

December 17, 2014

MEMORANDUM TO: Anthony J. Mendiola, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Joseph Holonich, Senior Project Manager */RA/*
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE OCTOBER 27, 2014, MEETING WITH THE
ELECTRIC POWER RESEARCH INSTITUTE ON PLANNED
REVISIONS TO MRP [MATERIALS RELIABILITY
PROGRAM]-227-A "PRESSURIZED WATER REACTOR
INTERNALS INSPECTION AND EVALUATION GUIDELINES"

On October 27, 2014, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from the Electric Power Research Institute (EPRI) and industry. The purpose of the meeting was for EPRI representatives to discuss with the NRC staff the changes and adjustments being considered in Revision 1 to MRP-227-A, "Pressurized Water Reactor Internals Inspection and Evaluation Guidelines." Additionally, the meeting was to help ensure the NRC staff understood the direction the industry team is going, and to get the NRC staff perspective on the changes and adjustments being considered. Information pertaining to this meeting, including presentations by EPRI and NRC staff as well as attendees, can be found in the meeting package available at Agencywide Documents Access and Management System (ADAMS) Accession No. ML14255A240.

In its opening remarks, the NRC staff stated that it was interested in hearing the plans for the MRP-227 revision. The NRC staff further noted that there were two issues of importance that needed to be covered. They were cast austenitic stainless steel and the action items from the safety evaluation (SE) for MRP-227.

Industry, in its opening remarks, said that there had been excellent communication in the past couple of years on MRP-227, especially in the last 18 months. Further the industry indicated that it wanted to provide answers to the NRC staff on Revision 1 to MRP-227. The industry emphasized that there were a lot of parts to MRP-227, including license renewal (LR) and that the meeting was intended to provide information at a high level that would satisfy the NRC staff.

CONTACT: Joseph J. Holonich, DPR/PLPB
(301) 415-7297

Continuing the industry representatives reported that it had begun work on Revision 1 in the last 3 to 4 months and that it had a goal of submitting the revision in the third calendar quarter of 2015. Industry representatives also noted that Revision 1 would reflect everything covered in MRP-227-A and all operating experience from utilities using MRP-227-A. The industry goal for Revision 1 was to have a document the NRC staff would accept without any plant-specific action items. Thus, the industry was working to address the issues in the Action Items documented in the SE for MRP-227.

The EPRI and NRC staff each made a presentation at the meeting. Copies of the slides used can be found in the ADAMS package identified in the first paragraph.

In discussions, the NRC staff asked if the Revision 1 to MRP-227 would be used in the next round of LR applications. In response, industry representatives noted that the plan was for Revision 2 of MRP-227 to be issued by 2020 which was after the next round of LR applications which was expected to begin in 2018.

The portion of the industry presentation on primary and expansion components inspection requirements identified that changes to MRP-227 would include consideration of MPR-189, Revision 2 and MRP-231, Revision 3. The NRC staff requested if these reports could be submitted for information. The EPRI representatives agreed to provide the reports to the NRC staff for information. This is an action item from the meeting.

Another report discussed during the meeting was Pressurized Water Reactor (PWR) Owners Group (PWROG) WCAP-17451-P, Revision 1 regarding Westinghouse-designed control rod guide tube guide cards inspection and evaluation. For this report, the NRC staff also requested it be submitted for information. An action was taken to pursue the submittal of the report for information but an email to the PWROG was requested to initiate this action.

In the open discussion portion of the meeting, the NRC staff and industry representatives discussed how Revision 1 would be applied to the plants still expected to request LR. The industry representatives stated that this was the tail end of the LR process and that there were just a few PWRs to still submit their applications for LR.

Revision 1 to MRP-227 would not be submitted until September 2015 and it would take 2 to 3 years to complete the review. Thus, all the LRs would be done with MRP-227-A as the staff-approved guidance. It was emphasized, however, that Revision 1 applied to all reactors, those still undergoing LR and those that have completed LR. Revision 1 will contain guidance on transitioning from MRP-227-A.

The NRC staff questioned if plants had to use Revision 1 per Nuclear Energy Institute 03-08. In response, the industry representatives stated that plants are expected to use it to the extent possible, but shall not implement less conservative guidance elements until either generically approved by the NRC or staff-approved on a plant-specific basis.

A final topic discussed was whether the review would be fee-billable. The NRC staff stated that a revision might be fee-billable even if the original TR was not. However, the NRC staff stated that it would look into whether this report would be subject to fees and get an answer to the

industry. One option was that the industry could provide justification for fee waiver when it submitted the revision but the NRC staff would first check if that was needed.

The action items from the meeting were:

- 1) EPRI agreed to provide the MPR-189, Revision 2 and MRP-231, Revision 3 to the NRC staff for information.
- 2) The NRC staff will request WCAP- WCAP-17451-P, Revision 1 via email.
- 3) The NRC staff will check on whether the previous fee waiver was still valid for a revision to MRP-227.
- 4) The NRC staff will: 1) share foreign operating experience if we have any MRP does not have related to RVI; 2) investigate basis for including flux thimble tubes under Action Item 3; and provide feedback to MRP related to Action Item 5 as to whether licensees can submit the acceptance criteria for physical measurements closer to the date of the inspection.

Project No. 669

industry. One option was that the industry could provide justification for fee waiver when it submitted the revision but the NRC staff would first check if that was needed.

The action items from the meeting were:

- 5) EPRI agreed to provide the MPR-189, Revision 2 and MRP-231, Revision 3 to the NRC staff for information.
- 6) The NRC staff will request WCAP- WCAP-17451-P, Revision 1 via email.
- 7) The NRC staff will check on whether the previous fee waiver was still valid for a revision to MRP-227.
- 8) The NRC staff will: 1) share foreign operating experience if we have any MRP does not have related to RVI; 2) investigate basis for including flux thimble tubes under Action Item 3; and provide feedback to MRP related to Action Item 5 as to whether licensees can submit the acceptance criteria for physical measurements closer to the date of the inspection.

Project No. 669

DISTRIBUTION:

PUBLIC

PLPB R/F	SRosenberg	G Cheruvenki
RidsAcrsAcnwMailCenter	RidsNrrDpr	RidsNroOd
RidsNrrDprPlpb	RIdsNrrLADHarrison	JHolonich
JPoehler	RidsOgcMailCenter	RidsNrrDeEvib
RidsResOd	PPurtcher	AHiser

External Distribution

Amberge, Kyle kamberge@epri.com

ADAMS Accession Nos.: ML14302A025 (Minutes) ML14255A237 (Notice); ML14255A240 (Meeting Package)

OFFICE	NRR/DPR	NRR/DPR	NRR/DE	NRR/DPR	NRR/DPR
NAME	JHolonich	DHarrison	SRosenberg	AMendiola	JHolonich
DATE	12/5/2014	12/15/2014	12/9/2014	12/15/2014	12/17/2014

OFFICIAL RECORD COPY