



NUCLEAR ENERGY INSTITUTE

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May 4, 2011

Mr. William H. Ruland  
Director, Division of Safety Systems  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Transmittal: PWROG 50.46(b) Margin Assessment Report

**Project Number: 689**

Dear Mr. Ruland:

In August 2009 the NRC published an advance notice of proposed rulemaking to modify acceptance criteria for Emergency Core Cooling Systems in 10 CFR 50.46.<sup>1</sup> As part of this rulemaking package, a change in the oxidation acceptance criterion was proposed. During a public meeting<sup>2</sup> on August 12, 2010, the Pressurized Water Reactor Owners Group (PWROG) and Boiling Water Reactor Owners Group (BWROG) proposed performing surveys of plant information and comparing against the proposed acceptance criterion. The purpose of this effort is to provide assurance that the current operating plants have margin to the proposed limits.

Attached is a copy of the PWROG Margin Assessment Report. We anticipate that the BWROG assessment report will be provided to NEI on or before May 27, 2011. To ensure consistency in the content and format of the information provided in the two reports, we plan to perform a review of both reports following receipt of the BWROG report. We will then make necessary adjustments to the presentation format of one or both reports.

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<sup>1</sup> August 13, 2009, FRN 74FR40765, an advanced notice of a proposed rulemaking (ANPR) on "Performance-Based Emergency Core Cooling System Acceptance Criteria"; Document ID: NRC-2008-0332-0023.

<sup>2</sup> Summary of the Public Meeting to Discuss Plant Specific Emergency Core Cooling System Performance Assessments and Status of Title 10 of the Code of Federal Regulations Section 50.46(B) Rulemaking; ML102360406

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If you have any questions, please feel free to contact me at 202-739-8108; [jcb@nei.org](mailto:jcb@nei.org) or Gordon Clefton at 202-739-8086; [gac@nei.org](mailto:gac@nei.org).

Sincerely,



John C. Butler

Attachment

c: Mr. Melvin L. Arey, Jr., PWROG, Duke  
Mr. Ted Schiffley, BWROG, Exelon  
Mr. Ken Yueh, EPRI  
Mr. Tom Eichenberg, FRP RegTAC, OPPD