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OFFICER

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

July 25, 2022

Robert O. McGill
MRP Program Manager
Electric Power Research Institute
3420 Hillview Avenue
Palo Alto, CA 94304

SUBJECT: LETTER TO ROBERT O. MCGILL IN RESPONSE TO A REQUEST FOR A FEE
EXEMPTION FOR MATERIALS RELIABILITY PROGRAM-227, REVISION 2

Dear Robert McGill:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated May 9, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22129A139), requesting a fee exemption under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 170.11(a)(1)(ii) for NRC review and endorsement of Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation (I&E) Guidelines (MRP-227, Revision 2).

The NRC has established regulations for the granting of fee exemptions under 10 CFR 170.11 "Exemptions." An interested person may apply for an exemption under 10 CFR 170.11 in accordance with 10 CFR 170.5, "Communications."¹ The NRC staff reviewed your request based on the regulations in 10 CFR 170.11(a)(1)(ii) and 10 CFR 170.11(a)(13). Section 170.11(a)(1)(ii) states:

(a) No application fees, license fees, renewal fees, 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).

Section 170.11(a)(13) states:

All fee exemption requests must be submitted in writing to the Chief Financial Officer in accordance with § 170.5, and the Chief Financial Officer will grant or deny such requests in writing.

¹ 10 CFR 170.5 provides that "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."

In your letter, you state that MRP-227, Revision 2, was provided as a means of exchanging information with the NRC for the purpose of supporting generic regulatory improvements related to methodologies for demonstrating pressurized water reactor (PWR) safety-related internals integrity throughout the life of the plant, including the extended period authorized by license renewal in accordance with 10 CFR Part 54. In addition, you indicate that many licensees have made commitments as part of power up-rate and license renewal submittals to incorporate the applicable program elements of an industry reactor vessel internals inspection program.

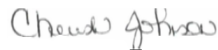
Your letter further states that the guidelines in MRP-227, Revision 2, serve as an effective means to address the aging of reactor internals components and meet or exceed NRC guidance provided in the Generic Aging Lessons Learned (GALL) Reports, both NUREG-1801, Revision 2, "Generic Aging Lessons Learned (GALL) Report," and NUREG-2191, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report." The subject inspection and evaluation guideline is applicable to reactor internal structural components for Babcock & Wilcox, Combustion Engineering, and Westinghouse designed PWRs.

Finally, your letter states that the major intent of MRP-227, Revision 2, is to incorporate lessons learned and to address subsequent license renewal periods of extended operation (beyond 60-calendar years of PWR operation) concerns related to managing the aging effects of PWR reactor internals.

The NRC staff's review of MRP-227, Revision 2, meets the criteria under 10 CFR 170.11(a)(1)(ii) because the review and potential endorsement of MRP-227, Revision 2, will improve subsequent license renewal applications submitted to the NRC, which will improve the efficiency of the staff's review, and the guidelines will ultimately be incorporated into an update to NUREG-2191, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report." Thus, the NRC staff concludes that MRP-227, Revision 2, if endorsed, would assist the NRC in generic regulatory improvements or efforts related to PWR operating power reactors; therefore, the fee exemption request is approved.

If you have any technical questions regarding this matter, please contact Brian Yip at 301-415-3154. Please contact Jo Jacobs, of my staff, at 301-415-8388 for any fee-related questions.

Sincerely,



Signed by Johnson, Cherish
on 07/25/22

Cherish K. Johnson
Chief Financial Officer

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DATED: JULY 25, 2022

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