

August 31, 2012

James M. Bleigh
Performance Contracting, Inc.
Engineered Systems Group
16047 West 110th Street
Lenexa, KS 66219

SUBJECT: PERFORMANCE CONTRACTING, INC., REQUEST FOR CLARIFICATION OF
SECY-12-0093

Dear Mr. Bleigh:

I am responding to your letter on behalf of Performance Contracting, Inc., (PCI) dated August 15, 2012, (Agencywide Document Access and Management System (ADAMS) Accession No. ML12229A547) which requested clarification of a statement in SECY-12-0093, "Closure Options for Generic Safety Issue – 191 [GSI-191], Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance." Specifically, you wanted clarification of the following statement on testing that allows 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.

The U.S. Nuclear Regulatory Commission (NRC) staff considered the status of the PCI Large Flume Test Protocol (LFTP), which credits debris settling, when it wrote this statement. The NRC staff position on the LFTP was documented in a letter sent to you on April 26, 2012 (ADAMS Accession No. ML120480092). This position was not changed by the SECY. The April 26, 2012, letter states:

We [NRC staff] have reviewed the LFTP document and agree that it can be used as guidance to conduct plant-specific testing needed to address Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," as long as our additional comments below are taken into consideration. However, this does not constitute official endorsement of the protocol because application of the protocol necessitates making a number of plant-specific decisions when the tests are conducted.

Contrary to PCI's interpretation, this does not mean that the NRC staff will "accept test results implemented using the test protocol conditional on the staff's review and acceptance of any

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Hold Points applicable to a specific plant's test plan." The staff will review and determine acceptability of LFTP test results when they are submitted by a licensee as part of its response to Generic Letter 2004-02. The staff agreed that the LFTP could be used as guidance to conduct plant-specific testing, subject to certain conditions, because it is *likely* to lead to test results acceptable to staff. The staff does agree with PCI that NRC acceptance of the test results is not the only factor which determines if a licensee has resolved GSI-191. For example, the test results could show that a licensee needs to take additional actions to reduce debris sources in containment.

If you have any questions, please contact me at (301) 415-1380.

Sincerely

/RA/

Blake Purnell, Project Manager
Generic Communications Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

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Blake Purnell, Project Manager
Generic Communications Branch
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