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2006-333 BWR Vessel & Internals Project (BWRVIP)

July 12, 2006

Document Control Desk
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Attention: Meena Khanna

Subject: Project No. 704 – BWRVIP Response to NRC Request for Additional Information on BWRVIP-104

References:
1. Letter from Stephanie Coffin (NRC) to Bill Eaton (BWRVIP Chairman), "Request for Additional Information – Review of BWR Vessel and Internals Project Report, BWRVIP-104, Evaluation and Recommendations to Address Shroud Support Cracking in BWRs," dated March 29, 2004.
2. Letter from Carl Terry (BWRVIP Chairman) to Document Control Desk (NRC), "Project No. 704 – Transmittal of BWRVIP-104: BWR Vessel and Internals Project, Evaluation and Recommendations to Address Shroud Support Cracking in BWRs," dated September 24, 2002.

Enclosed are five (5) copies of the BWRVIP response to the NRC Request for Additional Information (RAI) on the BWRVIP report entitled "BWRVIP-104: BWR Vessel and Internals Project, Evaluation and Recommendations to Address Shroud Support Cracking in BWRs," that was transmitted to the BWRVIP by the Reference 1 letter identified above.

Please note that the response to RAI-4 states that BWRVIP will withdraw BWRVIP-104 in its entirety and reinstitute the inspection guidance published in BWRVIP-38 for examination of the shroud support welds. This change in position is based on a revised analytical evaluation of cracking in the H9 weld, results of inspections performed to date and level of complexity to inspect the Alloy 182 weld of H9.

The updated analytical evaluation is included as Attachment A to this RAI response. The results of the updated analysis show that postulated transverse and circumferential cracking in H9 will not reach a critical size in the RPV shell for a period of 60 years. The updated analysis and the BWRVIP-38 report confirms large flaw tolerance both from the viewpoint of shroud support load carrying capability and structural integrity of the vessel even considering crack growth into the vessel wall.

4 Encls forwarded to: Meena Khanna 7/14/06

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The enclosed document contains proprietary information. Therefore, the request to withhold the BWRVIP-104 report from public disclosure that was transmitted to the NRC by the Reference 2 letter identified above also applies to the enclosed document.

If you have any questions on this subject please contact George Inch (Constellation Energy Group, BWRVIP Assessment Committee Technical Chairman) by telephone at 315.349.2441 or by e-mail at george.inch@constellation.com.

Sincerely,

William A Eaton

William A. Eaton
Entergy Operations, Inc.
Chairman, BWR Vessel and Internals Project