



2025-029 \_\_\_\_\_ 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

**Subject:** BWRVIP Docket No. 99902016 – BWRVIP Response to BWRVIP-138,  
Revision 2 Draft Safety Evaluation

**Reference:**

1. Email from Lois James (NRC) to Martin Bonifanti (BWRVIP Chairman) and Nathan Palm (EPRI BWRVIP), “Draft Safety Evaluation Associated for EPRI Report BWRVIP-138, Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines, Revision 2” dated February 28, 2025 (BWRVIP Letter 2025-009A NRC ADAMS Accession No. ML25028A103)
2. June 13, 2025, Public Meeting between NRC staff and EPRI to discuss draft SE conditions, “Draft SE Public Meeting for BWRVIP-138, Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines, Revision 2,” dated June 2, 2025 (NRC ADAMS Accession No. ML25153A586)
3. Letter from Barry Davis (BWRVIP Chairman) and Nathan Palm (EPRI BWRVIP) to NRC Document Control Desk, “Draft Safety Evaluation (SE) Public Meeting for BWRVIP-138, Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines, Revision 2– EPRI Presentation Materials,” dated June 3, 2025 (BWRVIP Letter 2025-026, NRC ADAMS Accession No. ML25154A235)
4. Email from Lois James (NRC) to Barry Davis (BWRVIP Chairman) and Nathan Palm (EPRI BWRVIP), “NRC Response to EPRI’s Request to Reconsider the Conditions in the Draft Safety Evaluation for EPRI Report BWRVIP-138, “Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines,” Revision 2,” dated June 6, 2025 (BWRVIP Letter 2025-027A, NRC ADAMS Accession No. ML25157A059)

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5. Letter from Martin Bonifanti (BWRVIP Chairman) and Nathan Palm (EPRI BWRVIP) to Lois James (NRC), “BWRVIP Docket No. 99902016 – BWRVIP-138, Revision 2: BWR Vessel and Internals Project, Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines” dated October 25, 2023 (NRC ADAMS Accession No. ML23298A077, BWRVIP Letter 2023-077)

6. 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-138 Revision 2: BWR Vessel and Internals Project, Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines” dated January 3, 2024 (NRC ADAMS Accession No. ML23299A287, BWRVIP Letter 2024-001A)

The NRC email referenced above (Reference 1) transmitted a draft NRC Safety Evaluation (SE) of the BWRVIP report entitled “BWRVIP-138, Updated Jet Pump Beam Inspection and Flaw Evaluation Guidelines, Revision 2” 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 enclosure in double brackets. Attachment 1 also contains the BWRVIP’s comments and a summary table with the BWRVIP’s comments.

On April 21, 2025, the EPRI BWRVIP requested a public meeting to discuss the conditions imposed on BWRVIP-138, Revision 2 in the draft SE. The public meeting was scheduled for Friday, June 13, 2025 (Reference 2). On June 3, 2025, the EPRI BWRVIP submitted presentation materials to discuss the BWRVIP position on each of the conditions (Reference 3). By email (Reference 4), the NRC staff notified the EPRI BWRVIP that the presentation materials were reviewed, and the NRC has decided to remove all of the conditions imposed on BWRVIP-138, Revision 2. The June 13, 2025, public meeting was subsequently cancelled. Since the conditions in Section 4 of the draft SE will be removed in the final safety evaluation, the mark-up in attachment 1 also indicates instances throughout the draft SE where the conditions are listed or referenced. These instances are identified for removal from the Final SE based on the removal of the conditions.

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-138, Revision 2. The proprietary information in BWRVIP-138, Revision 2 was already identified as being proprietary information, along with the requisite affidavit, when the

document was transmitted to the NRC (see Reference 5). The request for withholding was approved by the NRC as documented in Reference 6.

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