

April 30, 2021

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

Ref Docket Number 99902021

Subject: Request for Exemption of NRC Review Fees for EPRI Report 3002019621,
“Susceptibility of Valve Applications to Failure of the Stem-to-Disk Connection”

Reference: [1] ASME Case OMN-28, “Alternative Valve Position Verification Approach to Satisfy
ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation”

The purpose of this letter is to request that the document titled “Susceptibility of Valve Applications to Failure of the Stem-to-Disk Connection” be exempt from NRC review fees in accordance with 10CFR170.11(a)(1)(ii).

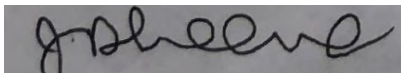
EPRI developed report 3002019621 “Susceptibility of Valve Applications to Failure of the Stem-to-Disk Connection” in response to new rulemaking concerning requirements set forth in ASME O&M Code ISTC-3700 pertaining to position verification testing when licensees adopt 2012 and later additions of the ASME O&M Code. The EPRI report was developed in parallel with the new ASME Code Case OMN-28 which allows for an alternative to ISTC-3700 by evaluating valve susceptibility to stem – disk separation. If deemed not susceptible, the Code Case interval to perform ISTC-3700 and the supplemental indications would be extended from 2 years to 12 years. With the recent approval of the ASME Code Case, it is expected that many licensees will be using the EPRI report as the technical basis for the evaluation of their valves.

The submittal of this report for NRC review comes at the request of the NRC by Michael Farnan on March 24, 2021. It is NRC desire to obtain an official copy of the report for use by the regional inspectors. A documented review and position on the EPRI report would allow for regional inspectors to become familiar with EPRI report and understand what is needed when a licensee completes an engineering analysis of a valve susceptibility to failure.

It is requested that, if this fee exemption is approved, any fees billed to EPRI associated with the report be refunded.

If you have any questions on this subject, please contact the EPRI project manager, Nick Camilli, by telephone at 704.595.2594 or by e-mail at ncamilli@epri.com.

Sincerely,



Jeffrey D. Greene
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