

October 22, 2019

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

BWRVIP Docket No. 99902016

Attention: Joseph Holonich

Subject: Transmittal of "BWRVIP-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations"

References: [1] NUREG-2192, Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants, July 2017.

Enclosed is one (1) paper copy of the report "BWRVIP-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations," EPRI Technical Report 3002012535. This report is being transmitted to the NRC for review and approval.

BWRVIP-315 provides a technical basis demonstrating the adequacy of the BWRVIP reactor internals aging management guidance to adequately manage age-related degradation of BWR reactor internals for operation beyond 60 years, including:

- Identification of appropriate enhancements to the BWRVIP reactor internals aging management guidance documents for operation beyond 60 years.
- Specification of the engineering input limitations relevant to BWRVIP guidance for managing aging of BWR reactor internals.
- Generic disposition of the further evaluation items related to BWR reactor internals contained within NUREG-2192 [1]:
 - Section 3.1.2.2.12: Cracking Due to Irradiation-Assisted Stress Corrosion Cracking
 - Section 3.1.2.2.13: Loss of Fracture Toughness Due to Neutron Irradiation or Thermal Aging Embrittlement
 - Section 3.1.2.2.14: Loss of Preload Due to Thermal or Irradiation-Enhanced Stress Relaxation

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BWRVIP requests that the NRC review of BWRVIP-315 be performed on a fee exempt basis and a separate BWRVIP letter to the NRC Chief Financial Officer (CFO) is being transmitted requesting a fee exemption. The BWRVIP requests that the NRC review of BWRVIP-315 proceed in parallel with the CFO's review of the fee exemption request.

Please note that the enclosed report contains proprietary information. All proprietary information is highlighted with yellow shading. Pages containing the proprietary information are also marked with the letters "TS" in the footer area indicating that the highlighted information is considered trade secrets in accordance with 10CFR2.390. A letter requesting that the report be withheld from public disclosure and an affidavit describing the basis for withholding this information are provided as Attachment 1.

One paper copy of the non-proprietary report "BWRVIP-315NP: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations," EPRI Technical Report 3002012535NP, is also enclosed. This non-proprietary report is identical to the enclosed proprietary report except that the proprietary information has been deleted and the letters "NP" appear in the BWRVIP report number.

If you have any questions on this subject, please contact the BWRVIP SLR project manager, Wayne Lunceford, by telephone at 650.855.8556 or by e-mail at walunceford@epri.com.

Sincerely,



Nathan Palm, EPRI, BWRVIP Program Manager
Tim Hanley, Exelon Corporation, BWRVIP Chairman

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