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November 9, 2009

Mr. Rick Libra
Exelon
Chairman, BWR Vessel and Internals Project
Electric Power Research Institute
3420 Hillview Avenue
Palo Alto, CA 94304-1395

SUBJECT: DRAFT REVISED SAFETY EVALUATION (SE) FOR BOILING WATER REACTOR (BWR) VESSEL AND INTERNALS PROJECT (BWRVIP) TOPICAL REPORT (TR) BWRVIP-62, "BWR VESSEL AND INTERNALS PROJECT, TECHNICAL BASIS FOR INSPECTION RELIEF FOR BWR INTERNAL COMPONENTS WITH HYDROGEN INJECTION" (TAC NO. ME0043)

Dear Mr. Libra:

By letter dated December 31, 1998, as supplemented by letters dated August 1, 2001 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML012140408), May 19, 2003 (ADAMS Accession No. ML031430145), and December 17, 2004 (ADAMS Accession No. ML043560323), the Electric Power Research Institute (EPRI) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review and approval BWRVIP report TR-108705 (BWRVIP-62), "BWR Vessel and Internals Project, Technical Basis for Inspection Relief for BWR Internal Components with Hydrogen Injection." A non-proprietary version of BWRVIP-62 was sent on March 7, 2000, and is available in ADAMS under Accession No. ML003691748. BWRVIP-62 contains a discussion of the technical basis for relief from current inspection requirements for BWR reactor vessel internal components (RVIs) that are protected from intergranular stress corrosion cracking (IGSCC) by the injection of hydrogen into the reactor coolant.

On January 30, 2001, the NRC staff issued its initial SE (ADAMS Accession No. ML010370141) for BWRVIP-62. This SE contained open items which are described in more detail in Section 3.0 of this SE. In response to the open items contained in the NRC staff's SE dated January 30, 2001, the BWRVIP provided technical information related to the implementation of the BWR Vessel Internals Application (BWRVIA) model in a letter dated August 1, 2001, followed by supplemental information in letters dated May 19, 2003, and December 17, 2004. The NRC staff has reviewed the responses, and its comments and recommendations regarding these responses are stated in Section 3.0 of this SE.

On July 22, 2008, the NRC staff issued a revised SE (ADAMS Accession No. ML081700483) for BWRVIP-62. The BWRVIP reviewed this SE and identified a few technical inaccuracies and addressed its position on some of the mitigation aspects which were transmitted to the staff in letter dated October 30, 2008. The staff reviewed the BWRVIP's submittal, made appropriate technical corrections, and incorporated them into this draft revised SE. Attachment 1 of this draft revised SE contains a detailed explanation of the staff's review with respect to the BWRVIP's positions and the technical inaccuracies that were found in the staff's SE dated July 22, 2008. Enclosed for BWRVIP review and comment is a copy of the NRC staff's draft revised SE.

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Pursuant to Section 2.390 of Title 10 of the *Code of Federal Regulations* (10 CFR), we believe that the enclosed draft SE may contain proprietary information. Therefore, we will delay placing the draft SE in the public document room for a period of 10 working days from the date of this letter to provide you with the opportunity to comment on the proprietary aspects. If you believe that any information in the enclosure is proprietary, please identify such information line-by-line and define the basis pursuant to the criteria of 10 CFR 2.390. After 10 working days, the draft SE will be made publicly available, and an additional 10 working days are provided to you to comment on any factual errors or clarity concerns contained in the draft SE. The final SE will be issued after making any necessary changes and will be made publicly available. The NRC staff's disposition of your comments on the draft SE will be discussed in the final SE.

To facilitate the NRC staff's review of your comments, please provide a marked-up copy of the draft SE showing proposed changes and provide a summary table of the proposed changes.

If you have any questions, please contact Michael D. McCoppin at (301) 415-2737.

Sincerely,

/RA/

Stacey L. Rosenberg, Chief
Special Projects Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 704

Enclosure:
Draft SE

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R. Libra

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*No major changes to SE input

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