

POJ-669

March 12, 2001



Dr. Brian W. Sheron
Associate Director for Project Licensing and Technical Analysis
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Extension of Risk-Informed Inservice Inspection (RI-ISI) Methodology

Dear Dr. Sheron:

Per Reference 1, EPRI submitted a draft report documenting the extension of the EPRI RI-ISI process (Reference 2) as an acceptable alternative to augmented inspection programs for break exclusion requirements (BER) typically identified via Standard Review Plan sections 3.6.1 and 3.6.2.

A waiver of review fees is requested based on the exemption listed in footnote 4 to the Special Projects fee category in the table presented in 10CFR50.170.21, which says: [footnote] "4. Fees will not be assessed for requests/reports submitted to the NRC: ...

3. As a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts."

We look forward to your review of the Reference 1 material and welcome a meeting in the near future to discuss any comments you or your staff may have.

Sincerely,

Pat O'Regan
EPRI Risk Informed Inspection Program Manager

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cc: L. Ohlshan (USNRC)
R. Bradley (NEI)

References:

1. NEI letter from Patrick O'Regan to Dr. Brian Sheron (USNRC), dated February 28, 2001.
2. *Revised Risk-Informed Inservice Inspection Evaluation Procedure*, EPRI, Palo Alto, CA: 1999. EPRI TR-112657, Rev. B-A