UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 10, 2001

CHIEF FINANCIAL
OFFICER

Westinghouse Electric Company, LLC
ATTN: Mr. Andrew P. Drake
WOG Project Manager
P.O. Box 355 (ECE 5-16)
Pittsburgh, PA 15230

Dear Mr. Drake:

I am responding to the October 12, 2000, and November 16, 2000, letters from the Westinghouse Owners Group (WOG), requesting a waiver of the fees to review the WOG Topical Report "Inclusions of Augmented Piping Inspection Program into the WOG Risk-Informed ISI Program, WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP-5200). The topical report addendum was submitted for review and approval by the WOG on December 21, 1999, and revised on June 2, 2000. For reasons stated below, 10 CFR 170 fees are waived for WCAP-14572, Revision 1-NP-A Addendum 1.

In 1995, the Nuclear Regulatory Commission (NRC) published a policy statement (60FR42622) on the use of probabilistic risk assessment the (PRA) methods in nuclear regulatory activities. The NRC staff was directed to prepare an action plan, together with a timetable for developing Regulatory Guides (RGs) and Standard Review Plans (SRPs) associated with the use of PRA in specific applications. A task group was established to delineate specific tasks in the RI-ISI area. The nuclear industry, under one umbrella of Nuclear Energy Institute (NEI), submitted two methodologies for the implementation of the RI-ISI. The NRC encouraged licensees to submit pilot plant applications for demonstrating risk-informed methodologies to be used for piping segment and piping structural element selection in systems scheduled for ISI. WCAP-14572 was the WOG methodology used by Virginia Electric and Power Company for the Surry, Unit 1 pilot plant application. Using the results from the review of the pilot plant applications, staff developed a RI-ISI application-specific RG and the corresponding SRP chapters and associated inspection procedure documents. Therefore, in a May 14, 1996, letter to the NEI, NRC waived the fees for the review of the original WCAP-14752 based 10 CFR 170.21(J), Footnote 4, criterion 3.

The basis for the fee waiver request is that the WOG believes that the submittal and review of this addendum similarly falls under 10 CFR 170.21(J), Footnote 4. This addendum to the WOG RI-ISI process permits, as an option, the revision of selected augmented inspection regulatory requirements, including High Energy Line Break (HELB) exclusions. The Office of Nuclear Reactor Regulation staff has confirmed that the new information will be used to support NRC's generic regulatory improvements, specifically regarding RI-ISI. This review will also assist the NRR staff in developing guidance for the industry on similar submittals.

Based on the foregoing, I have determined that the review of WCAP-14572, Revision 1-NP-A Addendum 1 meets the criteria for the fee waiver in 10 CFR 170.21(J), Footnote 4, criterion 3.

As indicated in your November 16, 2000, letter, you have received and paid the following invoices associated with the review of WCAP-14572, Revision 1-NP-A Addendum 1:

Invoice Number	Amount	Date Paid
RL0390-00	$8,601	May 30, 2000
RL0553-00	$2,891	Aug. 14, 2000
RL0027-01	$5,499	Oct. 30, 2000

In addition, Invoice Number RL0323-01, dated February 7, 2001, was paid on February 22, 2001, in the amount of $18,648. These invoices will be canceled and a refund in the amount of $35,639 will be sent to you within 30 days from the date of this letter.

If you have any questions, please contact Ellen Poteat of my staff at 301-415-6392.

Sincerely,

original signed by:
Peter J. Rabideau
/for/ Jesse L. Funches
Chief Financial Officer

Distribution:
L. Tremper, OCFO/DAF/LFARB
D. Weiss, OCFO/DAF/LFARB
G. Jackson, OCFO/DAF/LFARB
OCFO/DAF/LFARB RF (LF-01-1)
OCFO/DAF RF (DAF 1-008)
OCFO/DAF SF (LF-3.1.7)
OC-2001-024 (S. Hudson)

Document Name: G:\DAF-1-008.wpd

ADAMS- Yes/No SENSITIVE/NON-SENSITIVE PUBLIC/NON-PUBLIC Initials -mep
*SEE PREVIOUS CONCURRENCE
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NAME	EPoteat/DJWeiss		GCJackson		DBDandois		Scollins* FAXED	
DATE	5/3 /01		5/2 /01		5/4 /01		03 / 20 /01	

OFFICE	OCFO/DAF/LFARB	N	OGC		DCFO	N	CFO	C
NAME	ACRossi		TRothschild*E-MAIL		PJRabideau		JLFunches for	
DATE	5/7 /01		3 / 16 /01		5/10/01		5/10/01	

OFFICIAL RECORD COPY 5/8 d

The four invoices listed above will be canceled and a refund in the amount of $35,639 will be sent to you within 30 days of the date of this letter.

If you have any questions, please contact Ellen Poteat of my staff at 301-415-6392.

Sincerely,

Jesse L. Funches
Chief Financial Officer

Distribution:
L. Tremper, OCFO/DAF/LFARB
D. Weiss, OCFO/DAF/LFARB
G. Jackson, OCFO/DAF/LFARB
OCFO/DAF/LFARB RF
OCFO/DAF RF (DAF 1-008)
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Document Name: G:\DAF-1-008.wpd

Initial 3/22/01

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OFFICE	OCFO/DAF/LFARB/NMT	OCFO/DAF/LFARB	OCFO/DAF/LFARB	NRR:DIR
NAME	EPoteat/DJWeiss	GCJackson	DBDandois	~~SCollins~~
DATE	/ /01	/ /01	/ /01	03/20/01

OFFICE	OCFO/DAF/LFARB	OGC	DCFO	CFO
NAME	ACRossi	TRothschild	PJRabideau	JLFunches
DATE	/ /01	/ /01	/ /01	/ /01

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If you have any questions, please contact Ellen Poteat of my staff at 301-415-6392.

Sincerely,

Jesse L. Funches
Chief Financial Officer

Distribution:
L. Tremper, OCFO/DAF/LFARB
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OFFICE	OCFO/DAF/LFARB/NMT	C	OCFO/DAF/LFARB		OCFO/DAF/LFARB	C	NRR:DIR	
NAME	EPoteat/DJWeiss		GCJackson		DBDandois		SCollins	
DATE	3/15/01		/ /01		3/15/01		3/22/01	

OFFICE	OCFO/DAF/LFARB		OGC		DCFO		CFO	
NAME	ACRossi		TRothschild		PJRabideau		JLFunches	
DATE	/ /01		3/16/01		/ /01		/ /01	

OFFICIAL RECORD COPY

From: Trip Rothschild
To: Barber, Kathryn; Poteat, M. Ellen
Date: 3/16/01 3:21PM
Subject: Re: Westinghouse fee waiver letter

see attached

OGC has no legal objections; I have provided a couple of editorial suggestions to you orally.

Keep up the good work.

>>> M. Ellen Poteat 03/16/01 02:17PM >>>
Thank you for the quick turnaround, I have made the suggested changes. see attached. How does it look now?

Thanks,
Ellen

>>> Kathryn Barber 03/16/01 01:14PM >>>
Hi,
Trip Rothschild asked that I review the fee waiver letter being sent to Westinghouse Electric Company and provide my comments to you. The only changes I would suggest would be to insert the phrase "to WCAP-14572" in the second sentence of the second paragraph following the word "addendum" to make the sentence more clear. I would also suggest adding either a footnote or a parenthetical to the end of the second sentence of the second paragraph which explains what criterion number 3 in footnote 4 says. I would also insert "10" to the CFR cite found in the first sentence of the second paragraph. Trip agrees with these comments and believes they make the letter more intelligible to members of the general public.

If you have any questions, please contact me at 415-1572. I will be out of the office Friday afternoon and Monday, but Trip will have access to the written comments.

E-mail to NRC 5/16

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CHIEF FINANCIAL OFFICER

Westinghouse Electric Company LLC
ATTN: Mr. Andrew P. Drake
WOG Project Manager
P.O. Box 355 (ECE 5-16)
Pittsburgh, PA 15230

Dear Mr. Drake:

I am responding to the October 12, 2000, and November 16, 2000, letters from the Westinghouse Owners Group (WOG), requesting a waiver of the fee to review the WOG Topical Report "Inclusions of Augmented Piping Inspection Program into the WOG Risk-Informed ISI Program, WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP 5200). The topical report addendum was submitted for review and approval by the WOG on December 21, 1999, and revised on June 2, 2000. For reasons stated below, an exemption from the 10 CFR Part 170 fee for the review of the WCAP-14572, Revision 1-NP-A Addendum 1 is granted in accordance with 10 CFR Part 170.21, Footnote 4.

In a May 14, 1996, letter to the Nuclear Energy Institute (NEI), NRC waived the fee for the review of the original WCAP-14752 based on Footnote 4 to CFR 170.21 because the topical report contained a generic approach for risk informed inservice inspections based on the probabilistic risk assessment criteria, and NRC staff intended to use the information in support of planned generic regulatory improvement activities. The WOG believes that the submittal of the proposed addendum and its review also falls under criterion three of Footnote 4 to 10 CFR 170.21. The Office of Nuclear Reactor Regulation staff has confirmed that the new information will be used to support generic regulatory improvements, specifically regarding risk-informed inservice inspections, and assist them in developing guidance for the industry on similar submittals.

Based on the foregoing, I have determined that the review of WCAP-14572, Revision 1-NP-A Addendum 1 meets the criteria in 10 CFR Part 170.21, Footnote 4 and therefore is not subject to fees.

As indicated in your November 16, 2000, letter you have received and paid the following invoices associated with the review of WCAP-14572, Revision 1-NP-A Addendum 1:

Invoice Number	Amount	Date Paid
RL0390-00	$8,601	May 30, 2000
RL0553-00	$2,891	Aug. 14, 2000
RL0027-01	$5,499	Oct. 30, 2000

In addition, Invoice Number RL0323-01, dated February 7, 2001, was paid on February 22, 2001, in the amount of $18,648.

The four invoices listed above will be canceled and a refund in the amount of $35,639 will be sent to you within 30 days of the date of this letter.

If you have any questions, please contact Ellen Poteat of my staff at 301-415-6392.

Sincerely,

Jesse L. Funches
Chief Financial Officer

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D. Weiss, OCFO/DAF/LFARB
G. Jackson, OCFO/DAF/LFARB
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OC-2001-024 (S. Hudson)

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NAME	EPoteat/DJWeiss		GCJackson		DBDandois		SCollins	
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NAME	ACRossi		TRothschild		PJRabideau		JLFunches	
DATE	/ /01		/ /01		/ /01		/ /01	

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Date Rec'd: 01/25/2001

DAF Action: DAF-1-008

OC Action : 2001-024

DAF Due Date: 02/14/2001

Branch: LFARB

Action Item: Request for Fee Billing Waiver for Review of WOG Topical Rpt. Inclusion of Augmented Piping Insp. Pgms. Into WOG Risk-informed ISI Program

Description: Request Final Decision

Date to DIR:

Ext. Date:

Date Closed:

Subject File:

OCFO TICKET

24-Jan-01

Assigned	DAF
Item No	2001-024
Priority	1
From	Collins
Office	NRR
To	Funches
Date	01/22/2001
Due Date	02/14/2001
Ticket No	
Subject	Request for Fee Biling Waiver for Review of WOG Topical Rpt. Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program
Instructions	Request [redacted] final decision.
Distribution	
Copies	

2001-024

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 22, 2001

MEMORANDUM TO: Jesse Funches, Chief Financial Officer

FROM: for Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR FEE BILLING WAIVER FOR REVIEW OF WESTINGHOUSE OWNERS GROUP (WOG) TOPICAL REPORT WCAP 14572, REVISION 1-NP-A, ADDENDUM 1, "INCLUSION OF AUGMENTED PIPING INSPECTION PROGRAMS INTO THE WOG RISK-INFORMED ISI PROGRAM" (MUHP-5200)

By letters dated October 12, 2000, and November 16, 2000, copies attached, the Westinghouse Owners Group (WOG) requested a waiver of fees for the review of the WOG's Topical Report WCAP-14572, Revision 1-NP-A, Addendum 1, "Inclusion of Augmented Piping Inspection Programs In the WOG Risk-Informed ISI Program." The WOG submitted this topical report addendum on December 21, 1999, for the staff's review and approval. The staff waived the fees associated with the review of the original WOG topical report based on criterion three of Footnote 4 to 10 CFR 170.21. Accordingly, the staff believes that it is appropriate to waive the fees associated with the review of this topical report addendum. The WOG cites the footnote as the rationale for requesting a non-fee-billable review of the topical report addendum, similar to that of the original topical report. Footnote 4 states that fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts.

NRR requests that a final decision be made by the NRC's Chief Financial Officer for transmittal to the WOG.

Attachments: 1. Letter from WOG dated 10/12/2000
2. Letter from WOG dated 11/16/2000

2/1/01
2/5/01

Asked staff to described how NRC is going to use the info provided in the Addendum

2001 JAN 24 PM 12:31

From: Girija Shukla
To: M. Ellen Poteat
Date: 3/14/01 8:53AM
Subject: Re: WCAP-13472, ADDENDUM 1, FEE WAIVER

Please see attached, the suggested changes are in bold. (Also WCAP-14572 was revised on June 2, 2000.)

G. S. Shukla
Project Manager
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

301- 415-8439/ Fax 301-415-3061/ gss@nrc.gov

>>> M. Ellen Poteat 03/14/01 08:11AM >>>
Beginning of letter to WOG attached.

Review 170.21 footnote 4

Ellen
415-6392

Mr. Andrew P. Drake
WOG Project Manager
Westinghouse Electric Company
PO Box 355 (ECE 5-16)
Pittsburgh, PA 15230

Dear Mr. Drake:

I am responding to your November 16, 2000, letter and the October 12, 2000, letter from Mr. Karl Jacobs, Chairman of the Westinghouse Owners Group (WOG), requesting a waiver of the fee to review the WOG Topical Report "Inclusions of Augmented Piping Inspection Program into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP 5200). The topical report addendum was submitted by the WOG on December 21, 1999 **as revised on June 2, 2000**, for review and approval. For reasons stated below, an exemption from the 10 CFR Part 170 fee for the review of the WCAP-14572, Addendum 1 is granted in accordance with 10 CFR Part 170.21, Footnote 4.

In a May 14, 1996, letter to the Nuclear Energy Institute (NEI), NRC waived the fee for the review of the original WCAP-14752 based on Footnote 4 to CFR 170.21 because the topical report contained a generic approach for risk informed inservice inspections based on the probabilistic risk assessment criteria and NRC staff intended to use the information in support of planned generic regulatory improvement activities. The WOG believes that the submittal of the proposed addendum and its review also falls under criterion three of Footnote 4 to 10 CFR 170.21. As stated in a January 22, 2001, memorandum from Samuel J. Collins, Director, Office of Nuclear Reactor Regulation (NRR), the staff believes that it is appropriate to waive the fees associated with the review of the addendum. The staff will use the new information **it gains from the review in supporting generic regulatory improvements, specifically regarding risk-informed inservice inspections. This review will also assist the NRR staff in developing guidance for the industry on similar submittals.**

ML003777351

OG-00-097

WCAP-14572 Revision 1-NP-A Addendum 1
Project Number 694

Domestic Members

AmerenUE
Callaway
American Electric Power Co.
D.C. Cook 1 & 2
Carolina Power & Light Co.
H.B. Robinson 2
Shearon Harris
Commonwealth Edison
Braidwood 1 & 2
Byron 1 & 2
Consolidated Edison
Company of NY, Inc.
Indian Point 2
Duke Power Company
Catawba 1 & 2
McGuire 1 & 2
First Energy Nuclear
Operating Co.
Beaver Valley 1 & 2
Florida Power & Light Co.
Turkey Point 3 & 4
New York Power Authority
Indian Point 3
Northeast Utilities
Seabrook
Millstone 3
Northern States Power Co.
Prairie Island 1 & 2
Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
PSEG - Nuclear
Salem 1 & 2
Rochester Gas & Electric Co.
R.E. Ginna
h Carolina Electric
s Co.
V.C. Summer
STP Nuclear Operating Co.
South Texas Project 1 & 2
Southern Nuclear
Operating Co.
J.M. Farley 1 & 2
A.W. Vogtle 1 & 2
Tennessee Valley Authority
Sequoyah 1 & 2
Watts Bar 1
TXU Electric
Comanche Peak 1 & 2
Virginia Power Co.
North Anna 1 & 2
Surry 1 & 2
Wisconsin Electric Power Co.
Point Beach 1 & 2
Wisconsin Public Service Corp.
Kewaunee
Wolf Creek Nuclear
Operating Corp.
Wolf Creek

International Members

Electrabel
Doel 1, 2, 4
Tihange 1, 3
Kansai Electric Power Co.
Mihama 1
Takahama 1
Ohi 1 & 2
Korea Electric Power Co.
Kori 1 - 4
Yonggwang 1 & 2
Nuclear Electric plc
Sizewell B
Nuklearna Elektrarna Krsko
Krsko
ish Utilities
sco 1 & 2
Vandellos 2
Almaraz 1 & 2
Vattenfall AB
Ringhals 2 - 4
Taiwan Power Co.
Maanshan 1 & 2

October 12, 2000

Mr. Steven Bloom
Project Manager for Westinghouse Owners Group
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Westinghouse Owners Group
<u>Waiver of NRC Review Fees for WOG Topical Report "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP-5200)</u>

References: 1. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1 (MUHP-5200)" dated December 21, 1999

2. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program" dated October 14, 1999.

3. Letter from Stephen D. Floyd, Nuclear Energy Institute, to NEI Administrative Points of Contact containing "Example Submittal For Plants that Follow the WOG Methodology (WCAP-14572)," dated March 9, 1999.

4. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to U.S. Nuclear Regulatory Commission, "Transmittal of Approved Topical Reports: WCAP-14572 Revision 1-NP-A (Non-Proprietary) "WOG Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report" and WCAP-14572 Revision 1-NP-A, Supplement 1 (Non-Proprietary) "Westinghouse Structural Reliability and Risk Assessment (SRRA) Model for Piping Risk-Informed Inservice Inspection"(MUHP-5091)" dated March 8, 1999.

5. Letter from Thomas Essig, U.S. Nuclear Regulatory Commission, to Mr. Lou Liberatori, Chairman, Westinghouse Owners Group, "Safety Evaluation of Topical Report WCAP-14572, Revision 1, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report,"" dated December 15, 1998.

6. Letter from Mr. Ronald M. Scroggins, U.S. Nuclear Regulatory Commission to Mr. Stephen D. Floyd, Nuclear Energy Institute, dated May 14, 1996.

Attachment 1

Dear Mr. Bloom:

By letter dated December 21, 1999 (reference 1) the WOG submitted addendum to WCAP-14572, Revision 1-NP-A, for review. This addendum to the WOG RI-ISI process permits, as an option, the revision of selected augmented inspection regulatory requirements, including High Energy Line Break (HELB) exclusion examinations, where safety impacts can be shown to be maintained or enhanced. Changes to these augmented requirements would be evaluated using the appropriate regulatory change mechanisms (e.g. 10CFR50.55a, 50.59.) and would be submitted by individual utilities as part of the example submittal (reference 3).

As outlined in reference 5, the NRC waived any fees associated with the review of the WOG Topical report. The NRC agreed that the waiver request for this document met criterion three of Footnote 4 to 10 CFR 170.21. This footnote states that fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts.

We believe that this submittal of the proposed addendum and its review also falls under criterion three of Footnote 4 to 10 CFR 170.21 and requested a waiver of the review fees.

We have not received any response to our request for a waiver of the review fees. In addition, we have received and paid the following invoices associated with the review of this topical report:

Invoice #	Date	Amount
RL0390-00	5/13/00	$8,601.00
RL0553-00	7/31/00	$2,891.00

This letter is to reiterate our request for the waiver of review fees as requested in the submittal letter (reference 1) and a refund of the review fees paid to date.

Please direct any questions with regard to this request to Mr. Andrew Drake, WOG Project Manager at (412)-374-6207 or by mail at:

Mr. Andrew P. Drake
WOG Project Manger
Westinghouse Electric Company
PO Box 355 (ECE 5-16)
Pittsburgh, PA 15230

Very truly yours,

Karl Jacobs, Chairman
Westinghouse Owners Group

00og097.doc

Domestic Members
AmerenUE
Callaway
American Electric Power Co.
D.C. Cook 1 & 2
Carolina Power & Light Co.
H.B. Robinson 2
Shearon Harris
Commonwealth Edison
Braidwood 1 & 2
Byron 1 & 2
Consolidated Edison
Company of NY, Inc.
Indian Point 2
Duke Power Company
Catawba 1 & 2
McGuire 1 & 2
First Energy Nuclear
Operating Co.
Beaver Valley 1 & 2
Florida Power & Light Co.
Turkey Point 3 & 4
New York Power Authority
Indian Point 3
Northeast Utilities
Seabrook
Millstone 3
Northern States Power Co.
Prairie Island 1 & 2
Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
PSEG - Nuclear
Salem 1 & 2
Rochester Gas & Electric Co.
R.E. Ginna
South Carolina Electric
Co.
Summer
Nuclear Operating Co.
South Texas Project 1 & 2
Southern Nuclear
Operating Co.
J.M. Farley 1 & 2
A.W. Vogtle 1 & 2
Tennessee Valley Authority
Sequoyah 1 & 2
Watts Bar 1
TXU Electric
Comanche Peak 1 & 2
Virginia Power Co.
North Anna 1 & 2
Surry 1 & 2
Wisconsin Electric Power Co.
Point Beach 1 & 2
Wisconsin Public Service Corp.
Kewaunee
Wolf Creek Nuclear
Operating Corp.
Wolf Creek

International Members
Electrabel
Doel 1, 2, 4
Tihange 1, 3
Kansai Electric Power Co.
Mihama 1
Takahama 1
Ohi 1 & 2
Korea Electric Power Co.
Kori 1 - 4
Yonggwang 1 & 2
Nuclear Electric plc
Sizewell B
Nuklearna Elektrarna Krsko
Krsko
Spanish Utilities
1 & 2
Helios 2
Vattenfall AB
Ringhals 2 - 4
Taiwan Power Co.
Maanshan 1 & 2

OG-00-118

WCAP-14572 Revision 1-NP-A Addendum 1
Project Number 694

November 16, 2000

Mr. Stephen Dembek
Chief, PD IV/D-2
Division of Licensing Project Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Westinghouse Owners Group
Waiver of NRC Review Fees for WOG Topical Report "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP-5200)

References: See Attachment

Dear Mr. Dembek:

By letter dated October 12, 2000 (reference 1) the Westinghouse Owners Group (WOG) reiterated its request for an exemption to the review fees for the WOG Topical report "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1".

This topical report addendum was submitted by the WOG on December 21, 1999 (reference 2) for review and approval. As outlined in reference 6, the NRC waived any fees associated with the review of the original WOG topical report. The NRC agreed that the waiver request for that document met criterion three of Footnote 4 to 10 CFR 170.21. This footnote states that fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts.

As noted in both the December 21, 1999 and October 12, 2000 letters, The WOG believes that the submittal of the proposed addendum and its review also falls under criterion three of Footnote 4 to 10 CFR 170.21 and requested a waiver of the review fees.

We have not received any response to either of our request for a waiver of the review fees. In addition, we have received and paid the following invoices associated with the review of this topical report:

Invoice #	Date	Amount	TAC
RL0390-00	5/13/00	$ 8,601.00	MA7795
RL0553-00	7/31/00	$ 2,891.00	MA7795
RL0027-01	10/23/00	$ 5,499.00	MA7995

This letter is to reiterate our request for the waiver of review fees as requested in the previous letters (references 1 and 2) and a refund of the review fees paid to date.

Please direct any questions with regard to this request to me at 412-374-6207. The refund of previously paid review fees totaling $16, 991.00 should be made payable to:

Westinghouse Electric Company LLC
PO Box 355 (ECE 5-16)
Pittsburgh, PA 15239
Attention: Andrew Drake, WOG Project Manager

Very truly yours,

Andrew P. Drake, Project Manager
Westinghouse Owners Group

Attachment

Cc: Westinghouse Owners Group Steering Committee (1L, 1A)

List of References

1. Letter from Karl Jacobs, Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Waiver of NRC Review Fees for WOG Topical Report "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1" (MUHP-5200)" dated October 12, 2000

2. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1 (MUHP-5200)" dated December 21, 1999

3. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, U.S. Nuclear Regulatory Commission, "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program" dated October 14, 1999.

4. Letter from Stephen D. Floyd, Nuclear Energy Institute, to NEI Administrative Points of Contact containing "Example Submittal For Plants that Follow the WOG Methodology (WCAP-14572)," dated March 9, 1999.

5. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to U.S. Nuclear Regulatory Commission, "Transmittal of Approved Topical Reports: WCAP-14572 Revision 1-NP-A (Non-Proprietary) "WOG Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report" and WCAP-14572 Revision 1-NP-A, Supplement 1 (Non-Proprietary) "Westinghouse Structural Reliability and Risk Assessment (SRRA) Model for Piping Risk-Informed Inservice Inspection"(MUHP-5091)" dated March 8, 1999.

6. Letter from Thomas Essig, U.S. Nuclear Regulatory Commission, to Mr. Lou Liberatori, Chairman, Westinghouse Owners Group, "Safety Evaluation of Topical Report WCAP-14572, Revision 1, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report,"" dated December 15, 1998.

7. Letter from Mr. Ronald M. Scroggins, U.S. Nuclear Regulatory Commission to Mr. Stephen D. Floyd, Nuclear Energy Institute, dated May 14, 1996.