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2020-095	BWR Vessel & Internals Project (BWRVIF

(via e-mail)

November 5, 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-321 Draft Safety

Evaluation

References:

- 1. Email from Joseph J. Holonich (NRC) to Tim Hanley (BWRVIP Chairman), "BWRVIP-321 Draft Safety Evaluation," dated October 21, 2020 (BWRVIP Letter 2020-088A, NRC ADAMS Accession No. ML20280A318)
- 2. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), "BWRVIP Docket No. 99902016 Transmittal of BWRVIP-321: BWR Vessel and Internals Project, Plan for Extension of BWR Integrated Surveillance Program (ISP) Through the Second License Renewal (SLR)," dated March 8, 2019 (BWRVIP Letter 2019-021, NRC ADAMS Accession No. ML19071A234)
- 3. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), "BWRVIP Docket No. 99902016 BWRVIP Response to Request for Additional Information on BWRVIP-321 to NRC," dated June 8, 2020 (BWRVIP Letter 2020-046, NRC ADAMS Accession No. ML20188A358)
- 4. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), "BWRVIP Docket No. 99902016 Revised BWRVIP Response for RAI-10 to the NRC Request for Additional Information on BWRVIP-321," dated July 15, 2020 (BWRVIP Letter 2020-058, NRC ADAMS Accession No. ML20206K867)
- 5. Email from Joseph J. Holonich (NRC) to Wynter McGruder (EPRI), "Transmittal of Proprietary Information Withholding Determination," dated July 6, 2020 (NRC ADAMS Accession No. ML20168A000/ML20168A006)
- 6. Letter from Joseph J. Holonich (NRC) to Tim Hanley (BWRVIP Chairman), "Proprietary Determination of EPRI Topical Report, BWRVIP-321: BWR Vessel

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and Internals Project, Plan for Extension of The BWR Integrated Surveillance Program (ISP) Through the Second License Renewal (SLR)," dated April, 23, 2019. (NRC ADAMS Accession No. ML19091A259)

The NRC email referenced above (Reference 1) transmitted a draft NRC Safety Evaluation of the BWRVIP report entitled "BWRVIP-321: BWR Vessel and Internals Project, Plan for Extension of BWR Integrated Surveillance Program (ISP) Through the Second License Renewal (SLR)" to the BWRVIP and requested that the BWRVIP identify any proprietary information in the draft SE. The email also 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 draft SE showing proposed changes and a summary table of the proposed changes. Attachment 1 provides the marked-up copy with identification of EPRI proprietary information, denoted by yellow highlighting and enclosing in double 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-321 or the BWRVIP's responses to NRC Requests for Additional Information (RAI) for the BWRVIP-321 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 2, 3, and 4). The requests for withholding were approved by the NRC as documented in References 5 and 6.

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 <a href="wmcgruder@epri.com">wmcgruder@epri.com</a>.

Sincerely,

Tim Hanley, Exelon, BWRVIP Chairman

Nathan Palm, EPRI, BWRVIP Program Manager

c: BWRVIP Technical Chairs BWRVIP EPRI Task Managers