

## Lois James

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**From:** Fougrousse, Richard <RFougrousse@epri.com>  
**Sent:** Tuesday, August 26, 2025 1:22 PM  
**To:** Lois James  
**Cc:** ext\_Ashley\_Lindeman  
**Subject:** [External\_Sender] Input on Draft SE for RI-HELB

Hey Lois,

Input on the draft SE for HELB are provided below.

1. We did not identify any proprietary information in the draft SE.
2. Could the last two sentences of the paragraph on page 2 that starts on line 33 be struck? We believe the two sentences are unnecessary and potentially confusing. We think the sentence "Each licensee seeking to implement the alternative would need to follow the appropriate change control process", adequately captures the obligation of licensees to follow appropriate change control processes in determining when and if a licensee must submit for approval under 10 CFR 50.90. No further cautions or elaborations on what "may" be required are needed, and the inclusion of these statements may lead to confusion and inefficiency.

32    3.    SUMMARY OF PROPOSED APPROACH

33    The RI-HELB methodology is based on EPRI TR-112657 (EPRI 2000a), for F  
34    Inservice Inspection (RI-ISI), and the extension of RI-ISI to break exclusion r  
35    programs in EPRI TR-1006937 (EPRI 2002a) and is used to determine SSCs imp  
36    postulated pipe breaks and the risk significance of these breaks. This proposed RI  
37    would provide an alternative to the above deterministic approaches for me  
38    requirements. Each licensee seeking to implement the alternative would need  
39    appropriate change control process. ~~The NRC staff notes that the first plant(s) to use~~  
40    ~~require NRC approval pursuant to 10 CFR 50.90. Implementation at subsequent pla~~  
41    ~~require NRC approval depending on the plant specific licensing bases and any c~~  
42    ~~compared to the initial approval(s).~~

3. On page 12, line 6, pls insert "Final" before "High consequence rank".

1 Therefore, the plant would be expected to maintain a reasonable balance among  
2 defense.

3 EPRI also stated that the RI-HELB does not substitute programmatic activities for de  
4 to an extent that reduces the reliability and availability of the design features. TI  
5 approach avoids over-reliance on programmatic activities. The NRC staff notes th  
6 events with a Final High consequence rank would continue to meet existing deterr  
7 requirements so that there would not be a significant change in DID- with respect t  
8 redundancy, independence, and diversity; adequate defense against potential cor  
9 failure and maintaining multiple fission product barriers.

Thanks.

Rick

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