



John C. Butler  
SENIOR DIRECTOR  
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NUCLEAR GENERATION DIVISION

November 15, 2012

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

**Subject:** GSI-191 – Revised Schedule for Licensee Submittal of Resolution Path

**Project Number: 689**

Dear Mr. Ruland:

Industry recommended actions for closure of Generic Safety Issue (GSI) 191, *PWR Sump Performance*, were identified in a letter to you dated May 4, 2012 (ML12142A316). The key elements of this plan were reflected in the closure options discussed in SECY 12-0093, *Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance*. As part of this plan, licensees of Pressurized Water Reactors (PWRs) will provide a docketed submittal to the NRC by December 31, 2012, that outlines a GSI-191 resolution path and schedule for each of their PWRs.

As discussed with you during the NEI GSI-191 Workshop held recently in Baltimore, MD, we believe that licensee decisions on the appropriate resolution path for their PWRs can be impacted by the Commission response to SECY 12-0093 and by the NRC safety evaluation (SE) on WCAP-16793, Revision 2, *Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid*. These documents are anticipated to be completed and publicly available sometime in December, 2012.

NEI is recommending that licensees delay submittal of their GSI-191 resolution path and schedule until January 31, 2013, or 30 days following placement of both documents into the public record, whichever is later. This is necessary to allow time for licensees to appropriately address Commission direction contained in the Staff Requirements Memorandum on SECY 12-0093 and staff decisions contained in the SE on WCAP-16793.

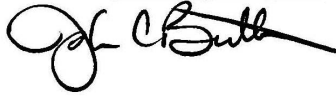
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We request a response indicating your concurrence with this change in schedule. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Butler

c: Mr. Jack R. Davis, NRR/DSS, NRC  
Mr. Stewart N. Bailey, NRR/DSS/SSIB, NRC