



Program Management Office
1000 Westinghouse Drive
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Project Number 694
WCAP-17261-P/NP, Revision 0

July 10, 2013

OG-13-243

U.S. Nuclear Regulatory Commission
Document Control Desk
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Subject: PWR Owners Group
Withdrawal of WCAP-17261-P/NP, Revision 0, "Justification for a Technical Specification Action for Two Inoperable RTS or ESFAS Instrumentation Channels," PA-LSC-0136

References:

1. "Submittal of WCAP-17261-P/NP, Revision 0, 'Justification for a Technical Specification Action for Two Inoperable RTS or ESFAS Instrumentation Channels,' PA-LSC-0136", January 11, 2012, OG-12-16 [ML12026A468]
2. Letter from Sher Bahadur (NRC) to A. Nowinowski (Westinghouse) "Request for the Supplemental Information for the Review of Pressurized Water Reactor Owners Group (PWROG) Topical Report WCAP-17261-P/NP, Revision 0, "Justification for a Technical Specification Action for Two Inoperable RTS or ESFAS Instrumentation Channels" (TAC No. ME7894) [ML12261A340], November 8, 2012
3. Letter from Jonathan Rowley (NRC) to Anthony Mendiola (NRC) "Summary of March 29, 2013, Meeting with the Pressurized Water Reactor Owners Group Regarding Topical Report WCAP-17261-P, "Justification for a Technical Specification Action for Two Inoperable RTS [Reactor Trip System] or ESFAS [Engineered Safety Features Actuation System] Instrumentation Channels", [ML13143A266] including Draft PWROG Responses to NRC Request for Supplemental Information [ML13136A156], June 12, 2013

The purpose of this letter is to notify the Staff that the Pressurized Water Reactor Owners Group (PWROG) is requesting that topical report, WCAP-17261-P/NP, Revision 0, "Justification for a Technical Specification Action for Two Inoperable RTS or ESFAS Instrumentation Channels," which was submitted on January 11, 2012, be withdrawn from NRC review and approval, and to discuss the reasons for this action.

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The PWROG submitted the WCAP for NRC review and approval via Reference 1 on January 11, 2012. The objective of this program was to develop the technical justification to support adding an Action to Technical Specifications 3.3.1, "RTS Instrumentation," and 3.3.2, "ESFAS Instrumentation," for two inoperable reactor trip system (RTS) or engineered safety features actuation system (ESFAS) channels for those RTS and ESFAS Functions with a two-out-of-four actuation logic.

The NRC requested that supplemental information be provided to the Staff prior to NRC acceptance of the Topical Report (Reference 2) for review. The PWROG met with the NRC on March 29, 2013 to discuss the draft responses to the letter that contained the request for supplemental information (Reference 3).

The PWROG is withdrawing the WCAP since an agreement could not be reached on a technical approach that would satisfy the Staff reviewers and provide an Action for two inoperable RTS or ESFAS channels, which was the objective of the program. The one option that the Staff may have found acceptable would require the PWROG to modify the request to require that one of the two inoperable channels be placed in trip within a time period acceptable to the Staff, as opposed to the 24 hour Completion Time (CT), that was proposed by the program. The Staff indicated that a CT of 1 hour for placing one of the two inoperable channels in the tripped state would likely be acceptable, since LCO 3.0.3 would provide 1 hour for this condition, i.e., two inoperable channels, since there is no existing Condition for two inoperable channels. The benefit to the PWROG members of adding this Action, with a CT of one hour, is marginal and does not provide a sufficient amount of time for corrective maintenance that was intended by the proposed 24 hour CT.

In their closing remarks, the Staff indicated that they would require approximately an additional 500 Staff hours to complete the review of the topical report, and that the NRC Safety Evaluation (SE) would probably not be favorable. The amount of review fees required to complete the review, when added to the NRC review fees associated with the acceptance review, combined with the potential for an unfavorable NRC SE resulted in the decision to withdraw the WCAP from NRC review.

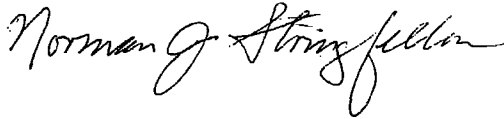
Therefore, the PWROG is withdrawing the WCAP and requests that the Staff discontinue their review of this document.

Correspondence related to this transmittal should be addressed to:

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
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Cranberry Township, Pennsylvania 16066

If you have any questions, please do not hesitate to contact me at (205) 992-7037 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,

A handwritten signature in cursive script that reads "Norman J. Stringfellow".

Jack Stringfellow
Chairman
PWR Owners Group

NJS:rfn

cc: PWROG Licensing Subcommittee
PWROG Management Committee
PWROG Risk Management Subcommittee
PWROG Steering Committee
PWROG PMO
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