

PROJ0669



**MRP** Materials Reliability Program \_\_\_\_\_ MRP 2011-018  
(via email)

June 20, 2011

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

Subject: Comments and Recommended Changes Regarding NRC Draft Regulatory Issue  
Summary: License Renewal Submittal Information for Pressurized Water Reactor Internals  
Aging Management (ADAMS Number ML110950593)

Reference: 1) Draft NRC Regulatory Issue Summary, "License Renewal Submittal Information  
for Pressurized Water Reactor Internals Aging Management," (ADAMS Number  
ML110950593), June 10, 2011.

To Whom It May Concern:

The purpose of this letter is to provide the NRC with MRP comments and recommended changes to the draft Regulatory Issue Summary (RIS) on License Renewal Submittal Information for Pressurized Water Reactor Internals Aging Management (Reference 1). MRP has the following comments on the draft RIS:

- 1 Expectations for Category "A" and "B" (page 4 of 7 and associated table entries): Industry preference would be to base 12-month submittal/submittal revision deadlines on issuance of MRP-227-A rather than the RIS. This will ensure that the licensee submittals accurately incorporate all changes to MRP-227 agreed to during the RAI process and resulting from the final SE. These changes will not be captured in a consolidated document until MRP-227-A is issued. MRP-227-A is expected to be issued this year (that is, on or before December 31, 2011).
- 2 Expectations for Category "A" facilities (page 4 of 7): It is understood that any proposed deviations from MRP-227-A requirements be highlighted in revised AMP/inspection plan submittals. However, to clarify that associated technical justification for such deviations need not be submitted at the time of AMP/inspection plan submittal, suggest revision of the third sentence to read:

"Licensees of Category "A" facilities who propose in their resubmittal to deviate from provisions of MRP-227-A based upon having completed specific inspections will need to subsequently provide submit a justification for each deviation from the MRP-227-A guidelines."

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- 3 Table, Category "A" and "B" entries:
- a. For consistency, under the "Description" column, suggest "inspection program" be revised to read "inspection plan" as worded in the "NRC Expectations" column as this terminology is interpreted by MRP as describing the same documentation.
  - b. (comment only; no changes suggested) We understand that AMP/inspection plan indicates AMP and/or inspection plan, as applicable to individual facility commitments.
  - c. Consistent with the preceding comment, in some instances only an AMP or inspection plan is referenced. Suggest review of the document to ensure that in such cases it isn't more appropriate to reference "AMP/inspection plan." For example, the "NRC Expectations" column for Category "A" facilities indicates that "Licensees may withdraw their current *inspection plan* submittals ..." but the entry later indicates the licensees would "... resubmit *AMPs/inspection plans* ...."
- 4 Table, Category "C" entry, "NRC Expectations" column: For correctness and consistency with the associated text on page 4 of 7, suggest revising to read "...such that the submittal information identified in *the SE for* MRP-227-A would be submitted ...."
- 5 (editorial comment) Under "Intent" and throughout document: To avoid potential confusion, suggest using the acronym "RI" for reactor vessel internals since "RVI" is typically used as an acronym for reactor vessel integrity.
- 6 (editorial comment) Expectations for Category "C" facilities (page 4 of 7): For consistency, suggest use of the acronym "SE" rather than "SER."

If you have any questions on this material, please 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  
Sheldon Stuchell, NRC  
Victoria Anderson, NEI  
Anne Demma, EPRI  
David Steininger, EPRI

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