



CHIEF FINANCIAL
OFFICER

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 21, 2019

H.M. Hashemian, Ph.D.
President
Analysis and Measurement Services Corporation
9119 Cross Park Drive
Knoxville, TN 37923

Dear Dr. Hashemian:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated March 13, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19099A032), requesting a fee waiver under Title 10 of the *Code of Federal Regulations* (10 CFR) 170.11(a)(1)(ii) for NRC review of the project referred to as, "Resolving the Regulatory Issues with Implementation of Online Monitoring [OLM] Technologies to Extend the Calibration Intervals of Process Instruments in Nuclear Power Plants."

The NRC has established regulations for the granting of fee exemptions under 10 CFR 170.11, "Exemptions," which may be applied for in accordance with 10 CFR 170.5, "Communications." The NRC staff has reviewed your request based on the following regulations, 10 CFR 170.11(a)(1)(ii) and 10 CFR 170.11(a)(13):

10 CFR 170.11(a) No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC— . . . (ii) When the NRC, at the time the request/report is submitted, plans to use the information in response to an NRC request from the Office Director level or above to resolve an identified safety, safeguards, or environmental issue, or to assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).

10 CFR 170.11(a)(13) All fee exemption requests must be submitted in writing to the Chief Financial Officer in accordance with § 170.5,¹ and the Chief Financial Officer will grant or deny such requests in writing.

Analysis and Measurement Services Corporation (AMS) was awarded a grant from the U.S. Department of Energy (DOE) under Funding Opportunity Announcement #0001817 to work with the NRC on a project referred to as "Resolving the Regulatory Issues with Implementation of OLM Technologies to Extend the Calibration Intervals of Process Instruments in Nuclear Power Plants." Both the industry, with Electric Power Research Institute (EPRI) Topical Report

¹ 10 CFR 170.5 provides that, "All communications concerning the regulations in this part should be addressed to the NRC's Chief Financial Officer, either by mail to the U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; by hand delivery to the NRC's offices at 11555 Rockville Pike, Rockville, Maryland; or, where practicable, by electronic submission, for example, via Electronic Information Exchange, or CD-ROM."

(TR) 104965, "On-Line Monitoring of Instrument Channel Performance," dated 1998, and the NRC with NUREG/CR 6895, "Technical Review of On-Line Monitoring Techniques for Performance Assessment," dated January 2006, have issued guidance on how to proceed with OLM in order to meet the existing regulatory requirements. The NRC safety evaluation report (SER) for the EPRI TR issued on July 24, 2000, found OLM to have four inherent deficiencies. In addition, the SER identified 14 requirements to be addressed by plant specific license amendments if the calibration frequency for safety-related instrumentation were to be relaxed.

The AMS project will produce a TR modeled after a successful implementation of OLM technology at the Sizewell B nuclear power plant in the United Kingdom. Sizewell B is a Westinghouse Pressurized Water Reactor (PWR) near London, England. AMS implemented OLM at Sizewell B between 2005-2010, leading to extension of calibration intervals of hundreds of pressure, level, and flow transmitters. The TR will provide a generic overview of the OLM process for pressure, level, and flow transmitters. If approved by the NRC, the TR will allow licensees to extend calibration intervals without the need for additional plant-specific work. As such, the review of this TR will support ongoing NRC generic regulatory improvements/efforts associated with the surveillance requirements for pressure, level, and flow transmitters.

The NRC staff concludes that NRC review of the AMS project, "Resolving the Regulatory Issues with Implementation of Online Monitoring [OLM] Technologies to Extend the Calibration Intervals of Process Instruments in Nuclear Power Plants," meets the criteria under 10 CFR 170.11(a)(1)(ii); therefore, the fee waiver request is approved.

If you have any technical questions regarding this matter, please contact Mr. Jonathan Rowley at 301-415-4053. Please contact Ms. Jo Jacobs, 301-415-8388, or Mr. William Blaney, 301-415-5092, of my staff for any fee-related questions.

Sincerely,

/RA/

Maureen E. Wylie
Chief Financial Officer

SUBJECT: LETTER TO H.M. HASHEMIAN RESPONSE TO FEE WAIVER (AMS),
 DATED: May 21, 2019

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