



Program Management Office
4350 Northern Pike
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OG-07-544

WCAP-15791-P, Rev 2, Draft (Proprietary)
Project No. 694

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

Subject: **Comments on the Draft Safety Evaluation for WCAP-15791-P, Revision 2, Draft "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times", (MUHP-3010/PA-LSC-0029/LSC-0135R1)**

Reference:

1. NRC Letter, S. Rosenberg to G. Bischoff, "Draft Safety Evaluation for Westinghouse Owners Group (WOG) Topical Report (TR) WCAP-15791-P, Revision 2, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times" (TAC NO. MD3834)", November 1, 2007.

The purpose of this letter is to provide comments on the Draft Safety Evaluation (Reference 1) for WCAP-15791-P, Revision 2, Draft "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times".

Please contact Christine DiMuzio at 412-374-5680 to discuss the proposed changes to this Draft Safety Evaluation.

Sincerely yours,

Frederick P. "Ted" Schiffler, II, Chairman
Pressurized Water Reactor Owners Group

FPS:CAD:sv

Attachment

DOYB
LRR

cc: Licensing Subcommittee
S. Peters, NRC (via FedEx)
J. D. Andrachek
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Steering Committee
S. Rosenberg, NRC (via FedEx)
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Table 1: PWROG Review Comments on the NRC's Draft Safety Evaluation on WCAP-15791-P, Rev. 2 dated November 1, 2007		
Comment Number	Page/Line	Comment
1	Page 13 Lines 8-9	It is stated "Plant-specific applications will need to discuss whether and how the above assumptions are incorporated in their plant (1) operating practices, procedures, and TSs, and (2) PRA models". This statement is inconsistent with item #1 in Section 5 which states "Address how the first, third, and sixth items of the general assumptions of WCAP-15791, which are listed in Section 3.2 in the SE, are incorporated in the specific plant practices, procedures, TS, and PRA." It is suggested that the sentence on lines 8-9 be modified as follows "Plant-specific applications will need to discuss whether and how the <u>first, third, and sixth</u> assumptions are incorporated in their plant (1) operating practices, procedures, and TSs, and (2) PRA models." Note that the revised words are underlined.
2	Page 13 Lines 13-15	It is stated "..., Proposed Condition D addresses an inoperable CIV in more than one penetration flow path and limits the CT to four hours." Proposed Condition D limits all but one CIV to 4 hours. The CT for one CIV is allowed to be greater than 4 hours. For clarification purposes, it is suggested that this sentence be modified as follows "..., Proposed Condition D addresses an inoperable CIV in more than one penetration flow path and limits the CT <u>for all but one CIV to four hours</u> " Note that the revised words are underlined.
3	Page 16 Lines 13-16	It is stated "A licensee that implements WCAP-15791 must demonstrate by its plant-specific application, the applicability of the WCAP-15791 input parameter assumptions with respect to Δ CDF, Δ LERF, ICCDP, and ICLERP to their particular plant." It is only necessary to demonstrate the applicability of WCAP-15791 input parameter assumptions if the generic results in the WCAP are being applied. Therefore, the following change is suggested "A licensee that implements <u>the generic results in</u> WCAP-15791...". Note that the revised words are underlined.
4	Page 18 Lines 24-27	It is stated "Plant-specific CIV reliability and availability will be monitored and assessed..." As noted in previous PWROG comments, it is not necessary to monitor and assess reliability. The CIV reliability is not impacted by the proposed CT changes. Therefore, it is suggested that "reliability and" be removed from this sentence. This statement will then be consistent with Item 7 in Section 5.0 of the Safety Evaluation.
5	Page 21 Lines 10-11	It is stated "Licensees have confirmed that (1) the generic WOG PRA values used for the Tier 1 evaluations in WCAP-15791 envelope the PRA values for their plants...". This statement is almost duplicative of the statement on Page 20, Lines 41-43 (both are bullets in Section 3.5). The difference is that the statement on Page 20, Lines 41-43 specifies that this applies to licensees that apply the generic results, which is correct. It is suggested that the statement on Page 21, Lines 10-11 be deleted since it is incorrect and, if it was corrected, it would duplicate what is already stated.

6	Page 22 Line 14	Suggest adding the underlined words in the following sentence to be consistent with Section 3.2 and Section 8.2 of the WCAP. "Address how the first, third, and sixth items of the <u>basis and general assumptions...</u> "
7	Page 22 Lines 43-45	It should be specified that this PRA quality requirement is only required for the Tier 3 evaluations to be consistent with Page 15, Line 4. Suggest replacing the word "this" with "Tier 3" in the following sentence "Verify that the plant-specific PRA quality is acceptable for <u>this</u> application...". The revised sentence will be "Verify that the plant-specific PRA quality is acceptable for <u>Tier 3 applications...</u> ".
8	Page 23 Line 38-39	It is stated "CIV reliability and availability will also be monitored...". The words "reliability and" should be removed from this sentence. This statement will then be consistent with Item 7 in Section 5.0 of the Safety Evaluation and the WCAP.
9	Page 23 Lines 41-42	It should be specified that this PRA quality requirement is only required for the Tier 3 evaluations to be consistent with Page 15, Line 4. It is suggested that the underlined words be added to the sentence "...that PRA quality is adequate <u>for Tier 3 evaluations</u> as part of the basis...".