40TH ANNIVERSARY
PWROG
PWR Owners Group

Program Management Office
1000 Westinghouse Drive, Suite 172
Cranberry Township, PA 16066

WCAP-17096-NP, Revision 3
Project Number 99902037

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OG-19-213

U.S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: PWR Owners Group
Request for Exemption of NRC Review Fees for WCAP-17096-NP, Revision 3, "Reactor Internals Acceptance Criteria Methodology and Data Requirements," PA-MSC-1567

Reference 1: OG-19-164, "Transmittal of WCAP-17096-NP, Revision 3, "Reactor Internals Acceptance Criteria Methodology and Data Requirements," PA-MSC-1576.

The purpose of this letter is to request that WCAP-17096-NP, Revision 3, "Reactor Internals Acceptance Criteria Methodology and Data Requirements," be exempt from NRC fees in accordance with 10 CFR 170.11 (a)(1)(ii).

Reference 1 transmitted Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR), WCAP-17096-NP, Revision 3, "Reactor Internals Acceptance Criteria Methodology and Data Requirements," for NRC review in accordance with the Nuclear Regulatory Commission (NRC) TR program for review and acceptance for referencing in regulatory actions.

MRP-227, "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines," were developed by the Materials Reliability Program (MRP) to manage the long-term aging of reactor vessel internal components. MRP-227 is applicable to reactor vessel internals structural components in Babcock &Wilcox (B&W), Combustion Engineering (CE) and Westinghouse Nuclear Steam Supply System (NSSS) plants.

MRP-227, Rev. 1 provides a means of exchanging information for the purpose of supporting generic regulatory improvements associated with the methodologies for demonstrating the integrity of PWR reactor vessel internals for the life of the plant, including the first operating license renewal in accordance with 10CFR54. Additionally, licensees have made commitments in Power-Uprate License Amendment Requests to implement the applicable elements of MRP-227 regarding their reactor vessel internals inspection programs.

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The MRP-227 guidelines provide an effective means of addressing the aging of reactor vessel internals structural components that meet or exceed the NRC guidance in NUREG-1801, Revision 2, "Generic Aging Lessons Learned (GALL) Report." MRP-227, Revision 1 addresses the conditions and plant specific licensee action items contained in the NRC Safety Evaluation Report for Revision 0 on a generic basis to eliminate the need for plant specific evaluations and submittals to the NRC review for license renewal applications.

The NRC issued the Final Safety Evaluation for MRP-227-A, Rev. 1 in May 2019 (ADAMS Accession No. ML 19081A001). The NRC issued a fee waiver for the review of MRP-227, Rev. 1 (ADAMS Accession No. ML 16098A264).

WCAP-17096-NP, Revision 3 contains the methodology and data requirements necessary to evaluate the potential degradation of reactor vessel internals structural components during MRP-227, Rev. 1 inspections. WCAP-17096-NP, Revision 3 includes changes related to updates made to MRP-227, Rev. 1 and in response to lessons learned from operating experience from MRP-227 inspections conducted to date. WCAP-17096-NP, Revision 3 is also applicable to all B&W, CE, and Westinghouse NSSS plants. WCAP-17096-NP, Revision 3 also provides a means of exchanging information for the purpose of supporting generic regulatory improvements associated with the potential degradation of reactor vessel internals structural components during MRP-227, Rev. 1 inspections for the life of the plant, including the first license renewal. The NRC review of the generic TR will be substantially less than the NRC review of individual, plant specific applications of the methodologies.

NRC review and approval of the generic TR provides a consistent basis for the evaluation of reactor internal degradation identified during MRP-227 inspections, which will reduce the burden on both licensee and NRC resources for the disposition of plant specific MRP-227 inspection results.

NRC review and approval of WCAP-17096-NP, Revision 3 is the most efficient use of NRC and industry resources to support generic regulatory improvements that are not currently addressed by current NRC regulations or guidance.

WCAP-17096-NP, Revision 3 contains a methodology, that following NRC approval, will be used to disposition MRP-227 Rev. 1 inspection results. Therefore, the PWROG is requesting a fee waiver in accordance with 10 CFR 170.11 (a)(1)(ii).

It should be noted that a fee exemption was granted for the review of WCAP-17096-NP, Revision 2 on June 28, 2010 (ADAMS Accession No. ML 1018900761).

Thank you for considering the PWROG's request for the exemption from NRC review fees associated with WCAP-17096-NP, Revision 3.

Correspondence related to this transmittal should be addressed to:

Mr. W. Anthony Nowinowski, Program Manager
PWR Owners Group, Program Management Office
Westinghouse Electric Company
1000 Westinghouse Drive, Suite 172
Cranberry Township, Pennsylvania 16066

If you have any questions, please do not hesitate to contact me at (805) 545-4328 or Mr. W. Anthony Nowinowski, Program Manager of the PWR Owners Group, Program Management Office at (412) 374-6855.

Sincerely yours,

Ken J Schrader

Ken Schrader, Chief Operating Officer and Chairman
PWR Owners Group

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