Program Management Office
1000 Westinghouse Drive
Cranberry Township, PA 16066

WCAP-17867-P, Revision 0
Project Number 694

April 9, 2014

OG-14-136

Mr. Patrick L. Hiland, Director
Division of Engineering
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. James E. Dyer
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: PWR Owners Group
Request for Exemption from NRC Fees to Review WCAP-17867-P "Westinghouse SSPS Board Replacement Licensing Summary Report," dated January 2014

References:

1. NRC letter from Pat Hiland (NRC) to Jack Stringfellow (PWROG), dated September 11, 2013 (ML13254A117).
2. OG-14-41, "Submittal of WCAP-17867-P, Revision 0, "Westinghouse SSPS Board Replacement Licensing Summary Report," PA-LSC-1170, dated February 21, 2014.

Dear Messrs. Hiland and Dyer:

The Pressurized Water Reactor Owner's Group (PWROG) is requesting an exemption from NRC fees to review WCAP-17867-P "Westinghouse SSPS Board Replacement Licensing Summary Report," dated January 2014.

WCAP-17867-P discusses the design process, design details, analyses, manufacturing controls, and verification process and results, that provide a comprehensive conclusion that the installation of the new design Solid State Protection System (SSPS) circuit boards maintain or improve upon the existing reliability and functional requirements for the SSPS, and does not introduce any unanalyzed failures or the potential for software common cause failure (CCF) that would affect the function of the SSPS functions. The PWROG is submitting this TR to the NRC for review and approval so that licensees can reference the NRC approved TR in their 10 CFR 50.59 Screens/Evaluations that will be completed to install the new design SSPS circuit boards.

In Reference 2, the NRC provided the PWROG with a voluntary opportunity to develop and submit a Topical Report on the acceptability of the new design SSPS boards for use to the NRC staff for review.

NRC review and approval of WCAP-17867-P will address all of these aspects associated with the new design SSPS boards, via a generic licensing action, as opposed to via the submittal of plant-specific LARs. The NRC approved version of the TR will be referenced in plant-specific 10 CFR 50.59 Screens/Evaluations that will be completed to install the new design SSPS circuit boards. NRC approval of the generic TR will reduce the impact on both licensee and NRC resources by eliminating the need for the preparation of, and NRC review of LARs associated with the installation of the new design SSPS boards.

A review fee waiver for the NRC review of WCAP- 17867-P is requested pursuant to the provisions of 10 CFR 170.11(a)(1)(iii)(A). WCAP- 17867-P was submitted for the specific purpose of supporting ongoing NRC generic regulatory improvements. WCAP-17867-P provides a generic discussion of the design aspects of the new SSPS boards. NRC approval of the TR will allow installation of the new design SSPS boards without the submittal of LARs. Therefore the review of this TR will support ongoing NRC generic regulatory improvements/efforts associated with the installation of components that contain digital devices.

Thank you in advance for consideration of our request for exemption from NRC review fees associated with WCAP-17867-P.

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,

Jack Stringfellow, Chief Operating Officer and Chairman
PWR Owners Group

CMH:NJS:rfn

cc: PWROG Management Committee
PWROG Licensing Subcommittee
PWROG Steering Committee
PWROG I&C Working Group
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