



Program Management Office
4350 Northern Pike
Monroeville, Pennsylvania 15146

EIR 51-9102685
Project Number 694

March 20, 2009

OG-09-123

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-001

Subject: PWR Owners Group
For Information Only – Engineering Information Record
51-9102685-000 (Proprietary) “GSI-191 FA Test Report for
PWROG” PA-SEE-0479

Reference: (1) OG-07-264, Submittal of WCAP-16793-NP, Revision 0, “Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid”, Gordon Bischoff (PWROG) to U.S. NRC Document Control Desk, June 4, 2007

In late 2006 the Pressurized Water Reactor Owners Group (PWROG) undertook a program to provide analyses and information on the effect of debris and chemical products on core cooling for Pressurized Water Reactors (PWRs) when the Emergency Core Cooling System (ECCS) is realigned to recirculate coolant from the containment sump. The intent was to demonstrate adequate heat removal capability for all plant scenarios. This program is documented in WCAP-16793-NP, Revision 0, “Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid” (Reference 1).

In March 2008, the Advisory Committee on Reactor Safeguards (ACRS) reviewed the content and conclusions of WCAP-16793 Revision 0, recommending the PWROG consider a fuel testing program to support the conclusions of WCAP-16793-NP, Revision 0.

In late 2008 the PWROG initiated prototypical fuel assembly (FA) testing to establish limits on the debris mass (particulate, fibrous and chemical) that could bypass the reactor containment building sump screen and not result in unacceptable head loss that would impede core inlet flow and challenge long-term core cooling of the core. The results of the PWROG fuel testing program for current AREVA fuel designs are documented in

DO48
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Engineering Information Record 51-9102685-000P, "GSI-191 FA Test Report for PWROG" Revision 0 "GSI-191 Fuel Assembly Test Report for PWROG".

This letter transmits four (4) copies of 51-9102685, Revision 0, and is provided as a supplement to, and in support of, WCAP-16793-NP, Revision 1, and, as such, no review fee or separate Safety Evaluation (SE) is expected.

EIR 51-9102685-000 contains information proprietary to AREVA NP, and it is supported by an affidavit signed by AREVA, owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b) (4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that this information which is proprietary to AREVA NP be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

A non-proprietary version of this document is currently being produced and will be transmitted under a separate cover.

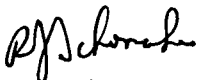
Correspondence with respect to the copyright or proprietary aspects of the information listed above or supporting AREVA affidavit should be addressed to Ms. Gayle Elliot, Manager, Regulatory Affairs, AREVA NP 3315 Old Forest Rd. Lynchburg VA 24502.


Correspondence related to this transmittal should be addressed to:

Mr. Anthony Nowinowski
Manager, Owners Group Program Management Office
Westinghouse Electric Company
Mail Stop ECE 5-16
P.O. Box 355
Pittsburgh, Pennsylvania 15230-0355

If you have any questions, please do not hesitate to contact me at 817-475-6989 or Mr. Anthony Nowinowski of the Owners Group Program Management Office at 412-374-6855.

Sincerely yours,



 Dennis E. Buschbaum, Chairman
PWR Owners Group

Enclosure: AREVA Document 51-9102685-000 (Proprietary)

cc: PWROG Management Committee
PWROG Steering Committee
PWROG Systems & Equipment Engineering Subcommittee
PWROG Licensing Subcommittee
PWROG PMO
H. Cruz, USNRC
T.S. Andreychek, Westinghouse
S. Baier, Westinghouse
T. Croyle, Westinghouse
P.V. Pyle, Westinghouse
R. Schomaker, AREVA NP

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in 51-9102685-000 entitled, "GSI-191 FA Test Report for PWROG," dated March 2009 and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

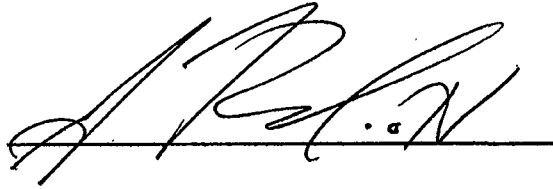
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

A handwritten signature in black ink, appearing to be 'S. L. McFaden', written over a horizontal line.

SUBSCRIBED before me this 20th
day of March 2009.

A handwritten signature in black ink, appearing to be 'Sherry L. McFaden', written over a horizontal line.

Sherry L. McFaden
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 10/31/10
Reg. # 7079129

