

2008-080 _____ BWR Vessel & Internals Project (BWRVIP)

March 7, 2008

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

Attention: Jon Thompson

Subject: Project No. 704 – Clarification Regarding NRC Review of BWRVIP-03, Revision 10

- References:
1. BWRVIP Letter 2008-048 from Rick Libra (BWRVIP Chairman) to Document Control Desk (NRC), "Project No. 704 – TR-105696-R10 (BWRVIP-03) Revision 10: BWR Vessel and Internals Project, Reactor Pressure Vessel and Internals Examination Guidelines," dated February 12, 2008
 2. Letter from Jack R. Strosnider (NRC) to Carl Terry (BWRVIP Chairman), "Final Safety Evaluation of BWR Vessel and Internals Project, Reactor Pressure Vessel and Internals Examination Guidelines (BWRVIP-03) Revision 1 (TAC NO. M95369)," dated July 15, 1999
 3. Letter from William H. Bateman (NRC) to Carl Terry (BWRVIP Chairman), "Clarification to NRC Review of BWRVIP-03," dated September 21, 2001
 4. Letter from Matthew A. Mitchell (NRC) to Bill Eaton (BWRVIP Chairman), "Request for Additional Information - Review of BWR Vessel and Internals Project Report, BWRVIP-03, Revision 6, Reactor Pressure Vessel and Internals Examination Guidelines," dated June 23, 2006

The purpose of this letter is to provide clarification regarding the NRC review of the BWRVIP document entitled "TR-105696-R10 (BWRVIP-03) Revision 10: BWR Vessel and Internals Project, Reactor Pressure Vessel and Internals Examination Guidelines" that was submitted to the NRC by the Reference 1 letter identified above.

The original version of BWRVIP-03 was submitted to the NRC in 1995. The BWRVIP updates and publishes a revised version of the BWRVIP-03 document every year, primarily to incorporate new nondestructive examination (NDE) demonstrations performed throughout the year. The NRC issued a Safety Evaluation (SE) of BWRVIP-03, Revision 1, in 1999 (Reference 2 above) and a subsequent clarification letter in 2001 (Reference 3 above). The SE approved BWRVIP-03, Revision 1, and the clarification letter indicated that the NRC will continue to review future BWRVIP-03 revisions as they are submitted, however, if the NDE demonstration and documentation process established in the BWRVIP-03 report are not significantly changed, then the NRC will not issue SEs on later revisions. NRC SEs have not been issued on any revisions to BWRVIP-03 after Revision 1.

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In 2006, the NRC transmitted a Request for Additional Information (RAI) on BWRVIP-03, Revision 6, to the BWRVIP (Reference 4). BWRVIP-03, Revision 10, includes some important changes to visual inspection requirements that were made in response to NUREG-6860 findings and the BWRVIP's own remote visual examination research, which also relate to questions 2.5.3.5 and 2.5.5.1 from the RAI. The revised visual inspection requirements include the following changes:

<u>Affected Section(s)</u>	<u>Description of Change</u>
2.5, Para. 3.6	Changed the definition of Enhanced VT-1 (EVT-1) from requiring ½ mil resolution to requiring the capability of resolving the ASME Code Section XI VT-1 0.044 inch characters.
2.5, Para. 5.1	Deleted the requirement for the ½ mil Sensitivity, Resolution and Control Standard (SRCS) and added the requirement for ASME Code Section XI VT-1 0.044 inch characters as a required SRCS.
2.5, Para. 6.3.2	Updated to reflect requirement for resolving the ASME Code Section XI VT-1 0.044 inch characters.
2.5, Para. 6.5.5	Added requirement for camera motion (speed) during examination to not exceed 0.5 inch/sec.
2.5, Para. 6.5.6	Changed requirement for camera angle to not exceed 30 degrees from perpendicular to the surface (previously EVT-1 defaulted to Code VT-1 requirement of not to exceed 60 degrees).

The BWRVIP suggests that the NRC review of BWRVIP-03, Revision 10, focus on the affected sections identified above that include changes to visual inspection requirements. The other changes in Revision 10 are either editorial or simply documentation of new NDE technique demonstrations performed in accordance with previously identified and approved processes.

If you have any questions on this subject, please call Chuck Wirtz (FirstEnergy, BWRVIP Integration Committee Technical Chairman) at 440.280.7665.

Sincerely,



Rick Libra
Exelon
Chairman, BWR Vessel and Internals Project