



August 18, 2023

Howard Osborne
Chief Financial Officer
U. S. Nuclear Regulatory Commission

Ref Docket Number 99902021

Subject: Request for Exemption of NRC Review Fees for EPRI 3002023774, “EPRI MOV Performance Prediction Methodology (PPM) Version 4.1”

Reference: [1] EPRI 3002026131, Motor-Operated Valve Performance Prediction Program: Addendum 11 to TR-103237-R2 - Changes to Performance Prediction Methodology Software, Version 4.1

The purpose of this letter is to request that the software titled “EPRI MOV Performance Prediction Methodology (PPM) Version 4.1” be exempt from NRC review fees in accordance with 10CFR170.11(a)(1)(ii).

The EPRI Performance Prediction Methodology (PPM) software is the only NRC approved method to conservatively predict dynamic thrust/ torque operating requirements. The software was built on and validated against an elaborate test program comprised of flow loop and in-situ testing encompassing new and used valves. The PPM software was built as a response to NRC Generic Letter 89-10. Since initial release, the NRC has provided a Safety Evaluation (or a letter confirming NRC approval for use under an existing Safety Evaluation) on each new release of PPM. While the changes in Version 4.1 are relatively minor, after a review of EPRI report 3002026131 via the NRC Reading Room, the NRC has requested to receive PPM V4.1.

It is anticipated that licensees will need an NRC approved version of PPM V4.1 such that any analysis performed can be appropriately documented. As no technical changes were made in Version 4.1 that alter the applied engineering equations/methods of the PPM or that fall outside of the current NRC SEs on the PPM and associated methodologies, EPRI anticipates the NRC will be able to approve use of PPM Version 4.1 through a letter referencing the existing NRC SEs, consistent with other recent PPM Software revisions, or utilize a relatively simplified SE.

The submittal of this software for NRC review comes at the request of the NRC by Tom Scarbrough on May 9, 2023. It is the desire of the NRC to obtain an official copy of the software for the safety evaluation process and that has been provided by EPRI. A documented review and position on PPM V4.1 would allow for utilities to document analysis using the latest release.

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 me by telephone at 704.595.2594 or by e-mail at ncamilli@epri.com.

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Sincerely,

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