



NUCLEAR ENERGY INSTITUTE

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January 4, 2005

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington DC 20555

SUBJECT: Request to Withdraw EPRI Report (EPRI 1003385, Nov. 2002) from
NRC Staff Review

Dear Sir:

NEI has submitted two EPRI reports for NRC review dealing with the response of high-burnup LWR fuel to reactor transients such as the reactivity initiated accident (RIA). The first report proposing revisions to current RIA criteria (Reference 1) was submitted in April 2002 and continues to be under review by NRR. The second report (Ref. 2) addressing the analysis methodology for use in determining whether fuel will meet revised RIA criteria was submitted in March 2004.

We plan to submit for review two additional and related reports: one on burnup extension licensing (Ref. 3) covering all design criteria other than those dealing with RIA and LOCA and the second specifically dealing with LOCA criteria. We anticipate submitting Ref. 3 in early 2005 and the LOCA report following the conclusion of the joint RES-EPRI experimental program at ANL (in late 2006 or early 2007).

We consider the report currently under NRC review (RIA criteria for high-burnup fuel) to be the most important. In view of NRC's overall review workload, and in consideration of the fact that industry's need for the approaches proposed in Ref. 2 may depend to a great extent on the NRC's acceptance of RIA criteria per Ref 1, we withdraw our request for the review of Ref 2. We will reassess submittal of three-dimensional methodology (Ref. 2) after the NRC review of Ref. 1 is completed.

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This withdrawal of Ref 2 from active review is unrelated to review fee considerations. We continue to believe that ample justification can be provided for a waiver of review fees for Ref 2, if and when it is determined that industry will need to use and reference it in licensing applications.

If you have any questions, please contact me at 202-739-8080; am@nei.org.

Sincerely,



Alexander Marion

c: Mr. Frank M. Akstulewicz, NRR
Mr. Thomas W. Alexion, NRR

Ref 1. Topical Report on Reactivity Initiated Accident: Bases for RIA Fuel and Core Coolability Criteria - EPRI 1002865 (June 2002).

Ref 2. Three-Dimensional Rod Ejection Accident Peak Fuel Enthalpy Analysis Methodology – EPRI 1003385 (November 2002).

Ref 3. Licensing Criteria for Fuel Burnup Extension Beyond 62 GWd/tU – Industry Guide – EPRI 1008108 (October 2004).