

From: [Carter, Bob](#)
To: [Holonich, Joseph](#)
Cc: cjwirtz@firstenergycorp.com; [McGehee, Andrew](#); Andrew.Odell@exeloncorp.com; [DiSabatino Jr, Ronald J:\(GenCo-Nuc\)](#); [Dyle, Robin](#)
Subject: RE: BWRVIP Response to New Potential BWRVIP-100, Rev. 1 RAI concerning the impact of the GE Safety Communications
Date: Wednesday, October 02, 2013 8:21:22 AM
Attachments: [Response to NRC concerning impact of GE Safety Communications on BWRVIP-100R1.docx](#)

Joe,

The response is attached. Thanks

Bob

From: Holonich, Joseph [<mailto:Joseph.Holonich@nrc.gov>]
Sent: Wednesday, October 02, 2013 6:44 AM
To: Carter, Bob
Subject: RE: BWRVIP Response to New Potential BWRVIP-100, Rev. 1 RAI concerning the impact of the GE Safety Communications

Bob,

Please resend with the attachment in the body of the email and, more importantly, removing the word draft. Then I will put into ADAMS and we're ready to go.

Thanks,

Joe

From: Carter, Bob [<mailto:bcarter@epri.com>]
Sent: Friday, September 20, 2013 4:54 PM
To: Holonich, Joseph
Cc: 'Odell, Drew'; cjwirtz@firstenergycorp.com; 'Ronald.DiSabatino@exeloncorp.com'; McGehee, Andrew; Dyle, Robin; Contractor - Steinert, Larry
Subject: BWRVIP Response to New Potential BWRVIP-100, Rev. 1 RAI concerning the impact of the GE Safety Communications

Joe,

Attached is the BWRVIP's response to a new potential NRC RAI on BWRVIP-100, Rev. 1. Please contact me following the staff's review to determine if any additional actions by the BWRVIP are required.

Thank you.

Regards,

Bob

Dear Joe,

It is our understanding that the NRC is planning to issue a new RAI for BWRVIP-100, Rev. 1 regarding the impact of recently issued GEH Safety Communications (SCs). Specifically the GEH SCs in question are SC 09-01, SC 09-03-Rev. 1 and SC 11-07. These SCs have a common theme in that they relate to annulus pressurization (AP) and/or recirculation line break (RLB) loads that might affect flaw evaluations leading to either a change in allowable flaw size and/or a change in the inspection frequency. An input to the flaw evaluation is the fracture toughness which is addressed in BWRVIP-100, Rev. 1. The staff would like to know if these SCs could in any way change the conclusions of BWRVIP-100, Rev. 1.

To answer this question, it is important to understand that AP and/or RLB loads (their duration and magnitude) are not used in BWRVIP-100, Rev. 1 to determine allowable fracture toughness limits. In fact, this is true of all other applied loads. The limits were based on an arbitrary maximum assumed stress of 6 ksi which at the time of preparation of this report was consistent with the maximum stress limit in BWRVIP-76, Rev. 1. Thus, while new or additional loads might be discovered and recommended for flaw evaluation, the limits specified in BWRVIP-100, Rev. 1 will not be impacted and remain valid.

Additionally, it should be pointed out the majority of applications of BWRVIP-100, Rev. 1 deal with highly irradiated core shroud welds. These welds are located in the beltline region of the core shroud (e.g., H4) and experience much lower stresses under AP and RLB loading compared to lower core shroud welds (e.g., H6, H7) which are in a low fluence region of the vessel and thus consequently have much larger fracture toughness.

In summary, the GEH SCs do not impact the results and conclusions stated in BWRVIP-100, Rev. 1

Sincerely

Bob Carter
EPRI, BWRVIP