

**BWRVIP** BWR Vessel & Internals Project \_\_\_\_\_ 2000-268

October 17, 2000

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

Attention: Jack R. Strosnider

Subject: NRC Safety Evaluation of BWRVIP-75

Reference: Letter from Jack R. Strosnider (NRC) to Carl Terry (BWRVIP Chairman), "Safety Evaluation of the BWR Vessel and Internals Project, BWR Vessel and Internals Project, Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (BWRVIP-75), EPRI Report TR-113932, October 1999 (TAC NO. MA5012)," dated September 15, 2000.

The purpose of this letter is to clarify the basis for the evaluation and methodology described in the report "BWR Vessel and Internals Project, Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (BWRVIP-75)," EPRI Report TR-113932, October 1999. This report was transmitted to the NRC on October 27, 1999.

The NRC issued a Safety Evaluation (SE) of the BWRVIP-75 report on September 15, 2000 (Reference letter identified above). In that SE, the NRC staff referred to a meeting at which BWRVIP representatives described the basis for the evaluation and methodology in the BWRVIP-75 report. The BWRVIP confirms that the BWRVIP-75 report is a deterministic evaluation and the proposed methodology does not rely on risk insights to justify the proposed reduction in inspection scope and frequency. This may not be clear in the BWRVIP-75 report. The BWRVIP will revise the BWRVIP-75 report to clarify this point.

BWR utilities are implementing the guidance and revised inspection scope and frequency as described in the NRC SE on BWRVIP-75. In fact, some BWR utilities are implementing this guidance for use during Fall 2000 outages, some of which have begun.

The BWRVIP will also respond to the Open Items identified in the SE on BWRVIP-75. We will advise you of the schedule for this response when it is available. The BWRVIP will revise the BWRVIP-75 report to clarify the deterministic nature of the report, incorporate guidance in the SE and incorporate resolution of the Open Items identified in the SE.

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ADD: Jack Strosnider  
to ERIS

If you have any questions on this subject, please contact Rich Ciemiewicz of PECO Energy, BWRVIP Assessment Committee Technical Chairman, by telephone at 610.765.5963.

Sincerely,

*Tom J. Mulford*

*for*

Vaughn Wagoner  
Carolina Power & Light  
BWRVIP Integration Committee Technical Chairman