

December 4, 2003

Bill Eaton, BWRVIP Vice Chairman
Entergy Operations, Inc.
Echelon One
1340 Echelon Parkway
Jackson, MS 39213-8202

SUBJECT: REVIEW OF BWRVIP-95 REPORT, "BWR VESSEL AND INTERNALS
PROJECT, GUIDE FOR FORMAT AND CONTENT OF BWRVIP REPAIR
DESIGN SUBMITTALS"

Dear Mr. Eaton:

The NRC staff has reviewed the BWRVIP-95 report, "BWR Vessel and Internals Project, Guide for Format and Content of BWRVIP Repair Design Submittals." The report provides guidelines for a standard format and content that BWR licensees can follow in preparing their repair design submittals. The proposed format and content are intended for repairs of components designed, fabricated and inspected in accordance with the ASME Code, using the appropriate BWRVIP Repair Design Criteria as an alternative to the Code requirements. Such alternatives must be submitted to the staff for review and approval, pursuant to 10 CFR 50.55a(a)(3)(i), prior to licensee implementation.

The purpose of the report is to expedite the licensee's preparation of repair design submittals as well as to facilitate the NRC staff's review of the submittals. The proposed format consists of three parts, namely, a cover letter, the technical submittal and the attachments. The content of the technical submittal is proposed to consist of 10 primary sections which are (1) Introduction and Summary, (2) Background, (3) Component Operational and Safety Functions, (4) Scope of Repair, (5) Design Objectives, (6) Description of Repair Components and Repair Design Features, (7) Structural and Design Evaluation, (8) Systems Evaluation, (9) Materials, Fabrication and Installation and (10) Inspection and Testing.

Based on its review, the staff finds that the guidelines provided in the subject report are comprehensive and useful in assisting the licensee's preparation of the repair design submittals for NRC review. However, to further enhance the guidelines in the report, the staff recommends the following:

- (1) A statement should be provided in the cover letter and in the Introduction and Summary section to indicate whether the referenced applicable BWRVIP Repair Design Criteria report has been reviewed and approved by NRC. If it has been approved by NRC, identify the approval letter and the open items, if any. The proposed resolution of these open items should be discussed in the appropriate primary sections.
- (2) A statement should be provided in the cover letter to indicate whether there are any exceptions to the referenced applicable BWRVIP Repair Design Criteria report. A

summary should be provided of all exceptions in the Introduction and Summary section, and the relevant sections identified that contain the reasons and the technical bases for the exceptions.

- (3) Since the proposed format and content are intended for repairs of Code components using the appropriate BWRVIP Repair Design Criteria report, as an alternative to the Code requirements pursuant to 10 CFR 50.55a(a)(3)(i), an independent section should be included in the report to discuss and demonstrate that the subject repair would provide an acceptable level of quality and safety in comparison to Code requirements.
- (4) A "Reference" section should be provided in the report which identifies all letters, reports, test data and analyses that are referenced or discussed in the repair design submittal.

The staff believes that the incorporation of the above recommendations in the proposed report would facilitate the staff's review of the licensee's repair design submittals. If you have any further questions regarding this subject, please contact William Koo of my staff at (301) 415-2706.

Sincerely,

/RA/

William H. Bateman, Chief
Materials and Chemical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation

cc: BWRVIP Service List

B. Eaton

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- (3) Since the proposed format and content are intended for repairs of Code components using the appropriate BWRVIP Repair Design Criteria report, as an alternative to the Code requirements pursuant to 10 CFR 50.55a(a)(3)(i), an independent section should be included in the report to discuss and demonstrate that the subject repair would provide an acceptable level of quality and safety in comparison to Code requirements.
- (4) A "Reference" section should be provided in the report which identifies all letters, reports, test data and analyses that are referenced or discussed in the repair design submittal.

The staff believes that the incorporation of the above recommendations in the proposed report would facilitate the staff's review of the licensee's repair design submittals. If you have any further questions regarding this subject, please contact William Koo of my staff at (301) 415-2706.

Sincerely,

/RA/

William H. Bateman, Chief
Materials and Chemical Engineering Branch
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Office of Nuclear Reactor Regulation

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