



2023-060 \_\_\_\_\_ BWR Vessel & Internals Project (BWRVIP)

(via e-mail)

August 25, 2023

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

Attention: Lois James

Subject: Docket No. 99902016 – BWRVIP Response to Revised BWRVIP-315 Draft Safety Evaluation

- References:
1. Email from Lois James (NRC) to Tim Hanley (BWRVIP Chairman) and Nathan Palm (EPRI), “Issuance of Draft SE Associated with BWRVIP-315, Reactor Internals Aging Management Evaluation for Extended Operations for Proprietary Information Review (EPID L-2019-TOP-0050),” dated May 26, 2023 (NRC ADAMS Accession No. ML22138A043)
  2. Email from Joseph J. Holonich (NRC) to Wynter McGruder (EPRI), “Draft Safety Evaluation for BWRVIP-315,” dated September 1, 2021 (BWRVIP Letter 2021-063A, NRC ADAMS Accession No. ML21105A038)
  3. Meeting between the NRC staff and EPRI, “Closed Meeting to discuss the draft Safety Evaluation for BWRVIP-315,” dated September 28, 2021 (NRC ADAMS Accession No. ML21256A060)
  4. Letter from Tim Hanley (BWRVIP Chairman) to Serita Sanders (NRC), “Docket No. 99902016 – BWRVIP Response to BWRVIP-315 Draft Safety Evaluation,” dated January 20, 2022 (NRC ADAMS Accession No. ML2205A113)
  5. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), “Transmittal of BWRVIP-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations,” dated October 22, 2019 (BWRVIP Letter 2019-096, NRC ADAMS Accession No. ML19297G276)

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6. Letter from Tim Hanley (BWRVIP Chairman) to Joseph Holonich (NRC), “BWRVIP Docket No. 99902016 – BWRVIP Response to BWRVIP-315 Request for Additional Information (RAIs),” dated February 15, 2021 (BWRVIP Letter 2021-015, NRC ADAMS Accession No. ML21047A085)
7. Email from Joseph J. Holonich (NRC) to Wynter McGruder (EPRI), “Proprietary Information Withholding Determination for BWRVIP-315 RAI Response,” dated March 12, 2021 (NRC ADAMS Accession No. ML21047A084)
8. Letter from Joseph J. Holonich (NRC) to Tim Hanley (BWRVIP Chairman), “Acceptance Review and Proprietary Determination for EPRI Topical Report, BWRVIP-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations,” dated February 24, 2020. (BWRVIP Letter 2020-009B, NRC ADAMS Accession No. ML19296A008)

The NRC email cited as Reference 1 transmitted a copy of the revised draft NRC Safety Evaluation (SE) of the BWRVIP report entitled “BWRVIP-315: BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations” to the BWRVIP and requested that the BWRVIP identify any proprietary information in the draft SE. The email also requested that the BWRVIP identify any factual errors or clarity concerns associated with the draft Safety Evaluation.

The BWRVIP received the original draft NRC SE (Reference 2) in September 2021. The BWRVIP met with the NRC in a closed meeting (Reference 3) to discuss the conditions and the open item contained in the original draft SE of BWRVIP-315. The NRC provided clarifications which allowed the BWRVIP to proceed with providing a response to the BWRVIP-315 draft SE. The BWRVIP provided a response to the original draft NRC SE (Reference 4) in January 2022. After review of the BWRVIP response to the original draft NRC SE, the NRC provided the revised draft NRC SE in Reference 1.

To facilitate the NRC staff’s review of the BWRVIP’s comments, the NRC requested the BWRVIP provide a marked-up copy of the revised draft SE showing proposed changes and a summary table of the proposed changes. [Attachment 1](#) provides the marked-up copy of the revised draft SE. Attachment 1 also contains the BWRVIP’s comments along with a summary table.

The BWRVIP identified that information contained in Attachment 1 includes proprietary information. Therefore, Attachment 1 is considered EPRI “Trade Secrets” in accordance with 10CFR2.390. All proprietary information was taken from either BWRVIP-315 or the BWRVIP’s responses to NRC Requests for Additional Information (RAI) for the BWRVIP-315 review that

was already identified as being proprietary information, along with the requisite affidavits, when those documents were transmitted to the NRC (see References 5 and 6). The requests for withholding were approved by the NRC as documented in References 7 and 8.

If you have any questions regarding this subject, please contact Wynter McGruder at EPRI by telephone at 704.957-9235 or by e-mail at [wmcgruder@epri.com](mailto:wmcgruder@epri.com).

Sincerely,



Nathan Palm, EPRI, BWRVIP Program Manager  
Martin Bonifanti, Constellation, BWRVIP Chairman

c: BWRVIP Technical Chairs  
BWRVIP EPRI Task Managers