

From: [Leslie Fields](#)
To: [Holderbaum, Chad M.](#); [Andrachek, James D](#)
Cc: [Gerond George](#); [Angie Buford](#); [David Dijamco](#); [John Tsao](#)
Subject: NRC Transmittal of the Draft Safety Evaluation for Topical Report PWROG-18068-NP, Revision 1
Date: Thursday, August 8, 2024 3:02:00 PM
Attachments: [Comment - Resolution Table Template \(PWROG-18068\) Clean.docx](#)

Dear Chad Holderbaum of PWROG,

By letter dated July 27, 2021, as supplemented by letters dated March 8, 2024, and July 24, 2024, the Pressurized Water Reactor Owners Group (PWROG) submitted topical report PWROG-18068-NP, Revision 1, "Use of Direct Fracture Toughness for Evaluation of RPV Integrity," to the U.S. Nuclear Regulatory Commission (NRC) for review and approval. The topical report proposes an alternative methodology to the structural integrity requirements for RPV materials specified in 10 CFR 50. The proposed alternative methodology is based on the use of the ductile-brittle reference temperature (T_0) in lieu of the nil-ductility reference temperature (RT_{NDT}) for RPV material integrity evaluations.

A copy of the draft Safety Evaluation (SE) has been placed in the Box.com folder and shared with you. The draft SE is being provided for an accuracy, clarity, editorial, and proprietary information review. If the PWROG requests technical comments on any areas in the draft SE, the NRC staff will exercise its discretion on whether to address those comments. Pursuant to Section 2.390 of Title 10 of the *Code of Federal Regulations* (10 CFR), if you believe that any information in the draft SE is proprietary, PWROG should identify such information line-by-line and define the basis pursuant to the criteria of 10 CFR 2.390. Use double brackets and yellow highlight to identify any [[proprietary information]]. After 10 working days, the draft SE will be made publicly available, if appropriate.

Your comments on the draft SE must be provided via e-mail/letter from an authorized individual. In addition, please provide an electronic redline/strikeout Microsoft Word version of the draft SE either via email or the Box.com folder. To help expedite the NRC staff's response to comments it would be helpful if PWROG provides all feedback in the attached Comment/Resolution table with the formal transmitted communication in a Microsoft Word file addressing the application areas shown below:

Comment No., Page No., Line No., and Comment Type (if comments other than proprietary information are provided (i.e., editorial, clarity, accuracy)), Suggested Revision, and leave a blank column for NRC Disposition/Response to comments. Please note that NRC has prepared some comments for PWROG to consider in the final TR.

Please be informed that PWROG may provide its comments in any format that it chooses. The final SE will be issued after making the necessary changes.

At this stage of the process, the NRC staff has completed its technical review of the submitted information and will not entertain new technical arguments. The NRC staff's conclusions and conditions will not change unless new information is provided that was not available during our review. If PWROG would like to discuss the draft SE in detail, we can do that in a noticed public meeting that can be closed if proprietary information needs to be discussed. This email, the draft SE, and NRC comment resolution table have been placed in ADAMS as Official Agency Records. The draft SE and table are declared as nonpublic

because it may contain pre-decisional information until it is declared final. This email is declared publicly available.

If you have any questions, please feel free to contact me at 301-415-1186 or by email at leslie.fields@nrc.gov.

Sincerely,

Leslie C. Fields.

US NRC Senior Project Manager

NRR/DORL

: leslie.fields@nrc.gov

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DATE	6/20/2024	7/18/2024	7/22/2024	8/06/2022	8/08/2022