



Program Management Office
4350 Northern Pike
Monroeville, Pennsylvania 15146

Project No. 694

WCAP-15622-NP

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OG-07-287

U.S. Nuclear Regulatory Commission
Document Control Desk
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**Subject: PWR Owners Group Withdrawal of Topical Report WCAP-15622-NP, Rev. 0
- "Risk-Informed Evaluation Of Extensions To AC Electrical Power System
Completion Times" (TAC No. MB2257) - (MUHP-3010/PA-LSC-0029)**

References:

1. "Transmittal of WCAP-15622, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times', Non-Proprietary Class 3 (MUHP-3010)", OG-01-039, dated June 15, 2001.
2. "Transmittal of RAI Responses for WCAP-15622, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times', (MUHP-3010)", OG-02-052, dated November 27, 2002.
3. "Response to Request for Additional Information - WCAP-15622-NP, Rev. 0, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times'", WOG-03-635, dated December 10, 2003.
4. Letter, R. Gramm (NRC) to G. Bischoff (WOG), "Draft Safety Evaluation for Topical Report WCAP-15622, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times' (TAC No. MB2257)" dated July 1, 2005.
5. "Comments on WCAP-15622-NP, Rev. 0 Draft Safety Evaluation (MUHP-3010)", WOG-05-414, dated September 27, 2005.
6. Letter, S. Rosenberg (NRC) to G. Bischoff (PWROG), "Draft Safety Evaluation For Topical Report WCAP-15622, 'Risk-Informed Evaluation Of Extensions To AC Electrical Power System Completion Times' (TAC No. MB2257)", dated April 17, 2007.

The purpose of this letter is for the Pressurized Water Reactor Owners Group (PWROG) to officially withdraw Topical Report WCAP-15622, "Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times", submitted June 2001, and to discuss the reasons for this action.

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The PWROG submitted WCAP-15622 for NRC review and approval via Reference 1. WCAP-15622 included plant specific analyses (for eight participating plants), consistent with Regulatory Guides 1.174 and 1.177, for each Completion Time (CT) proposed to be extended for each participating licensee. The objective of including the plant specific analyses and results in the WCAP was to allow licensees to reference the approved WCAP in license amendment requests for the proposed CT changes. This approach, referred to as a Joint Application Report, had previously been submitted by other Owners Groups (CEOG and B&WOG), and approved by the staff.

Several of the plants that originally included plant specific analyses and results in the WCAP provided revised plant specific results in responses to the three sets of RAIs via References 2 and 3.

The PWROG was informed during a teleconference held on November 19, 2004 that the staff would not approve the plant specific results, as revised in the RAI responses in References 2 and 3, in the draft Safety Evaluation (SE). The staff stated that only the generic methodology contained in the WCAP would be discussed in the draft SE.

The initial draft SE for WCAP-15622 was issued by the staff on July 1, 2005 via Reference 4. The PWROG provided comments on the initial draft SE via Reference 5. A revised draft SE for WCAP-15622 was issued by the staff on April 17, 2007 via Reference 6. A number of the PWROG comments provided in Reference 5 were not addressed in the revised draft SE. A meeting was held with the staff on June 21, 2007, to discuss the PWROG's issues with the revised draft SE.

The PWROG is disappointed with, but acknowledges, the current staff positions with respect to CT extensions for the Emergency Power Source and Electrical Distribution Technical Specifications. The threshold and criteria for deterministic defense-in-depth considerations for risk-informed CT extensions are not well documented and appear to have become more demanding as additional license amendments have been reviewed and approved for these changes. Despite these outcomes, the PWROG hoped to resolve several confusing, inconsistent, and perhaps inaccurate statements made in the latest draft SE and to capture these in the final SE and approved WCAP. This was the subject of the public meeting held on June 21, 2007. The PWROG requested the staff to consider the revised plant specific results and other information that was submitted via References 2 and 3 in the final SE. The staff stated that RAI responses are not part of a Topical Report (TR), and that the SE would only reflect the initial revision of a TR, unless the TR was revised to reflect the RAI responses. Although this was applied inconsistently in the draft SE, the information regarding the PRA requirements contained in the revised draft SE may be incomplete and misleading. This also appears to alter the long-standing practice of appending RAI's and responses to the Approved version of a TR and for the SE to consider the information as appropriate.

It is unfortunate that the PWROG has spent well over \$750,000 on the development of this topical report, payment of NRC review fees, and responding to RAIs only to find that the NRC position on risk-informed CT extensions has changed from when similar CT extensions were previously approved for the other Owners Groups. Consistent regulatory positions should be the rule, not the exception, and the PWROG is disappointed that the Westinghouse plants are unable to take advantage of some of the same CT extensions approved for the other NSSS designs.

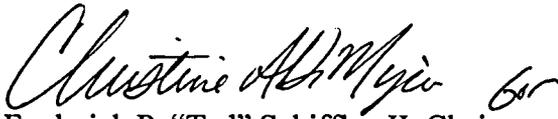
Based on the draft SE provided in Reference 6 and the modest revisions that the staff agreed to at the June 21 meeting, there is very little value to be gained for the PWROG members by pursuing a final SE for this program. Therefore, the PWROG withdraws WCAP-15622-NP, Rev 0," dated June 2001 and requests that the Staff discontinue review of this document.

Correspondence related to this transmittal should be addressed to:

Mr. Gordon Bischoff, Program Manager
Owners Group Program Management Office
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355

If you have any questions, please do not hesitate to contact me at (630) 287-8780 or Ms. Christine DiMuzio of the PWR Owners Group, Program Management Office at (412) 374-5680.

Sincerely,



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

cc: Sean Peters, NRC
Stacey Rosenberg, NRC
Management Committee
Steering Committee
Licensing Subcommittee
Risk Management Subcommittee
Program Management Office
J. Andrachek, W
J. Andre, W
G. Ament, W
P. Hijeck, W
J. Gresham, W