

September 27, 2016

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

Attention: Joseph Holonich

Subject: Project No. 704 – BWRVIP Response to BWRVIP-139-A, Appendix B, Draft Safety Evaluation

- References:
1. Letter from Kevin Hsueh (NRC) to Tim Hanley (BWRVIP Chairman), "Draft Safety Evaluation for License Renewal Appendix to Topical Report 'Appendix B to BWRVIP-139-A: BWR Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines' (TAC NO. ME2188)," dated June 29, 2016 (ADAMS Accession No. ML16098A355)
 2. Letter from Dennis Madison (BWRVIP Chairman) to Joseph Holonich (NRC), "Project No. 704 – Appendix B to BWRVIP-139-A: BWR Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines," dated February 21, 2014 (BWRVIP 2014-023, NRC ADAMS Accession No. ML14071A468)
 3. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), "Project No. 704 – BWRVIP Response to NRC Request for Additional Information on Appendix B to BWRVIP-139-A," dated October 21, 2015 (BWRVIP 2015-133, NRC ADAMS Accession No. ML15299A216)
 4. Letter from Joseph J. Holonich (NRC) to Dennis Madison (BWRVIP Chairman), "Request for Withholding Information from Public Disclosure of Electric Power Research Institute Topical Report "Appendix B to BWRVIP-139-A: BWR [Boiling Water Reactor] Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines (TAC NO. ME2188)," dated April 11, 2014 (NRC ADAMS Accession No. ML14072A078)
 5. Letter from Joseph J. Holonich (NRC) to Tim Hanley (BWRVIP Chairman), "Request for Withholding Information from Public Disclosure of Electric Power Research Institute Boiling Water Reactor Vessel and Internals Project Response to NRC to NRC Request for Additional Information on Appendix B to "BWRVIP-139-A: BWR Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines" (CAC NO. ME2188)," dated August 24, 2016 (NRC ADAMS Accession No. ML16231A125)

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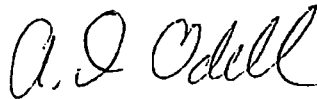
The NRC letter referenced above (Reference 1) transmitted a draft NRC Safety Evaluation of the BWRVIP report entitled "Appendix B to BWRVIP-139-A: BWR Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines" to the BWRVIP and requested that the BWRVIP identify any proprietary information in the draft SE. The letter also requested that the BWRVIP provide any comments on factual errors or clarity concerns.

To facilitate the NRC staff's review of the BWRVIP's comments, the NRC requested the BWRVIP provide a marked-up copy of the draft SE showing proposed changes and a summary table of the proposed changes. Attachment 1 provides the marked-up copy with identification of EPRI proprietary information, denoted by yellow highlighting and enclosing in brackets, and the BWRVIP's comments.

The information identified in Attachment 1 as being proprietary information, is considered to be EPRI "Trade Secrets" in accordance with 10CFR2.390. It is all information that was taken from either Appendix B to BWRVIP-139-A or the BWRVIP's responses to NRC Requests for Additional Information (RAI) for the Appendix B to BWRVIP-139-A review; and that was already identified as being proprietary information, along with the requisite affidavits, when those documents were transmitted to the NRC (see References 2 and 3). The requests for withholding were approved by the NRC as documented in References 4 and 5.

If you have any comments or questions, please contact Bob Carter at 704.595.2519 or by email at bcarter@epri.com.

Sincerely,



Andrew McGehee, EPRI, BWRVIP Program Manager
Drew Odell, Exelon, BWRVIP Integration Committee Chairman

c: BWRVIP Technical Chairs
BWRVIP EPRI Task Managers

BWRVIP Comment Summary Table

Comment No.	Draft SE Location	Comment Type	Comment	NRC's Response
1	Pg. 5, Section 3.3, first sentence of the fourth para.	Clarification	Do not know what "Non-PS #1" means. There is no such term or section in the BWRVIP's response to RAI B-4. Please clarify.	
2	Pg. 5, Section 3.3, third sentence of the fourth para.	Editorial	Sentence does not read well. Suggest inserting "that" in front of "would" such that it reads, "...includes all steam dryer assembly components that would be ..."	
3	Section 3.4, Pg. 7, first para.	Editorial	Suggest changing "OpE" here, and throughout, to the more common acronym, "OE", that is used throughout the industry.	
4	Section 3.4, Pg. 9, second para., third bullet	Accuracy	The GALL AMP reference is incorrect. XIM8 is for BWR penetrations. The correct GALL AMP reference for BWR vessel ID attachment welds is XIM4.	
5	Sections 3.6 & 3.7, and 4.2.1 & 4.2.2, Conditions 1 and 2	Clarification	The BWRVIP believes the issues identified as Conditions 1 and 2 are not conditions to place on the use of BWRVIP-139-A and Appendix B. The described requirements are LR Rule requirements that apply specifically to licensees. Thus, these issues should be identified as an Applicant/Licensee Action Items (A/LAIs).	
6	Section 4.3, TRCI #1	Clarification	The BWRVIP understands that the TRCI is only applicable to the Dryer itself, not the in-vessel support lugs/brackets (which would be covered by BWRVIP-48-A and ASME Section XI Category B-N inspections) and that no other actions besides revising Section B.3 as stated in the TRCI are expected.	
7	Section 4.4, identified A/LAIs	Clarification	Other than exhibiting the NRC's safety evaluation in the "-A" version of the BWRVIP-139-A, License Renewal (LR) appendix, no changes to the LR appendix will be made to state the need for compliance with the identified A/LAI. Addressing A/LAIs is the responsibility of licensees separate from the NEI 03-08 requirements of the topical report and its LR appendix	