

PROJ0669
99902021

March 3, 2021

Ms. Cherish K. Johnson
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Fee Exemption Request for Review and Endorsement of EPRI Submittal related to the methodology presented in the EPRI Topical Report "Use of Data Validation and Reconciliation Methods for Measurement Uncertainty Recapture" (EPRI 3002018337).

Reference: [1] Summary of February 13, 2020, Pre-Submittal Meeting with the Electric Power Research Institute to Discuss "TP-EPRI-2019-005 Topical Report: Data Validation and Reconciliation Use for Determining Nuclear Power Station Reactor Power"(EPID L-2020-TOP-0004)

Dear Ms. Johnson:

On January 27, 2021, EPRI submitted the Topical Report "Use of Data Validation and Reconciliation Methods for Measurement Uncertainty Recapture" (EPRI 3002018337) to the NRC for review and approval.

The objective of this report is intended to establish the technical basis for using Data Validation and Reconciliation (DVR) Techniques for Measurement Uncertainty Recapture uprates and perform related evaluations to substantiate the uncertainty claims of the DVR process. The material contained within the report evaluates and outlines implementation of Data Validation and Reconciliation as a means to reduce the uncertainty of determinations of nuclear power plant core thermal power and evaluate the DVR for use in a measurement uncertainty recapture uprate.

In the two decades since the measurement uncertainty recapture uprates were implemented, there have been numerous recorded down powers by power plants as a result of instrument failure; most commonly on the part of the ultrasonic flow meter or as a result of fouling of the differential pressure flow meter. Operating Experience also exists in which plants have operated higher than their core thermal power license limit as a result of the erroneous plant feedwater flow metering. Data Validation and Reconciliation offers the nuclear power industry plants a method of improving the reliability of CTP calculations by reducing single point measurement vulnerabilities, such as the ultrasonic flow meter. D035

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EPRI is requesting a fee waiver for the review of the Topical Report "Use of Data Validation and Reconciliation Methods for Measurement Uncertainty Recapture" (EPRI 3002018337).

The NRC has an established regulation governing fee exemptions as stated in 10 CFR 170.11, "Exemptions." In accordance with 10 CFR 170.11, our fee exemption request is based on the following specific regulations: 10 CFR 170.11 (a)(1)(ii) and 10 CFR 170.11 (a)(13). As stated in 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).

NRC review and endorsement and subsequent industry implementation of the EPRI Technical Report 3002018337, "Use of Data Validation and Reconciliation Methods for Measurement Uncertainty Recapture: Topical Report" will result in improvements to Nuclear Power Plant Core Thermal Power Monitoring, and as a topical report that is applicable to all current U.S. Nuclear Plant designs, may be referenced by each plant in a License Amendment Request (LAR) submittal, optimizing NRC allocation of resources for LAR review.

It is requested that, if this fee exemption is approved, any fees billed to EPRI associated with the report pre-submittal meeting (Reference [1]) be refunded.

Please contact me should you have any questions at 704-595-2666 or jgreene@epri.com

Sincerely,

Jeffrey Greene 
Digitally signed by Jeffrey
Greene
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Jeffrey D. Greene
Program Manager

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