



Domestic Utilities

Ameren UE
American Electric Power
Carolina Power & Light
Commonwealth Edison
Consolidated Edison
Duke Power
Duquesne Light
Florida Power & Light

New York Power Authority
Northeast Utilities
Northern States Power
Pacific Gas & Electric
Public Service Electric & Gas
Rochester Gas & Electric
South Carolina Electric & Gas

Southern Nuclear
South Texas Projects Nuclear
Tennessee Valley Authority
TU Electric
Virginia Power
Wisconsin Electric Power
Wisconsin Public Service
Wolf Creek Nuclear

International Utilities

Electrabel
Kansai Electric Power
Korea Electric Power
Nuclear Electric LTD
Nuklearna Elektrana
Spanish Utilities
Taiwan Power
Vattenfall

OG-99-099

WCAP-14572 Revision 1-NP-A Addendum 1
Project Number 694

December 21, 1999

Mr. Steven Bloom
Project Manager for Westinghouse Owners Group
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Westinghouse Owners Group
**Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed
ISI Program - WCAP-14572, Revision 1-NP-A Addendum 1 (MUHP-5200)**

References:

1. Letter from Thomas Essig, U.S. Nuclear Regulatory Commission, to Mr. Lou Liberatori, Chairman, Westinghouse Owners Group, Safety Evaluation of Topical Report WCAP-14572, Revision 1, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report," December 15, 1998.
2. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Chief, Information Management Branch, U.S. Nuclear Regulatory Commission, Westinghouse Owners Group Transmittal of Approved Topical Reports: WCAP-14572 Revision 1-NP-A (Non-Proprietary) "WOG Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report" and WCAP-14572 Revision 1-NP-A, Supplement 1 (Non-Proprietary) "Westinghouse Structural Reliability and Risk Assessment (SRRA) Model for Piping Risk-Informed Inservice Inspection"(MUHP-5091), March 8, 1999.
3. Letter from Stephen D. Floyd, Nuclear Energy Institute, to NEI Administrative Points of Contact containing "Example Submittal For Plants that Follow the WOG Methodology (WCAP-14572)," dated March 9, 1999.
4. Letter from Louis F. Liberatori, Jr., Chairman, Westinghouse Owners Group, to Mr. Steve Bloom, Project Manager for Westinghouse Owners Group, U.S. Nuclear Regulatory Commission, Westinghouse Owners Group Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program, October 14, 1999.
5. Letter from Mr. Ronald M. Scroggins, U.S. Nuclear Regulatory Commission to Mr. Stephen D. Floyd, Nuclear Energy Institute, dated May 14, 1996.

Dear Mr. Bloom:

By letter dated December 15, 1998 from Thomas Essig, U.S. Nuclear Regulatory Commission, to Mr. Lou Liberatori, Chairman, Westinghouse Owners Group (reference 1), the NRC forwarded a Safety

Evaluation Report (SER) finding the Westinghouse Owners Group (WOG) risk-informed inservice inspection methodology for piping acceptable. Currently the WOG Topical Report and the NRC's Safety Evaluation state that the application of the methodology is approved as an alternative to the ASME Section XI ISI requirements and do not include changes to augmented piping inspection programs that cover some degradation mechanisms that may have been separately required by NRC. Specifically, the WCAP and SER state that the report should not be taken as a basis to change augmented inspection programs.

As a follow-up to our previous letter (reference 4) and based on the WOG/NRC meeting on this subject on November 23, 1999, we are submitting the enclosed proposed addendum to WCAP-14572, Revision 1-NP-A, for review. This addendum to the WOG RI-ISI process permits, as an option, the revision of selected augmented inspection regulatory requirements, including High Energy Line Break (HELB) exclusion examinations, where safety impacts can be shown to be maintained or enhanced. Changes to these augmented requirements would be evaluated using the appropriate regulatory change mechanisms (e.g. 10CFR50.55a, 50.59.) and would be submitted by individual utilities as part of the example submittal (reference 3).

As outlined in reference 5, the NRC waived any fees associated with the review of the WOG Topical report. The NRC agreed that the waiver request for this document met criterion three of Footnote 4 to 10 CFR 170.21. This footnote states that fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts. We believe that this submittal of the proposed addendum and its review also falls under criterion three of Footnote 4 to 10 CFR 170.21.

To this end, in the near term to support utilities that are actively applying the WOG RI-ISI methodology, we respectfully request that the NRC issue an addendum to the original SER (reference 1). Specifically, we request approval to allow augmented inspection programs, except for specific Intergranular Stress Corrosion Cracking (IGSCC) categories and the Flow Assisted Corrosion (FAC) program, to be included or subsumed into the risk-informed ISI methodology. In addition, a waiver of fees to review this submittal is also requested.

Continued refinement of risk-informed ISI programs, such as inclusion of the various augmented programs into an integrated risk-informed ISI program, will enhance safety while also reducing the costs of these programs.

Please direct any questions or comments to Mr. Ken Balkey, Westinghouse, at (412)-374-4633 or Ms. Nancy Closky, Westinghouse, at (412)-374-5916.

Very truly yours,



Louis F. Liberatori, Jr., Chairman
Westinghouse Owners Group

OG-99-099
December 21, 1999

cc: (All 1L)

Dr. Brian Sheron, NRC
Mr. Jack Strosnider, NRC
Mr. Gary Holahan, NRC
Mr. Richard Wessman, NRC
Dr. Goutam Bagchi, NRC
Dr. Syed Ali, NRC
Mr. Stephen Dinsmore, NRC
Mr. Stephen Dembek, NRC
Mr. Ralph Beedle, NEI
Mr. Anthony Pietrangelo, NEI
Mr. Biff Bradley, NEI
Mr. Alex Marion, NEI
WOG Steering Committee
WOG Materials Subcommittee
WOG Risk-Based Technology Working Group