



NUCLEAR ENERGY INSTITUTE

Stephen D. Floyd
DIRECTOR LICENSING AND
PERFORMANCE-BASED
REGULATION

April 15, 1996

GLENDA JACKSON

FAX: 301-415-5387

Dr. Brian W. Sheron
Director, Division of Engineering
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

PROJECT NUMBER: 689

Dear Dr. Sheron:

This letter transmits Draft A of NEI 96-XX, "Industry Guideline for Risk-Based Inservice Inspection" and supporting documents described below, in support of industry risk-based ISI (RB-ISI) initiatives.

Pursuant to our discussions with your staff on RB-ISI, the following are enclosed for your review. These documents are being forwarded in support of the industry generic RB-ISI relief program including the three pilot plants. We respectfully request a waiver of any fees associated with the review of the following documents. These documents are developed by the nuclear industry through NEI, utilities, WOG, and EPRI and are being submitted to the NRC as a generic approach for implementation of the RB-ISI program at operating nuclear plants. We believe this waiver request satisfies criterion three of footnote four to 10 CFR 170.21. This footnote states that fees will not be assessed if the review request is made "as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts."

Enclosure 1 is a copy of Draft A of NEI 96-XX, "Industry Guideline for Risk-Based Inservice Inspection," dated April 12, 1996. Enclosure 2 is fifteen (15) copies of WCAP-14572 (non-proprietary), "WOG Application of Risk-Based Methods to Piping Inservice Inspection Topical Report," dated March 1996, and one (1) copy of the Copyright Notice (Enclosure 2a). This WCAP supports the pilot application for RB-ISI for the Surry plant. Enclosure 3 is two copies of the EPRI Report TR-106218, "Risk-Informed Inservice Inspection Evaluation Procedure," dated January 1996 (twelve (12) more copies will be forwarded later). Please note that the EPRI

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report was previously sent to Dr. Goutam Bagchi for your staff with a request for withholding from public disclosure under 10 CFR 2.790(a)(4). A copy of this letter is included as Enclosure 3a. This EPRI report supports the pilot application for the RB-ISI for ANO-2 and Fitzpatrick plants. Enclosure 4 includes copies of the industry master plan on RB-ISI and the schedule for submittal of the guideline, supporting technical documents and pilot plant applications.

We would appreciate the opportunity to meet with you at your earliest convenience to make a formal presentation on the industry RB-ISI program and the above reports, including the NEI guideline on RB-ISI.

If you have any questions or comments on the enclosures, or would like to arrange a meeting, please call Mehdi Sarram (202-739-8186) of the NEI staff or me at (202) 739-8078.

Sincerely,

A. Marion for

Stephen D. Floyd

MS/SDF/jes

Enclosures

DAF Action Items		
Action: DAF-6-115: Fees - Review of NEI 96-XX		
Priority Item (*):	OC#:	EDO#:
Due Date: 96/05/03	Completion Date:	Responsible: LFARB/GCJ
Date Received: 96/05/01		
Comment: LETTER TO: Stephen D. Floyd, Nuclear Energy Institute, FROM: Brian W. Sheron, NRR, SUBJECT: Fees associated with review of NEI 96-XX, "Industry Guideline for Risk-based Inservice Inspection."		



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Mr. Stephen D. Floyd
Director, Licensing and Performance Based Regulation
Nuclear Energy Institute
1776 I Street N.W., Suite 400
Washington D.C. 20006-3708

SUBJECT: FEES ASSOCIATED WITH REVIEW OF NEI 96-XX, "INDUSTRY GUIDELINE FOR
RISK-BASED INSERVICE INSPECTION"

Dear Mr. Floyd:

This letter acknowledges receipt of Draft A of NEI 96-XX, "Industry Guideline for Risk-Based Inservice Inspection" including EPRI Report TR-106218 and Westinghouse Energy Systems Report WCAP-14572. The WCAP report is the non-proprietary version and the EPRI report TR-106218 is the proprietary version.

We have reviewed your request to waive any fees for the review of the documents submitted pursuant to criterion three of footnote four to 10 CFR 170.21. This footnote states that fees will not be assessed for requests/reports submitted to the NRC as a means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts.

However, the efforts expended by the NRC staff and its contractors in modifying and improving the proposed risk informed inspection methodology would only benefit the sponsoring organizations - EPRI and Westinghouse. Our practice in the past has been that proprietary topical reports have been reviewed for fees paid by the sponsoring organization. Therefore, we do not consider waiving fees for the review of the EPRI and Westinghouse reports appropriate. It should be noted that 10 CFR Part 170.12(f) states, in part, that fees for special projects such as topical reports are based on full cost of the review and are payable upon notification by the Commission.

If you have any further question or comments, please feel free to contact us.

Sincerely,

Brian W. Sheron, Director
Division of Engineering
Office of Nuclear Reactor Regulation

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DOCUMENT NAME: G:\ALI\NEILTRO1

SUBJECT: FEES ASSOCIATED WITH REVIEW OF NEI 96-XX, "INDUSTRY GUIDELINE FOR RISK-BASED INSERVICE INSPECTION"

ORIGINATOR: Syed Ali

DATE: April 22, 1996

● ● ● ROUTING ● ● ●

	NAME	DATE
1.	<u>S Ali</u> <i>SAA</i>	<u>4/23/96</u>
2.	<u>RRothman</u> <i>RR</i>	<u>4/17/96</u>
3.	<u>GBagchi</u> <i>GB</i>	<u>4/25/96</u>
4.	<u>Glainas</u>	<u>1/196</u>
5.	<u>BSheron</u>	<u>1/196</u>

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SUBJECT: FEES ASSOCIATED WITH REVIEW OF NEI 96-XX, "INDUSTRY GUIDELINE FOR RISK-BASED INSERVICE INSPECTION"

ORIGINATOR: Syed Ali

DATE: April 22, 1996

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	NAME	DATE
1.	SAli <i>SAA</i>	<u>4/23/96</u>
2.	RRothman <i>RR</i>	<u>4/27/96</u>
3.	GBagchi <i>GB</i>	<u>4/25/96</u>
4.	GLainas	<u>1/196</u>
5.	BSheron	<u>1/196</u>

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PLEASE RE-CONSIDER

GOUTAM

I THINK ITS BEST
TO GO THRU
OFFICE

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PRabideau - 9D33 (WFM)

please call Syed Ali
215-2776