EPRI | ELECTRIC POWER RESEARCH INSTITUTE

2015-040______________________________________BWR Vessel & Internals Project (BWRVIP)

April 20, 2015

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

Attention: Joseph Holonich

Subject: Project No. 704 – Withdrawal of BWRVIP report, "BWRVIP-194: BWR Vessel and Internals Project, Methodologies for Demonstrating Steam Dryer Integrity for Power Uprate," EPRI Technical Report 1016578, October 2008

References:

1. BWRVIP Letter No. 2008-342 from Rick Libra (BWRVIP Chairman) to Vanice Perin (NRC), Project No. 704 – Re-Transmittal of BWRVIP-194: BWR Vessel and Internals Project, Methodologies for Demonstrating Steam Dryer Integrity for Power Uprate, dated October 31, 2008 (ML083640370)
2. BWRVIP Letter 2011-159 from Dave Czufin (BWRVIP Chairman) to Andrew Hon (NRC), Project No. 704 – BWRVIP Response to NRC Request for Additional Information on BWRVIP-194, dated September 8, 2011 (ML11255A326)

The purpose of this letter is to inform the NRC that the BWRVIP is withdrawing BWRVIP-194 from NRC review.

The purpose of BWRVIP-194 was to obtain a generically approved methodology for demonstrating steam dryer integrity for power uprate conditions. It was submitted to the NRC for review and approval on October 31, 2008 via reference 1. Although the review of BWRVIP-194 was well along in progress, in the Fall of 2013 the NRC informed the BWRVIP that they did not plan to continue the review of BWRVIP-194 because they were not aware of any further plants that were planning extended power uprates. The economic environment for the power industry had changed such that several plants had cancelled their planned extended power uprates and no further plants were in the cue. With no further uprates planned, the utility need for a generic steam dryer analysis methodology no longer existed. The BWRVIP considered withdrawing BWRVIP-194 from NRC review at that time, but instead asked the NRC to put their review of BWRVIP-194 on hold for about one year while the BWR industry gauged whether there may be a resurgence in plants seeking power uprates. The year has passed and there is no indication that there will be enough of a resurgence in plant submittals for extended power uprate to warrant approval of a generic analysis methodology.

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NRR

Designated Original
July 13, 2015
Joseph Holonich

Since BWRVIP-194 and the RAI responses contained 3rd party proprietary information, please provide confirmation that the hard copies of the reports and RAI responses that were provided by references 1 and 2 have been destroyed.

If you have any questions on this subject please call Ron DiSabatino, Exelon, BWRVIP Assessment Committee Technical Chairman, at 717.456.3685.

Sincerely,

A. O. McGehee   Tim Hanley

Andrew McGehee, EPRI, BWRVIP Program Manager
Tim Hanley, Exelon Corp., BWRVIP Chairman

Agencywide International Travel Step-by-Step Checklist

Updated: 6/19/15

Pre-Travel Activities

Stage 1: Consultation / Coordination Activities
(Begin 2mo. before departure)

- Consultation Activities
- Coordination with Staff
- Request Passports and Visas
- Review Procedures

Stage 2: Travel Authorization Activities
(DUE 30 days before departure)

- Authorization/Hotel-Flight
- Pre-Trip Notification /EDO Daily
- Form 445
- Country Clearance

Stage 3: Preparatory amd Logistics Activities

- Counterintelligence Briefing
- Health Immunizaitons
- Technical Presentations
- Electronic Equipment
- Confirm Country Clearance
- Miscellaneous Activities

During Travel Activities

- Communicate Urgent Information

Post-Travel Activities

- Communicate Important Information
- Counterintelligence Questionnaire
- Travel Voucher (5 BUSINESS days upon return)
- Trip Report (15 BUSINESS days upon return)

DOCUMENTING TIME SPENT ON INTERNATIONAL ACTIVITIES

On January 22, 2015, the Office of the Chief Financial Officer (OCFO) issued new Task Assignment Control (TACs) numbers for supporting international activities (YA 2015-0111). These TACs were centralized and are specific to individual business lines. For further information and business line-specific definitions of these TACs, please refer to the i-Travel TAC list.

Generally, every year, the offices will conduct a travel call during the summer months to identify proposed trips for the upcoming Fiscal Year. These trips will be entered in i-Travel, the agencywide tracking system for international trips. Prior to entering the information, the staff should reference data for previous years and coordinate with staff in other offices to avoid duplicative entries. Office management will then review the data and will approve or reject the entries by taking in consideration the available budget and the potential benefit to the organization. There will be emergent requests that come up unexpectedely and will need to be reviewed after the travel call closes. Detailed guidance on the preparatory activities for supporting international travel is included below.

PRE-TRAVEL ACTIVITIES

STAGE 1: CONSULTATION/COORDINATION ACTIVITIES (Begin at least 2 months before departure)

☐ **CONSULT WITH MANAGEMENT, INTERNATIONAL LIAISON AND OIP DESK OFFICER**

- **Consult with your immediate supervisor and your office International Liaison -** Discuss purpose, expected outcomes, and alignment issues. The International Liaison will be able to confirm if there are sufficient funds to support the trip.
- **Consult with OIP Desk Officer** - The OIP desk officer can provide advice and information related to foreign travel and the country or international agency to be visited. They can also provide advice on whether coordination at the Commission level is needed.

☐ **COORDINATE AT STAFF LEVEL**

- As a general practice, travelers should search i-Travel for trips to the same function/event that will be supported by other offices. Travelers are also encouraged to take advantage of the i-Travel multi-office trip database to determine if the proposed meeting typically requires multi-office coordination. **If 4 or more travelers are involved, the lead office should be identified at the staff level.** Typically, the Program Office sponsoring the trip and generally having the most travelers is the lead office and is responsible for consolidating and issuing the pre-trip notification and the trip report.
- The lead office or traveler creates a **NEW TRIP** in i-Travel to obtain management approval. Certain offices require their travelers to identify the trip's priority. For further information and office-specific definitions of these priorities please refer to the i-Travel priority list.
- As appropriate, coordinate with staff members in your office, other NRC Headquarters offices, Regional staff, and staff in other agencies to ensure alignment in NRC and U.S. Government positions.

☐ **REQUEST/OBTAIN OFFICIAL PASSPORT AND VISA**

The Department of State (DOS) recommends that government travelers use an official passport, whenever possible. If traveling with a Commissioner, an official passport is preferred. The official passport or personal passport, should be valid for at least 6 months after the completion of the trip. If your passport will not be valid, depending on your destination, your passport may have to be renewed prior to departure. Obtaining a passport and visa may require 60 days or more to process. Travelers should consider beginning this process as soon as possible.

- Contact the OIP Passport and Visa Specialist (passports.resource@nrc.gov) to determine whether a passport or visa is required. The specialist will provide a list of required documentation and forms. Consult DOS guidance, as needed.
- Passport photos can be provided by AVPhoto. Make an appointment by emailing AV-PHOTO.Resource@nrc.gov with CC to passports.resource@nrc.gov.

☐ **REVIEW INTERNATIONAL TRAVEL PROCEDURES**

- Travelers should review guidance documents on international travel found in Management Directive 5.13, and OEDO Procedure-0290.
- Travelers are also encouraged to complete the online international travel training course available via iLearn (Course ID 1661).

The following international travel package items should be made available **30 CALENDAR days before the trip start date**:

- Travel authorization - routed electronically via ETS2
- Form 445 and, if applicable, Form 279 and the invitation letter – provided to the respective office i-Travel Point of Contact
- Pre-trip notification – routed electronically via i-Travel (Note: *EDO Daily Note requirements may apply*)
- Country Clearance form – routed electronically via CountryClearance.Resource@nrc.gov

STAGE 2: TRAVEL AUTHORIZATION ACTIVITIES (30 CALENDAR days before departure)

☐ **COMPLETE TRAVEL AUTHORIZATION AND BOOK HOTEL/FLIGHT RESERVATIONS**

All travel authorizations should be processed via ETS2 (e-Travel), **with the exception of reimbursable trips** (i.e., trips that will not be paid by your office).

- Make hotel and flight reservations via ETS2. Afterwards, submit the electronic travel authorization via ETS2 or via Form 279. Form 279 is located in i-Travel and must be used **ONLY** when processing reimbursable travel. After obtaining your immediate supervisor's signature (i.e., Form 279 box 28), provide a copy of the form and the invitation letter acknowledging that the costs will be paid by an external source to your office i-Travel Point of Contact for review. Remaining signatures in the Form 279 will be obtained by OCFO.
- **ACCOUNTING CODES**: When processing the authorization use one of the international activities Accounting Codes (Job Codes). Please refer to the i-Travel Job Code list for the office-specific definitions of these codes.
- **PREMIUM TRAVEL** must be approved by the EDO or the Chairman. A justification must be sent via memo from the traveler's Office Director to the EDO or the Chairman. The premium travel training (iLearn Course ID 261) must be completed. Refer to Yellow Annoucement 2009-034 and frequently asked questions for additional guidance.

☐ **SUBMIT PRE-TRIP NOTIFICATION AND EDO DAILY NOTE**

The use of a paper pre-trip notification was discontinued in 2012. The pre-trip notification should be submitted electronically via i-Travel after obtaining management approval from all offices involved in the trip.

- When more than 1 traveler will participate, **a consolidated pre-trip notification** should be submitted by the lead office or the trip POC.
- Send the pre-trip notification to your **office distribution** via i-Travel. **Distribution of the pre-trip notification is due 30 CALENDAR days before the departure date (trip start date).**
  Note: When the decision to take the travel is made less than 30 days prior to the commencement of travel, the pre-trip notification is to be sent within **3 BUSINESS days** of the decision to undertake the travel.

The staff is required to issue an EDO Daily Note **ONLY for trips of 4 or more individuals.**

  - Add the pre-trip notification (i.e., email generated by i-Travel) to ADAMS. The document should be profiled as Non-Public, "Sensitive Internal Information - Periodic Review Required".
- Create an EDO Daily Note providing the number of travelers, purpose of the trip and the ADAMS Accession number for the pre-trip notification. Please refer to the i-Travel Daily Note examples for templates.
- Submit the EDO Daily Note via email to your Division Technical Assistant with CC to your office i-Travel Point of Contact. The lead office i-Travel Point of Contact will edit the trip in i-Travel to include the ML number.

☐ **SUBMIT FORM 445, REQUEST FOR APPROVAL OF OFFICIAL FOREIGN TRAVEL**

The Form 445 must be signed by the traveler's Office Director and the OIP Office Director. Air reservations are subject to cancellation by the airline if they are not ticketed at least 48 hours prior to departure. Plane tickets will not be issued unless a Form 445 is processed by OCFO. Once received, OCFO will provide the final ETS2 approval (CERTIFIED stamp).

- Complete the form available in i-Travel. List the OIP Desk Officer, your office i-Travel Point of Contact, and other applicable individuals, in box 11. NSIR staff should also list and obtain initials from the Division Director.
- Provide a copy of Form 445 to your office i-Travel Point of Contact for review and initials. The i-Travel Point of Contact will verify that all forms are complete and that the pre-trip notification has been sent out appropriately.
- Once the office i-Travel Point of Contact has reviewed/initialed the form, it will then be provided to the Office Director for signature. The traveler will be contacted once the Office Director's signature has been obtained.
- Provide the signed Form 445 (and, if applicable, the signed Form 279 and invitation letter) to the Administrative Assitants in the OIP Front Office (O-4D3). Once the OIP Director's signature is obtained, the documents will be scanned and emailed to OCFO. OIP will send the traveler an electronic copy for his/her records.

☐ **SUBMIT COUNTRY CLEARANCE INFORMATION**

- As required by DOS, complete the Country Clearance form available in i-Travel.
- Send the completed form via e-mail to CountryClearance.Resource@nrc.gov. Please include the destination city, and, if applicable, IAEA or NEA in the subject. A confirmation will be received (Subject: eCC [Info Only, No Action]).
  Note: The Clearance form contains PII information; thus, it should **ONLY** be sent to the email specified above.

STAGE 3: PREPARATORY AND LOGISTICS ACTIVITIES

☐ **REVIEW COUNTERINTELLIGENCE (CI) MEASURES**

- Government officials can be the target of intelligence agencies of other countries. If management approval has been obtained, the traveler will be prompted by i-Travel (~45 calendar days prior to departure) to contact the CI group in NSIR (CITravel.Resource@nrc.gov) to schedule a CI briefing, including information on country-specific personal security threats.
- Travelers should review the agency guidance on foreign travel CI and foreign travel information located in NSIR's SharePoint before departure, and the CI training available via iLearn (Course ID4361).

☐ **UPDATE HEALTH IMMUNIZATIONS**

Contact the NRC Health Unit (415-8400) or a Regional Health Center to consult on possible medical issues and precautions, including the possibility of getting any inoculations that are recommended, antibiotics, and educational materials. This is particularly important when travel is contemplated to developing nations, or away from main stream locations. Travelers can check recommended immunizations and health advisories in the CDC Web site.

☐ **SEEK APPROVAL OF AND DISTRIBUTE PRESENTATIONS (Begin preparatory activities 15 BUSINESS days before the departure. Distribution is due 1 WEEK before the departure date)**

Presentations to be provided to international audiences need to reviewed and approved by appropriate Branch and Division management. Refer to the OIP guidelines on how to prepare presentations for international audiences available in i-Travel under Help/Guidance. In accordance with OEDO Procedure-0350, the Office Director has the lead for determining if the presentation needs to be shared with the EDO and the Commission. Examples of presentations and speeches that should be submitted can be found in the referenced procedure. If the presentation or speech will be shared follow this guidance:

- Place the presentation in ADAMS
- Send an EDO Daily Note or One-Week Ahead input, using the format in OEDO Procedure-0350, Section 3.3.

In the rare occasion that policy issues will be discussed, the guidance in Management Directvie 3.9 should be used.

☐ **OBTAIN ELECTRONIC EQUIPMENT (15 BUSINESS days before the departure date) and Business Cards**

- Laptops, converters, calling cards, cell phones, and blackberries are available for international travel. If electronic equipment will be needed, submit a request via the OIS Customer Service Catalog. Provide a justification and specify that the equipment will be used during international travel.
- Contact your Administrative Assistant for information on how to obtain business cards.

☐ **REVIEW EMBASSY COUNTRY CLEARANCE**

Prior to departure, confirm that Country Clearance has been granted. The Department of State will send a notification to the traveler via email (Subject line: eCC [Info Only, No Action]). A copy of this email should be carried during the trip. If this email hasn't been received, immediately contact the OIP Desk Officer.

☐ **OTHER PREPARATORY ACTIVITIES**

- PREPARATORY WORK: The traveler is responsible for reading necessary background information and documents that will be discussed during the meeting and for researching current NRC and U.S. technical and policy positions.
- SECURITY TRAINING: Certain trips funded by the IAEA will require the staff to complete security training. It is the traveler's responsibility to complete the training and fax or email a copy of their completion certificate to IAEA.
- CONFIDENTIALLITY AGREEMENT: Some international organizations (e.g., IAEA) may request the traveler to sign a confidentiality agreement. OIP requests that the staff responds by stating "as a representative of the U.S. Government, I'm not required to sign the confidentiality agreement. For additional questions on this matter, please contact the U.S. Mission." Please CC the OIP Desk Officer and your office i-Travel Point of Contact.
- CONFERENCE REGISTRATION: IAEA / UN Conference Participants may receive an email from the Conference Registration staff requesting the staff to upload a JPEG photo in an effort to expedite the registration / badging process. If you don't have a business picture available, please contact the AVPhoto staff via the operator to schedule a photo session. Please note that the IAEA picture upload window is short. If the photo is provided, your badge will be processed and available in the registration desk at the Vienna International Centre (VIC). If a photo is not provided, one will have to be taken upon arrival at the VIC.
- EMBASSIES: Locate the closest U.S. Embassy and, if necessary, print maps of the area and the bus and metro systems. Also note the DOS's Regional Security Officer (RSO) name and phone for the visited country.
- PROTOCOL: Inform yourself of the basic cultural norms of the places being visited and read the Country Profile available in the OIP SharePoint portal. Travelers are also encouraged to complete the online course on Communicating Across Cultures available via iLearn (Course ID comm_26_a02_bs_enus).
- TRAVEL ITINERARY CONFIRMATION: The traveler is responsible for ensuring that airline tickets have been issued prior to departure. Please carry a copy of the ETS2 itinerary and the emergency travel agent contact information.

DURING TRAVEL ACTIVITIES

COMMUNICATE URGENT INFORMATION

It is the traveler's responsibility to communicate as soon as possible (via phone call, email, etc.) to his/her management, office International Liaison, and OIP Desk Officer any urgent information that needs to be transmitted to the Commission, EDO, or senior management.

POST-TRAVEL ACTIVITIES

☐ **COMMUNICATE IMPORTANT INFORMATION**

It is the traveler's responsibility to communicate as soon as practicable to his/her management, office International Liaison, and OIP desk officer any important information that needs to be transmitted to the Commission, EDO, or senior management.

☐ **COMPLETE COUNTERINTELLEGENCE (CI) POST-TRAVEL QUESTIONNAIRE**

Upon completion of your trip, i-Travel will prompt travelers to complete and submit a CI post-travel questionnaire via email to CITravel.Resource@nrc.gov. Upon receipt and review of the questionnaire, the CI group may contact the traveler for additional information and clarification.

☐ **SUBMIT TRAVEL VOUCHER**

All travel vouchers should be processed via ETS2 (e-Travel), **with the exception of reimbursable trips** (i.e., trips that will not be paid by your office). Issuance of the travel voucher is due **5 BUSINESS days after the completion of the trip.**

- REIMBURSABLE TRAVEL: Travelers that had to use a Form 279 for processing their travel authorization must complete their travel voucher by using Form 64, which is available in i-Travel. The traveler and his/her immediate supervisor should sign box 24 and box 25, respectively. The signed form should sent to OCFO via the travel box located in the lobby of TWFN-9 or via mail to Travel Payment Team MS T-9H4. OCFO requires that the original 'signed' forms are submitted to support travel audit activities.
- NSIR staff should provide the actual travel costs to the office i-Travel Point of Contact so that the office travel plan is updated

☐ **SUBMIT TRIP REPORT**

Trip reports must be issued **15 BUSINESS days after the completion of the trip.** The completion of the trip is the date the traveler returns to the office as specified in i-Travel and the Form 445.

- Complete the trip report form available in i-Travel
  - When more than 1 traveler participated in the meeting, a consolidated trip report should be developed.
  - Generally, the report should be as long as necessary to convey the significant issues and results of the trip.
  - Traveler should consult with his/her management, the office International Liaison, and the OIP Desk Officer when recommending that a trip report be provided to the Commission.
  - Generally, the report should be marked as "Official Use Only – Sensitive Internal Information"
- Place completed form and supporting documents or attachments in ADAMS
  - The report should be profiled as Non-Public, "Sensitive Internal Information – Periodic Review Required".
  - Trip reports would *not* normally be profiled as "Sensitive – Federal, State, Foreign Government and International Agency Controlled," unless the trip report contains information obtained from foreign or international agency documents that are marked sensitive.
- After obtaining the ADAMS number, send the trip report to your **office distribution** via i-Travel.
  - RESULTS ACHIEVED: Travelers must summarize and document the results achieved in i-Travel. Using a few concise bullets or paragraphs, the traveler should explain how the information obtained/shared at the meeting will inform our regulatory practices, and discuss how our participation at the meeting will benefit the NRC.

References:

- Management Directive 5.13, "NRC International Activities Practices and Procedures," dated June 6, 2008.
- Management Directive 3.9, "NRC Staff and Contractor Speeches, Presentations, Papers, and Journal Arcitles on Regulatory and Technical Subjects," dated November 1, 2011.
- OEDO Procedure – 0290, Revision 1, International Travel, dated March 29, 2011.
- OEDO Procedure – 0350, Revision 4, "EDO Daily Notes and One-Week Look-Ahead," dated November 1, 2010.