September 14, 2004

Mr. J. A. Gresham Regulatory Compliance and Plant Licencing Westinghouse Electric Company P. O. Box 355 Pittsburgh, PA 15230-0355

SUBJECT: WESTINGHOUSE CONCLUSIONS REGARDING CROSSFLOW ULTRASONIC

FLOW MEASUREMENT SYSTEM PERFORMANCE EVENTS

Dear Mr. Gresham:

In your letter to Brian Sheron dated June 18, 2004, Westinghouse described the results of the evaluation of the potential impact of the plant configuration issues and the discovery of signal contamination that affected CROSSFLOW Ultrasonic Flow Meter (UFM) performance at Byron, Braidwood and Ft. Calhoun power plants. Westinghouse and the Advanced Measurement Analysis Group (AMAG) concluded that:

- a. The UFM performance in those power plants does not represent a significant safety concern because of the amount of margin typically available in various safety analyses, even in a situation where they may have led to an overpower condition.
- b. The information previously submitted remains valid for those conditions in which the CROSSFLOW UFM was designed to function.
- c. The performance observations from the above noted events represent plant specific rather than generic installation issues.
- d. Westinghouse Owners Group (WOG) CROSSFLOW Task Force confirmed that their current operating CROSSFLOW installations are performing within the acceptable limits and would alert the operators, via system inherent diagnostics, if out of limit conditions are experienced.

Your letter described vendor notices you have issued to all CROSSFLOW users. While you continue to believe that the performance observations are plant specific rather than generic and that reasonable assurance exists that the current installations are performing within the licensing basis, Westinghouse/AMAG planned to further assess these installations against the lessons learned in two stages. The first stage will assess CROSSFLOW applications supporting Appendix K MUR power uprate and will be completed by August 2004. The second stage will assess the power recovery application of the CROSSFLOW by the end of September 2004.

As you know, the NRC has planned a public meeting on September 17, 2004, to gather information from licensees and the industry on UFM experience. The NRC continues to gather information regarding UFM experience to determine the extent of the generic implications of this experience and to decide on the need for and nature of any generic communication requiring licensees to demonstrate that they have taken the necessary and sufficient actions to ensure plant operation within the licensed power level. The results of your assessments will contribute to that decision. Further, in the event that Westinghouse/AMAG determines as a result of your assessments that there is a generic applicability, you should determine whether that finding affects the technology and methodology documented in licensing topical report CENPD-397-P-A, Rev.01, and notify the NRC accordingly.

Sincerely,

(/RA 09/14/04)

Jose A. Calvo, Chief Electrical & Instrumentation and Controls Branch Office of Nuclear Reactor Regulation As you know, the NRC has planned a public meeting on September 17, 2004, to gather information from licensees and the industry on UFM experience. The NRC continues to gather information regarding UFM experience to determine the extent of the generic implications of this experience and to decide on the need for and nature of any generic communication requiring licensees to demonstrate that they have taken the necessary and sufficient actions to ensure plant operation within the licensed power level. The results of your assessments will contribute to that decision. Further, in the event that Westinghouse/AMAG determines as a result of your assessments that there is a generic applicability, you should determine whether that finding affects the technology and methodology documented in licensing topical report CENPD-397-P-A, Rev.01, and notify the NRC accordingly.

Sincerely,

(/RA 09/14/04)

Jose A. Calvo, Chief Electrical & Instrumentation and Controls Branch Office of Nuclear Reactor Regulation

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