



NUCLEAR ENERGY INSTITUTE

*Designated
Original*

Biff Bradley
MANAGER, RISK ASSESSMENT
NUCLEAR GENERATION DIVISION

September 25, 2006

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

PROJECT NUMBER: 689

SUBJECT: Submittal of Topical Report on 10 CFR 50.69 Application

Enclosed for NRC review is Pressurized Water Reactor Owners Group (PWROG) topical report WCAP-16308-NP, "Pressurized Water Reactor Owners Group 10 CFR 50.69 Pilot Program – Categorization Process – Wolf Creek Generating Station," addressing a plant-specific application of 10 CFR 50.69 to the Wolf Creek Generating Station (WCGS). This represents the first pilot application of the 10 CFR 50.69 categorization process, as described in NEI 00-04, "10 CFR 50.69 SSC Categorization Guideline," which has been endorsed through NRC Regulatory Guide 1.201."

The primary objective of this submittal is to provide, for NRC review, a demonstration of an alternative method for categorization of passive (pressure boundary retaining) functions. Regulatory Guide 1.201 currently endorses ASME Code Case N-660, "Risk-Informed Safety Classification for Use in Risk-Informed Repair/Replacement Activities," but notes that "Alternatives to this Code Case may be submitted for NRC review and approval as part of a specific §50.69 application."

The topical report only addresses the categorization process of SSCs and does not address the technical capabilities of the licensees Probabilistic Risk Analysis (PRA). This topical report is being submitted to provide a real case categorization process for NRC review. A plant specific license amendment application is required in accordance with 50.69(b)(2) to provide the categorization process and the technical capability of the licensee's PRA that is used as a basis for the categorization. While the categorization process described in this report has been applied to two systems at WCGS, it is recognized that the results of the categorization cannot be directly used in the implementation of 50.69 since the quantitative risk assessment was not based on a PRA that meets the technical adequacy requirements of the 50.69 rule. However, we do request NRC review and approval of the enclosed methodology for passive categorization as an alternative to ASME Code Case N-660.

D046

U.S. Nuclear Regulatory Commission
September 25, 2006
Page 2

We request that NRC reviews of the enclosure be granted a fee waiver pursuant to the provisions of 10 CFR 170.11, specifically:

1. The request is to assist in developing an NRC regulatory guide (the final version of Regulatory Guide 1.201 to endorse the passive function categorization process) in accordance with 10 CFR 170.11(a)(1)(ii).
2. The request is to support NRC generic regulatory improvements (implementation of 10 CFR 50.69, risk-informed scope of special treatment regulations), in accordance with 10 CFR 170.11(a)(1)(iii).

We look forward to NRC review of the pilot application of this important risk-informed initiative. Please contact me if you have any questions.

Sincerely,



Biff Bradley

Enclosure

c: Mr. Gary M. Holahan, U. S. Nuclear Regulatory Commission
Mr. James E. Lyons, U. S. Nuclear Regulatory Commission
Mr. Michael D. Tschiltz, U.S. Nuclear Regulatory Commission