

March 30, 2017

TSTF-17-03  
PROJ0753

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

**SUBJECT:** Request for Fee Exemption for TSTF-567, "Add Containment Sump TS to Address GSI-191 Issues"

**REFERENCE:** Letter to NRC Public Document Room from the TSTF, "Transmittal of TSTF-567, Revision 0, "Add Containment Sump TS to Address GSI-191 Issues," March 30, 2017.

Dear Sir or Madam:

In Reference 1, the TSTF submitted TSTF-567, Revision 0, "Add Containment Sump TS to Address GSI-191 Issues," to the NRC for review. TSTF-567 is applicable to operating pressurized water reactors (PWRs) and was created in response to NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors," and Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors."


The industry and the NRC continue to research the potential effects of post-accident debris and chemical interactions to resolve Generic Safety Issue (GSI) 191, "Assessment of Debris Accumulation on PWR Sump Performance." There is a possibility that new phenomena and analyses may call into question aspects of the evaluations that demonstrate the ability of the Emergency Core Cooling System or Containment Spray System to respond to postulated accidents. Therefore, TSTF-567 proposes an extended Completion Time to provide the opportunity to evaluate new information regarding these low-probability events during plant operation without requesting emergency relief from the NRC. This improves plant safety by focusing the licensee's and NRC's attention on evaluating the new information instead of on a plant shutdown.

The TSTF requests that the NRC's review of TSTF-567 be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. The Traveler meets the exemption requirement in 10 CFR 170.11(a)(1)(iii), in that it is "a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory

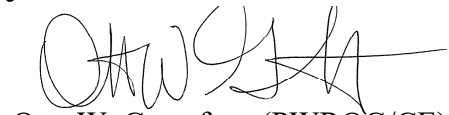
improvements or efforts." In this case, the generic regulatory improvement effort is the NRC's resolution of Generic Safety Issue 191 by development of a consistent industry approach to address containment sump vulnerabilities from post-accident containment debris. The traveler is a proven method for the industry and the NRC to exchange information, leading to an NRC safety evaluation of the acceptability of the proposed Technical Specifications changes. 10 CFR 170.11(a)(1)(B) states, "The NRC must be the primary beneficiary of the NRC's review and approval of these documents. This exemption does not apply to a topical report submitted for the purpose of obtaining NRC approval for future use of the report by the industry to address licensing or safety issues, even though the NRC may realize some benefits from its review and approval of the document." The NRC clearly benefits from a single industry approach to resolving this Technical Specifications issue. NRC approval of the generic traveler will significantly reduce the impact on NRC resources by eliminating the need for the review of plant-specific Technical Specifications changes.

In order to avoid delay in the NRC review of TSTF-567, the TSTF requests that the NRC begin review of the Traveler prior to a decision on the fee waiver request. Should the NRC not grant the fee waiver request, the Pressurized Water Reactor Owners Group should be billed for the review of the Traveler.


Should you have any questions, please do not hesitate to contact us.




James R. Morris (PWROG/W)



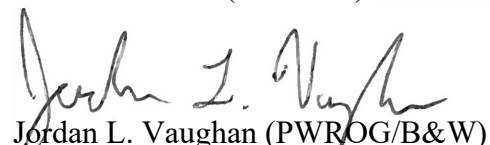
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