



NUCLEAR ENERGY INSTITUTE

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SENIOR DIRECTOR, ENGINEERING  
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July 1, 2004

Mr. Richard J. Barrett  
Director, Division of Engineering  
Mail Stop O-9E3  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** PWR Primary to Secondary Leak and Secondary Water  
Chemistry Guidelines for Review

**PROJECT NUMBER: 689**

Dear Mr. Barrett:

In previous communications we agreed to provide draft copies of revisions to EPRI Steam Generator Program Guidelines for your review. The PWR Primary to Secondary Leak Guidelines and Secondary Water Chemistry Guidelines are currently being revised, and proprietary and non-proprietary versions of the documents are enclosed. Your comments on these documents are requested by July 30, 2004, in order to support our publication schedule. We request that you provide your comments electronically to Jim Benson at EPRI ([jbenson@epri.com](mailto:jbenson@epri.com)) using the forms included as Enclosures 1 and 5.

The proprietary information in Enclosures 2 and 6 is supported by the signed affidavits in Enclosure 3 and 7. The affidavits set forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity, the consideration listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, we respectfully request that the information, which is proprietary to EPRI, be withheld from public disclosure in accordance with 10 CFR 2.790. Non-proprietary versions of this information are provided in Enclosures 4 and 8.

Consistent with previous submittals supporting NRC review of EPRI's Steam Generator Management Program Guidelines, we believe any NRC staff review of the enclosed reports is exempt from the fee recovery provision contained in 10 CFR Part 170. This submittal provides information that may be helpful to NRC staff



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when evaluating licensee submittals provided to implement the Steam Generator Program Generic License Change Package. Such reviews are exempted under §170.11, Exemptions, Subpart (a) (1) (iii). This provision states, (a) "No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for...(1) A special project that is a request/report submitted to the NRC-- (iii) As a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts".

If you have any questions, please contact me (202-739-8080; [am@nei.org](mailto:am@nei.org)) or Jim Riley (202-739-8137; [jhr@nei.org](mailto:jhr@nei.org)).  
[jhr@nei.org](mailto:jhr@nei.org).

Sincerely,



Alexander Marion

Enclosures

c: William H. Bateman  
Louise Lund  
Kenneth Karwoski  
Emmett Murphy