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To: Frank Orr <FRO@nrc.gov>, Jennifer Uhle <JXU1@nrc.gov>, "WAM1@nrc.gov" <WAM1@nrc.gov>
Date: 10/25/04 11:06
Subject: Comments on Draft SE

I had a few comments on the draft SE on the ASTRUM topical, WCAP-16009-P, that I discussed with Frank Orr last Thursday. I wanted to document them in an email, and make sure we are all in agreement before we send formally. (I am assuming this is an acceptable practice, let me know if not.) My understanding from the draft SE is that these need to be finalized by November 2, 20 working days from the issue of the draft SE.

Page 3, line 35: strike "2-loop,"

Basis: 2-loop PIRT is addressed in WCAP-14449-P-A, not WCAP-12945-P-A. The following sentence on lines 36-38 is adequate, as is, to address 2-loop PIRT.

Page 5, lines 17 & 18: Delete the sentence "The nodalization for each design is part of the frozen code version for each NPP design."

Basis: As currently written, one would think that this section concludes that the nodalization for all 2-loop plants is the same, and ditto for 3- & 4-loop designs. The nodalization is a function of the plant-specific design. This was illustrated in WCAP-12945-P-A; see, for example, Figures 20-2-5 and 20-3-2. These show how the noding is adjusted for two 4-loop plants that have different upper internals designs. The important thing is the nodalization philosophy, which is to maintain a consistent strategy between the noding used for code assessment and NPP analysis.

Page 5, line 19: Typo; "nodalizations" => "nodalizations"

Page 10, lines 1-2: Replace first sentence with something like "This SE generically approves the ASTRUM process of determining the maximum oxidation and hydrogen generation results, but requires that this information be reported on a plant-specific application which uses ASTRUM."

Basis: Page 8, lines 23-28, indicates that the methodology is acceptable. Current text on page 10 implies otherwise. The suggested replacement text is more along the lines of what Frank has in mind. (Frank to concur or clarify. It is not clear to me if a plant who uses ASTRUM in 2005 and submits a license amendment request to support switch to ASTRUM should have to do this again in 2008 if they do a reanalysis that would not require a Tech Spec change. Would seem they could just update their SAR during the annual update.)

Page 10, lines 3-5: Section 13-3 of WCAP-16009-P reviews all of the prior SER applicability limits and usage conditions from the NRC review of WCAP-12945-P-A and WCAP-14449-P-A, and indicates which are still applicable and which are not. (Some became irrelevant due to change in uncertainty method.) It was not clear that the staff agreed with our assessment, based on this general statement on page 10. One clarification that would seem acceptable would be to leave the statement as is, and in our formal transmittal of these comments declare something like "It is Westinghouse's understanding that our conclusions in Section 13-3 of WCAP-16009-P regarding the continued validity of prior SER requirements are acceptable to the staff." (This may warrant another informal iteration.)

Page 10, line 34: The correct reference should be LTR-NRC-04-30. The AW-04-1834 reference is for the accompanying Affidavit for Withholding.

Please advise on the the best way to proceed.

Thanks!
Mitch Nissley

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