

NRR-DMPSPeM Resource

From: Green, Kimberly
Sent: Wednesday, September 26, 2018 11:44 AM
To: Lashley, Phil H.
Cc: Spiesman, Benjamin L.; Minniti, Matthew J.
Subject: Acceptance of Request IR-061 for Review (EPID L-2018-LLR-0119)

Dear Mr. Lashley:

By letter dated September 7, 2018, FirstEnergy Nuclear Operating Company requested relief from the requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), IWA-4000, at Perry Nuclear Power Plant, Unit 1. The request, IR-061, proposed an alternative to use ultrasonic examinations in lieu of radiography in accordance with ASME Code Case N-831. The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the request for the alternative. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the request has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Section 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternative would provide an acceptable level of quality and safety.

The NRC staff has reviewed your request and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 120 hours to complete. The NRC staff expects to complete the review by the requested date of February 28, 2019. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimate, will be communicated to you during our routine interactions.

The estimate is based on the NRC staff's initial review of the request and could change due to several factors including requests for additional information, and unanticipated addition of scope to the review.

If you have any questions, please contact me.

Sincerely,
Kimberly Green, Sr. Project Manager
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