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October 18, 2004

WOG-04-534

WCAP-15957, Rev.0  
Project Number 694

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: **Westinghouse Owners Group**  
**Response to the NRC's Denial of the Request to Review WCAP**  
**15957, "Risk-Informed Evaluation of Extensions to Fluid Safety**  
**System Completion Times" (MUHP-3010)**

WCAP 15957, "Risk Informed Evaluation of Extensions to Fluid Safety System Completion Times," provides the technical justification for extending the Completion Time of several fluid system Technical Specifications for the Westinghouse NSSS plants. WCAP-15957 was submitted for NRC review and approval by Reference 1. Reference 2 transmitted the NRC's denial of the request to review WCAP-15957.

The NRC staff did not accept WCAP-15957 for review based on the following reasons:

- Inadequate Consideration of External Events
- Simultaneous Inoperability of Multiple Components not Considered
- Coordination with the Established Industry Efforts not Considered

The NRC recommended that the Westinghouse Owners Group (WOG) revise the WCAP to address the issues mentioned above and resubmit WCAP-15957 through NEI as part of the industry Risk Management Tech Spec (RMTS) Initiatives.

The purpose of this letter is to propose a revision to WCAP-15957 that addresses the issues identified in the NRC's denial of the request to review WCAP-15957.

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The WOG proposes to revise WCAP-15957 as follows to address these issues.

- Inadequate Consideration of External Events

Guidance for addressing the impact of external events on the proposed changes will be included in the WCAP.

- Simultaneous Inoperability of Multiple Components not Considered

Guidance for performing Tier 2 analyses to identify the limitations on simultaneous system and component outages to ensure that risk significant configurations will not occur will be included in the WCAP.

Implementation guidance similar to that which was developed for RMTS Initiative 2 "Missed Surveillances SR 3.0.3," (TSTF-358) and RMTS Initiative 3 "Increased Flexibility in Mode Restraints LCO 3.0.4," (TSTF-359), and that which is being developed for RMTS Initiative 7a, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability," (TSTF-427) will be developed to address the performance of Tier 3 analyses to ensure the capability to identify risk significant equipment outage configurations associated with emergent conditions.

- Coordination with the Established Industry Efforts not Considered

The NRC review of WCAP-15957 will be coordinated with the other NEI/NRC RMTS Initiatives.

In order to fully understand the staff positions, and to be responsive in the revision to the WCAP, the WOG requests a meeting with the NRC staff to discuss the approach discussed above prior to revising and resubmitting WCAP-15957 for NRC review and approval.

If you have any questions regarding this request, please feel free to call me at 630-657-3897, Mr. Jerry Andre (Westinghouse) at 412-374-4723, or Mr. Jim Andrachek (Westinghouse) at 412-374-5018.

Very truly yours,



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

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References:

1. Westinghouse Owners Group Letter (F.P. Schiffley) to USNRC, Chief, Information Management Branch, "Transmittal of WCAP-15957 (Non-Proprietary), Rev. 0, "Risk Informed Evaluation of Extensions to Fluid Safety System Completion Times," WOG-04-215, April 22, 2004.
2. NRC Letter from Herbert N. Berkow (NRC) to Gordon Bischoff (Westinghouse), "Request for the Staff Review of Topical Report WCAP-15957, "Risk Informed Evaluation of Extensions to Fluid Safety System Completion Times (TAC NO. MC2764)," July 22, 2004.

cc: WOG Steering Committee  
WOG Management Committee  
WOG Licensing Subcommittee  
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G. Shukla, USNRC (via Federal Express)  
WOG Project Management Office  
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