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General Comment

Regarding Section XI.M31, the Program Description and portions of the Evaluation and Technical basis make the assumption that surveillance capsules, such as those installed in the BWR and PWR fleet operating in the US, have a fluence that "leads" the peak pressure vessel fluence. However, recent surveillance testing has shown that certain designs have capsules which "lag" the peak vessel location, that is they have a fluence which is lower than that of the peak vessel location at any given time. Due to this, it is impossible for such plants to use their existing surveillance capsule specimens to evaluate future conditions of the pressure vessel embrittlement and specifically preclude the condition of achieving a "fluence of between 1.0 and 1.25 times the peak reactor vessel wall neutron fluence projected at the end of the subsequent period of extended operation."

Specific examples of plants that are unable to meet this requirement include BWR/6 designs whose capsules are installed at 3/177/183 degrees along the flat sides of the reactor core where the core to vessel distance is greatest and, therefore, has the lowest fluence. It has also been shown for BWR/4 and BWR/5 designs that the capsule may also lag despite being mounted in a location much closer to the vessel peak fluence azimuth.

For further evidence, see BWRVIP-250NP (NRC Accession Number ML11326A290) and BWRVIP-281NP (NRC Accession Number ML14308A077).

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