

# BWRVIP

BWR Vessel &  
Internals Project

Issue Management and Resolution

## MEMORANDUM

September 20, 1996

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: C. E. Carpenter

Subject: Intent to Submit a Petition for Rulemaking

The purpose of this memo is to advise the NRC staff that the BWRVIP intends to submit a petition for rulemaking to revise 10CFR50.55a(g)(6)(ii)(A) regarding inservice inspection requirements for BWR reactor pressure vessel (RPV) shell welds.

On September 28, 1995 the BWRVIP submitted to the NRC staff the document entitled "BWR Vessel and Internals Project, BWR Reactor Pressure Vessel Shell Weld Inspection Recommendations (BWRVIP-05)," EPRI report TR-105697, September 1995. Subsequent to that submittal, the BWRVIP has responded to two NRC Requests for Additional Information (RAIs) and has met with the staff on several occasions. The most recent meeting with the NRC staff on this subject was on July 11, 1996. At that meeting, NRC management indicated that the appropriate means for revising inspection requirements for BWR RPV shell welds as recommended in the BWRVIP-05 document would be for the BWRVIP to submit a petition for rulemaking.

The BWRVIP is in the process of preparing a petition for rulemaking to revise 10CFR50.55a(g)(6)(ii)(A) regarding inservice inspection requirements for BWR RPV shell welds. We anticipate meeting with the NRC staff to review our preliminary petition materials on October 15, 1996 (subject to final confirmation of personnel availability, etc.). The petition will request revisions to the rule only for BWRs and will focus on BWR issues that were not addressed when the current rule was promulgated such as:

1. Irradiation embrittlement effects are greatly reduced in BWRs compared to PWRs.
2. Operating conditions like the PWR pressurized thermal shock transient are not possible in BWRs.

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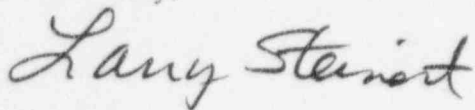
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3. The most limiting condition with respect to low temperature pressurization of a BWR vessel is the vessel pressure test performed each outage.
4. Circumferential BWR RPV shell welds are much less risk-significant than longitudinal welds.

The BWRVIP-05 document concludes that the extent of BWR RPV shell weld inservice inspections can be reduced considerably with no significant increase in RPV failure or leakage probability, and there would be significant cost savings to the industry associated with the revised inspection recommendations.

The BWRVIP looks forward to continue working with the NRC staff on our petition for rulemaking. If you have any questions on this subject please feel free to contact me at any time. I can be reached by telephone at (205) 992-7121.

Sincerely,



for Robin L. Dyle  
Southern Nuclear Operating Company  
Technical Chairman  
BWRVIP Assessment Committee

c: Tom Beckham, SNC  
Carl Terry, NMPC  
Sheri Mahoney, Entergy  
BWRVIP Integration Committee  
Warren Bilanin, EPRI  
Bob Carter, EPRI