

November 13, 2007

Ms. Laurie Lahti
Licensing Manager/2007 NRUG Chair
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: CLOSURE OF GENERIC SAFETY ISSUE 191, PRESSURIZED WATER
REACTOR SUMP PERFORMANCE

Dear Ms. Lahti:

This letter responds to a question raised at the August 8, 2007, meeting of the National/Regional Utility Group (NRUG) regarding how Generic Safety Issue (GSI) 191, Pressurized Water Reactor (PWR) Sump Performance, will be closed and how that closure will be documented.

In September 2004, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors." This document was the principal regulatory vehicle by which the NRC requested licensee action to address debris-induced clogging of PWR emergency recirculation strainers after a loss-of-coolant accident (LOCA). Review of licensee responses to that document will be the primary method the NRC will use to close GSI-191.

Consistent with the intent of GL 2004-02, the NRC expects to receive submittals from all PWR licensees on or before December 31, 2007. These submittals will document each plant evaluation of potential debris sources, expected transport of debris to the emergency strainers after a LOCA, and resulting impact on the strainers and components downstream of the strainers. Each licensee will be expected to demonstrate, through a plant-specific combination of modifications, testing, and analyses, that all applicable NRC regulations regarding long-term cooling of the core post-LOCA are met.

For various reasons, the most important of which is delay in developing test procedures and conducting tests to address potential effects of chemical interactions on strainer performance, a number of licensees will not be in a position to provide their final testing and analysis results by the end of 2007. Others have received permission to complete one or more modifications needed to fully address the sump performance issue in an outage beyond 2007. The NRC said (ADAMS Accession No. ML071060091) that all licensees should provide all relevant and available information by December 31, 2007, and that remaining information (if any) should be provided within 90 days of completion of all actions needed to address GL 2004-02.

The NRC staff will review the licensee submittals in the first half of 2008. The review will begin with a "quick look" at each package to identify significant issues needing immediate attention. This review will be followed by more detailed individual reviews in each technical area

relevant to GSI-191 and GL 2004-02. For those licensees whose corrective actions the staff has audited, the staff will also review the affected licensees' resolution of open items identified during their respective audits. When all individual-area reviews are complete for a given plant, an integration team of senior staff members will evaluate all the review inputs. This team will make a "holistic" determination, consistent with Commission direction, whether each plant has provided information sufficient for the staff to conclude with reasonable assurance that NRC's regulations are met. If a licensee's submittal indicates that corrective actions are complete but the licensee has not provided sufficient information for this determination for a given plant, the NRC will ask for additional information from that licensee.

If a licensee has received permission from the NRC for an extension to complete all corrective actions at a given plant, the NRC staff will review the information in the submittal to determine whether it is sufficient to reach a conclusion regarding whether the licensee has adequately addressed the issue. For example, if an extension has been granted to complete a particular modification, but the testing and evaluation for that plant are complete, the staff may conclude that the affected plant has satisfactorily addressed the issue, pending the completion of the remaining modification. In some cases, even a conditional determination may need to be deferred until more information is received after all corrective actions are complete.

NRC management will review and concur in the team's determination regarding each plant. Management will also consider the results of Temporary Instruction TI-2515/166, which will verify through inspection that licensees have made corrective actions to which they have committed. Once all plant-specific reviews are complete, and the NRC staff concludes that a plant has satisfactorily addressed GL 2004-02 and GSI-191, the NRC will issue a closure letter to the licensee for that plant documenting the NRC's conclusions and closure of the GL for that plant. Once the reviews of all plants are complete and the staff has determined that licensees have satisfactorily addressed the issue, the NRC will close the GL and the GSI through established Agency processes. Even after these generic closure activities are complete, NRC resources will continue to be applied to track remaining corrective actions until all are complete at all PWRs.

If you have any questions regarding this matter, please contact Mr. Michael Scott of the Division of Safety Systems in the Office of Nuclear Reactor Regulation. Mr. Scott, who can be reached at (301) 415-0565, is the Agency's lead for GSI-191 and GL 2004-02.

Sincerely,

/RA/

William H. Ruland, Director
Division of Safety Systems
Office of Nuclear Reactor Regulation

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