

March 10, 2006

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

SUBJECT: NRC APPROVAL LETTER FOR BWRVIP-95-A, "BWR VESSEL AND
INTERNALS PROJECT, GUIDE FOR FORMAT AND CONTENT OF
BWRVIP REPAIR DESIGN SUBMITTALS"

Dear Mr. Eaton:

By letter dated November 17, 2005, the Boiling Water Reactor Vessel and Internals Project (BWRVIP) submitted Proprietary Report BWRVIP-95-A, "BWR Vessel and Internals Project, Guide for Format and Content of BWRVIP Repair Design Submittals," for Nuclear Regulatory Commission (NRC) staff review. The BWRVIP-95-A 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 American Society of Mechanical Engineers (ASME) Code, using the appropriate BWRVIP repair design criteria report as an alternative to the ASME Code requirements. Such alternatives must be submitted to the staff for review and approval, pursuant to the Code of Federal Regulations (CFR), 10 CFR 50.55a(a)(3)(i).

The BWRVIP-95-A report presents a compilation of information from the BWRVIP-95 report and the NRC staff final safety evaluation (SE) dated May 13, 2005, which includes the BWRVIP's associated responses to NRC staff recommendations.

The NRC staff has reviewed the information in the BWRVIP-95-A report and has found that the report accurately incorporates all of the relevant information which was submitted by the BWRVIP in the documents noted above to support NRC staff approval of the report. The staff found that minimal revisions were made to the BWRVIP-95 report in the production of the BWRVIP-95-A report. These revisions are discussed in detail below.

Two revisions that were made to the BWRVIP-95 report were based on staff recommendations as stated in its initial SE dated May 13, 2005. The staff recommended that the BWRVIP add a requirement to the BWRVIP-95 report that a licensee should indicate in its submittal whether the applicable repair design criteria report has been approved by the NRC and indicate whether exceptions to the repair design criteria report are taken. The staff noted that the BWRVIP supplemented the text in Section 3.1, "Cover Letter," and Section 3.2.1, "Introduction and Summary," of the BWRVIP-95 report to note that licensees should identify: whether the referenced applicable BWRVIP repair design criteria report has been reviewed and approved by the NRC, open items from the review (if any), whether the proposed design takes exception to any of the requirements of the repair design criteria report, a list of the exceptions taken with

references to the sections of the submittal that discuss each exception (if any), the reason for the exception, and the technical basis for the exception, including a discussion of the level of quality and safety for the exception. Therefore, the staff determined that the BWRVIP adequately addressed its recommendations of indicating whether the applicable repair design criteria report has been approved by the NRC and whether exceptions to the repair design criteria report are taken.

The next revision was also based on a staff recommendation as stated in the initial SE dated May 13, 2005. The staff recommended that the BWRVIP include a "Reference" section in the guidelines that would identify all letters, reports, test data, and analyses that are referenced or discussed in the repair design submittal. The staff determined that the BWRVIP added Section 3.2.11, "References," to the BWRVIP-95 report, to address the staff's recommendation.

The last revision was that the BWRVIP added the statement, "Approval required prior to startup," in the reporting requirements for the following repair categories, as illustrated in the table of Section 1.1 of the BWRVIP-95 report: Non-Code component (repair deviates from the applicable repair design criteria report, ASME Code component (repair does not meet ASME Code requirements but fully or partially meets requirements of the applicable repair design criteria report), and ASME Code component (repair does not meet ASME Code requirements; repair design criteria report not used as the basis for the repair design). The staff determined that the BWRVIP adequately revised the reporting requirements of these repair categories to be consistent with the requirements of 10 CFR 50.55a(a)(3)(i).

Based on the discussion above, the staff has determined that the BWRVIP-95-A report is acceptable. Please contact Meena Khanna of my staff at (301) 415-2150 if you have any further questions regarding this subject.

Sincerely,

/RA/

William H. Bateman, Deputy Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

cc: BWRVIP Service List

B. Eaton

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William H. Bateman, Deputy Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

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