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Your ref: LTR-NRC-02-33

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- References:
1. SECY-02-0057, "Update to SECY-01-0133, Fourth Status Report on Study of Risk-Informed Changes to the Technical Requirements of 10 CFR Part 50 (Option 3) and Recommendations on Risk-Informed Changes to 10 CFR 50.46 (ECCS Acceptance Criteria)", dated March 29, 2002
 2. SECY-01-0133, "Status Report on Study of Risk-Informed Changes to the Technical Requirements of 10 CFR Part 50 (Option 3) and Recommendations on Risk-Informed Changes to 10 CFR 50.46 (ECCS Acceptance Criteria), dated July 23, 2001

Subject: Comments on NRC's proposed revision to the Acceptance Criteria for Emergency Core Cooling Systems for Light Water Cooled Nuclear Power Reactors as described in 10CFR50.46

SECY-02-0057 (Reference 1) provided an update to the Commission in SECY-01-0133 (Reference 2) on risk-informed changes to 10 CFR 50.46. One of the recommendations is that the current prescriptive ECCS acceptance criteria be replaced with a performance-based requirement, which would allow use of advanced cladding materials without having to submit an exemption request.

The Westinghouse Electric Company recommends that additional industry input be obtained for any proposed regulation changes related to 10 CFR 50.46. For example, the testing method to be used to demonstrate the cladding material's ductility following high temperature oxidation in a steam environment needs to be one that can be related to un-irradiated material. One necessary outcome of the current NRC-sponsored test program at Argonne National Laboratory should be a method to relate irradiated material ductility to un-irradiated ductility.

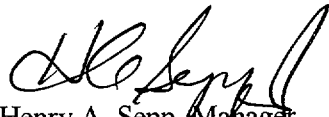
Multiple testing methods have been proposed and include ring compression, four-point bending, quench and 0.3-Joule impact testing. Westinghouse experience suggests that the 0.3-Joule impact test is undesirable because the impact load is arbitrary, and the test results do not define the boundary between ductile and brittle behavior. The ring compression and quench test methods are better suited for defining this boundary.

The Westinghouse position is the current Hobson Ring Compression and quench tests, which have been widely used to demonstrate residual ductility, are sufficient. Any departure from these methods should undergo industry review and have a firm technical basis supporting the change.

Westinghouse appreciates the opportunity to provide these comments and plans to participate in future stakeholder discussions on this subject.

Correspondence with respect to this issue should be addressed to H. A. Sepp, Manager of Regulatory and Licensing Engineering, Westinghouse Electric Company, P .O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Sincerely,



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