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Wolf Creek

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May 31, 2006

WOG-06-173

WCAP-16406-P Draft Rev. 1
Project Number 694

U.S. Nuclear Regulatory Commission
Document Control Desk
and Chief Financial Officer
Washington, DC 20555-0001

Subject: PWR Owners Group
Submittal of WCAP-16406-P Draft Revision 1, "Evaluation of Downstream Sump Debris Effects in Support of GSI-191" (PA-SEE-0195)

Reference: (1) Response to Westinghouse Owners Group Letter No. WOG-05-287, Regarding WCAP-16406-P, "Evaluation of Downstream Sump Debris Effects in Support of GSI-191", Herbert N. Berkow (NRC) to Gordon Bischoff (WOG), October 27, 2005.

This letter transmits four (4) copies of WCAP-16406-P Draft Revision 1, entitled "Evaluation of Downstream Sump Debris Effects in Support of GSI-191," dated May 2006. The Pressurized Water Reactor Owners Group (PWROG) is requesting formal review of WCAP-16406-P Revision 1 in accordance with the Nuclear Regulatory Commission (NRC) licensing topical report program for review and acceptance for referencing in licensing actions.

A proprietary line in/line out copy of WCAP-16406-P Draft Revision 1 reflecting the changes made to capture the NRC comments previously obtained from Reference 1 is provided per the NRC's request. A non-proprietary version is not available and will not be submitted. This is due to the extensive quantity of proprietary information contained in WCAP-16406-P Revision 1, and omitting such information within this document would compromise the intent and coherence of this WCAP.

WCAP-16406-P Draft Revision 1 provides methods and information for each PWR licensed in the U. S. that can be used to perform an assessment of the impact of debris on various equipment required by the ECCS and NSSS to maintain the core in a coolable geometry in a post-accident condition. Each plant will need to determine their plant-specific sump debris mixture and sump screen size in order to utilize the evaluation. This report provides information on a common methodology and

acceptance criteria for potentially affected components for Westinghouse, CE, and B&W PWR NSSS designs. This report also identifies potential plant actions (based on evaluation) which may include component modifications to demonstrate compliance with the NRC GL2004-02.

Please note that Chapter 4, entitled "Systems Descriptions and Mission Times," and Appendices A, B, C, D, G, H and M, are submitted for information only and no review is being requested on these sections.

Also enclosed is Westinghouse authorization letter AW-06-2156, accompanying affidavit, Proprietary Information Notice, and a Copyright Notice.

WCAP-16406-P Draft Revision 1 contains information proprietary to Westinghouse Electric Company LLC, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b) (4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that this information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the information listed above or the supporting Westinghouse affidavit should reference AW-06-2156 and should be addressed to Mr. J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355

The PWROG requests that a fee waiver be considered for the NRC review of WCAP-16406-P Draft Revision 1 pursuant to the provisions of 10 CFR 170.11(a)(1)(i). WCAP-16406-P Draft Revision 1 provides the technical background as requested by the NRC in the Safety Evaluation of NEI 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology." Both NEI-04-07, which was exempt from NRC review fees, and WCAP-16406-P Revision 1 were developed in response to NRC request associated with Generic Safety Issue GSI-191. The application of the methods and information described in this report will reduce regulatory burden and allow for more appropriate allocation of NRC inspection resources.

During the fee waiver decision period, the PWROG respectfully requests the NRC Staff to review WCAP-16406-P Draft Revision 1. The PWROG will assume the responsibility of the NRC review fees accrued if the fee waiver is not granted.

Consistent with the Office of Nuclear Reactor Regulation, Office Instruction LIC-500, "Processing Request for Reviews of Topical Reports," the PWROG requests that the NRC provide target dates for any Request(s) for Additional Information and for issuance of the Safety Evaluation for WCAP-16406-P Draft Revision 1.

Correspondence related to this transmittal and invoices associated with the review of WCAP-16406-P Draft Revision 1 should be addressed to:

Mr. Gordon Bischoff
Manager, Owners Group Program Management Office
Westinghouse Electric Company
Mail Stop ECW 3rd Floor
P. O. Box 355
Pittsburgh, Pennsylvania 15230-0355

The reference documents requested in Reference (1) above are currently being prepared and will be provided under a separate cover.

If you have any questions, please do not hesitate to contact me at 630-657-3897 or Mr. Gordon Bischoff of the Owners Group Program Management Office at 860-731-6200.

If you require further information, please contact Mr. Reginald R. Dulaney in the Owners Group Program Management Office at 412-374-6549.

Regards,



Frederick P. "Ted" Schiffley, II, Chairman
PWR Owners Group

FPS:RRD:las

Enclosures

cc: PWROG Steering Committee
PWROG Management Committee
PWROG Licensing Subcommittee
PWROG Systems and Equipment Engineering Subcommittee
PWROG Project Management Office
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