



16047 West 110<sup>th</sup> Street, Lenexa, Kansas 66219  
Telephone: 913-928-2801 Fax: 913-928-2901

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

August 15, 2012  
Transmittal ID: PCI-2012.08.15

Subject: **REQUEST FOR CLARIFICATION REGARDING SECY-12-0093 DATED JULY 9, 2012;  
ENCLOSURE 1 PAGE 8**

Dear Sir:

Performance Contracting Inc. (PCI) is requesting the US NRC confirm our interpretation of the subject section issued in SECY-12-0093 dated July 9, 2012; Enclosure 1 page 8.

The section from Enclosure 1 applicable follows in its entirety.

Debris Settling

After numerous discussions with vendors and licensees, the staff has agreed to a generic procedure that can be used to perform testing that allows settling, including a resolution of the issues described above. The procedure requires complex calculations using computational fluid dynamics models and comparisons between the plant and the test flume. The procedures also include hold points that the staff must review if the plant-specific implementation of the procedure does not meet certain criteria. Up to this point, no plant has tested using this procedure, so it is not clear whether it will provide a successful methodology. The industry testing that credits settling is behind the schedule proposed by industry when SRM-SECY-10-0113 was issued.

To be specific, PCI interprets this section to mean the staff has agreed to the generic procedure presented by PCI; specifically the refined LFTP (ADAMS ML1136A127) and the staff is willing to accept test results implemented using this test protocol conditional on the staff's review and acceptance of any Hold Points applicable to a specific plant's test plan.

PCI further interprets the sentence underlined above to mean the results from these tests may, or may not prove to be successful to resolving GSI-191 for the licensee.

Please confirm in writing if this interpretation is consistent with the staff's meaning and intent.

We greatly appreciate the USNRC's effort, specifically as it relates to the Safety Issues Resolution Branch's attention to the review of PCI's documents and reports.

Sincerely,

A handwritten signature in black ink, appearing to read 'James M. Bleigh', is written over a printed name and title. The signature is fluid and cursive.

James M. Bleigh  
PCI / Engineered Systems Group Manager

cc: Blake Purnell; Project Manager, DPR/PGCB with attachments, or

Mr. Stewart Bailey, Chief Safety Issues Resolution Branch  
Division of Safety Systems  
Office of Nuclear Reactor Regulation

Y GDI  
NRR