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Attention: J. S. Wermiel, Chief
Reactor Systems Branch
Division of Systems Safety and Analysis

Our ref: LTR-NRC-05-49

August 11, 2005

Subject: Response to NRC's Draft Safety Evaluation By the Office Of Nuclear Reactor Regulation
Topical Report WCAP-16259-P, Revision 0, "Westinghouse Methodology for Application of
3-D Transient Neutronics to Non-LOCA Accident Analysis" (Non-Proprietary)

Dear Mr. Wermiel:

Enclosed is a non-proprietary version of Westinghouse's proprietary review of NRC's Draft Safety Evaluation By the Office Of Nuclear Reactor Regulation Topical Report WCAP-16259-P, Revision 0, "Westinghouse Methodology for Application of 3-D Transient Neutronics to Non-LOCA Accident Analysis."

Very truly yours,

A handwritten signature in black ink that reads "R. M. Gresham/for".

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Enclosure

cc: B. J. Benney, NRR
F. M. Akstulewicz, NRR
A. C. Attard, NRR
W. L. Jensen, NRR
L. M. Feizollahi, NRR

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**Response to NRC's Draft Safety Evaluation
By the Office Of Nuclear Reactor Regulation
Topical Report WCAP-16259-P, Revision 0
"Westinghouse Methodology for Application of 3-D
Transient Neutronics to Non-LOCA Accident Analysis"**

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**Response to NRC's Draft Safety Evaluation
By the Office Of Nuclear Reactor Regulation
Topical Report WCAP-16259-P, Revision 0
"Westinghouse Methodology for Application of 3-D
Transient Neutronics to Non-LOCA Accident Analysis" (TAC No. MC3036)**

No proprietary information was identified by Westinghouse in the NRC's Draft Safety Evaluation for WCAP-16259-P. Included below are some clarifications for readability and correction of references. Changes are noted in italics, underline text.

1. Page 6; Line 46 "In April 1997, Westinghouse submitted topical report WCAP-14545 describing use of VIPRE for"
Recommendation: "In April 1997, Westinghouse submitted topical report WCAP-14565 describing use of VIPRE for"
Reason: Incorrect reference.
2. Page 7; Line 10 "calculations as described in the SER included with WCAP-14545-P-A (Reference 8)."
Recommendation: "calculations as described in the SER included with WCAP-14565-P-A (Reference 8)."
Reason: Incorrect reference.
3. Page 7; Line 17 "Westinghouse will continue to use stand-alone VIPRE models described in WCAP-14545-A to"
Recommendation: "Westinghouse will continue to use stand-alone VIPRE models described in WCAP-14565-P-A to"
Reason: Incorrect reference.
4. Page 7; Line 23 "the core need be described in the simulation, as opposed to the entire core for coupling to"
Recommendation: "the core needs to be described in the simulation, as opposed to the entire core for coupling to"
Reason: Readability.
5. Page 11; Line 31 "tilted power shape in the core so that the hottest fluid region will be adjacent to coolant that has"
Recommendation: "tilted power shape in the core so that the hottest fuel region will be adjacent to coolant that has"
Reason: Readability.
6. Page 14; Line 15 "conservative. The methodology utilizes the NRC-approved codes SPNOVA (References 4 and"
Recommendation: "conservative. The methodology utilizes the NRC-approved codes SPNOVA (References 5 and"
Reason: Incorrect reference.
7. Page 14; Line 16 "5), VIPRE-01 (References 6 and 7), and RETRAN-02 (Reference 9 and 10), which have been"
Recommendation: "6), VIPRE-01 (References 7 and 8), and RETRAN-02 (References 9 and 10), which have been"
Reason: Incorrect references.