

2011-131 \_\_\_\_\_ BWR Vessel & Internals Project (BWRVIP)

July 26, 2011

Document Control Desk  
U. S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Attention: Andrew Hon

Subject: Project No. 704 – BWRVIP Comments on NRC Draft Safety Evaluation of  
Nondestructive Examination Flaw Sizing Uncertainty

Reference: Letter from Robert A. Nelson (NRC) to David Czufin (BWRVIP Chairman), “Draft  
Safety Evaluation for Electric Power Research Institute Boiling Water Reactor  
Vessel and Internals Project Topical Report BWRVIP-63 Regarding Open Item on  
the Treatment of Nondestructive Examination Flaw Sizing Uncertainty as Related to  
BWRVIP (TAC NO. MD9556),” dated July 12, 2011.

The purpose of this letter is to respond to the NRC request in the letter referenced above to  
identify any EPRI proprietary information in the subject draft NRC Safety Evaluation (SE) as  
well as to provide any clarity concerns regarding the draft SE.

EPRI has determined that there is EPRI proprietary information in the draft SE. Enclosed is the  
draft SE with EPRI proprietary information highlighted with yellow shading. This information is  
considered “trade secrets” in accordance with 10 CFR 2.390.

The BWRVIP has only one comment on the draft SE. The comment relates to the following last  
two sentences in the first paragraph of Section 3.2.1:

“The SE on TR BWRVIP-76, “BWR Core Shroud Inspection and Flaw Evaluation Guidelines,”  
dated June 27, 2006, agreed with the BWRVIP on requiring licensees to report to the NRC their  
analytical evaluation results of core shroud inspections. This allows the NRC to review, on a  
plant-specific basis, any extreme case that has a long (approximately 360°) and deep (less than  
90 percent of the wall thickness) flaw in a core shroud.”

While the statement about reporting analytical evaluations to the NRC is correct regarding  
BWRVIP-76, it is not consistent with BWRVIP-76, Revision 1 that was recently transmitted to  
the NRC nor is it consistent with BWRVIP-94, as referenced in BWRVIP-76, Revision 1.  
BWRVIP-94 states that flaw evaluations performed in accordance with guidance in BWRVIP  
reports for the acceptance of inspection results do not require transmittal to, or approval by, the  
NRC. However, BWRVIP-94 does require that flaw evaluations that deviate from the guidance

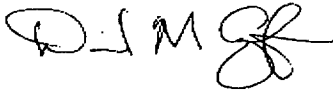
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in BWRVIP reports (e.g., assumptions, methods, acceptance criteria, etc.) be submitted to the NRC. This is consistent with the SE's of all the other NRC approved BWRVIP Inspection and Evaluation Guidelines, which do not require submittal of flaw evaluations to the NRC. Therefore, the BWRVIP recommends that these last two sentences of the first paragraph of Section 3.2.1 of the draft SE be deleted.

If you have any questions on this subject please call Chuck Wirtz (FirstEnergy, BWRVIP Integration Committee Technical Chairman) at 440.280.7665.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Czufin', with a stylized flourish at the end.

Dave Czufin  
Exelon  
Chairman, BWR Vessel and Internals Project