



08/17/2023
PT-08172023-223

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U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

EPRI Docket No. 99902021

Attention: Lois James

Subject: Request for NRC Review of “Enhanced Risk-Informed Categorization Methodology for Pressure Boundary Components,” EPRI Technical Report 3002025288, June 2023.

Reference: EPRI letter #PT-05032023-216, "Request for Exemption of NRC Review Fees for “Enhanced Risk-Informed Categorization Methodology for Pressure Boundary Components, EPRI Technical Report 3002025288,” dated May 3, 2023.

Enclosed is one (1) paper copy of the report “Enhanced Risk-Informed Categorization Methodology for Pressure Boundary Components,” EPRI Technical Report 3002025288, April 2023. This report is being transmitted to the USNRC for review and approval.

As background, USNRC rule 10CFR50.69, “*Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors,*” which is applicable to both Part50 and Part52 Licensees and applicants provides an alternative approach for establishing the requirements for treatment of structures, systems and components (SSCs) for nuclear power reactors using a risk-informed method of categorizing SSCs according to their safety significance. Implementation guidance for this rule is provided in USNRC Regulatory Guide 1.201, “*Guidelines for Categorizing Structures, Systems and Components in Nuclear Power Plants According to Their Safety Significance.*” Unfortunately, as evidenced by the withdrawal of the initial 50.69 pilot application (see Surry letter dated June 12, 2006), the endorsed process for risk-informed categorizing of pressure boundary component was not workable. Since that time, Licensees have been using as a stop gap measure the risk-informed repair / replacement methodology as demonstrated at ANO (ML-090930246). USNRC review and approval of 3002025288 will increase USNRC and Licensee efficiencies while also increasing plant safety

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and better focusing USNRC and industry resources on those activities that impact plant safety as intended by the 10CFR50.69 rulemaking. Additionally, it is envisioned that once 3002025288 has been approved by USNRC, Regulatory Guide 1.201 can be revised to identify 3002025288 as an acceptable methodology for categorizing pressure boundary components and thus closing the current gap in its regulatory guidance.

Further, while USNRC Regulatory Guide 1.26, “Quality Group Classifications and Standards for Water, Steam and Radioactive Waste Containing Components of Nuclear Power Plants has been revised (see revision 6 dated December 2021) to acknowledge that risk-informed categorization processes may be used to further define “safety-related” and “non-safety related”, it does not identify an USNRC acceptable approach for conducting such risk-informed categorizations. As such, it is also envisioned that once USNRC has approved 3002025288, Regulatory Guide 1.26 can also be revised to close this additional regulatory guidance gap.

EPRI requests that the NRC review of 3002025288 be performed on a fee exempt basis and a separate EPRI letter to the NRC Chief Financial Officer (CFO) has been transmitted requesting a fee exemption.

USNRC review of 3002025288 will not only close the above mentioned regulatory guidance gaps, it will reduce staff efforts reviewing future submittals, re-submittals as well as NRC audits of 10CFR50.69 categorization and alternate treatment efforts.

Sincerely,

Fernando Ferrante

Digitally signed by Fernando
Ferrante
Date: 2023.08.18 09:52:53 -04'00'

Fernando Ferrante
Program Manager, Risk & Safety
EPRI

Attachment: “Enhanced Risk-informed Categorizing Methodology for Pressure Boundary Components, EPRI Technical Report 3002025288,” dated June 2023

c: Anthony Rossi, NRC

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