Lois James

From: Lindeman, Ashley <alindeman@epri.com>
Sent: Wednesday, June 11, 2025 5:59 PM
To: Lois James; ext_Fernando_Ferrante
Cc: Aida Rivera-Varona; Jennie Rankin; Meena Khanna; Shilp Vasavada; Bob Pascarelli; Matthew Mitchell; Fougerousse, Richard
Subject: [External_Sender] RE: Proposed Limitations and Conditions to be Contained in the Safety Evaluation for EPRI Report 3002025288, "Enhanced Risk-Informed Categorization Methodology for Pressure Boundary Components" (EPID No. L-2023-NTR-0008)

Hi Lois,

Thank you for providing the limitations and conditions for the TR. I do not believe we need to hold the public meeting tomorrow, but in the interest in making the TR as self-contained and clear as possible, I am requesting the following edits to the TR to incorporate the limitations and conditions. We agree that the limitations and conditions are not optional and we commit to the following edits to the TR as noted below:

For Limitation 1: EPRI will change the word should to must in the third paragraph of Section 4.1.1. See original and revised shown below:
Original text:
Prior to using the enhanced categorization methodology, non-conservatisms or the use of methods not commonly accepted must be reviewed to determine their impact, if any, on the risk-informed categorization of the pressure boundary. The analyst should also review key assumptions and sources of model uncertainty in the context of this application.

Revised text:
Prior to using the enhanced categorization methodology, non-conservatisms or the use of methods not commonly accepted must be reviewed to determine their impact, if any, on the risk-informed categorization of the pressure boundary. The analyst ***must*** *review key assumptions and sources of model uncertainty in the context of this application.*

For condition 1: EPRI proposes to add the red bolded text to the fifth paragraph of Section 4.1.2:
Additional text is highlighted in bold
As such, application of the following prerequisites in the context of 10 CFR 50.69 will provide a robust mechanism for ensuring pressure boundary integrity[1]. **In the LAR submittal for implementing the enhanced passive categorization, the licensee shall identify the programs for addressing localized corrosion, flow-accelerated corrosion, and erosion. The following bullets provide examples of industry guidance, if other guidance is used, the licensee shall provide justification to demonstrate robustness.**

We agree with the intent of the L&Cs, and hope that by placing these expectations in the TR will ensure consistency in applications.

Best Regards,
Ashley

Ashley M. Lindeman
Principal Project Manager

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From: Lois James <Lois.James@nrc.gov>
Sent: Wednesday, June 11, 2025 12:52 PM
To: Ferrante, Fernando <fferrante@epri.com>
Cc: Lois James <Lois.James@nrc.gov>; Aida Rivera-Varona <Aida.Rivera-Varona@nrc.gov>; Jennie Rankin <Jennivine.Rankin@nrc.gov>; Meena Khanna <Meena.Khanna@nrc.gov>; Shilp Vasavada <Shilp.Vasavada@nrc.gov>; Bob Pascarelli <Robert.Pascarelli@nrc.gov>; Matthew Mitchell <Matthew.Mitchell@nrc.gov>; Lindeman, Ashley <alindeman@epri.com>; Fougerousse, Richard <RFougerousse@epri.com>
Subject: [EXTERNAL] Proposed Limitations and Conditions to be Contained in the Safety Evaluation for EPRI Report 3002025288, "Enhanced Risk-Informed Categorization Methodology for Pressure Boundary Components" (EPID No. L-2023-NTR-0008)

Fernando Ferrante, Program Manager, Risk & Safety
Electric Power Research Institute
1300 West W.T. Harris Boulevard
Charlotte, NC 28262-8550

Dear Fernando Ferrante:

By letter dated August 17, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23234A266), as supplemented on November 30, 2023 (ADAMS Accession No. ML23334A210), and June 14, 2024 (ADAMS Accession No. ML24180A016), Electric Power Research Institute (EPRI) submitted EPRI Technical Report (TR) 3002025288, "Enhanced Risk-Informed Categorization Methodology for Pressure Boundary Components," dated June 2023, to the U.S. Nuclear Regulatory Commission (NRC) for review and approval. EPRI TR 3002025288 presents an enhanced methodology for categorizing pressure boundary components in support of 10 CFR 50.69 applications.

The NRC staff is ready to issue the Safety Evaluation for EPRI Report 3002025288 for proprietary review. Before we issue the safety evaluation for proprietary review, the NRC staff wanted to give EPRI a chance to review the limitations and conditions and request a public meeting to discuss.

All parties are working to a tight schedule, and the public meeting has already been scheduled for June 12, 2025, at 3:00 pm and noticed on June 4, 2025 in ADAMS Accession No. ML25155B872). The limitations and conditions are provided in Enclosure 1 to this email and will be made public in order to support a public meeting.

Please review the limitations and conditions and let the NRC staff know, no later than close of business on June 11, 2025, whether EPRI would like to hold the public meeting to discuss

Sincerely,

Lois M. James, Senior Project Manger
Division of New and Renewed Licenses (DNRL)

Office of Nuclear Reactor Regulation (NRR)
U.S. Nuclear Regulatory Commission
Lois.James@nrc.gov

Docket Nos. 99902021

Enclosure:
As stated

ADAMS Nos,: ML25162A117 (pkg), ML25162A119 (email), ML25162A120 (proposed limitations and conditions)

[1] For each of these programs, CDF/LERF risk insights alone should not be used to relax testing/inspection/monitoring of highly susceptible locations.