



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
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May 24, 2017

MEMORANDUM TO: Kevin Hsueh, Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager /RA/  
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SUBJECT: SUMMARY OF APRIL 12, 2017, MEETING ON  
BAFFLE-FORMER BOLT INTERIM GUIDANCE

On April 12, 2017, U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from the Electric Power Research Institute (EPRI). The purpose of the meeting was to discuss the EPRI interim guidance on baffle-former bolt (BFB) inspections in MRP Letter 2017-009 dated March 15, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No.: ML17087A106). The guidance was transmitted to NRC staff for information as an attachment to EPRI Materials Reliability Program (MRP) Letter MRP 2017-011, dated March 23, 2017 (ML17087A107). Information related to the meeting can be found in the ADAMS package accession number ML17087A023.

The meeting discussions focused on the EPRI guidance developed for baffle-former bolt inspections and the NRC staff questions on the guidance. Copies of the guidance and questions can be found in the referenced ADAMS package.

The NRC staff summarized its concerns related to each question, and EPRI discussed the information that it would use in its proposed response to each of the questions. One point agreed upon during the discussions was that the interim guidance letter was not clear on whether the guidance is applicable to previously examined BFBs in accordance with MRP-227-A, "Pressurized Water Reactor Internals Inspection and Evaluation Guidelines," (ADAMS Accession No.: ML12017A193). EPRI stated that the guidance is applicable to previously examined BFBs in accordance with MRP-227. EPRI noted that NRC questions related to plant actions resulting from prior BFB exams need to be addressed to the plants directly.

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EPRI discussed industry plans for the next six months. It was reported that operating experience (OE) from fall and spring outages will be a major factor driving future revisions to the interim guidance for BFBs.

At the conclusion of the meeting, the NRC staff expressed two concerns regarding the interim guidance:

1. Per Item B of the interim guidance, subsequent volumetric Ultrasonic Testing (UT) shall be performed on an interval established by plant-specific evaluation per MRP-227-A, Needed Requirement 7.5 as documented and dispositioned in the owner's plant corrective action. However, the interim guidance does not provide any requirements or guidance for the plant-specific evaluation. Therefore, the NRC staff is concerned that the level of rigor of these plant-specific evaluations may vary widely.
2. The second concern related to Note b to the table and is described in Question 7 below.

Based on its concerns, the NRC staff added a new question:

#### Question 7

Note (b) to the table in MRP Letter 2017-009 states:

(b) A longer reinspection interval, not to exceed 10-years, may be justified by plant-specific evaluation based on plant-specific exam findings. This evaluation may include additional justification from plant modifications and/or improvements (for example, replacements of BFBs, conversion to up-flow, replacement of lower internals, etc.)

The NRC staff is concerned that Note (b) could allow plants to exceed the maximum subsequent examinations intervals without having to deviate from the NEI 03-08 "needed" guidance of MRP 2017-009. Therefore, the NRC staff would not be informed of plants exceeding the table intervals and would not have an opportunity to review the plant-specific evaluations supporting the longer interval. MRP Letter 2017-009 also does not provide any guidance for the methodology of the plant-specific evaluations. Therefore, the level of rigor of these evaluations could vary widely.

The NRC staff therefore requests that EPRI consider removing note (b) from the interim guidance, or adding more detailed guidance for the methodology of the plant-specific evaluation of the subsequent examination interval.

EPRI stated that it was considering revising the guidance for determining the baffle-former bolt interval for subsequent examinations in WCAP-17096-NP-A "Reactor Internals Acceptance Criteria Methodology and Data Requirements," (ADAMS Accession No.: ML101460157) methodology to be used for plant-specific evaluations of reinspection intervals to its interim guidance for BFB inspections. EPRI stated that this would be considered during upcoming industry meetings as part of PWR Owners Group proposed actions.

The NRC staff also indicated that it may be interested in further review of the proprietary analyses supporting the 6-year and 10-year maximum reinspection intervals. It was agreed that the need for a closed meeting to discuss these analyses in detail would be considered.

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INTERIM GUIDANCE DATED: MAY 24, 2017

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