



Program Management Office  
1000 Westinghouse Drive  
Cranberry Township, PA 16066

February 4, 2014

Project No. 694

OG-14-47

To: US Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Attention: Mr. Tim McGinty  
Director, Division of Safety Systems  
Office of Nuclear Reactor Regulation

Subject: **GSI-191 Resolution Schedule Discussion (PWROG PA-SEE-1090)**

Dear Mr. McGinty:

In response to our previous discussions concerning the availability of an NRC thermal/hydraulic reviewer for the ongoing PWROG GSI-191 in-vessel fiber program, the PWROG understands that the staff is unable to dedicate the necessary resources at this time to support review of the thermal hydraulics evaluation portion of the program. The PWROG further understands that these resources are presently dedicated to activities related to Fukushima initiatives and will not be available until such time that the Fukushima mitigating strategies response is near completion. Accordingly, the PWROG has assessed program schedule changes to accommodate the appropriate staff review.

The PWROG believes that a schedule revision is necessary since a significant portion of the GSI-191 in-vessel fiber program is predicated on the thermal/hydraulic evaluation results. The program incorporates full-scale head loss testing that is dependent upon input from the thermal/hydraulic analyses. Proceeding with testing in advance of NRC review places the program at risk, recognizing the large additional cost if the full-scale testing needs to be repeated following that review.

Presently, sub-scale debris head loss testing is underway to establish various physical testing parameters to be used in the subsequent full-scale head loss testing program. Both the sub-scale test program and the thermal/hydraulic analyses are necessary inputs to the final full-scale testing. Completion of this sub-scale program has been reforecast for the end of March, 2014 with the full-scale test program commencing thereafter in April, 2014. NRC review of the thermal/hydraulic model and results would need to begin by mid-February to support discussion with the PWROG and concurrence for the full-scale testing to proceed according to this schedule. The PWROG has estimated that a minor delay in interaction between the NRC and the PWROG technical team can be compensated for by a corresponding revision in the program schedule.

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However, longer delays (e.g. more than 2 months) will likely result in a disproportionate schedule impact given the loss of key Westinghouse and AREVA technical resources to competing efforts and the time necessary to realign those resources and restart the program. The PWROG is concerned that continued delays are not consistent with the NRCs principles of good regulation, and that failure to come to resolution on GSI 191 is an example of how the cumulative regulatory activities can impact limited industry resources.

The PWROG appreciates the staff's efforts to support the PWROG program. In order to assist the PWROG better allocate its resources, the PWROG requests additional discussion to estimate the time frame needed in order to secure this review. Please feel free to call me at your convenience.

Sincerely,



Jack Stringfellow  
Chairman, Pressurized Water Reactor Owners Group

NJS:JTM:rfn

cc: PWROG PMO  
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PWROG Management Committee  
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R. J. Schomaker, AREVA NP