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WCAP-15831-P
Project 694

December 30, 2003

WOG-03-664

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Chief, Information Management Branch
Division of Program Management

Subject: Clarification to WCAP-15831-P "WOG Risk Informed ATWS
Assessment and Licensing Implementation Process"

References: WOG/NRC Meeting Announcement, December 11, 2003: Westinghouse Owners Group Meeting with NRC Senior Management to Address Issues Relating to WCAP 15831-P, "WOG Risk Informed ATWS Assessment and Licensing Implementation Process", WOG-03-584, dated November 10, 2003

Request for Additional Information Regarding WCAP-15831-P, "WOG Risk-Informed ATWS Assessment and Licensing Implementation Process" (TAC No. MB5751), WOG-03-440, dated August 25, 2003

Transmittal of Reports: WCAP-15831-P, Rev 0 (Proprietary) and WCAP -15831-NP, Rev. 0, (Non-Proprietary), Entitled "WOG Risk-Informed ATWS Assessment and Licensing Implementation Process" (MUHP-1033), OG-02-027, dated July 23, 2002

The NRC Staff and the Westinghouse Owners Group met on December 11, 2003 to discuss the RAIs the Staff provided to the WOG on WCAP-15831-P ("WOG Risk-Informed ATWS Assessment and Licensing Implementation Process"). The Staff indicated that a number of the RAIs provided on the WCAP were a result of the second approach, presented in Section 7 of the WCAP, to address the requirement for a configuration management program. The Staff stated in the letter transmitting the RAIs on the WCAP, and also at the December 11 meeting, that they consider this to be a risk-

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based approach and find that it is not acceptable since it does not address defense-in-depth. The WOG has agreed to eliminate this approach and will delete it from the WCAP in Revision 1. Revision 1 will be issued following resolution of the RAIs on the WCAP. It is the WOG's understanding that by eliminating this approach, the NRC will retract the current set of RAIs and issue a much smaller set directed at further developing and implementing a configuration management program with the purpose of maintaining defense-in-depth.

Over the next two months, the WOG plans to develop the details of the configuration management program that can be used by licensees implementing the ATWS risk-informed approach to address defense-in-depth. The WOG would like to meet with the Staff the week of March 15, 2004 to discuss this program.

If you require further information, please feel free to contact Mr. Jim Molkenthin in the Owners Group Program Management Office at (860) 731-6727.

Sincerely,



Frederick. P. "Ted" Schiffley, II
Chairman
Westinghouse Owners Group

cc: Management Committee
Analysis Subcommittee
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