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Subject: Request for Pre-Submittal Meeting Regarding Topical Report WCAP-18124-NP-A, Revision 0, Supplement 1 – P/NP “Fluence Determination with RAPTOR-M3G and FERRET – Supplement for Extended Beltline Materials”

The purpose of this letter is to formally request a pre-submittal meeting to support a December 2020 submittal of Supplement 1 to Topical Report WCAP-18124-NP-A, Revision 0.

Regulatory Guide 1.190, “Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence,” identifies procedures acceptable to the NRC staff for determining reactor pressure vessel neutron exposure (fluence). WCAP-18124-NP-A has been approved by the NRC for neutron fluence determination in accordance with Regulatory Guide 1.190 using the RAPTOR-M3G and FERRET computer codes. The NRC identified two “Limitations and Conditions” associated with the application of RAPTOR-M3G and FERRET. Limitation #1 restricts the applicability of WCAP-18124-NP-A to traditional beltline RPV regions and states that additional justification must be supplied for extended beltline RPV and reactor vessel internal component applications.

The objective of this supplement to WCAP-18124-NP-A is to provide the justification necessary to narrow Limitation #1 and allow licensees to apply the RAPTOR-M3G method in the extended beltline regions of RPVs on a generic basis.

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cc: Ekaterina Lenning (NRC)  
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