



Westinghouse Owners Group

Domestic Utilities

Alabama Power
American Electric Power
Carolina Power & Light
Commonwealth Edison
Consolidated Edison
Duquesne Light
Duke Power

Georgia Power
Florida Power & Light
Houston Lighting & Power
New York Power Authority
Northeast Utilities
Northern States Power
Pacific Gas & Electric

Portland General Electric
Public Service Electric & Gas
Public Service of New Hampshire
Rochester Gas & Electric
South Carolina Electric & Gas
Southern California Edison
Tennessee Valley Authority

Texas Utilities Electric
Union Electric
Virginia Power
Wisconsin Electric Power
Wisconsin Public Service
Wolf Creek Nuclear
Yankee Atomic Electric

International Utilities

Belgian Utilities
Kansas Electric Power
Korea Electric Power
Nuclear Electric plc
Nukleama Elektroma
Spanish Utilities
Swedish State Power Board
Taiwan Power

OG-90-65

RECEIVED

November 1, 1990

*90 NOV -6 P3:21

Ms Diane B. Dandois, Branch Chief
Licensee Fee and Debt Collection Branch
Division of Accounting and Finance
Office of Controller
U.S. Nuclear Regulatory Commission
Washington, DC 20555

- Reference 1) NRC Invoice Number I2028, dated 8/13/90
 2) Letter OG-88-41, dated 11/21/88 R.A. Newton, WOG to M.W. Hodges, NRC
 3) Letter dated December 11, 1989 from A.C. Thadani, NRC to R.A. Newton, WOG "Loss of RHRS Cooling While the RCS is Partially Filled" WCAP-11916, July 1988, and other related Westinghouse Owners Group Activities

Subject: Westinghouse Owners Group
Request for Exemption from 10CFR170

In response to an event at an operating nuclear plant where Residual Heat Removal System (RHRS) cooling was lost during the time when the Reactor Coolant System (RCS) was only partially filled, the Westinghouse Owners Group (WOG) recognizing the potential safety significance of the degraded plant condition undertook a program to study the potential consequences of the loss of RHRS cooling during the partially filled RCS operating mode. The NRC issued Generic Letter 87-12 to address this issue and the subject WOG study would aide the member utilities in better understanding the issues raised.

Recognizing the importance of this event and the need to provide each utility operating staff with an understanding of the potential consequences and guidance regarding appropriate actions to be taken to negate any undesirable consequences, the WOG held a workshop to share the results of the WOG study with

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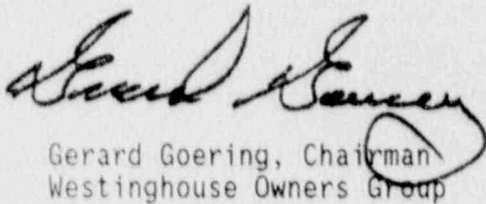
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The WOG was surprised when a NRC invoice, reference 1, was recently received for fees covering the review of the WOG report which had only been sent to the NRC for information. The incurrence of review fees for information reports could discourage the WOG from providing information copies to the staff in the future. The sharing of this report with the NRC staff was thought to be both beneficial to the NRC staff and the industry.

Thus the WOG respectfully requests that the WOG be exempted from the review fee assessment of 10CFR170.12(f), for the NRC staff initial review of the WOG report, WCAP-11916 "Loss of RHRS Cooling While RCS is Partially Filled".

In addition, in the future, prior to the WOG providing copies of WOG reports to the NRC staff, the assessment fees or agreement of no assessment fees will need to be specifically established.

Very truly yours,



Gerard Goering, Chairman
Westinghouse Owners Group

GG/dac

attachments

cc: T. Murley, NRC
R.C. Jones, Jr., NRC
W. Lyon, NRC
Westinghouse Owners Group Primary Representatives
Steering Committee
J.B. George, TU Electric
C.K. McCoy, Georgia Power
K.J. Voytell

NRC FORM 300
(9-89)

U.S. NUCLEAR REGULATORY COMMISSION

INVOICE NUMBER

INVOICE

12028

MAKE CHECKS PAYABLE TO THE U.S. NUCLEAR REGULATORY COMMISSION. REFERENCE THE INVOICE NUMBER ON REMITTANCE, AND

MAIL TO:
U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF ACCOUNTING AND FINANCE
OFFICE OF THE CONTROLLER
WASHINGTON, DC 20545

INVOICE DATE

8/13/90

LICENSE NUMBER (if applicable)
Topical Report

REFERENCE NUMBER (if applicable)

CONTACT:

NAME
Lynda S. Venson

TELEPHONE

AREA CODE	NUMBER
301	492-7049

TO:
Westinghouse Electric Corporation
ATTN: Mr. William J. Johnson
Nuclear Safety Department
Nuclear Technology Systems Division
P.O. Box 355
Pittsburgh, PA 15230-2728

DESCRIPTION

AMOUNT

This invoice is for the review of the following reports pursuant to 10 CFR 170.12(f) and 170.21.J. It includes the professional staff hour costs and related contractual costs, if any. Please refer to this invoice number when making payment.

<u>Report Number and Title</u>	<u>Review Status</u>	<u>Review Period</u>	
WCAP-11916 on Loss of RHRs Cooling while the RCS is Partically Filled - submitted 8/1/89 46.0 hrs @ \$86 p/h	Pending (TAC No. 74130)	8/89 - 12/89	\$3,956

FACILITY REVENUE CODE: AA903 SP

AMOUNT DUE
(See Terms)

\$3,956

TERMS. Interest will accrue from the invoice date at the annual rate of 9%. Payment is due immediately. However, interest will be waived if payment is received within 30 days from the invoice date. Penalty and administrative charges will be assessed on a delinquent invoice. Additional terms and conditions are attached, if applicable.

NOTE. If there are any questions about the existence or amount of the debt, contact the individual named above. For NRC debt collection procedures, including interest and penalty provisions, see 31 U.S.C. 3717, 4 CFR 101-105, and 10 CFR 15.