



NUCLEAR ENERGY INSTITUTE

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Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** NRC Review of MRP-169, *Technical Basis for Preemptive Weld Overlays for Alloy 82/182 Butt Welds in PWRs*

**PROJECT NUMBER:** 689

In a letter dated September 7, 2005, NEI submitted MRP-169, *Technical Basis for Preemptive Weld Overlays for Alloy 82/182 Butt Welds in PWRs*, for your review and approval. MRP-169 is related to MRP-139, *Primary System Piping Butt Weld Inspection and Evaluation Guideline*, in that the preemptive overlays described in MRP-169 affect the frequency of inspection outlined in MRP-139. Since the industry has not sought the NRC's approval of MRP-139, questions have arisen regarding what sections of MRP-169 should be reviewed in order to preserve the independence of these two documents from a regulatory approval perspective.

We have reviewed MRP-169 and determined that our original request for approval should be modified to request NRC review and approval of only those sections of the report pertaining to design requirements, design methodology, and the examination volumes of full and optimized structural pre-emptive weld overlays. Therefore, we are requesting NRC's review and approval of only sections 4.0, *Design Requirements*, and 7.1, *Requirements for Types of Examination for Weld Overlays*. The remainder of MRP-169 is submitted for information only.

We believe NRC staff review of MRP-169 is exempt from the fee recovery provision contained in 10 CFR Part 170. The Electric Power Research Institute (EPRI) has already provided the NRC's Chief Financial Officer a written justification for a waiver of NRC review fees for this document in a letter from Mr. D. Modeen dated July 21, 2005. In this letter, EPRI stated its intent to submit this report within a month for review. Pre-approval of the methodology by NRC for industry-wide use will simplify NRC reviews by reducing or eliminating the need for case-by-case review and approval of individual requests for each application. There are about six utilities prepared to implement this methodology in 2006. Review fees in such cases are exempted under §170.11, Exemptions, Subpart (a) (1) (iii).

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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.

We would be pleased to meet with NRC staff to discuss this request. If you have any questions on this matter, 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)).

Sincerely,



Alexander Marion

- c: Mr. Michael E. Mayfield, U. S. Nuclear Regulatory Commission
- Mr. John A. Grobe, U.S. Nuclear Regulatory Commission
- Mr. William H. Bateman, U. S. Nuclear Regulatory Commission
- Mr. Terence L. Chan, U. S. Nuclear Regulatory Commission
- Mr. Ted J. Sullivan, U. S. Nuclear Regulatory Commission
- Mr. Jay W. Collins, U. S. Nuclear Regulatory Commission
- Ms. Michelle C. Honcharik, U. S. Nuclear Regulatory Commission