



NUCLEAR ENERGY INSTITUTE

James H. Riley
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NUCLEAR GENERATION DIVISION

June 9, 2010

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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Reference:

1. NRC (S.L. Rosenberg) letter to NEI (J.H. Riley) dated March 25, 2010, *Draft Safety Evaluation for Nuclear Energy Institute Topical Report Materials Reliability Program (MRP): Technical Basis for Preemptive Weld Overlays For Alloy 82/182 Butt Welds In Pressurized Water Reactors (MRP-169) (TAC No.MD8005)*
2. NEI letter to NRC dated April 23, 2010, *Industry Comments on Draft Safety Evaluation for MRP-169 Revision 1*

Subject: Additional Industry Comments on Draft Safety Evaluation for MRP-169, Revision 1

Project Number: 689

On April 23, 2010, NEI submitted comments on the Draft Safety Evaluation Report (SER) on Topical Report "Materials Reliability Program (MRP): Technical Basis for Preemptive Weld Overlays of Alloy 82/182 Butt Welds in PWRs (MRP-169)". This letter contains additional industry comments that the Nuclear Energy Institute (NEI)¹ is submitting on behalf of the industry.

During discussion on May 4, 2010 with Mr. Kenneth Karwoski (NRC representative) at the ASME code Working Group on Welding, it was noted that some discrepancies exist between the language in the Draft SER and MRP-169-1. These discrepancies relate to the crack tip stress intensity factor magnitude. This letter documents our comments on the discrepancy. The industry respectfully requests that the NRC consider these additional comments prior to issuing the final SER on MRP-169.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

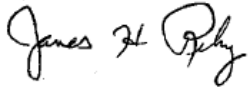
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If you have any questions on this matter, please contact me at 202-739-8137; jhr@nei.org or Eric Willis at 650-855-2023; ewillis@epri.com.

Sincerely,

A handwritten signature in black ink that reads "James H. Riley". The signature is written in a cursive style with a large initial "J" and "R".

James H. Riley

Attachment

c: Ms. Tanya M. Mensah, NRR/DPR/PLPB, NRC
Mr. Timothy R. Lupold, NRR/DCI/CPNB, NRC
Mr. John C. Tsao, NRR/DCI/CPNB, NRC

Mr. E. Willis, EPRI

Ms. C. King, EPRI

Mr. P. Riccardella, Structural Integrity