



MRP Materials Reliability Program _____ MRP 2024-001
(via email)

Date: February 23, 2024

To: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

Subject: Report Transmittal: *Materials Reliability Program: Guidance on Timing for Technical Specifications Revision Following Surveillance Capsule Testing (MRP-484)*. EPRI, Palo Alto, CA: 2023. 3002026457. (Reference: EPRI Docket No. 99902021.)

Attention: Ms. Lois James (lois.james@nrc.gov)

References:

1. *Materials Reliability Program: Guidance on Timing for Technical Specifications Revision Following Surveillance Capsule Testing (MRP-484)*. EPRI, Palo Alto, CA: 2023. 3002026457.
2. MRP Letter 2024-001, Report Transmittal: *Materials Reliability Program: Guidance on Timing for Technical Specifications Revision Following Surveillance Capsule Testing (MRP-484)*. EPRI, Palo Alto, CA: 2023. 3002026457. (Reference: EPRI Docket No. 99902021.)

Enclosed is the EPRI report *Materials Reliability Program: Guidance on Timing for Technical Specifications Revision Following Surveillance Capsule Testing (MRP-484)*. This report is being transmitted as a means of exchanging information with the NRC for the purpose of supporting generic regulatory guidance improvement related to the timing for submittal of 10 CFR 50, Appendix G Technical Specifications updates, i.e. Pressure-Temperature (P-T) Limits, following the withdrawal and testing of a surveillance capsule in accordance with 10 CFR 50 Appendix H. In its current form, neither Appendix H, nor ASTM E185-82, invoked by reference in Appendix H, is clear regarding an exact date in which revised Technical Specifications revisions must be submitted. It only confirms that the expected date for their submittal must be provided within the [surveillance] report.

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MRP-484 provides a technical basis supporting generic and conservative guidance, relevant to the entire US PWR fleet, for when Technical Specifications revisions must be reported:

As part of surveillance capsule withdrawal and reporting to the NRC, plants assess the need to update their Technical Specifications in compliance with Section IV.C of Appendix H to 10 CFR Part 50. If a need to update the Technical Specifications is identified, then plants must submit that update to the NRC for review within 5 years of the date they submitted the surveillance capsule report. This 5-year reporting timeframe is constrained by the expiration of current P-T limits as well as by compliance with the reporting requirements of 10 CFR 50.61 if either is more limiting. The 5-year reporting timeframe may be extended based on plant-specific justifications making use of the information in this report, subject to the review and approval of the NRC.

EPRI is requesting that the NRC issue a safety evaluation report (SER) on MRP-484, specifically the generic and conservative guidance contained within the report.

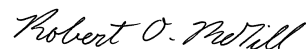
At present, EPRI is not requesting that a formal pre-submittal meeting be held; however, after an initial review of the document by the NRC, if a meeting to discuss the document is deemed necessary, the need for a meeting can be revisited at that time. Finally, EPRI is concurrently requesting a review fee exemption request for this report (See Reference 2). While this request is being processed, EPRI still wishes to proceed with the review.

If you have any questions about this project, please contact Mr. Bob McGill at EPRI (rmcgill@epri.com, 650-855-8568) or Mr. Elliot J. Long (elong@epri.com, 412-495-6659).

Sincerely,



Rex Meeden, PMMP EC Chairman
Arizona Public Service



Robert O. McGill, MRP Program Manager
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cc: Lois James (lois.james@nrc.gov)