

MRP Materials Reliability Program _____ MRP 2009-005

January 12, 2009

Chief Financial Officer
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Request for Exemption of NRC Review Fees for *Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-Rev. 0)*. EPRI, Palo Alto, CA: 2008. 1016596
Ref: EPRI Project Number 689

Reference: MRP Letter 2009-004, Christian B. Larsen (EPRI) to Document Control Desk, U.S. Nuclear Regulatory Commission, Dated January 12, 2009, Report Transmittal

The purpose of this letter is to request that the document entitled "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-Rev. 0)", EPRI, Palo Alto, CA: 2008, 1016596, be exempt from NRC review fees in accordance with 10CFR170.11(a)(1)(iii)(A)(I).

MRP-227-Rev. 0 was submitted to the NRC by the referenced MRP letter, which indicates that the document is provided as a means of exchanging information for the purpose of supporting generic regulatory improvements related to methodologies for demonstrating pressurized water reactor (PWR) internals integrity throughout the life of the plant, including the extended period authorized by license renewal in accordance with 10CFR Part 54. In addition, many licensees have made commitments as part of power up-rate submittals to incorporate the applicable program elements of an industry reactor vessel internals inspection program.

The guidelines in MRP-227 serve as an effective means to address the aging of reactor internals components and meet or exceed NRC guidance provided in the Generic Aging Lessons Learned (GALL) Report (NUREG-1801). It is our understanding through numerous meetings between industry and NRC project staff that this Guideline is expected to be an important document for NRC staff to support agency reviews as discussed above. NRC review and acceptance of the MRP-227 document is the most efficient use of industry and NRC resources to support the agencies generic regulatory improvements in an area which is not fully addressed by current NRC regulations.

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Chief Financial Officer
January 12, 2009
2 of 2

MRP 2009-005

Since all PWR utilities are expected to use (and reference) MRP-227 in developing individual plant requests for NRC approval of reactor internals' aging management plans, NRC review of the document should substantially increase the efficiency and reduce the man-hours required for individual plant reviews.

If you have any questions on this subject please contact Anne Demma (ademma@epri.com, 650-855-2026).

Sincerely,



Christian B. Larsen
Nuclear Vice President and Chief Nuclear Officer

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