

**From:** Contractor - Wirtz, Charles <cwirtz@contractor.epri.com>  
**Sent:** Thursday, March 03, 2016 3:52 PM  
**To:** Holonich, Joseph  
**Cc:** McGehee, Andrew; Odell, Andrew D:(GenCo-Nuc); Carter, Bob; Dyle, Robin; Sheng, Simon; Mendiola, Anthony; McHale, John; Richter, Steven K.  
**Subject:** [External\_Sender] RE: BWRVIP-42, Rev 1 Review Actions

Joe,

As we discussed on today's call, please see the following proposed clarifications to be added to the "-A" version of BWRVIP-42, Revision 1 to resolve possible conditions 3a, 3b, and 3c.

3a). Insert in Section 4.1.6. "Plants should reexamine their AP load calculations and update those calculations, where necessary, considering the potential for increased AP loads as documented in Reference X. (Reference X will be listed in Section 6 as *GE-Hitachi Safety Communication SC 09-01, "Annulus Pressurization Loads Evaluation," June 8, 2009.*)

3b). Insert in Section 5.1.2.1.5. "The calculated time to reach the minimum allowable structural margin must be greater than or equal to the time to the next proposed scheduled inspection. Otherwise, the inspection interval must be reduced."

3c). Insert in Section 5.1.3. "In summary, plant leakage assessments must consider leakage from all potential sources. The total calculated leakage must be less than the allowable leakage to ensure the plant remains within their design basis. The leakage assessment should include all applicable references regarding the determination of calculated and allowable leakage."

We believe the above inserts are consistent with sample sentences provided by the Staff below. Please let us know if these proposed inserts resolve the Staff's concerns.

Note that this email does not contain any EPRI proprietary information.

Chuck

**Charles Wirtz**

**ELECTRIC POWER RESEARCH INSTITUTE**  
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**From:** Holonich, Joseph [<mailto:Joseph.Holonich@nrc.gov>]  
**Sent:** Thursday, September 17, 2015 9:55 AM  
**To:** Contractor - Wirtz, Charles <[cwirtz@contractor.epri.com](mailto:cwirtz@contractor.epri.com)>  
**Cc:** McGehee, Andrew <[AMcGehee@epri.com](mailto:AMcGehee@epri.com)>; Odell, Andrew D:(GenCo-Nuc) <[Andrew.Odell@exeloncorp.com](mailto:Andrew.Odell@exeloncorp.com)>; Carter, Bob <[bcarter@epri.com](mailto:bcarter@epri.com)>; Dyle, Robin <[rdyle@epri.com](mailto:rdyle@epri.com)>; Ronald J. DiSabatino ([ronald.disabatino@exeloncorp.com](mailto:ronald.disabatino@exeloncorp.com)) <[ronald.disabatino@exeloncorp.com](mailto:ronald.disabatino@exeloncorp.com)>; Sheng, Simon <[Simon.Sheng@nrc.gov](mailto:Simon.Sheng@nrc.gov)>; Mendiola, Anthony <[Anthony.Mendiola@nrc.gov](mailto:Anthony.Mendiola@nrc.gov)>; McHale, John <[John.McHale@nrc.gov](mailto:John.McHale@nrc.gov)>  
**Subject:** RE: BWRVIP-42, Rev 1 Review Actions

Chuck,

To avoid possible miscommunication on words that can eliminate Conditions 3(a), 3(b), and 3(c), please see below for some possible sentences. As we discussed earlier today, the BWRVIP can develop some wording that it can finalize in a letter to the staff.

Sample added sentence in the TLR for deletion of Condition 3(a):

The plants are required to reexamine their AP load calculation and make necessary revision, if necessary, considering the potentially increased AP loads as revealed in GE SC09-01.

Sample added sentence in the TLR for deletion of Condition 3(b):

If the calculated time is less than the time to the next proposed scheduled inspection, the plants are required to shorten the proposed scheduled inspection interval accordingly.

Sample added sentence in the TLR for deletion of Condition 3(c):

In any plant-specific leakage assessment, the plants are required to present a summary on its allowable leakage determination with the reference(s) clearly stated. The calculated leakage through detected and postulated flaws shall be bounded by this allowable leakage.

Joe

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**From:** Contractor - Wirtz, Charles [<mailto:cwirtz@contractor.epri.com>]

**Sent:** Wednesday, September 16, 2015 4:07 PM

**To:** Holonich, Joseph

**Cc:** McGehee, Andrew; Odell, Andrew D:(GenCo-Nuc); Carter, Bob; Dyle, Robin; Ronald J. DiSabatino ([ronald.disabatino@exeloncorp.com](mailto:ronald.disabatino@exeloncorp.com))

**Subject:** [External\_Sender] BWRVIP-42, Rev 1 Review Actions

Joe,

This email is a follow-up to the message I just left for you.

As an action item out of yesterday's call, the BWRVIP said they would caucus and then let the NRC know whether it was the BWRVIP's preference for the BWRVIP-42, Rev.1 CASS issue to wait for at least the draft SE for BWRVIP-234 to be issued so any actions taken to resolve the CASS issue for BWRVIP-42, Rev. 1 would be consistent with, or at least with the knowledge of, the BWRVIP-234 SE. It was decided that is our preference.

Additionally, on the call yesterday the BWRVIP indicated that outside of the CASS issue, it did not object with the NRC proceeding with development of the BWRVIP-42, Rev. 1 SE. After additional consideration, we now request that the NRC not proceed with development of the SE in order to provide time for additional consideration of the issues that Simon raised with the entire BWRVIP team. Additionally, for those items where the BWRVIP members on the call agreed that some clarification could be made and it was discussed that perhaps that could just be handled by documenting the proposed changes in an email that could be posted in ADAMS, it was later realized that would be out of process for us in that any new paragraphs to be inserted into BWRVIP-42, Rev. 1 would need to be approved by our committee review process.

Please give me a call so we can further discuss the intricacies on how to proceed from here.

Chuck

**Charles Wirtz**

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