



Westinghouse Electric Company  
1000 Westinghouse Drive  
Cranberry Township, Pennsylvania 16066  
USA

U.S. Nuclear Regulatory Commission  
Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Direct tel: (412) 374-4643  
Direct fax: (724) 940-8542  
e-mail: greshaja@westinghouse.com

LTR-NRC-18-27

May 8, 2018

Subject: Review of Draft Safety Evaluation for Westinghouse Electric Company Topical Report WCAP-18124-NP, Revision 0, "Fluence Determination With RAPTOR-M3G And FERRET" (CAC NO. MF9141)

References:

1. Westinghouse letter LTR-NRC-17-7, "Submittal of WCAP-18124-NP, Revision 0, 'Fluence Determination with RAPTOR-M3G and FERRET,' " January 25, 2017 (ML17030A377)
2. NRC letter to Westinghouse, "Request for Additional Information Re: Westinghouse Electric Company WCAP-18124-NP, Revision 0, 'Fluence Determination with RAPTOR-M3G and FERRET' Topical Report (CAC No. MF9141)" (ML17318A700)
3. Westinghouse letter LTR-NRC-18-5, "Response to the NRC Request for Additional Information on the RAPTOR-M3G and FERRET Topical Report," January 18, 2018 (ML18018B347)
4. NRC letter to Westinghouse, "DRAFT SAFETY EVALUATION FOR WESTINGHOUSE ELECTRIC COMPANY TOPICAL REPORT WCAP-18124-NP, REVISION 0, "FLUENCE DETERMINATION WITH RAPTOR-M3G AND FERRET" (CAC No. MF9141), April 3, 2018

Via Reference 1, WCAP-18124-NP, Revision 0 was submitted for NRC review and approval. Reference 2 requested additional information in support of that review. Reference 3 provided the response to the request for additional information. Reference 4 provided the staff's draft safety evaluation (SE). This draft was provided for comment on any proprietary aspects and any factual errors or clarity concerns.

Accordingly, Westinghouse has reviewed the subject draft safety evaluation and has determined that there is no proprietary information.

With respect to clarification, there are a few aspects that Westinghouse would like to bring to the attention of the NRC. First, it is noted that concerns for the limits of applicability are discussed relative to the extended beltline region (EBR) while there is no discussion relative to limitations on applicability to reactor vessel internals (RVI).

Also, the draft SE states in part, "...but agreed with NRC staff that it provides limited information to support fluence evaluations for *license renewal applications* {emphasis added} on a generic basis." Westinghouse agrees that the WCAP provides limited information to support fluence evaluations relative to the EBR or RVIs; however, it is unclear if that limitation is exclusive to license renewal applications.

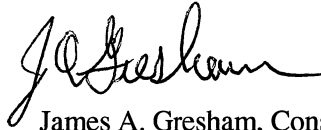
Finally, Limitation 1 is currently worded as:

*“Additional justification may be required for applications of the method to components including, but not limited to, the RPV upper circumferential weld and reactor coolant system inlet and outlet nozzles.”*

Typically the NRC expects licensees to delineate how the limitations and conditions have been met. For Limitation 1, the licensee would state something similar to, “Limitation 1 has been met pending any additional information requested by the NRC.”

This submittal does not contain proprietary information of Westinghouse Electric Company LLC.

Correspondence should be addressed to James A. Gresham, Consulting Engineer, Licensing & Regulatory Affairs, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 2, Suite 259, Cranberry Township, Pennsylvania 16066.



James A. Gresham, Consulting Engineer  
Licensing & Regulatory Affairs

cc: Ekaterina Lenning (NRC)  
Dennis Morey (NRC)