

August 24, 2017

Mr. Tim Hanley, Chairman  
ATTN: Debbie Rouse  
BWR Vessel and Internals Project  
1300 West W.T. Harris Boulevard (Building 1)  
Charlotte, NC 28262

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF RESPONSE TO  
APRIL 18, 2017, LETTER ON "PROJECT NO. 704 – STATUS OF BWRVIP-62  
REVISION AND INSPECTION RELIEF FOR BWR PIPING WELDS AND  
INTERNAL COMPONENTS WITH HYDROGEN INJECTION"

Dear Mr. Hanley:

This letter is in response to your letter of April 18, 2017, "PROJECT NO. 704 – STATUS OF BWRVIP-62 REVISION AND INSPECTION RELIEF FOR BWR [Boiling Water Reactor] PIPING WELDS AND INTERNAL COMPONENTS WITH HYDROGEN INJECTION" (Agencywide Documents Access and Management System Accession No. ML17111A869). In your letter the BWR Vessel and Internals Project (BWRVIP) provided to the U.S. Nuclear Regulatory Commission (NRC) staff a brief history of the review, and utilization process for BWRVIP-62-A and a clarification regarding the status of BWRVIP-62, Rev 1.

Your letter also stated that revisions to BWRVIP-62, Rev 1 will be made. However, your letter did not state if the revisions will be submitted to the NRC staff for review, and, if submitted, did not propose a timetable. Additionally, your letter confirms that, notwithstanding the withdrawal of BWRVIP-62, Rev 1, plants currently using Online Noble Metal Chemistry and using the acceptance criterion of BWRVIP-62, Rev 1 plan to continue claiming inspection relief as defined in the following BWRVIP reports:

- 1) BWRVIP-75-A, "BWR Vessel and Internals Project, Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules";
- 2) BWRVIP-138, Revision 1-A, "BWR Vessel and Internals Project, Updated Jet Pump Beam Inspection and Evaluation Guidelines"; and,
- 3) BWRVIP-180, "BWR Vessel and Internals Project, Access Hole Cover Inspection and Flaw Evaluation Guidelines."

Additionally, the NRC staff notes that BWRVIP-94, "BWR Vessel and Internals Project, Program Implementation Guide," states (p 1-4):

When this document and other BWRVIP guidelines are approved by the Executive Committee and are initially distributed, or subsequently revised, each utility shall modify their vessel and internals program documentation to reflect the new requirements and

shall implement the guidance within two refueling outages, unless a different schedule is identified by the BWRVIP at the time of document distribution. Implementation means not only incorporating the requirements into the utility program, but also performing the initial or baseline inspection and evaluation requirements. Note, however, that if new guidance approved by the Executive Committee includes changes to NRC approved BWRVIP guidance that are less conservative than those approved by the NRC, this less conservative guidance shall be implemented only after NRC approves the changes. "NRC approved" generally means publication of a "-A" document or equivalent.

Based on the above, it is the NRC staff position that BWRVIP-62, Rev 1 is a change to "NRC accepted-for-use BWRVIP guidance," (i.e., BWRVIP-62-A), and that the guidance in BWRVIP-62, Rev 1 appears less conservative than that contained in BWRVIP-62-A (i.e., the acceptance criteria regarding platinum loading is not contained in BWRVIP-62, Rev 1). In the absence of NRC accepting BWRVIP-62, Rev 1 for use, it is unclear to the NRC staff how the continued use of the guidance contained in BWRVIP-62, Rev 1 is consistent with either BWRVIP-94 or, more importantly, how plants utilizing this guidance remain in compliance with their licensing basis (e.g., the inspection commitments associated with generic letter 88-01, "NRC Position on IGSCC [Intergranular Stress Corrosion Cracking] in BWR Austenitic Stainless Steel Piping," as modified by BWRVIP-75-A).

Prior to proceeding further with its review of this issue, the NRC staff solicits input from the BWRVIP concerning these NRC staff observations and any potential resolution that the BWRVIP may wish to offer.

If you have any questions or require any additional information, please feel free to contact the Project Manager for this topical report, Joseph Holonich, at 301-415-7297 or by electronic mail at [Joseph.Holonich@nrc.gov](mailto:Joseph.Holonich@nrc.gov).

Sincerely,

*/RA/*

Louise Lund, Director  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

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