

**Comments for the Document Sponsor to Consider Pertaining to Non-Concurrence on
“Draft Safety Evaluation for the Electric Power Research Institute’s Topical Report (TR)
Materials Reliability Program (MRP) Report 1016596 (MRP-227), Revision 0, ‘Pressurized
Water Reactor (PWR) Internals Inspection and Evaluation Guidelines.’”**

**Michael J. Case
RES/DE**

I agree with Mr. Tregoning on the inadequacy of VT-3 inspection method for reactor internal inspections identified in MRP-227 for the following reasons:

- In the context of the regulatory application of this topical report (license renewal), it is the industry’s (or licensee’s) burden to present sufficient information as to why the particular inspection technique is effective in managing aging in the period of extended operation. Given the lack of PWR internal inspections results, it is uncertain whether the VT-3 technique is effective as part of an aging management program to identify cracking in RVI components.
- Given this uncertainty and given the breadth of this program (all PWRs) and its potential application in the extended term and subsequent renewal periods (i.e. over the next 40 years), I believe it is premature to use a more relaxed inspection method until sufficient data on this issue is developed.
- The NRC can always relax its inspection requirements when new data is presented. Conversely, by initially adopting a relaxed inspection method, the staff would have to demonstrate that a significant safety issue is involved in order to increase the requirements should experience demonstrate problems with the VT-3 technique.
- If the relaxed inspection method is adopted, the NRC has no regulatory means to collect the results of these inspections to assess their effectiveness as an aging management program.

In conclusion, given the uncertainty of the effectiveness of the VT-3 technique, I agree with Mr. Tregoning that the EVT-1 or UT technique should be adopted to identify cracking in RVI components until such time that the industry provides sufficient operational experience to substantiate the VT-3 technique as an effective aging management technique for identifying cracking in reactor vessel internal components.