



NUCLEAR ENERGY INSTITUTE

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February 28, 2011

Mr. James E. Dyer
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NRC Endorsement of MRP-287, "Materials Reliability Program: Primary Water Stress Corrosion Cracking (PWSCC) Flaw Evaluation Guidance"

Project Number: 689

Dear Mr. Dyer:

In November 2009 the NRC held a public meeting on primary water stress corrosion cracking flaw evaluation procedures. Flaw evaluation experts representing industry and the U.S. Nuclear Regulatory Commission (NRC) staff reviewed the ASME Code Section XI flaw evaluation process and its required inputs. Consensus guidance was discussed emphasizing the attributes most important to achieving consistent results with greater inherent credibility. These results were distilled into the detailed written guidance presented in MRP-287, "Materials Reliability Program: Primary Water Stress Corrosion Cracking (PWSCC) Flaw Evaluation Guidance". The purpose of this letter is to communicate our intent to seek NRC endorsement of MRP-287 and to request a waiver of the associated NRC review fees.

MRP-287 received extensive input from industry experts and NRC during its development. Its use in the preparation of relevant relief requests and other licensing submittals are expected to streamline the approval process. In recent discussions, the Staff indicated that it was generally pleased with the content of MRP-287 and is interested in endorsing it in order to provide a single guidance document that is accepted by both the industry and NRC. Industry supports this approach.

We believe NRC review of MRP-287 is exempt from the fee recovery provision contained in 10 CFR Part 170. Generic approval of this guidance document by NRC for industry-wide use will ensure that both the industry and NRC have consistent expectations for PWSCC flaw evaluation. Review fees in such cases are exempted under §170.11, Exemptions, Subpart (a) (1) (iii). This provision states, (a) "No application fees, license fees, renewal fees, inspection fees, or special project fees shall be

Mr. James E. Dyer

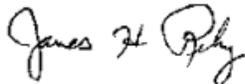
February 28, 2011

Page 2

required for...(1) A special project that is a request/report submitted to the NRC--(iii) As a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts."

We request that the NRC communicate its decision regarding the fee waiver prior to our submittal of MRP-287. If you have any questions on these matters, please feel free to contact me at 202-739-8137 or forward your response to jhr@nei.org.

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

c: Mr. Shelton S. Stuchell, NRC
Mr. Craig Harrington, EPRI