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U. S. Nuclear Regulatory Commission  
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Your ref:  
Our ref: LTR-RAC-11-32  
April 28, 2011

SUBJECT: REPLY TO REQUEST FOR ADDITIONAL INFORMATION  
REFERENCE: TAC L33069

Mr. Ryder:

Westinghouse Electric Company LLC (Westinghouse) herein provides the additional example as requested in your April 21, 2011 email and discussed during the April 20, 2011 conference call between NRC and Westinghouse staffs to clarify responses to the RAIs. Westinghouse agreed to revise the response for RAI 11: Provide an example of "some design features of the system [that] may be implicitly credited in incredibility determinations," as mentioned in NCS-017.

*Another example involves the 8 inch polypak. Since this small, favorable container is used in many processes throughout the plant, it is analyzed in multiple different criticality calculations. All of these analyses make assumptions about the design of the polypak, and this design is explicitly protected as a credible criticality scenario in a single Criticality Safety Evaluation (CSE), which identifies Items Relied On For Safety (IROFS) and demonstrates double contingency. Thereafter, for any criticality scenario that involves polypaks directly or indirectly, the nominal design of the polypak would only be implicitly credited (since any failure of the design is already highly unlikely per the previous credible scenario). For example, a postulated scenario about loading too many polypaks into a hood would only consider the administrative violations required to achieve criticality, and the scenario might be categorized as incredible without explicitly crediting the passive design of the polypak.*

Should you have any further questions or require additional information, please contact me at (803) 647-2045, or the Nuclear Criticality Safety Engineering Manager, Carl Snyder at (803) 647-3550.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Gerard F. Couture'.

Gerard F. Couture, Manager  
Licensing & Regulatory Programs  
Columbia Fuel Fabrication Facility  
(License SNM-1107, Docket 70-1151)

MISSOI

cc: U. S. Nuclear Regulatory Commission Region II  
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