

2010-113 _____ BWR Vessel & Internals Project (BWRVIP)

May 12, 2010

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

Attention: Michael McCoppin

Subject: Project No. 704 – Clarification Regarding BWRVIP Implementation of
Limitations and Conditions in the NRC Final Safety Evaluation of BWRVIP-62

Reference: Letter from Thomas B. Blount (NRC) to Rick Libra (BWRVIP Chairman), “Final
Safety Evaluation for Boiling Water Reactor Vessel and Internals Project Topical
Report – 108705 (BWRVIP-62), BWR Vessel and Internals Project, Technical
Basis for Inspection Relief for BWR Internal Components with Hydrogen
Injection (BWRVIP-62) (TAC NO. ME0043),” dated April 21, 2010

The purpose of this letter is to provide clarification regarding BWRVIP implementation of limitations and conditions in the NRC final Safety Evaluation (SE) of the BWRVIP document entitled “BWRVIP-62: BWR Vessel and Internals Project, Technical Basis for Inspection Relief for BWR Internal Components with Hydrogen Injection (BWRVIP-62)” that was transmitted to the BWRVIP by the NRC letter referenced above.

BWRVIP-62 and the final SE address two mitigation techniques: 1) moderate hydrogen water chemistry (HWC) and 2) traditional noble metal chemical application (NMCA). However, since the publication of BWRVIP-62, the additional mitigation technique of on-line NMCA has been developed and implemented. Although not addressed in BWRVIP-62, the mitigation effects of on-line NMCA are much the same as traditional or classic NMCA. Therefore, the BWRVIP has advised member utilities that BWRVIP plants utilizing on-line NMCA can implement inspection relief for BWR internal components subject to the limitations and conditions for NMCA plants in the NRC final SE on BWRVIP-62. This position is effective immediately.

As requested in the NRC final SE, the BWRVIP will be working to submit BWRVIP-62-A to the NRC in the near future. Subsequent to that submittal, the BWRVIP will then also prepare a BWRVIP-62, Revision 1 for submittal to the NRC that will include on-line NMCA. Upon completion of NRC review of BWRVIP-62, Revision 1, if the NRC imposes different limitations and conditions on plants implementing inspection relief using on-line NMCA as compared to traditional or classic NMCA, the BWRVIP will revise recommendations to the BWRVIP utilities as necessary.

Together . . . Shaping the Future of Electricity

Add: M. McCoppin
to ERIPB

6004
KRR

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 that reads "Rick Libra". The signature is written in a cursive, slightly slanted style.

Rick Libra
Exelon
Chairman, BWR Vessel and Internals Project

c: Matt Mitchell, NRC
Ganesh Cheruvenki, NRC