



Fax Cover Sheet

To: NRC OPERATIONS CTR From: J. A. GRESHAM

Fax: 301-816-5151 Pages: 3 + COVER

Phone: 301-816-5100 Date: 10-24-09

Re: _____ cc: _____

- Urgent
- For Review
- Please Comment
- Please Reply

Comments:
INTERIM REPORT PURSUANT TO 10 CFR 21.2(a)(2)

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Our ref: LTR-NRC-09-52

October 24, 2009

Subject: Interim Report of the Evaluation of a Deviation Pursuant to 10CFR21.21(a)(2)

The purpose of this letter is to provide the staff with the prescribed sixty (60) day interim report as required per 10CFR21.21 (a)(2) of a deviation identified by Westinghouse Electric Company LLC. The deviation being evaluated is aggressive wear of Rod Cluster Control Assembly (RCCA) guide cards.

- (i) Name and address of the individual or individuals informing the Commission.

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- (ii) Identification of the facility, the activity, or the basic component supplied for such facility or such activity within the United States which fails to comply or contains a deviation which is under evaluation. As noted above, this is an interim report and Westinghouse has not yet concluded its determination as to whether there is a defect as defined by 10CFR21.

RCCA Guide Cards are used on all Westinghouse pressurized water reactors.

- (iii) Identification of the firm constructing the facility or supplying the basic component which contains the deviation which is under evaluation.

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- (iv) Nature of the deviation and the safety hazard which is created or could be created by such deviation.

Aggressive wearing of the RCCA guide card has been observed at an international plant. Such aggressive wear has not been observed in any US plants. If this issue were to remain uncorrected, it is possible for enough wear to occur during the life of the plant that the RCCAs could become unguided and may not properly insert into the

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core. It has not been concluded whether there is a safety hazard which would result from this deviation.

- (v) The date on which the information of such deviation was obtained.

The Westinghouse president was informed of this issue on 10-23-09.

- (vi) In the case of a basic component which contains the deviation, the number and location of these components in use at, supplied for, being supplied for, or may be supplied for, manufactured, or being manufactured for one or more facilities or activities subject to the regulations in this part.

RCCA guide cards are used on all Westinghouse pressurized water reactors. Each reactor has 25-53 guide tubes that contain 8-11 guide cards.

- (vii) The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.

Westinghouse has been working with the Pressurized Water Reactors Owners Group (PWROG) materials sub-committee on a project that identified the issue of wear of the RCCA cards. One recent international plant inspection revealed an aggressive wear while no other inspections have found this aggressive wear. Based on the aggressive wear found at the international plant, Westinghouse reviewed Foreign Material Exclusion video tapes from guide tube support pin replacements and other jobs to determine if more plants have an aggressive wear. Westinghouse reviewed video tapes of all five different types of guide tubes (14x14, 15x15, 16x16, 17x17 Std and 17x17AS). Westinghouse is currently analyzing if it is credible for an RCCA rodlet that has completely worn through one or more guide cards to become jammed such that it would not properly insert into the core in the event that a rod drop was required and the probability that more than one non-insertable RCCA occurs. With the exception of the international plant with aggressive wear, no plant is projected to reach 100% slot wear before 38 effective full power years of operation. 100% slot wear is required in order for the RCCA rod to become unguided and potentially impact proper insertion of the RCCA. This analysis is expected to be completed by 12/31/09. Westinghouse plans to continue to work with the PWROG on the guide card inspections and is currently in discussions with the PWROG about developing categorization of plant susceptibility to wear and developing inspection criteria based on this susceptibility.

- (viii) Any advice related to the deviation that has been, is being, or will be given to purchasers or licensees.

As noted above, this issue was identified in the context of work being done with the PWROG which is fully aware of the issue. There is no immediate safety concern currently known or postulated for any plant. Based upon the information regarding the degree and distribution of aggressive wear in the RCCA cards in use at the international plant, no additional inspection would be required prior to three more effective full power years of operation.

With respect to 10CFR21, the issue which Westinghouse is evaluating is whether if such aggressive wear is left uncorrected, a plant could eventually lose guidance of the

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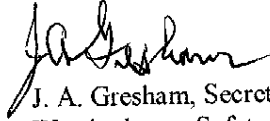
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RCCA rods such that they would not insert properly in the event that a rod drop was required.

- (ix) In the case of an early site permit, the entities to whom an early site permit was transferred.

N/A

Very truly yours,



J. A. Gresham, Secretary
Westinghouse Safety Review Committee

cc: G. Bacuta (NRC OWFN 12E-1)