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MEMORANDUM TO: Dennis C. Morey, Chief
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Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager **/RA/**
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SUBJECT: SUMMARY OF THE SEPTEMBER 11, 2019, MEETING BETWEEN THE
U.S. NUCLEAR REGULATORY COMMISSION STAFF AND THE
ELECTRIC POWER RESEARCH INSTITUTE TO DISCUSS
BWRVIP-315

On September 11, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from the Electric Power Research Institute (EPRI). The purpose of the meeting was to discuss the Boiling Water Reactor (BWR) Vessel and Internals Project (BWRVIP) plans for submittal of BWRVIP-315, "BWR Vessel and Internals Project, Reactor Internals Aging Management Evaluation for Extended Operations." Information related to the meeting, including presentations and the attendees list, can be found in the Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML19247B470.

The first part of the meeting was open. EPRI provided an overview of BWRVIP-315 and its planned submission in October 2019. During this session, the NRC staff asked about the need to make future revisions BWRVIP-41, Revision 4, "BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines," and other topical reports (TRs) that could be affected by BWRVIP-315.

EPRI responded that BWRVIP-315 would provide information on what changes would be made to BWRVIP-41, Revision 4 and other TRs. Further, EPRI said that if the NRC accepted BWRVIP-315 for use, it would also be accepting those revisions at the same time.

Also, the NRC staff identified that it continues to evaluate materials research and operating experience and asked if EPRI had a mechanism to update BWRVIP-315. EPRI stated BWRVIP-315 should not require any updates but that it was constantly reviewing operating experience and research and development results to revise its TRs as necessary.

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In the open session, the NRC staff discussed the possibility of using BWRVIP-315 as a pilot in the recent efforts to change the review process for TRs. The NRC staff said that a working group had developed numerous recommendations to improve the timeliness of TR reviews. BWRVIP-315 was viewed by the NRC staff as a candidate for the revised TR review process.

Under the revised process, the NRC staff would not issue request for additional information (RAI) questions. Rather, the NRC staff would prepare a draft safety evaluation (SE) with open items. This draft SE would be provided to EPRI and EPRI would respond to the open items. Also, instead of generating RAI questions for clarification information, EPRI could just provide the information via a letter and that would eliminate the need for multiple rounds of RAI questions.

The NRC staff caveated the potential use of BWRVIP-315 as a pilot because it had not yet received the TR, so it could not make a final determination. EPRI also agreed to look at whether it would support the use of BWRVIP-315 as a pilot.

In the closed portion of the meeting, EPRI provided details on the information in BWRVIP-315. During that portion, the NRC staff and EPRI representatives engaged in numerous clarification discussions and questions and answers on the proposed changes. The information discussed was proprietary, so no details of the discussions are provided.

The NRC staff asked in the closed session if the BWRVIP had considered flexible operation. A copy of MRP-2019-002, "Flexible Power Operations," was recently provided to the staff from the Materials Reliability Program at EPRI and the staff was wondering if something similar existed in the BWRVIP. EPRI responded that it would look at MRP-2019-002 and consider if a similar action was needed in the BWRVIP. This was an action from the meeting.

At the end of the closed session, EPRI and the NRC staff discussed conditions in existing SEs. EPRI stated that many of conditions were the responsibility of licensees using TRs. However, many of those conditions were already required by regulation. The NRC staff took an action to look at existing SEs and decide if the conditions could be removed. If so, a process for doing this would have to be established.

Actions from the closed portion of the meeting were:

- 1) EPRI will review MRP-2019-002 and consider if something similar is needed in the BWRVIP; and
- 2) The NRC staff will review existing SEs and determine if it is worth revising them to remove conditions already required by regulation.

Docket No. 99902016

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