



Program Management Office
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Docket Number 99902037
Project 694

March 4, 2024

OG-24-40

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: **Final Post-Operational Test for the Generation III® Passive Thermal Shutdown Seal**

References:

1. PWROG-14001-P-A, Revision 1, "PRA Model for the Generation III Westinghouse Shutdown Seal," October, 2017.
2. OG-20-164, "Successful Post-Operational Test of the Generation III Passive Thermal Shutdown Seal," May 26, 2020.
3. OG-22-99, "Successful Post-Operational Test of the Generation III Passive Thermal Shutdown Seal," May 25, 2022.

Limitation and Condition Number 7 in the NRC Final Safety Evaluation (FSE) contained in Reference 1, states:

"The PWROG shall perform a minimum of two additional post-operational tests in which one of the post-operational tests shall be performed no later than 2020 for a Generation III® SDS assembly that has experienced approximately four years of operation and another post-operational test shall be performed no later than 2023 for a Generation III SDS assembly that has experienced approximately six years of operation. Furthermore, the PWROG shall perform one additional post-operational test if a Generation III SDS that has experienced approximately eight to nine years of operation will be available prior to December 31st, 2025."

References 2 and 3 transmitted the results of the two additional post-operational tests on the Generation III SHIELD® Passive Thermal Shutdown Seal as required by Limitation and Condition Number 7 as discussed above.

The Generation III SDS that are installed were reviewed to determine if any of them would satisfy the criteria for the final post-operational test that has experienced approximately eight to nine years of operation prior to December 31, 2025. Based on that review, none of the Generation III SDS will be installed for eight to nine years of operation prior to December 31, 2025 to satisfy the final post

operational test. It should be noted that the Generation III SDS that was tested in 2022 (Reference 3) experienced approximately 7.5 years of operation, which exceeded six years of operation that was required for the second post-operational test.

In summary, no Generation III SDS will be available with eight to nine years of operation prior to December 31, 2025 to satisfy the final post-operational test in Limitation and Condition Number 7 in the NRC FSE in Reference 1

If you have any questions, please do not hesitate to contact me at (815) 520-3023 or Dewey Olinski, Executive Director of the PWR Owners Group, Program Management Office at (412) 374-3025.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'James Lynde', with a long horizontal flourish extending to the right.

James Lynde
Chairman and COO
PWR Owners Group

cc: PWROG Steering Committee
PWROG PMO
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