

Program Management Office 1000 Westinghouse Drive Cranberry Township, Pennsylvania 16066

Project 694 Docket 99902037

August 8, 2023

OG-23-124

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

Subject: PWR Owners Group

PWROG Comments on the NRC Draft Safety Evaluation Associated with Topical Report (TR) PWROG-21001-P/NP, Revision 0, "Hydrogen-Based Transient Cladding Strain Limit" (PA-ASC-1671 R1)

Reference: 1. Email from Luke Haeg, (NRC) to Chad Holderbaum, (PWROG) – NRC

Transmittal of the Draft Safety Evaluation for Topical Report (TR) PWROG-21001-P/NP, Revision 0, "Hydrogen-Based Transient Cladding Strain Limit,"

July 11, 2023

2. Westinghouse Affidavit CAW-22-037, (ML22209A258)

The purpose of this letter is to transmit a table with the PWR Owners Group comments on the Draft Safety Evaluation (DSE) (Enclosure 1) and a markup of the DSE that includes the comments (Enclosure 2).

The proprietary information that is contained in PWROG-21001-P in the NRC DSE is contained in brackets and is highlighted in yellow in Enclosure 2.

The PWROG requests that the proprietary information in the NRC DSE be withheld from public disclosure in accordance with the enclosed affidavit, CAW-22-037, (Reference 2).

The PWROG requests that the Staff revise the DSE to address these comments and contact the PWROG with any questions regarding the PWROG comments.

Correspondence related to this transmittal should be addressed to:

Mr. Dewey Olinski, Executive Director PWR Owners Group, Program Management Office Westinghouse Electric Company 1000 Westinghouse Drive Cranberry Township, PA 16066 If you have any questions, please do not hesitate to contact me at (602) 999-2080 or Mr. Olinski, Executive Director of the PWR Owners Group, Program Management Office at (412) 374-3025. Sincerely yours,

Michael Powell Chairman and COO PWR Owners Group

Enclosure 1: Comment table on the Draft Safety Evaluation for 21001-P Revision 0

(Westinghouse Non-Proprietary)

Enclosure 2: Markup of the Draft Safety Evaluation for PWROG-20016-P Revision 0

(Proprietary)

cc: PWROG Steering Committee Representatives

PWROG Management Committee Representatives

PWROG Licensing Committee Representatives

PWROG Analysis Committee Representatives

PWROG PMO

T. Crede, Westinghouse Electric Company

G. Williams, Westinghouse Electric Company