



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

November 26, 2019

CHIEF FINANCIAL  
OFFICER

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 October 22, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19296C447), 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-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for 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."<sup>1</sup> 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, and the Chief Financial Officer will grant or deny such requests in writing.*

In your letter you state that BWRVIP-315 provides a technical basis demonstrating the adequacy of the boiling water reactor (BWR) internals aging management program to adequately manage age-related degradation of BWR reactor internals for operation beyond 60 years. Additionally, BWRVIP-315 provides generic disposition methods for the three further evaluation items related to aging management of BWR reactor internals in NUREG-2192, Revision 0, "Standard Review Plan for Review of Subsequent License Renewal Applications for

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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."

Nuclear Power Plants,” Sections 3.1.2.2.12, “Cracking Due to Irradiation-Assisted Stress Corrosion Cracking,” 3.1.2.2.13, “Loss of Fracture Toughness Due to Neutron Irradiation or Thermal Aging Embrittlement,” and 3.1.2.2.14, “Loss of Preload Due to Thermal or Irradiation-Enhanced Stress Relaxation.”

If accepted for use by the NRC, BWRVIP-315 could be used by subsequent license renewal (SLR) applicants and the NRC to increase SLR application efficiency. BWRVIP-315 also 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 operation beyond 60 years. The methodology in BWRVIP-315 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 has reviewed the fee waiver request and agrees with Electric Power Research Institute that the NRC’s review and approval of “BWRVIP-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations,” will further assist the NRC in generic regulatory improvements or efforts as described within the fee waiver request. 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-315,  
DATED: November 26, 2019

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