



Program Management Office
1000 Westinghouse Drive
Cranberry Township, PA 16066

Project Number 694

April 24, 2015

OG-15-164

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

Subject: PWR Owners Group
Notification of Intent to Supply Topical Report Regarding Containment Accident Pressure Margin

Dear Mr. Rowley,

The NRC issued a draft guidance document (ML100550869) titled "The Use of Containment Accident Pressure in Demonstrating Acceptable Operation of Emergency Core Cooling and Containment heat Removal Pumps during Postulated Accidents". The understood goal of this document was to formulate a Regulatory Guide to serve as guidance to the industry and NRC staff reviewers. A public meeting between the Staff and PWROG was held on April 10, 2012 to discuss the NRC draft guidance for the use of containment accident pressure (CAP) in determining the Net Positive Suction Head (NPSH) margin for Emergency Core Cooling System (ECCS) and containment heat removal pumps in pressurized water reactors. One of the requests that the NRC made of the PWROG was confirmation of the magnitude of uncertainty (21%) that the staff is expecting plants to apply in $NPSH_R$ calculations. In response to that, the PWROG has been working to construct a topical report which will propose an alternate approach to the NRC which consists of demonstrating that PWR plants, essentially always have more than 21% NPSH margin due to plant design and analytical conservatism. Even if it were assumed a PWR initially had no $NPSH_m$ at the onset of post-accident recirculation operation with suction from the containment sump, the imposition of a 21% penalty on $NPSH_R$ would result in an NPSH margin deficit for such a short period of time so as to preclude initiation of deterioration of limiting pump components. In addition, the report demonstrates that the pump mechanical and hydraulic performance in this operational regime is acceptable. The PWROG plans to have the topical report ready to submit to the staff for information by May 15, 2015. The PWROG will also be willing to present its conclusions to the staff upon request.

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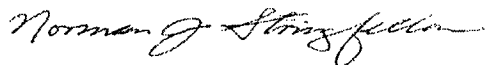
Correspondence related to this transmittal should be addressed to:

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 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.

Please contact me at 205-992-7037 or Jay Boardman at 412-374-5611 if you have any questions regarding this information.

Sincerely,



Jack Stringfellow, Chairman
PWR Owners Group
NJS:jdb:rfn

cc: PWROG SEE Subcommittee
PWROG Licensing Subcommittee
PWROG PMO
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