



2025-028 \_\_\_\_\_ BWR Vessel & Internals Project (BWRVIP)

(via e-mail)

June 17, 2025

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

Attention: Lois James

Subject: Docket No. 99902016 – BWRVIP Response to BWRVIP-100, Revision 2 Draft Safety Evaluation

- References:
1. Email from Lois James (NRC) to Martin Bonifanti (Constellation) and Nathan Palm (EPRI), “Draft Safety Evaluation Associated with EPRI Technical Report BWRVIP-100, “BWR Vessel and Internals Project, Updated Assessment of the Fracture Toughness of Irradiated Stainless Steel for BWR Internal Components,” Revision 2,” dated March 21, 2025 (BWRVIP Letter 2025-013A, NRC ADAMS Accession No. ML25023A092)
  2. Letter from Martin Bonifanti (BWRVIP Chairman) and Nathan Palm (EPRI BWRVIP) to Lois James (NRC), “BWRVIP Docket No. 99902016 – BWRVIP-100, Revision 2: BWR Vessel and Internals Project, Updated Assessment of the Fracture Toughness of Irradiated Stainless Steel for BWR Internal Components” dated July 11, 2023 (BWRVIP Letter 2023-049, NRC ADAMS Accession No. ML23198A333)
  3. Email from Lois James (NRC) to Martin Bonifanti (BWRVIP Chairman) and Nathan Palm (EPRI BWRVIP), “NRC Completion Determination Form 898 and Proprietary Determination Form 898 for BWRVIP-100 Revision 2: BWR Vessel and Internals Project, Updated Assessment of the Fracture Toughness of Irradiated Stainless Steel for BWR Internal Components” dated September 14, 2023 (BWRVIP Letter 2023-066A, NRC ADAMS Accession No. ML23214A047)

The NRC email referenced above (Reference 1) transmitted a draft NRC Safety Evaluation (SE) of the BWRVIP report entitled “BWRVIP-100, Revision 2, BWR Vessel and Internals Project, Updated Assessment of the Fracture Toughness of Irradiated Stainless Steel for BWR Internal

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Components” to the BWRVIP and requested that the BWRVIP identify any proprietary information in the draft SE.

To facilitate the NRC staff’s review of the BWRVIP’s comments, the NRC requested the BWRVIP provide a marked-up copy of the draft SE showing proposed changes and a summary table of the proposed changes. Attachment 1 provides the marked-up copy of the draft SE with identification of EPRI proprietary information, denoted by yellow highlighting and enclosing in double brackets. Attachment 1 also contains the BWRVIP’s comments and a summary table with the BWRVIP’s comments.

The information identified in Attachment 1 as proprietary information is considered EPRI “Trade Secrets” in accordance with 10CFR2.390. All of this proprietary information was taken from BWRVIP-100, Revision 2. The proprietary information in BWRVIP-100, Revision 2 was already identified as being proprietary information, along with the requisite affidavit, when the document was transmitted to the NRC (see Reference 2). The request for withholding was approved by the NRC as documented in Reference 3.

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,

*Barry Davis*

*Nathan Palm*

Barry Davis, Entergy, BWRVIP Chairman  
Nathan Palm, EPRI, BWRVIP Program Manager

c: BWRVIP Technical Chairs  
BWRVIP EPRI Task Managers