

2020-010 \_\_\_\_\_ BWR Vessel & Internals Project (BWRVIP)

(via e-mail)

February 28, 2020

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

Attention: Joseph Holonich

Subject: Docket No. 99902016 – BWRVIP Response to BWRVIP-25 Revision 1 Revised Draft Safety Evaluation

- Reference:
1. Letter from Dennis Morey (NRC) to Tim Hanley (BWRVIP Chairman), “Draft Safety Evaluation for BWRVIP-25, Revision 1: BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines (CAC NO. MF4887; EPID: L-2014-TOP-0008)” dated September 10, 2019 (BWRVIP Letter 2019-085A, NRC ADAMS Accession No. ML19007A012)
  2. Letter from Nathan Palm (EPRI BWRVIP) to Joseph J. Holonich (NRC), “Docket No. 99902016 – BWRVIP Response to BWRVIP-25 Revision 1 Draft Safety Evaluation,” dated October 15, 2019 (BWRVIP Letter 2019-092, NRC ADAMS Accession No. ML19290D822)
  3. Email from Joseph J. Holonich (NRC) to Wynter McGruder (EPRI BWRVIP), “Transmittal of Revised, Draft Safety Evaluation of BWRVIP-25, Revision 1” dated February 3, 2020 (BWRVIP Letter 2020-005A, NRC ADAMS Accession No. ML20030A002)
  4. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), “Project No. 704 – Transmittal of BWRVIP-25, Revision 1: BWR Vessel and Internals Project, BWR Core Plate Inspection and Evaluation Guidelines,” dated September 26, 2016 (BWRVIP Letter 2016-098, NRC ADAMS Accession No. ML16273A474)
  5. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), “Docket No. 99902016 – BWRVIP Response to Request for Additional Information on BWRVIP-25, Revision 1 to NRC,” dated October 12, 2018 (BWRVIP Letter 2018-126, NRC ADAMS Accession No. ML18295A204)

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6. Letter from Joseph J. Holonich (NRC) to Tim Hanley (BWRVIP Chairman), "Request for Withholding Information from Public Disclosure of Electric Power Research Institute BWRVIP-25, Revision 1: BWR Vessel and Internals Project, BWR Core Plate Inspection and Evaluation Guidelines (TAC NO. MF8414)," dated December 20, 2016 (BWRVIP Letter 2016-138B, NRC ADAMS Accession No. ML16277A000)

7. Letter from Joseph J. Holonich (NRC) to Tim Hanley (BWRVIP Chairman), "Proprietary Determination of Electric Power Research Institute Response to Requests for Additional Information on BWRVIP-25, Revision 1, BWR Vessel and Internals Project, BWR Core Plate Inspection and Evaluation Guidelines" (CAC NO. MF8863; EPID L-2016-TOP-0012)," dated November 14, 2018 (BWRVIP Letter 2018-142A; NRC ADAMS Accession No. ML18288A190)

The NRC letter referenced above (Reference 1) transmitted a draft NRC Safety Evaluation of the BWRVIP report entitled "BWRVIP-25, Revision 1: BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines" to the BWRVIP and requested that the BWRVIP identify any proprietary information in the draft SE. The letter also requested that the BWRVIP provide any comments on factual errors or clarity concerns. The BWRVIP provided the response to the draft NRC Safety Evaluation in the letter referenced above (Reference 2) on October 15, 2019.

The NRC email referenced above (Reference 3) transmitted a revised draft NRC Safety Evaluation of the BWRVIP report entitled "BWRVIP-25, Revision 1: BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines" to the BWRVIP and requested that the BWRVIP provide any comments on factual errors or clarity concerns.

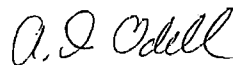
To facilitate the NRC staff's review of the BWRVIP's comments, the NRC requested the BWRVIP provide a marked-up copy of the revised draft SE showing proposed changes and an update to the summary table with the proposed changes. Attachment 1 provides the marked-up copy with identification of EPRI proprietary information, denoted by yellow highlighting and enclosing in brackets, and the BWRVIP's comments and a summary table with the BWRVIP's comments.

The information identified in Attachment 1 as being proprietary information, is considered EPRI "Trade Secrets" in accordance with 10CFR2.390. It is all information that was taken from either BWRVIP-25, Revision 1 or the BWRVIP's responses to NRC Requests for Additional Information (RAI) for the BWRVIP-25, Revision 1 review and that was already identified as being proprietary information, along with the requisite affidavits, when those documents were

transmitted to the NRC (see References 4 and 5). The requests for withholding were approved by the NRC as documented in References 6 and 7.

If you have any questions regarding this subject, please contact Wynter McGruder at EPRI by telephone at 704.595.2205 or by e-mail at [wmcgruder@epri.com](mailto:wmcgruder@epri.com).

Sincerely,



Nathan Palm, EPRI, BWRVIP Program Manager

Drew Odell, Exelon, BWRVIP Research Integration Committee Chairman

c: BWRVIP Technical Chairs  
BWRVIP EPRI Task Managers