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5/3/11
76 FR 24925
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July 5, 2011

Subject: Westinghouse Response to the Solicitation for Public Comment on Potential Alternatives to Resolve Generic Safety Issue 191, Pressurized Water Reactor Sump Performance (Docket ID NRC-2011-0090) (Non-proprietary)

On May 3, 2011, the Federal Register (FR) published a solicitation for public comment on potential alternatives to resolve Generic Safety Issue 191 (GSI-191), related to Pressurized Water Reactor (PWR) sump performance (76 FR 24925). This letter provides Westinghouse's general comments on potential alternatives.

Westinghouse supports the NRC staff's objective, as stated in the solicitation, to "employ innovation and creativity in fully exploring the policy and technical implications of all available alternatives for risk informing the path forward." As the NRC staff has indicated in the solicitation, "measures taken thus far in response to the sump-clogging issue have contributed greatly to the safety of US nuclear power plants . . . [and] adequate levels of safety and defense-in-depth are currently being maintained." This statement appropriately frames the issue as the need to come to a "risk-informed, safety conscious resolution to GSI-191."

To address and resolve GSI-191, a variety of alternatives need to be explored and utilized. The industry is currently working through several generic initiatives through the Pressurized Water Reactor Owners Group (PWROG) and the Nuclear Energy Institute (NEI), as well as plant-specific work, all of which is important to closing GSI-191. NEI has previously provided comments in response to the NRC's request for potential resolution paths, suggesting that a "one-size-fits-all" approach is not recommended, and that several different approaches will be necessary and outlining a number of possibilities. Westinghouse fully concurs with the NEI comments and suggestions.

In applying solutions like those summarized in the NEI document, one important principle needs to be maintained. A holistic approach should be maintained with respect to conservatisms in both deterministic evaluations as well as probabilistic and risk evaluations. This is essential, as the compounding of conservatisms leads licensees to take potentially unnecessary actions that could themselves unintentionally and adversely impact plant safety (e.g., higher heat and seismic loads when replacing fibrous insulation with metallic insulation). As NEI described in the section of its document on classical 10CFR50.46 methods, even deterministic methods like these do not require individually addressing uncertainties in every input, method, and model; uncertainties need to be appropriately addressed in an overall fashion such that there is a high

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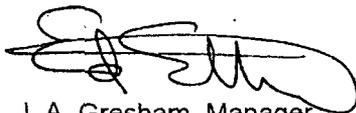
probability of meeting acceptance criteria. Very often, in GSI-191 analyses and evaluations, a compounding of uncertainties in a highly conservative manner has led to results that impose significant challenges on licensees to meet acceptance criteria. Another example of unnecessarily compounding conservatism has been in the use of "maximum conservatism" when considering two or more methods, techniques or test facilities. This is unnecessary if each of these methods is demonstrated to be conservative with respect to the results obtained, and therefore one need not determine which is "most conservative".

Additionally, it is critical that the industry and the NRC staff work closely together in the execution of on-going testing programs. These programs are critical to the success of GSI-191 resolution, and early resolution of any concerns is vital to meeting the Commission's desired resolution schedule (per the Commission's Staff Requirement Memorandum, or SRM, of December 23, 2010). In these programs, as with any other GSI-191 evaluations, the principles of holistic evaluation need to be considered and followed.

Westinghouse appreciates the opportunity to comment on the alternatives to resolve GSI-191. The steps taken by the industry thus far have been adequate to assure public health and safety, and measured steps must be taken via innovative and creative solutions to conclude this issue in a safety-conscious manner. We look forward to working with the NRC staff and other stakeholders through the remainder of the GSI-191 resolution process.

Correspondence regarding this letter and the attachments should reference LTR-NRC-11-34 and should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company LLC, 1000 Westinghouse Drive, Cranberry Woods, Pennsylvania, 16066.

Very truly yours,



J. A. Gresham, Manager
Regulatory Compliance

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