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U.S. Nuclear Regulatory Commission
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Project No.: 700
Our ref: LTR-NRC-04-27
3 May 2004

Subject: Comments on the Draft Report of the Ultrasonic Flow Meter Task Group

References: 1. Fax, Request for Additional Information, March 5, 2004
2. Letter, S. Dembek (NRC) to J. A. Gresham (Westinghouse), "Draft Report Of The Ultrasonic Flow Meter Task Group", April 16, 2004

Dear Mr. Dembek

Westinghouse Electric Company LLC (Westinghouse) and, its partner in ultrasonic flow measurement (UFM) technology, the Advanced Measurement and Analysis Group, Inc. (AMAG) participated in a Nuclear Regulatory Commission (NRC) UFM technology review conducted by a specially formed Task Group. In March 2004 (Reference 1), Westinghouse/AMAG received a Request for Additional Information (RAI) regarding its CROSSFLOW Ultrasonic Flow Measurement System. Since the Task Group was constrained to a tight completion schedule (i.e., UFM technology review completion and recommendations to NRC management by March 31, 2004), Westinghouse/AMAG likewise responded aggressively to the RAI through a series of meetings with members of the Task Group and other supporting NRC staff on March 12, 2004 and March 26, 2004. These meetings were also supplemented with telephone conference calls as necessary to discuss technical details. During the course of these meetings Westinghouse/AMAG turned over to the Task Group more than two dozen documents supporting the review.

On April 16, 2004 (Reference 2), the Task Group issued a draft copy of their report to Westinghouse/AMAG to review for technical accuracy and for identification of proprietary information. On April 22, 2004, Westinghouse/AMAG again met with the Task Group to discuss technical issues covered in the draft report along with other related topics. The Task Group acknowledged the verbal Westinghouse/AMAG comments but made no commitment to change the report language or format. As a follow-up, Westinghouse/AMAG is submitting herewith our mark-up of the draft UFM Task Group Report.

As you indicated in your letter (Reference 2), the report contains proprietary information regarding the CROSSFLOW Ultrasonic Flow Measurement System. As requested, this information has been identified in the report mark-up attached. As outlined in the affidavit provided with the original transmittal of documents supporting the UFM Task Group review, this information should be protected from public disclosure pursuant to 10 CFR 2.390. Likewise, as requested, we have also indicated those areas where we have questions regarding the technical accuracy of certain statements in the report. Because of the commercial sensitivity of such inaccuracies, this information should likewise be withheld from public disclosure.

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Westinghouse/AMAG remain committed to continuing to work with the NRC and the UFM Task Group to fully and fairly resolve all questions concerning the CROSSFLOW technology. If I can be of further assistance on this matter please do not hesitate to call me at (412) 374-4643 or Mr. Chuck Molnar of my staff at (860) 731-6286.

Very truly yours,



J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Attachment: as stated

cc: G. Dick (NRC w/ Attachment)
B. Sheron (NRC, w/o Attachment)
J. Wermiel (NRC w/o Attachment)

Pages 3 through 56 redacted for the following reasons:

EXEMPTION 4