



CHIEF FINANCIAL  
OFFICER

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

September 23, 2019

Mr. Nathan Palm  
BWRVIP Program Manager  
Electric Power Research Institute  
1300 West W.T. Harris Boulevard  
Charlotte, NC 28262

Dear Mr. Palm:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated August 22, 2019, requesting a fee waiver under Title 10 of the *Code of Federal Regulations* (10 CFR) 170.11(a)(1)(ii) for NRC review of "BWRVIP-329: BWR Vessel and Internals Project, Updated Probabilistic Fracture Mechanics Analyses for BWR Reactor Pressure Vessel Welds to Address Extended Operations."

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<sup>1</sup>, and the Chief Financial Officer will grant or deny such requests in writing.*

In your letter you state that BWRVIP-329 provides a technical basis for an alternative to the BWR reactor pressure vessel weld examination requirements specified by the American Society of Mechanical Engineers Section XI, Examination Category B-A, "Pressure Retaining Welds in Reactor Vessel." As stated in NUREG-2192, Revision 0, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants," Section 4.2.3.1.5, "Elimination of Boiling Water Reactor Circumferential Weld Inspection," and Section 4.2.3.1.6,

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<sup>1</sup> 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."

“Boiling Water Reactor Axial Welds,” approved technical alternatives for subsequent license renewal (SLR) have yet to be developed. If accepted for use by the NRC, BWRVIP-329 provides an alternative that could be applied by the NRC staff to eliminate the need for additional regulatory actions to address this issue in the context of 80-year operations. The methodology in BWRVIP-329 may be used at multiple sites requesting SLR, and by reviewing one methodology to assess multiple applications in individual SLRs, the NRC staff would benefit by having a significant reduction in time and resources.

The NRC staff concludes that EPRI’s request for NRC review of “BWRVIP-329: BWR Vessel and Internals Project, Updated Probabilistic Fracture Mechanics Analyses for BWR Reactor Pressure Vessel Welds to Address Extended Operations,” meets the criteria under 10 CFR 170.11(a)(1)(ii) because the guidance will assist the NRC in generic regulatory improvements or efforts; therefore, the fee waiver request is approved.

If you have any technical questions regarding this matter, please contact Mr. Joseph Holonich at 301-415-7297. Please contact Ms. Jo Jacobs, of my staff, at 301-415-8388 for any fee-related questions.

Sincerely,

*/RA/*

Maureen E. Wylie  
Chief Financial Officer

SUBJECT: LETTER TO NATHAN PALM RESPONSE TO FEE WAIVER BWRVIP-329,  
 DATED: September 23, 2019

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