

May 8, 2002

Carl Terry, BWRVIP Chairman  
Niagara Mohawk Power Company  
Post Office Box 63  
Lycoming, NY 13093

SUBJECT: UTILITY IMPLEMENTATION OF BWRVIP PRODUCTS

Dear Mr. Terry:

By letter dated April 16, 2002, you provided the staff with updated information regarding utility implementation of the various products developed by the BWR Vessel and Internals Project (BWRVIP), including the inspection and flaw evaluation guidelines that the NRC staff has previously reviewed and approved. You also reaffirmed in your letter the BWR utilities' commitment to implementation of the BWRVIP products. These commitments had been previously communicated to the staff by letters dated May 30 and October 30, 1997. Further, you stated that the BWRVIP Executive Committee (EC) has undertaken several initiatives, including the publication in August 2001 of the BWRVIP Program Implementation Guide (BWRVIP-94) and requesting that the Institute of Nuclear Power Operations (INPO) conduct "Review Visits" to review the adequacy, timeliness, and consistency of the implementation of the BWRVIP products at each BWR facility.

The staff understands that the initial INPO Review Visits, which began in 2001, are scheduled to be completed by 2003 and that the scheduling of the individual Review Visits were initially arranged to ensure that the BWRVIP products are being implemented on a timely schedule at the individual BWR plants. Further, while the results of the Review Visits completed to date have identified some recommendations for improving implementation of BWRVIP products, no safety issues have been identified. A summary of the first four review results was presented by INPO at the 2001 BWRVIP Symposium, which several members of my staff attended. This presentation by INPO and your discussions during recent meetings between the BWRVIP EC and NRC senior management indicates that, while it appears that domestic BWR licensees are adequately implementing and managing their individual BWRVIP programs, there is still room for improvement. A case in point was a recent BWR licensee who was initially unable to fully discuss the implementation of their BWRVIP program with the staff when questions arose about the scope and schedule of inspections to be performed. The staff understands that, based on this occurrence, the BWRVIP has taken additional steps to ensure that its members are reviewing their programs, and that the INPO Review Visits are being reprogrammed to address potential weaknesses in program implementation by some of your members. Should further implementation problems arise, the staff may reevaluate its position relative to this industry initiative.

Therefore, the staff requests the BWRVIP make a presentation to the staff in a public meeting in the near future on the results of the continuing INPO reviews at the various plant sites, the lessons learned, and a discussion regarding how you are incorporating the lessons learned from these INPO reviews and recent operating events into the BWRVIP program.

Carl Terry

-2-

It should be noted that, based on the above referenced commitments, the continuing critical self-assessments of the individual BWRVIP programs by INPO and the BWRVIP, your continuing efforts to revise and update the various BWRVIP products to incorporate recommendations in NRC safety evaluations and feedback from plant experience and lessons learned from the INPO Review Visits, the staff continues to find that the BWRVIP program provides an acceptable level of quality assurance of the safety-related components addressed.

The staff encourages the BWRVIP to continue frequent communications with the staff, addressing technical issues as they arise, and undertaking preemptive mitigative measures to manage material issues of the reactor pressure vessel, its internal components, and Class I piping.

Please contact C. E. (Gene) Carpenter, Jr., of my staff at (301) 415-2169 if you have any further questions regarding this subject.

Sincerely,

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Brian W. Sheron, Associate Director  
for Project Licensing and Technical Analysis  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission

cc: BWRVIP Service List

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-2-

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Sincerely,

Brian W. Sheron, Associate Director  
for Project Licensing and Technical Analysis  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission

cc: BWRVIP Service List

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