

NEIL WILMSHURST
Vice President and
Chief Nuclear Officer

January 19, 2011

Attention: Sheldon Stuchell
Document Control Desk
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Dear Sheldon:

Subject: Transmittal of RAI Response on Report; *Nondestructive Evaluation: Probabilistic Risk Assessment Technical Adequacy Guidance for Risk-informed Inservice Inspection Programs*. EPRI, Palo Alto, CA: 1021467

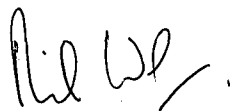
Ref. EPRI Project Number 669

Enclosed are responses to a Request for Additional Information (RAIs) issued on EPRI Report "Nondestructive Evaluation: Probabilistic Risk Assessment Technical Adequacy Guidance for Risk-informed Inservice Inspection Programs." EPRI, Palo Alto, CA: 1021467. This report was transmitted as a means of exchanging information with the NRC for the purposes of supporting generic regulatory improvements with respect to application of risk-informed technology to inservice inspection (RI-ISI) programs.

EPRI report 1021467 has been developed to provide guidance in defining which technical elements and supporting requirements of the plant PRA are applicable to RI-ISI programs. Also, for those supporting requirements that are applicable to RI-ISI programs, this report provides guidance on the appropriate capability category. This guidance is provided for both EPRI's traditional RI-ISI methodology (EPRI TR-112657) and our streamlined RI-ISI methodology (ASME Code Case N716).

If you have any questions on this subject, please contact Patrick O'Regan (poregan@epri.com, 508-497-5045).

Sincerely,



D035
NRR

Additional Clarification for Table 2-3 of EPRI Report 1021467

Sec ID 2008 (2009)	PRA Std// RG-1.200 Assessment	Action to be taken	Basis for why difference will not be significant for RI-PS/ISI Applications
IE-A3 (IE-A3)	Plant-specific experience may not be available Can be met at 1 st Period	Initially use generic experience and update as part of the RI-ISI living program requirement	See Note 1
IE-A3a (IE-A4)	CCI/II can be met partially as some components may be unique	Initially use generic analyses and update as part of the RI-ISI living program requirement	See Note 2
IE-C1b (IE-C3)	Procedures may not be available Can be met at Fuel Load	Analysis can be done using assumptions about the "as anticipated" to be operated plant and updated as part of the RI-ISI living program requirement	See Note 3
IE-C9 (IE-C11)	Procedures may not be available Can be met at Fuel Load	Analysis can be done using assumptions about the "as anticipated" to be operated plant and updated as part of the RI-ISI living program requirement	See Note 3
IE-C12 (IE-C14)	Procedures may not be available Can be met at Fuel Load	Analysis can be done using assumptions about the "as anticipated" to be operated plant and updated as part of the RI-ISI living program requirement	See Note 3
AS-A5 (AS-5)	Procedures may not be available Can be met at Fuel Load	Analysis can be done using assumptions about the "as anticipated" to be operated plant and updated as part of the RI-ISI living program requirement	See Note 3
AS-B5a (AS-B6)	Procedures may not be available Can be met at Fuel Load	Analysis can be done using assumptions about the "as anticipated" to be operated plant and updated as part of the RI-ISI living program requirement	See Note 3