

From: Undine Shoop *EDS*
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Date: Wed, May 9, 2007 10:38 AM
Subject: Letter from NEI

All,

As we discussed in today's meeting, attached is the NEI evaluation of the exponent report.

Undine

CC: Chris Miller; Sharon Sarna; Undine Shoop

Release

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Subject: Letter from NEI
Creation Date Wed, May 9, 2007 10:37 AM
From: Undine Shoop

Created By: USS@nrc.gov

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Summary Report
May 2007

**Effect of Exponent Analysis of
Davis-Besse Reactor Vessel Head Wastage Event
On Industry Inspection Programs**

Summary Report

Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, D.C. 20006-3708

Handwritten signature



NUCLEAR ENERGY INSTITUTE

Marvin S. Fertel
SENIOR VICE PRESIDENT AND
CHIEF NUCLEAR OFFICER

May 9, 2007

Mr. Luis A. Reyes
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Reyes:

The FirstEnergy Nuclear Operating Company (FENOC) docketed a May 2, 2007, letter responding to four specific issues raised by the NRC staff regarding the Exponent Failure Analysis Associates' technical report, "Review and Analysis of the Davis-Besse March 2002 Reactor Pressure Vessel Head Wastage Event." In the May 2nd letter, FENOC noted that they provided the Exponent report to NEI with a request that an evaluation be conducted to determine if the report calls into question the adequacy of the industry's operational monitoring or inspection programs or otherwise raise a potential generic safety concern.

NEI commissioned an expert panel to conduct an evaluation of the report. The findings and conclusions were reviewed with the NEI Materials Executive Oversight Group (MEOG) responsible for oversight and coordination of the industry programs involving management of materials issues. The MEOG concurred with the expert panel's findings. NEI also briefed the industry Chief Nuclear Officers of the evaluation and its conclusions. NEI provided the following in response to FENOC's request:

1. Do the crack growth rates and reactor pressure vessel (RPV) head wastage mechanisms identified in the report call into question the adequacy of the industry's monitoring and inspection programs?

Response: No. We believe the industry's materials monitoring programs are sound and will help maintain safe operation of nuclear power plants. The reported crack growth rates are within the industry data for primary water stress corrosion cracking of Alloy 600 materials documented in the EPRI Materials Reliability Program technical report, "Materials Reliability Program Crack Growth Rates for Evaluating Primary Water Stress Corrosion Cracking (PWSCC) of Thick-Wall Alloy 600 Materials (MRP-55)," Revision 1., TR 1006695. Further, the wastage mechanisms and rates are within the bounds described in the EPRI Boric Acid Corrosion Guidebook (TR - 102748).

Mr. Luis A. Reyes
May 9, 2007
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The industry's operational monitoring and inspection programs as they relate to managing degradation of Alloy 600 nozzles located in the RPV head are capable of preventing the type of conditions postulated the Exponent report.

2. Does the information in the report raise a potential generic safety concern?

Response: No. The expert panel reviewed the reported crack growth rates and RPV head wastage analyses and concluded there is no new potential generic safety concern. Plant safety is not jeopardized because the postulated crack growth rates are within the distribution considered for nozzle cracking and the wastage rates are consistent with upper bounds of boric acid corrosion. This coupled with the industry's operational monitoring and inspection programs will continue to assure plant safety.

I have enclosed for your information a copy of the expert panel's summary report containing further details supporting the responses summarized above. Please contact me directly or Jay K. Thayer at 202.739.8112, jkt@nei.org should you have any questions.

Sincerely,



Marvin S. Fertel

Enclosure

c: William F. Kane, Deputy Executive Director, NRC
James E. Dyer, Director, NRC
John A. Grobe, Associate Director, NRC
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