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July 27, 2005  
WOG-05-353

WCAP-15830  
Project Number 694

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

Subject: Westinghouse Owners Group  
Response to the NRC Draft Denial of WCAP-15830, "Staggered Integrated ESF Testing," (Proprietary) (Task 2016)

Reference 1: Email, G. Shukla (NRC) to S. DiTommaso (WOG), "Staff Comments on our Review of WCAP-15830-P, Staggered Integrated ESF Testing," dated June 15, 2005 (TAC MB9131)

Topical report WCAP-15830, "Staggered Integrated ESF Testing" was transmitted to the NRC for review in April of 2003 and was accepted for review in September 2003. This report demonstrated, using deterministic and risk-based methodology, the acceptability of performing integrated surveillance testing of each engineered safety feature train on a staggered basis with one train tested each refueling cycle.

Several staff requests for additional information were received concerning WCAP-15830. These RAIs were proactively supported through WOG responses provided in February, June and September 2004. Staff feedback indicated satisfaction with the supplied responses and that a draft SE would be issued in November 2004. In April 2005, after two years of review entailing substantial WOG and utility efforts, the staff abruptly reversed their position and advised the WOG of their intent to issue a denial letter. Reference 1 summarized the basis for such denial.

On July 7, 2005, the WOG, participant utilities, and NRC personnel held a teleconference to review the basis for the staff's adverse position. While risk-based information provided in WCAP-15830 was found acceptable, the staff stated that the principal basis for denial was the belief, from a deterministic perspective, that the topical was inconsistent with recommendations embodied in Regulatory Guides 1.9 and 1.108. Regulatory Guides clearly state that they reflect current staff practice, but acceptable alternatives are possible. These acceptable alternatives are clearly embodied in the Commission's risk initiatives and subsequent Regulatory Guides. Clearly, this position needs to be reviewed by senior NRC management to ensure that a differing professional opinion based on dated regulatory guidance does not inappropriately establish regulatory policy that is in conflict with the risk-based guidance promulgated through Regulatory Guide 1.174.

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The quality of the plant's PRA and certain other plant-specific content in WCAP-15830 were identified as a staff concern since such information provided only limited detail. Utilities advised the staff that the required detail will be contained in plant-specific licensing applications and that the content provided in the topical was only representative with the intent to demonstrate the methodology.

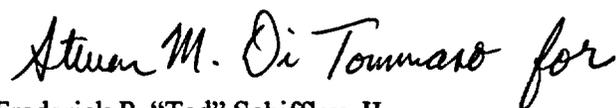
The topical illustrates that the proposed change in surveillance test interval has only a small impact on the calculated Core Damage Frequency (CDF) and Large Early Release Frequency (LERF), and does not affect containment integrity. Implementing a staggered test interval does not impact the redundancy, independence, or diversity of the ESFAS or of the ability of the plant to respond to events. The barriers protecting the public health and safety and the independence of these barriers are maintained.

Issues related to defense in depth and ensuring that sufficient and timely testing of the ESF actuation system are elements supporting resolution on a deterministic basis. Defense in depth is a fundamental design element within the nuclear industry, not one that is added after the fact through testing. Such testing only assures that the design elements have been successfully executed and remain operational. The necessary frequency for performing such testing can be demonstrated using risk-based techniques, techniques that are further confirmed through the cumulative body of results provided by surveillance tests. A further defense in depth basis is that robust features inherent in plant design provide for mitigation of a postulated design basis event by multiple means and do not solely rely on that provided by periodic testing of engineered safety features.

The WOG contends that the basis for denying approval of WCAP-15830 is without merit when consideration is given to the supporting risk analysis, is inappropriate after the extensive and cooperative efforts by both the staff and the WOG throughout the review cycle, and is inconsistent with other staff-approved risk-based surveillance interval extensions. Utility customers were also misled since licensee applications were submitted on the premise of staff approval; such applications now challenge the NRC performance metrics and precipitated a withdrawal request from the staff. Accordingly, the WOG respectfully requests a near-term meeting with NRC management to define the basis and criteria that would support approval of this topical report.

If you have any questions regarding this information, please feel free to call Mr. Steven DiTommaso of the Westinghouse Owners Group Program Management Office at 412-374-5217.

Very truly yours,



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

cc: WOG Steering Committee  
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