



NUCLEAR ENERGY INSTITUTE

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September 10, 2002

Dr. Brian W. Sheron  
Associate Director for Project Licensing and Technical Analysis  
Office of Nuclear Reactor Regulation  
Mail Stop  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** EPRI Technical Report 1007337, *PWR Reactor Pressure Vessel Upper Head Penetrations Inspection Plan (MRP-75)*

**PROJECT NUMBER: 689**

Dear Dr. Sheron:

During the past several months we submitted to the NRC a proposed inspection plan and associated technical bases, and participated in public meetings to brief the NRC staff on these documents. At the most recent meeting held July 24 the NRC staff requested a single report incorporating these documents. Enclosed for your review is EPRI Report 1007337, *PWR Reactor Pressure Vessel (RPV) Upper Head Penetrations Inspection Plan (MRP-75), Revision 1*.

The inspection plan and the associated technical bases were developed by the Materials Reliability Program (MRP) based upon inspection results to-date, crack growth analysis, probabilistic fracture mechanics and head wastage analysis to demonstrate that:

1. visual inspections are adequate to detect initial leakage,
2. the probability of nozzle ejection is low, and
3. the applicable ASME Code margins are maintained.

We are prepared to meet with the NRC staff in October to discuss the enclosed report and seek NRC acceptance of this inspection plan for management of RPV penetration cracking and wastage. I will contact you to schedule a meeting date.

Dr. Brian W. Sheron  
September 9, 2002  
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If you have questions, please contact Kurt Cozens at (202) 739-8085, [koc@nei.org](mailto:koc@nei.org) or me.

Sincerely,

A handwritten signature in blue ink that reads "Alex Marion". The signature is written in a cursive style.

Alexander Marion

KOC/maa  
Enclosure

- c: Mr. Richard J. Barrett, U. S. Nuclear Regulatory Commission  
Mr. William H. Bateman, U. S. Nuclear Regulatory Commission  
Mr. Joseph L. Birmingham, U. S. Nuclear Regulatory Commission  
Mr. Steven D. Bloom, U. S. Nuclear Regulatory Commission  
Mr. Michael L. Marshall, Jr., U. S. Nuclear Regulatory Commission