

MRP Materials Reliability Program _____ MRP 2011-006
(via email)

May 10, 2011

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

Subject: Comments and Recommended Changes Regarding NRC Draft Safety Evaluation of
MRP-227 Rev. 0

Reference: 1) NRC Letter John Jolicoeur (NRC) to Neil Wilmshurst (EPRI), "DRAFT SAFETY EVALUATION FOR THE ELECTRIC POWER RESEARCH INSTITUTE'S TOPICAL REPORT (TR) MATERIALS RELIABILITY PROGRAM (MRP) REPORT 1016596 (MRP-227), REVISION 0, "PRESSURIZED WATER REACTOR (PWR) INTERNALS INSPECTION AND EVALUATION GUIDELINES" (TAC NO. ME0680), dated March 28, 2011.

- Attachment 1: Table of MRP proposed changes to the draft SE that lists an item number, the location of the proposed change in the draft SE, the MRP change or issue and a discussion of each comment or issue.
- Attachment 2: Supplemental notes to select items identified in the 'Discussion' column of the Attachment 1 table.
- Attachment 3: Copy of the draft SE that includes the proposed additions in red type and underlining and proposed deletions in red type and strikethroughs. This attachment also includes the item number from the Attachment 1 table in blue shading to easily locate the proposed changes in the draft SE.

To Whom It May Concern:

The purpose of this letter is to provide the NRC with MRP comments and recommended changes to the draft Safety Evaluation of MRP-227, Rev. 0, transmitted to the MRP by Reference 1. Reference 1 requested that the MRP provide these comments and recommendations which are included in Attachments 1 through 3. Two (2) copies of each attachment are provided. A fourth attachment requested by the staff identifying proposed changes to MRP-227 Rev. 0 resulting from MRP review of the draft SE that will be included, verbatim, in MRP-227 Rev. A will be forwarded by separate letter by May 16, 2011.

The MRP also reviewed the staff non-concurrence (provided in Reference 1) along with the associated management endorsement and technical response. MRP agrees with the NRC position stated in the technical response. If you have any questions on this material, please

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contact Tim Wells (Southern Nuclear, MRP Chairman) at 205-992-7460, or Rick Reid (EPRI Reactor Internals Project Manager) at 704-595-2770.

Sincerely,



Tim Wells
Southern Nuclear Operating Company
Chairman, Materials Reliability Program

Cc: James Lash, First Energy
David Czufin, Exelon
Andrew Hon, NRC
Sheldon Stuchell, NRC (with 8 copies of Attachments 1-4)
Victoria Anderson, NEI
Anne Demma, EPRI
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