



OFFICE OF THE  
CHIEF FINANCIAL  
OFFICER

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 7, 2016

Mr. Andrew McGehee  
BWRVIP Program Manager  
Electric Power Research Institute  
3420 Hillview Avenue  
Palo Alto, CA 94304

Dear Mr. McGehee:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated September 29, 2016, requesting a fee waiver under Title 10 of the *Code of Federal Regulations* (10 CFR) 170.11(a)(1)(ii) for NRC review of BWRVIP-25, Revision 1, "BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines," for final NRC endorsement.

The NRC has established regulations for the granting of fee exemptions under 10 CFR 170.11, "Exemptions," for which licensees may apply in accordance with 10 CFR 170.5, "Communications." The NRC staff has reviewed your request based on the following regulation, 10 CFR 170.11(a)(1)(ii):

*10 CFR 170.11(a) No application fees, license fees, renewal fee, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC—(ii) When the NRC, at the time the request/report is submitted, plans to use the information in response to an NRC request from the Office Director level or above to resolve an identified safety, safeguards, or environmental issue, or to assist the NRC in generic regulatory improvements or efforts (e.g., rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).*

Here, EPRI satisfies the requirements from this regulation to assist the NRC in generic regulatory improvements. Your letter states that the guidelines in BWRVIP-25, Revision 1 serve as an effective means to address possible BWR core plate degradation issues that are not addressed by the American Society of Mechanical Engineers (ASME) Code or by NRC regulations. Although changing the ASME Code or revising the NRC regulations is an option to address this issue, the NRC staff agrees with the BWRVIP that, if BWRVIP-25, Revision 1 was accepted for use, then it would obviate the need for any such revisions. And NRC use of an accepted-for-use BWRVIP-25, Revision 1 would provide resolution of several license renewal issues and subsequent license renewal issues on a generic basis. Further, it would help the NRC staff update the Generic Aging Lessons Learned Report, or the License Renewal Interim Staff Guidance documents on aging management. Finally, it will help form the basis for license renewal applicants to demonstrate aging management of BWR reactor internal components in accordance with 10 CFR 54.21(a)(3). Thus, the NRC staff concludes the review of BWRVIP-25, Revision 1, if found acceptable for use, would provide a generic regulatory improvement.

Further, it would also benefit the NRC staff by saving resources by reducing the scope of license renewal and subsequent license renewal reviews because of the generic application of BWRVIP-25, Revision 1 should it be found acceptable for use.

*(a)(13) All fee exemption requests must be submitted in writing to the Chief Financial Officer in accordance with 10 CFR 170.5, and the Chief Financial Officer will grant or deny this request in writing. The 10 CFR 170.5 states, "All communications concerning the regulations in this part should be addressed to the NRC's Chief Financial Officer, either by mail to the U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; by hand delivery to the NRC's offices at 11555 Rockville Pike, Rockville, Maryland; or, where practicable, by electronic submission, for example, via Electronic Information Exchange, or CD-ROM.*

The fee exemption request for BWRVIP-25, Revision 1, "BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines," was submitted in writing by Electric Power Research Institute (EPRI); therefore, EPRI's request meets this regulation.

The NRC staff concludes that NRC review of BWRVIP-25, Revision 1, "BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines," for final NRC endorsement meets all criteria under 10 CFR 170.11(a)(1)(ii); therefore, the fee waiver request is approved. If you have any technical questions regarding this matter, please contact, Mr. Joseph Holonich at 301-415-7297. Please contact Ms. Jo Simpson, of my staff, at 301-415-8388, for any fee-related questions.

Sincerely,

**/RA/**

Maureen E. Wylie  
Chief Financial Officer

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**/RA/**

Maureen E. Wylie  
Chief Financial Officer

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**\*via e-mail**

**CFO-0009**

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