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Electric Corporation

Water Reactor
Divisions

Nuclear Technology Division
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January 15, 1982

Mr. D. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

Recently, the Nuclear Regulatory Commission has decided to exercise several of the accident analysis computer codes developed for NRC by various contractors. It was apparently decided to perform accident analyses for several plants in O.L. review. In particular, the Nuclear Regulatory Commission has informed Westinghouse of its intent to perform a loss-of-coolant accident analysis for the South Texas Nuclear Plant and a steam break analysis of the Byron Nuclear Plant. In order to support these efforts the Nuclear Regulatory Commission has asked for detailed information describing these plants so that input can be derived for these analyses. In addition, Westinghouse understands that a similar request was being contemplated for the Seabrook Nuclear Plant. It is the understanding of Westinghouse that this information was being requested on plant dockets because the Nuclear Regulatory Commission felt that this was the only way to obtain such information.

This issue was discussed at a meeting in Bethesda on December 11, 1981. Present at the meeting from the Nuclear Regulatory Commission were Brian Sheron, Norm Lauben and Jack Guttman of Reactor Systems Branch, Division of Systems Integration and Duke Wheeler and Ken Kiper, Project Managers for the Seabrook and Byron Projects, respectively, Division of Licensing. Don Sells, Project Manager for the South Texas Project, was unable to attend, while Ed Shumaker and Neal Abrams of the Nuclear Regulatory Commission legal staff were at the meeting part of the time. Representing Westinghouse at the meeting were Bob Wiesemann and Rick Muench, both of the Nuclear Safety Department. At that meeting Westinghouse expressed concerns about tying these exercises to plant review dockets. In particular, we are concerned over the escalation in the O.L. review process that these exercises represent. Westinghouse has always performed the subject analyses with models which have been approved by the NRC staff. All documentation requirements in 10CFR50, Part 46, Appendix B, Appendix K and Regulatory Guide 1.7 and ANS Standard 45.2.11 are also complied with. The accident analysis area has thus been one of the most organized, reliable and efficient parts of the Safety Analysis Reports and of the NRC Staff's review of those reports. We feel that the interjection of an independent set of analyses by a sub-contractor who is unfamiliar with licensing calculations on Westinghouse plants poses a serious threat to this efficient part of the licensing process at a time when the current Administration, members of the NRC staff and the industry are trying to streamline the licensing process.

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The other significant concern expressed at the December 11 meeting was the problem of protecting the large amount of proprietary information required which will be stored on the computers of the NRC subcontractors. Our experience is that once data is on a computer it becomes very difficult to control unless rigorous access control measures are implemented. To minimize our concerns while still meeting the needs of the NRC staff, Westinghouse recommended at the subject meeting that this exercise be done on a generic basis and not on plant dockets.

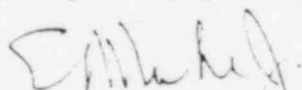
Members of the NRC staff present at the meeting agreed with our proposal. The purpose of this letter is to document our commitment to provide the information as agreed at that meeting and our understanding of the related commitments made by the NRC.

1. The NRC staff already possesses input for a typical 4 loop/15 x 15/3250 Mwt Westinghouse plant as well as a typical 4 loop/17 x 17/3411 Mwt plant equipped with upper head injection. In addition, we will supply by January 31, 1982, input data for a RESAR-3S plant (4 loop/17 x 17/3411 Mwt plant without upper head injection). Most of the Westinghouse plants currently in O.L. review or scheduled to be in O.L. review in the next several years are of this variety. Finally, when the NRC staff is reviewing the ECCS models for plants equipped with upper plenum injection, a generic set of input will be supplied for such a plant.
2. Westinghouse will answer the review questions on the South Texas and Byron Nuclear Plant dockets by referring to this letter and the generic process agreed to at the December 11 meeting.
3. We understand that the NRC will remove its requests for input information from the dockets where they currently appear and will not make this request on the Seabrook docket.
4. The NRC staff has agreed to document measures being taken to protect Westinghouse proprietary data before the generic data is made available. These measures were discussed and agreed to in a conference call between Westinghouse, NRC and EG&G personnel in late December.

In order to supply the RESAR-3S data by the date you requested, the information will be given in a form most convenient to Westinghouse, and it will all be marked proprietary.

If we can answer any questions for you, please do not hesitate to call Dr. Fred Cadek of my Staff at (412) 373-4720.

Very truly yours,



E. P. Rahe, Manager
Nuclear Safety Department

cc: H. Denton
R. Mattson
T. Speis
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