

2008-267 \_\_\_\_\_ BWR Vessel & Internals Project (BWRVIP)

September 22, 2008

Vanice Perin  
U. S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

PROJ 704

Subject: BWRVIP Response to NRC Request to Publish a "-A" Version of BWRVIP-03  
(Reactor Pressure Vessel and Internals Examination Guidelines)

- References:
1. Letter from Mark J. Maxin (NRC) to Rick Libra (BWRVIP Chairman), "Safety Evaluation for Electric Power Research Institute (EPRI) Boiling Water Reactor Vessel and Internals Project (BWRVIP) Report TR-105696-R6 (BWRVIP-03), Revision 6, 'BWR [Boiling Water Reactor] Vessel and Internals Project Reactor Pressure Vessel and Internals Examination Guidelines' (TAC NO. MC2293)," dated June 30, 2008.
  2. Letter from William H. Bateman (NRC) to Carl Terry (BWRVIP Chairman), "Clarification to NRC Review of BWRVIP-03," dated September 21, 2001.

The purpose of this letter is to provide the BWRVIP response to the NRC request in the Reference 1 letter identified above to publish a "-A" version of the report entitled "TR-105696-R6 (BWRVIP-03), Revision 6: BWR Vessel and Internals Project, Reactor Pressure Vessel and Internals Examination Guidelines."

The BWRVIP publishes a revision to the BWRVIP-03 report every year. These revisions primarily contain documentation of new examination demonstrations and related technology development. The current version of BWRVIP-03 is Revision 10. Thus, four (4) revisions to the BWRVIP-03 report have been published since the version that was the basis for the NRC Safety Evaluation (SE) in Reference 1. That SE did not place any conditions or limitations on the use of BWRVIP-03 so no changes to the report would be needed to reflect the NRC position. Furthermore, the Reference 2 NRC letter noted that as long as the demonstration and documentation process established in the BWRVIP-03 report, as approved by the NRC staff, are not significantly changed, then the NRC staff will not issue SEs on these later revisions. The demonstration and documentation process in BWRVIP-03 has not changed since Reference 2 was issued.

For the reasons stated in the preceding paragraph, a revision to BWRVIP-03, Revision 6, to incorporate the SE and other documents as requested in the Reference 1 NRC letter would not be practical or beneficial. Therefore, the BWRVIP will not publish a "-A" version of BWRVIP-03, Revision 6. However, the BWRVIP will continue to submit to the NRC revisions to the

Together . . . Shaping the Future of Electricity

Addl copies  
sent to  
V Perin

6004  
NR

BWRVIP-03 report as they are published. The next revision to BWRVIP-03 (Revision 11) will be submitted to the NRC in early 2009.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Libra". The signature is fluid and cursive, with the first name "Rick" and last name "Libra" clearly distinguishable.

Rick Libra  
Exelon  
Chairman, BWR Vessel and Internals Project

c: Chuck Wirtz, FirstEnergy  
Rich Ciemiewicz, Exelon  
Randy Stark, EPRI  
Bob Carter, EPRI  
Jeff Landrum, EPRI