

April 4, 2002



Mr. L Olshan
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Extension of the EPRI Risk-Informed ISI Methodology to Break
Exclusion Region Programs

Dear Mr. Olshan:

The USNRC approved the EPRI Risk-Informed Inservice Inspection (RI-ISI) methodology for generic application in 1999 (Reference 1). Since that time, its application has received widespread acceptance in the industry as a means to focus resources on risk significant components and eliminate unnecessary occupational exposures.

In parallel with these applications, EPRI has continued research and development efforts to further the effectiveness of risk and performance based technologies and hence risk-informed regulation. To support communication and technical discussion on these efforts, EPRI staff, member utilities and NEI staff have met periodically with USNRC staff. To this end, References 2 and 3 were provided to the staff.

The report attached to this letter, dated April 4, 2002, documents the extension of the RI-ISI methodology to Break Exclusion Region (BER) programs. This report is based upon trial application of this methodology to BWR and PWR plants as well as USNRC staff review and comment on its application.

We look forward to your review of the attached and welcome any discussion that would be of benefit in its review.

Sincerely,

A handwritten signature in black ink, reading "Pat O'Regan". The signature is fluid and cursive, with the first name "Pat" and last name "O'Regan" clearly visible.

Pat O'Regan
EPRI Risk Informed Inspection Program Manager

CHARLOTTE OFFICE

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Mr. L. Olshan
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cc:

F. Ammirato (EPRI)
R. Bradley (NEI)

References:

1. SAFETY EVALUATION REPORT related to "Revised Risk-Informed Inservice Inspection Procedure" (EPRI TR-112657, Rev. B July 1999), dated October 28, 1999.
2. EPRI letter from Patrick J. O'Regan to Dr. Brian Sheron (USNRC), dated February 28, 2001.
3. EPRI letter from Patrick J. O'Regan to Dr. Brian Sheron (USNRC), dated March 12, 2001.

Attachments:

1. TR-1006937, Extension of the EPRI Risk Informed ISI Methodology to Break Exclusion Region Programs, April 2002.

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