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MRP Materials Reliability Program MRP 2009-017

(via email)

February 6, 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

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

MRP letter 2009-005, Christian B. Larsen (EPRI) to Chief Financial Officer, U.S. Nuclear Regulatory Commission, Dated January 12, 2009, Request for Exemption of NRC Review Fees

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)(1).

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). The MRP will support the NRC in preparing the next revision of the GALL report and the applicable sections of Standard Review Plan (SRP) for the PWR internals components addressed by MRP-227-Rev. 0. The subject guideline is applicable to reactor internal structural components for B&W, Combustion Engineering, and Westinghouse designed PWRs. The guideline does not address fuel assemblies, reactivity control assemblies, or welded attachments to the reactor vessel in the PWR fleet. Any request for support from MRP

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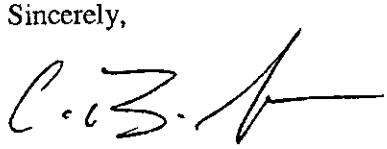
related to the MRP-227 is expected to follow the Request for Additional Information (RAI) process. It is also expected that once the NRC has completed the revision of the GALL report, it will be made available for public comment.

It is our understanding through numerous meetings between industry and NRC project staff that this Guideline is an important document for NRC staff to support agency actions as noted above. NRC review and acceptance of the MRP-227 document is the most efficient use of industry and NRC resources to support the agency's generic regulatory improvements in an area that is not fully addressed by current NRC regulations.

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.

EPRI MRP works in conjunction with NEI to manage the reactor internals project for the PWR industry. If you have any questions on this project, please contact Anne Demma at EPRI (ademma@epri.com, 650-855-2026) or Mike Melton at NEI (mam@nei.org, 202-739-8049).

Sincerely,



Christian B. Larsen Nuclear
Vice President and Chief Nuclear Officer

cc: Joe Hagan - First Energy
Mike Melton - NEI
Ted Sullivan - NRC
Denny Weakland - First Energy