette L. Vietti-Cook  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Rulemakings & Adjudications Staff

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Our ref: LTR-NRC-02-20

April 15, 2002

References:

- 1) Federal Register 52065, Vol. 66, No. 198, October 12, 2001
- 2) Westinghouse Letter LTR-NRC-01-43, "Comments on the Petition for Rulemaking to 10 CFR Part 50 Addressing the Impact of Crud on Core Cooling during a Postulated Large Break Loss of Coolant Accident (LBLOCA)," December 17, 2001
- 3) Federal Register 4214, Vol. 67, No. 19, January 29, 2002

A notice of receipt of a petition for rulemaking to 10 CFR Part 50 was published for public comment in Reference 1. The petitioner requested that the U.S. Nuclear Regulatory Commission amend 10 CFR 50.46(a)(1)(i) and Appendix K to Part 50 to address the impact of crud on core cooling during a large break loss of coolant accident (LBLOCA). The Westinghouse Electric Company provided comments regarding the petition in Reference 2, which concluded that the proposed revisions to § 50.46 and Appendix K to Part 50 are unnecessary.

A supplement to the original petition was published for public comment in Reference 3. The petitioner further requested that § 50.46 and Appendix K to Part 50 be revised to address the impact of severe crud deposits on core coolability during normal operation. In the statement of the specific issues involved, the petitioner postulated that severe crud deposition during operation within a plant's licensing basis and Technical Specifications could lead to a spontaneous core melt scenario.

The postulated scenario described in the supplemental petition is completely speculative. No technical, scientific or other details are provided to support claims such as "it is likely that rapid localized core melting will be initiated while the LWR is at power." It is also noted that the regulations recommended for modification are not related to normal operating conditions. They provide the acceptance criteria and other requirements related to the performance of emergency core cooling systems in the event of postulated loss of coolant accidents. A loss of coolant accident is not part of the scenario postulated in the supplemental petition.

Given the lack of a sound technical basis for the postulated scenario, it is recommended that the supplemental petition be denied.

Template = SECY-067

A BNFL Group company

SECY-02

The Westinghouse Electric Company appreciates the opportunity to comment on this petition for rulemaking. If there are any questions regarding these comments, please contact Mitch Nissley at (412) 374-4303.

Very truly yours,

A handwritten signature in black ink, appearing to read "H. A. Sepp". The signature is fluid and cursive, with a large initial "H" and a stylized "S".

H. A. Sepp, Manager  
Regulatory and Licensing Engineering

Cc: M. Nissley – WEC E-425A