

May 3, 2017

Ms. Sarah DiTommaso
Manager, ITAAC and Inspection Support
Westinghouse Electric Company
1000 Westinghouse Drive, Building 1
Cranberry Township, PA 16066

SUBJECT: WESTINGHOUSE RESPONSE TO WESTINGHOUSE/WECTEC REPORT
NO. 99901467/2016-201 AND NOTICE OF NONCONFORMANCE

Dear Ms. DiTommaso:

Thank you for your March 31, 2017, letter in response to the Notice of Nonconformance (NON) that was discussed in the subject U.S. Nuclear Regulatory Commission (NRC) inspection report. We have reviewed your letter and have further questions regarding your response to the Notice of Nonconformance identified in the inspection report. Specifically, it is not clear that the scope of the issue, identified in the Nonconformance, would be solely limited to isolation devices that are used between Class 1E and non-Class 1E components. Please provide information that justifies your position that the catastrophic failure of the subject devices would not cause an explosion or fire that could propagate to other safety divisions, since it is our understanding that the minimum separation requirements contained in IEEE 384 were derived based upon testing that was performed at less than full interrupting ratings. Consequently, conformance to IEEE 384 alone would not ensure that a maximum fault in one division, combined with a catastrophic failure of the subject breaker (or fuse), would not propagate to other safety divisions.

Also, since the same breakers are apparently used for multiple applications (both those credited as isolation devices as well as those that supply Class 1E power), does (or will) Westinghouse assign a different Part Number or designation to breakers that have had interrupting ratings verified versus those whose ratings have not been verified? If not, does (or will) Westinghouse clearly disclose to their customers that the dedication of the breakers does not include verification of the interrupting ratings? If not, what would prevent a licensee from substituting a verified breaker from one that was not?

Please provide a response within 30 days of this letter to the above request for additional information. The agency will consider extending the response time if you show good cause for us to do so.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Public inspections, exemptions, requests for withholding," of 10 CFR Part 2, "Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders," a copy of this letter and any associated correspondence will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, which is accessible at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

/RA/

Terry W. Jackson, Chief
Quality Assurance Vendor Inspection Branch-1
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901467

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Dated: May 3, 2017

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