

Westinghouse Electric Corporation Water Reactor Divisions PWR Systems Division

Box 355 Pittsburgh Pennsylvania 15230

September 15, 1980

Mr. James R. Miller, Chief Special Projects Branch Division of Project Management U. S. Nuclear Regulatory Commission Phillips Building 7920 Norfolk Avenue Bethesda, Maryland 20014

Dear Mr. Miller:

Subject: WCAP-9528, "ECCS Evaluation Model for Westinghouse Reloads of Combustion Engineering NSSS", June 1979.

The Nuclear Regulatory Commission Staff is currently reviewing the subject topical report as supporting information for a Westinghouse reload of Millstone, Unit 2. A significant part of the Evaluation Model for Millstone, Unit 2 is the so called "UHI Software Technology" described in Appendix A of WCAP 9528. These modeling features were already reviewed and approved as part of the Westinghouse Evaluation Model for Westinghouse plants equipped with Upper Head Injection. Our understanding is that approval of these particular features for Millstone, Unit 2 is subject primarily to a review of the differences between a plant equipped with Upper Head Injection and one without.

Commonwealth Edison Company has submitted a new LOCA analysis for the Zion plants with this same "UHI Software Technology". Other owners of Westinghouse NSSS are also requesting analyses with these improvements. The use of the "UHI Software Technology" is independent of the design differences between the Combustion Engineering designed Millstone, Unit 2 plant and the typical Westinghouse designed plant. It would therefore seem appropriate for the Nuclear Regulatory Commission Staff to give generic approval to the "UHI Software Technology" portion of WCAP-9528 so that it can be used on all Westinghouse designed NSSS. Our understanding is that such an approval will require little additional review above what is required to approve of its use for Millstone, Unit 2.

Therefore, Westinghouse requests that generic approval be granted for the "UHI Software Technology" portion of WCAP-9528 for use on all Westinghouse design NSSS. To make certain that there is no misunderstanding of the extent of the items to be included in the generic approval, the "UHI Software Technology" description is attached (Appendixes A and B). You will notice that the only difference between the attached information and WCAP-9528 is the nodalization

Mr. James R. Miller -2-September 15, 1980 used for the SATAN-VI calculation. This difference in nodalization is due solely to the design differences between a Westinghouse NSSS and a Combustion Engineering NSSS. This change is independent of the "UHI Software Technology". Your response, as soon as possible, would be appreciated. Sincerely, T. M. Anderson, Manager Nuclear Safety Department Attachment 15 cc: N. Lauben, NRC T. Speiss, NRC P. Check, NRC