

February 1, 2005

Mario V. Bonaca, Chairman  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: RESPONSE TO ADVISORY COMMITTEE ON REACTOR SAFEGUARDS ON  
SAFETY EVALUATION OF THE INDUSTRY GUIDELINES FOR EVALUATING  
PRESSURIZED WATER REACTOR SUMP PERFORMANCE

Dear Chairman Bonaca:

Thank you for your letter dated December 10, 2004, concerning the Advisory Committee on Reactor Safeguards' (ACRS) views on the Nuclear Regulatory Commission (NRC) staff's safety evaluation (SE) issued by letter dated December 6, 2004, of the Nuclear Energy Institute (NEI) guidance report (GR) "Pressurized Water Reactor Sump Performance Evaluation Methodology." The SE is part of the NRC staff's plan for resolving Generic Safety Issue (GSI) 191, "Assessment of Debris Accumulation on PWR Sump Performance."

The staff understands the ACRS' concerns and continues to take steps to address them. For example, the staff is conducting ongoing confirmatory work on the NUREG/CR-6224 head loss correlation. Additionally, downstream and chemical effects are also being evaluated. The staff will provide the results to the ACRS as they become available.

Because GSI-191 is an important safety issue and its resolution will result in safety improvement, the staff needs to continue moving forward to address the issue. To compensate for the absence of complete knowledge in certain areas we utilized conservative judgements to address uncertainties. Notwithstanding the noted limitations, the staff still concludes that the SE provides an acceptable methodology that supports sound regulatory decision making.

Thank you for your views and recommendations on this matter. I will continue to keep the ACRS informed of the staff's activities as we move forward to resolve GSI-191.

Sincerely,

**/RA Martin J. Virgilio Acting For/**  
Luis A. Reyes  
Executive Director  
for Operations

cc: Chairman Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
SECY

