

June 12, 2015

Mr. Tim Hanley  
Senior Vice President West Operations, Exelon  
Chairman, BWR Vessel and Internals Project  
3420 Hillview Avenue  
Palo Alto, CA 94304-1395

SUBJECT: REVIEW STATUS OF ELECTRIC POWER RESEARCH INSTITUTE BOILING WATER REACTOR VESSEL AND INTERNALS PROJECT TOPICAL REPORT "BWRVIP-183 REPORT, BWRVIP VESSEL AND INTERNALS PROJECT – TOP GUIDE GRID BEAM INSPECTION AND FLAW EVALUATION GUIDELINES" (TAC NO. ME2178)

Dear Mr. Hanley:

By letter dated December 11, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML113140259), the U.S. Nuclear Regulatory Commission staff provided a draft safety evaluation (SE) on the Boiling Water Reactor (BWR) Vessel and Internals Project (BWRVIP) topical report (TR) BWRVIP-183, "BWRVIP Vessel and Internals Project – Top Guide Grid Beam Inspection and Flaw Evaluation Guidelines." The draft SE was provided to the BWRVIP to review it for proprietary information and for factual errors or clarity concerns. In parallel with the review, the NRC updated the Generic Aging Lessons Learned (GALL) Report, NUREG-1801, including reference to BWRVIP-183 in anticipation of its acceptance.

After reviewing the draft SE, the BWRVIP made a verbal request that the NRC withhold issuance of the final SE to give the BWRVIP an opportunity to address the conditions and limitations in the draft SE. This request was reaffirmed in an email dated March 12, 2015, from Mr. Chuck Wirtz representing the BWRVIP. In this email Mr. Wirtz indicated that the BWRVIP still plans to respond to the unexpected conditions that were included in the draft SE. Also, Mr. Wirtz further indicated that the BWRVIP's response is in the final draft stages and is expected to be in the BWRVIP's committee review process in the near future.

Currently, there are several plants that have submitted license renewal applications that reference BWRVIP-183. If the NRC staff does not issue a final SE on BWRVIP-183, there will not be an NRC-approved BWRVIP-183 available for use, and licensees and license renewal applicants will not be able to reference this report to address inspections and aging management of top guides. Therefore, licensees will need to provide justifications for changes to top guide inspections on a plant-by-plant basis. Further, current license renewal applicants will need to provide plant-specific aging management programs or activities to address aging of top guides.

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After considering the BWRVIP's request, in light of the license renewal applications currently before the NRC, the NRC staff has determined that it can no longer hold this review in abeyance. The NRC staff believes that withholding the SE an amount of time that would be required to resolve the technical issues that resulted in the inclusion of the conditions and limitations in the draft SE would be inimical to the regulatory process. Thus, the NRC staff will proceed with issuing the draft SE as final in the near future.

If the BWRVIP would like to complete actions as originally requested in the December 11, 2011, letter, please provide this within 30 days of the date of this letter.

If you have questions regarding this matter, please contact Joseph Golla of my staff at 301-415-1002 or [Joe.Golla@nrc.gov](mailto:Joe.Golla@nrc.gov).

Sincerely,

*/RA/*

Anthony J. Mendiola, Chief (HCruz for)  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Project No. 704

T. Hanley

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Office of Nuclear Reactor Regulation

Project No. 704

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