



March 23, 2005

WOG-05-153

Project Number 694

Mr. Luis A. Reyes
Executive Director for Operations
U.S. NRC
Washington, DC 20555-0001

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

Subject: Westinghouse Owners Group
Request that NRC Complete the Pressurized Thermal Shock (PTS)
NUREG Reports that Document the PTS Risk Reevaluation Program
and Propose PTS (10CFR50.61) Rulemaking

Dear Mr. Reyes:

The purpose of this letter is to express our concern regarding the completion of the Pressurized Thermal Shock (PTS) NUREG Reports that support both the PTS Risk Reevaluation Program and the review of WCAP-16168 "Risk-Informed Extension of Reactor Vessel In-Service Inspection." The Westinghouse Owners Group (WOG) requests that the completion of the PTS NUREG Reports receive your personal attention and encourages you to dedicate the appropriate staff and resources to ensure that they are completed in a timely manner.

The Electric Power Research Institute (EPRI) has been working with the NRC RES on the PTS Risk Reevaluation Program since its inception in 1999 through the Materials Reliability Project (MRP). Representatives from the WOG provide support to this effort and participate in related NRC and ACRS meetings. The ACRS and the independent panel of experts supporting the NRC to technically review the program have generally expressed high praise for the technical approach and results of the PTS Risk Reevaluation Program. You can be proud of these compliments given the complex technical nature of this ambitious program. However, during the latter half of 2004, the ACRS and expert panel expressed concerns about the quantification and treatment of the uncertainties in the thermal and hydraulic (T&H) analyses that were used in the PTS Risk Reevaluation Program. Because of these concerns, NRC Nuclear Regulatory Research (RES) did not meet the end of 2004 milestone for recommending a technical basis for a revision of 10CFR50.61 to the Office of Nuclear Reactor Regulation (NRR). The resolution of these T&H concerns was successfully presented to the ACRS by the NRC staff in a meeting held in March 2005. However, the ACRS

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 - Callaway
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 - Arizona Public Service Co.
Palo Verde 1, 2 & 3
 - Constellation Energy Group
Calvert Cliffs 1 & 2
R. E. Ginna
 - Dominion Nuclear Connecticut
Millstone 2 & 3
 - Dominion Virginia Power
North Anna 1 & 2
Surry 1 & 2
 - Duke Energy
Catawba 1 & 2
McGuire 1 & 2
 - Entergy Nuclear Northeast
Indian Point 2 & 3
 - Entergy Nuclear South
ANO 2
Waterford 3
 - Exelon Generation Company LLC
Braidwood 1 & 2
Byron 1 & 2
 - FirstEnergy Nuclear Operating Co.
Beaver Valley 1 & 2
 - FPL Group
St. Lucie 1 & 2
Seabrook
Turkey Point 3 & 4
 - Nuclear Management Co.
Kewaunee
Palisades
Point Beach 1 & 2
Prairie Island 1 & 2
 - Omaha Public Power District
Fort Calhoun
 - Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
 - Progress Energy
H. B. Robinson 2
Shearon Harris
 - PSEG - Nuclear
Salem 1 & 2
 - South Carolina Electric & Gas Co.
V. C. Summer
 - Southern California Edison
SONGS 2 & 3
 - STP Nuclear Operating Co.
South Texas Project 1 & 2
 - Southern Nuclear Operating Co.
J. M. Farley 1 & 2
A. W. Vogtle 1 & 2
 - Tennessee Valley Authority
Sequoyah 1 & 2
Watts Bar 1
 - TXU Power
Comanche Peak 1 & 2
 - Wolf Creek Nuclear Operating Corp.
Wolf Creek
- International Members**
- Electrabel
Doel 1, 2, 4
Tihange 1 & 3
 - Electricité de France
Kansai Electric Power Co.
Mihama 1
Takahama 1
Ohi 1 & 2
 - Korea Hydro & Nuclear Power Co.
Kori 1 - 4
Ulsin 3 & 4
Yonggwang 1 - 5
 - British Energy plc
Sizewell B
 - NEK
Krško
 - NOK
Kemkraftwerk Beznau
 - Spanish Utilities
Asco 1 & 2
Vandellós 2
Almaraz 1 & 2
 - Ringhals AB
Ringhals 2 - 4
 - Taiwan Power Co.
Maanshan 1 & 2

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requested a significant revision to the T&H NUREG Report to incorporate the agreed-to resolution of their concerns.

The revision of 10CFR50.61 reflects a modern technological approach to the assessment of PTS risk and it is of major interest to the commercial nuclear power industry. The effect of raising the PTS screening criteria is to remove the operational risk for several plants that are projected to exceed the current PTS criteria either for their current license or for license renewal. Raising the PTS screening criteria will also reduce the regulatory risk for a subset of plants that are projected to approach, but not exceed, the current criteria during their current license or license renewal. The WOG is concerned that these positive effects on the industry will not be realized in a reasonable time frame. Additionally, the regulatory impact of years of excellent technological work by the NRC, NRC contractors, and the industry may be significantly reduced, or even obviated. To avoid these undesirable consequences, it is requested that the NRC RES staff complete the documentation of the PTS Risk Reevaluation Program in the PTS NUREG Reports expeditiously. Following completion of the NRC RES effort, it is requested that the NRC NRR complete their review of the PTS NUREG Reports and propose PTS (10CFR50.61) Rulemaking expeditiously.

Beyond the immediate use of a revised PTS screening criteria to clarify PTS risk associated with operating plants, the WOG has another urgent need for the completion of the PTS NUREG Reports. The NRC NRR has stated that the PTS NUREG Reports must be completed prior to initiating their review of WCAP 16168-NP. WCAP-16168-NP provides the technical justification for extending the reactor vessel in-service inspection (ISI) interval from 10 to 20 years. The technical approach utilized in the reactor vessel ISI interval extension program is an extension of the work performed in support of the PTS Risk Reevaluation Program and is based on the same pilot plants evaluated in the PTS Risk Reevaluation Program. The use of the PTS work in the reactor vessel ISI interval extension program was recommended by the NRC Staff during meetings held to discuss WCAP-16168-NP prior to submittal for review and approval. The use of the PTS work as a basis for the reactor vessel ISI interval extension program will minimize the impact on the Staff resources and provides a direct example of the industry application of the PTS Risk Reevaluation Program results. Utilizing a common technical basis ensures the most efficient use of both the NRC and industry resources on both of these efforts.

If the WOG can provide any assistance in the completion of this effort, please do not hesitate to contact Mr. Gordon Bischoff in the Westinghouse Owners Group Program Management Office at 860-731-6200. Thank you for your attention to this request.

Regards,



Gregg Overbeck, Executive Chairman of the WOG
Westinghouse Owners Group

mjl

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cc: WOG Executive Committee
WOG Management Committee
James Dyer (NRR)
Brian Sheron (NRR)
Herb Berkow (NRR)
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Program Management Office