

Duke Energy Company Oconee 1, 2, 3  
Entergy Operations, Inc. ANO-1  
Florida Power Corporation Crystal River 3



AmerGen Energy Company, LLC  
FirstEnergy Nuclear Operating Company  
Framatome ANP

TMI-1  
D-B

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Working Together to Economically Provide Reliable and Safe Electrical Power

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Washington, D.C. 20555-0001

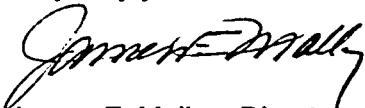
**Response to RAI on BAW-1543(NP), Revision 4, Supplement 5, "Supplement to the Master Integrated Reactor Vessel Surveillance Program"**

Ref.: 1. Letter, James F. Mallay (Framatome ANP), to Document Control Desk (NRC), "Request for Review and Approval of BAW-1543(NP), Revision 4, Supplement 5, 'Supplement to the Master Integrated Reactor Vessel Surveillance Program'," OG:03:01838, NRC:03:091, December 19, 2003.

Ref.: 2. Memo, Drew Holland (NRC), to James F. Mallay (Framatome ANP), "Request for Additional Information Regarding Topical Report BAW-1543," May 26, 2004.

On behalf of the B&W Owners Group Reactor Vessel Working Group, Framatome ANP requested the NRC's review and approval for referencing in licensing actions the topical report BAW-1543(NP), Revision 4, Supplement 5, "Supplement to the Master Integrated Reactor Vessel Surveillance Program." In Reference 2, the NRC requested additional information to facilitate the completion of its review. The response to this request, which is non-proprietary, is contained in the attachment to this letter.

Very truly yours,



James F. Mallay, Director  
Regulatory Affairs

Enclosure

cc: D. G. Holland  
B&WOG Reactor Vessel Working Group  
Project 693

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## Attachment A

### Response to RAI related to BAW-1543, Revision 4, Supplement 5

I. Appendix H to Title 10 of the Code of Federal Regulations Part 50 (Appendix H to 10 CFR Part 50), Paragraph III.C, "Requirements for an Integrated Surveillance Program" allows licensees with plants that have similar design and operating features to implement an integrated surveillance program with the approval of the Director of the Office of Nuclear Reactor Regulation. The Babcock and Wilcox (B&W) MIRVP was established in 1977 to provide a basis for sharing information between B&W designed and fabricated plants. In 1988, the MIRVP was expanded to include Westinghouse designed plants with B&W fabricated reactor vessels. In the introduction of BAW-1543, Revision 4, Supplement 5 (page 2) the licensee states that the Westinghouse-designed, B&W reactor vessel fabricated plant surveillance capsule withdrawal schedules are not MIRVP commitments, but merely reflect the current plans of these reactor vessel working group member plants.

**Question 1.** *If the Westinghouse designed plants' withdrawal schedules are not commitments, explain how each plant that participates in the MIRVP meets Appendix H requirements for an integrated surveillance program.*

**Response 1.** The Westinghouse designed plants (Point Beach 1 & 2, Surry 1 & 2, and Turkey Point 3 & 4) have their own surveillance programs that meet the requirements of 10CFR50 Appendix H. The Westinghouse plant owners participate in the MIRVP in order to share and use the limiting Linde 80 weld information generated in the MIRVP. However, in the Point Beach license renewal application (currently under review) Nuclear Management Company commits to using data from MIRVP capsules currently being irradiated.

**Question 2.** *Explain how the MIRVP is incorporated into each individual plant's licensing basis (i.e. is the surveillance capsule withdrawal schedule in the Technical Specifications or the final safety analysis report?).*

**Response 2.** The Turkey Point 3 & 4 UFSAR states that when the two MIRVP capsules that contain the SA-1101 weld (the same heat contained Turkey Point 3 & 4) are tested, the data will be evaluated and considered as appropriate. The Surry 1 & 2 UFSAR states that their withdrawal schedule is consistent with the guidelines of the MIRVP. The Point Beach 1 & 2 UFSAR cites the MIRVP as a supplement to the Point Beach 1 & 2 plant specific surveillance programs.

The B&W designed units (Oconee 1, 2, & 3, Arkansas Nuclear One 1, Davis-Besse, Crystal River 3, and Three Mile Island 1) meet 10CFR50 Appendix H through the MIRVP as documented in their respective UFSARs. In addition, the MIRVP is cited in the Arkansas Nuclear One 1 and the Oconee 1, 2, & 3 license renewal application and SERs in the Reactor Vessel Integrity Section. Also, the owners of some of the B&W designed plants cite the MIRVP in their Reactor Coolant System Pressure/Temperature Limit Sections of their Technical Specifications.

**Question 3.** *Due to recent reviews of license renewal applications, the staff has identified the need for license conditions with regard to reactor vessel surveillance programs for the period of extended operation. This license condition specifies that applicants will be required to submit any changes to surveillance capsule withdrawal schedules to the NRC for review and approval during the period of extended operation. For clarity, the staff requests that the applicant remove the following statement on page 3 of BAW-1543, Revision 4, Supplement 5: "The owners of plants that have been granted license renewal have made no commitments to test or use information from the capsules that continue to be irradiated under the MIRVP." Future applicants may wish to take credit for information obtained from the MIRVP as opposed to using plant specific information in order to meet the requirements of Appendix H to 10 CFR Part 50. If you conclude that the statement is relevant and should be maintained in the topical report, provide justification for this conclusion.*

**Response 3.** The statement will be removed upon issuance of the approved version of BAW-1543 Revision 4, Supplement 5.