

**MRP** Materials Reliability Program \_\_\_\_\_ MRP 2010-033

(via email)

May 19, 2010

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

**Subject:** Request for Exemption of NRC Review Fees for *Reactor Internals Acceptance Criteria Methodology and Data Requirements, WCAP-17096-NP, Revision 2 December 2009*

**Reference:** 1) MRP Letter 2010-034, Terry McAlister (EPRI MRP) to Tanya Mensah (NRC), U.S. Nuclear Regulatory Commission, Dated May 19, 2010, Report Transmittal  
2) EPRI report "*Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-Rev. 0)*," EPRI Palo Alto, CA, 2008, 1016596.  
3) MRP Letter 2009-004, Christian B. Larsen (EPRI) to Document Control Desk, U.S. Nuclear Regulatory Commission, Dated January 12, 2009, Report Transmittal  
4) Letter, J. E. Dyer, NRC to Christian B. Larson, EPRI, Review Fee Waiver Acceptance, Dated February 20, 2009

The purpose of this letter is to request that the document entitled "*Reactor Internals Acceptance Criteria Methodology and Data Requirements*", WCAP-17096-NP, Revision 2, December 2009, be exempt from NRC review fees in accordance with 10CFR170.11(a)(1)(iii)(A)(1).

WCAP-17096, Revision 2, was submitted to the NRC requesting a Safety Evaluation by Reference 1, 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.

WCAP-17096 is a companion document to MRP-227 (Reference 2 submitted to the NRC by Reference 3) and is to be used in conjunction with MRP-227. (Reference 4 granted the review-fee waiver for MRP-227.) The guidelines in MRP-227 and WCAP-17096 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

Together . . . Shaping the Future of Electricity

**PALO ALTO OFFICE**

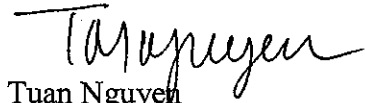
3420 Hillview Avenue, Palo Alto, CA 94304-1338 USA • 650.855.2000 • Customer Service 800.313.3774 • www.epri.com

understanding through numerous meetings between industry and NRC project staff that these documents are expected to be important for NRC staff to support agency reviews as discussed above. NRC review and acceptance of MRP-227 and WCAP-17096 is the most efficient use of industry and NRC resources to support the agency's generic regulatory improvements in an area which is not fully addressed by current NRC regulations.

Since all PWR utilities are expected to use and reference MRP 227 and WCAP-17096 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 Christine King ([cking@epri.com](mailto:cking@epri.com), 650-855-2164) or Chuck Welty ([cwelty@epri.com](mailto:cwelty@epri.com), 650-855-2371).

Sincerely,



Tuan Nguyen

Director, Nuclear Business Operations

Cc: James Lash, First Energy  
Terry McAlister, SCANA  
James Cirilli, Exelon  
James Molkenhain, Westinghouse  
Tanya Mensah, NRC  
Victoria Anderson, NEI  
Christine King, EPRI  
Chuck Welty, EPRI  
Anne Demma, EPRI

Together . . . Shaping the Future of Electricity

**PALO ALTO OFFICE**

3420 Hillview Avenue, Palo Alto, CA 94304-1338 USA • 650.855.2000 • Customer Service 800.313.3774 • [www.epri.com](http://www.epri.com)