Program Management Office
4350 Northern Pike
Monroeville, Pennsylvania 15146

December 13, 2007

OG-07-530

WCAP-16406-P (Proprietary)
Project Number 694

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

Subject: PWR Owners Group
WCAP 16406-P,"Comments on Draft Safety Evaluation for Topical Report (TR) 16406-P" (PA-SEE-0195)

Reference: (1) NRC Letter,"Draft Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR) WCAP 16406-P, Evaluation of Downstream Sump Debris Effects in Support of GSI-191", Revision 1 (TAC NO MD2189) November 13, 2007

The purpose of this letter is to communicate that the PWROG has no technical comments on the draft safety evaluation (Reference 1); however, a typographical error has been identified. On page 41 of 46, Line 35 of draft SE reads "an effect erosive wear. TR WCAP-16406-P, Revision 1, suggests that 'For elastomers,…'". The PWROG suggests that the word "on" be inserted between the words "effect" and "erosive". Line 35 should read "an effect on erosive wear. TR WCAP-16406-P, Revision 1, suggests that 'For elastomers,'".

Additionally, based on previous discussions relating to the wear model suction multiplier, the following discussion is provided:

Recently, a vendor familiar with the Davis-Besse HPI mock-up test informed representatives of the PWROG that there was a non-conservatism in WCAP-16406-P associated with assumptions made from the available data from the Davis-Besse Test results. Specifically, assumptions associated with the test debris load were not conservative. These inaccuracies have been evaluated by Westinghouse and the following recommendation is being made, based on the recently communicated information.

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WCAP-16406-P, Appendix O, Section 3.2 recommends a "suction multiplier" be applied to the free flowing abrasive wear model from Appendix F when calculating suction wear ring wear in order to reduce the conservatism of the unadjusted free flowing wear model. The 0.0865 multiplier was calculated in Table O-7 of the WCAP. Based on the new data provided, a new "suction multiplier" has been developed. The new multiplier is 0.205 and should be used to reduce the conservatism of the unadjusted free flowing wear model.

Section 3.2, "Evaluation of Wear in the Suction Side Running Clearances", Table O-7 and Table O-10, will be modified in the approved version of WCAP-16406-P to reflect the updated value of the suction multiplier.

If you have any questions, please do not hesitate to contact me at 630-657-3897 or Mr. Reginald R. Dulaney in the Owners Group Program Management Office at 412-374-6549.

Regards,

Christine A. Maggo for

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

FPS:RRD:sv

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