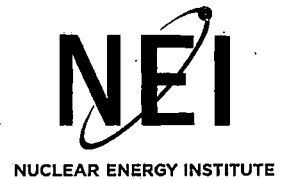


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May 5, 2016

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Submittal of PWROG-15060, "Pump Suction Gas Accumulation Operability Criteria Guidance"

**References:**

1. NEI 09-10, Revision 1a-A, "Guidelines for Effective Prevention and Management of System Gas Accumulation," Accession No. ML13136A129, April 2013.
2. Final Safety Evaluation for Nuclear Energy Institute Topical Report NEI 09-10, Revision 1a "Guidelines for Effective Prevention and Management of System Gas Accumulation", January 2013.
3. Westinghouse WCAP-17271-P, Revision 1, "Testing and Evaluation of Gas Transport to the Suction of ECCS Pumps," Volume I, November 2010.
4. Westinghouse WCAP-17276-P, Revision 1, "Investigation of Simplified Equation for Gas Transport," January 2011.
5. NEI (J Riley) letter to NRC M. Wylie) dated 11/13/15, Request for Exemption from NRC Fees to Review PWROG-15060, "Pump Suction Gas Accumulation Operability Criteria Guidance"

**Project Number: 689**

NEI submitted NEI 09-10 Revision 1a-A, "Guidelines for Effective Prevention and Management of System Gas Accumulation" (Reference 1) as part of industry's response to GL 2008-01, "Managing Gas Intrusion in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems". NEI 09-10 provides guidance for the prevention and management of gas intrusion and accumulation in plant systems. The NRC endorsed NEI 09-10 Revision 1a-A in a Safety Evaluation (Reference 2), however, questions regarding the guidance in NEI 09-10 remained. The SE *qualified* the use of two of NEI 09-10's main references (WCAP-17271 and WCAP-17276, References 3 and 4) that provide suitable correlations for calculating gas volume acceptance criteria. In addition, recent NRC inspections and audits have expressed concern that licensees may not have adequate guidance to apply the correlations in WCAP-17271 in a manner consistent with the limitations and conditions in the SE.

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Designated as original 05/24/2016  
Jonathan Rowley DB4le  
(Jonathan Rowley)

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May 5, 2016

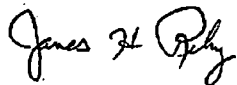
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In an attempt to resolve these questions, representatives of NEI, PWROG, and BWROG met with the NRC on January 15, 2015. During that meeting, the NRC concurred with use of the correlations in WCAP-17271 and WCAP-17276, but requested that additional guidance be provided to licensees to ensure the correlations are used within the limitations imposed by the SE. This additional guidance has been prepared and is documented in PWROG-15060, "Pump Suction Gas Accumulation Operability Criteria Guidance". This guidance is available to all plants in the industry, whether they be PWRs or BWRs.

The purpose of this letter is to request NRC endorsement of PWROG-15060. A non-proprietary version of this document, PWROG-15060-NP is included with this letter. The corresponding proprietary version, PWROG-15060-P, will be submitted by the PWR Owner's Group via PWROG letter OG-16-120. Note that a request for exemption from NRC fees for the review of PWROG-15060 was submitted via Reference 5.

If you have any questions on this matter, please contact me at 202-739-8137 or [jhr@nei.org](mailto:jhr@nei.org).

Sincerely,



James H. Riley

c: Eric Oesterle, NRR/DPR/PRMB/PFLT, NRC  
Warren Lyon, NRR/DSS/SRXB, NRC  
Kevin Hsueh, NRR/DPR/PLPB, NRC  
Jack Stringfellow, Chair, PWROG  
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