

BWRVIP

 BWR Vessel & Internals Project _____ 2002-103

April 29, 2002

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

Attention: C. E. Carpenter

Subject: Project No. 704 – BWRVIP Response to NRC Safety Evaluation of the BWR Integrated Surveillance Program

- References:
1. Letter from William H. Bateman (NRC) to Carl Terry (BWRVIP Chairman), “Safety Evaluation Regarding EPRI Proprietary Reports ‘BWR Vessel and Internals Project, BWR Integrated Surveillance Program Plan (BWRVIP-78)’ and ‘BWRVIP-86: BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan,’” dated February 1, 2002.
 2. Letter from Robert A. Gramm (NRC) to Mr. Randall K. Edington (Entergy Operations, Inc.), “River Bend Station, Unit 1 – Request to Defer the Testing of the Reactor Vessel Surveillance Capsule Specimens and Request to Extend the Date for Reporting Testing Results (TAC NO. MB0250),” dated February 26, 2001.

The purpose of this letter is to provide the BWRVIP response to the NRC Safety Evaluation (SE) of the BWR Integrated Surveillance Program (ISP) that was transmitted by the Reference 1 NRC letter and to request a change to the reporting of surveillance capsule results.

The BWRVIP concurs with the NRC staff conclusions described in the SE of the BWR ISP. The BWRVIP will work with the individual utilities to provide the appropriate commitment to the NRC by individual utilities to participate in the ISP.

The BWRVIP utilities recognize and concur with the NRC staff position requiring use of a RPV neutron fluence calculational methodology that will meet current NRC staff guidance in USNRC Regulatory Guide 1.190. The BWRVIP utilities also recognize that each BWR facility’s current RPV neutron fluence calculational methodology of record (i.e., that upon which most recent prior calculations have been based) may not be consistent with the guidance in Regulatory Guide (RG) 1.190. Therefore, the BWRVIP utilities agree that each facility’s next submittal of a RPV neutron fluence calculation should utilize an NRC staff approved methodology which is

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consistent with RG 1.190. However, if a utility elects to use a RPV neutron fluence calculational methodology which has not been previously reviewed by the staff against the guidance provided in RG 1.190, the utility will submit sufficient information along with the RPV neutron fluence evaluation for the NRC staff to determine that the methodology employed is consistent with the guidance provided in RG 1.190.

Additionally, since the neutron fluence calculations for the RPV surveillance capsules will be contracted through the BWRVIP as part of the ISP, the utilities will be informed of which RPV neutron fluence calculational methodology (or methodologies) has been used to establish the neutron fluences for the RPV surveillance capsules. The BWRVIP utilities also agree to provide a technical justification with their next RPV neutron fluence evaluation which will permit the NRC staff to conclude that the neutron fluence values for the RPV and surveillance capsules intended to represent the plant RPV limiting materials were calculated with methodologies which meet the "compatibility" requirement cited in the NRC SE of the BWR ISP.

Finally, in the Reference 2 letter, the NRC staff approved a deferral of the reporting of the first River Bend Station (RBS) surveillance capsule test results from March 2001 to September 2002 while the ISP was being reviewed by the NRC staff. Now that the ISP has been approved by the NRC staff as described in the SE, the BWRVIP is beginning to implement the ISP. The RBS capsule is the first plant capsule to be tested as part of the ISP. Because the ISP was only recently accepted by the NRC, implementation details of the ISP have yet to be finalized and participating utilities have not completed actions to adopt the ISP in place of existing programs. Furthermore, resources could not be allocated in time to complete RBS capsule testing, analysis and reporting of results by September 2002. Therefore, the BWRVIP requests an extension of the date for reporting of the RBS surveillance capsule test results until February 2003. This extension will not affect the planned Charpy testing or analysis of dosimetry and consequently will not affect the accuracy of the results.

If you have any questions on this subject, please contact Robin Dyle (Southern Nuclear, BWRVIP Assessment Committee Technical Chairman) by telephone at 205.992.5885.

Sincerely,



Carl Terry
Constellation Nuclear – Nine Mile Point LLC
Chairman, BWR Vessel and Internals Project