

March 1, 2001

MEMORANDUM TO: Edmund J. Sullivan, Jr., Chief
NDE and Metallurgy Section
Materials and Chemical Engineering Branch

FROM: Louise Lund */ra/*
Component Integrity & Chemical Engineering
Materials and Chemical Engineering Branch

SUBJECT: SUMMARY OF NRC-NEI SENIOR MANAGEMENT MEETING ON
STEAM GENERATOR ISSUES

Introduction

On February 16, 2001, a Senior Management Meeting was held with senior management from the Office of Nuclear Reactor Regulation (NRR) and Nuclear Energy Institute (NEI) to discuss steam generator (SG) issues. The meeting was held as a public meeting, with many members of the commercial nuclear industry and general public attending. For example, Electric Power Research Institute (EPRI), Westinghouse, Framatome, Bechtel, Mitsubishi Heavy Industries, Public Citizen, Sciencetech and various utilities were represented at the meeting. The attendees are listed in Attachment 1 to this memorandum.

The focus of the meeting was to discuss steam generator issues, including industry lessons learned from Indian Point 2, the NRC's SG action plan, the schedule for NRC review of NEI 97-06, and plans for future meetings. Edmund Sullivan, of the NRR staff, gave the first presentation at the meeting. The handout from his presentation is Attachment 2 to this memorandum. Michael Tuckman, Duke Power, gave the second presentation. The following provides a brief summary of the highlights from each of the presentations. The handout from his presentation is Attachment 3 to this memorandum.

NRC Presentation

Mr. Sullivan gave a presentation on the NRC SG action plan, which also provided information on the NEI 97-06 generic change package review. First, he presented the historical overview of the development of the action plan. He then discussed the purpose of the action plan, focusing on the goal of ensuring an integrated SG regulatory framework. He discussed the numerous activities related to SGs that were consolidated in the action plan. These activities are the evaluation and implementation of recommendations from the Indian Point 2 (IP2) Lessons-Learned Report, the evaluation and implementation of recommendations from staff review of the Office of the Inspector General Report on IP2, NRC staff review of NEI 97-06 "Steam

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Generator Program Guidelines,” resolution of generic safety issue 163 “Multiple Steam Generator Tube Leakage,” and resolution of the SG differing professional opinion. He pointed out that the action plan also includes non-SG related issues that arose out of recent SG activities (e.g., emergency planning issues).

Mr. Sullivan also provided examples of the tasks in the action plan. For example, he discussed the development of a regulatory issue summary, guidance for NRC inspectors, formal written guidance for NRC technical reviewers, and others. He discussed coordinating the resolution of issues with internal and external stakeholders. He discussed the availability of information and milestone updates on the SG action plan web page, located at the following Web address:

<http://www.nrc.gov/NRC/REACTOR/SGAP/index.html>.

Mr. Sullivan presented the NRC review schedule for the NEI 97-06 generic license change package. He assured the attendees that public comments would be addressed before the Commission is briefed on the package. He then identified items that could potentially affect schedule, resolving the definition of operability and whether requirements belonged in the Technical Requirements Manual or in the Technical Specifications. He mentioned that the technical staff in both organizations were currently addressing the two issues that had arisen. He concluded his presentation by remarking that the schedule and plans for implementation of the generic license change package will need more discussion and work from both sides.

NEI Presentation

Michael Tuckman, representing NEI, gave a presentation on steam generator issues. In his opening remarks, he commented that he appreciated that the senior management meetings were being held. He saw the meetings as an opportunity to ensure that senior management has a common understanding of the status and objectives of generic SG activities. He remarked that industry will continue to work with the NRC to address SG issues as they arise.

Mr. Tuckman reviewed the actions underway to address the implications of recent events. NEI has issued industry lessons learned letters to the utilities, providing guidance on recent technical issues. NEI has also issued a letter to the Chief Nuclear Officers at each nuclear utility with pressurized water reactors, to remind them of their commitment to the intent of the NEI 97-06 Steam Generator Program Guidelines. He discussed the recent submittal of two documents to the NRC, the revised SG Program Generic License Change Package and Revision 1 to the NEI 97-06 document. (ADAMS Accession No. ML010470486 and ML010430054, respectively)

Mr. Tuckman discussed the ongoing industry activities focused on steam generator issues. He mentioned that Revision 6 to the EPRI SG Examination Guidelines and Revision 2 to the EPRI In Situ Test Guidelines are both in progress. He discussed the value of the Institute for Nuclear Power Operations (INPO) SG review visits and their Web site. He stated that 9 to 12 plants per year are visited by INPO for a review of their SG program. INPO reviews their adherence to the NEI 97-06 program guidelines and provides comments back to the plants via letters to the Chief

Nuclear Officer of the utility company. INPO also posts lessons learned from the visits on their web site, to assist all of the plants. INPO uses NEI lessons learned letters during their reviews, to see how the plant has improved their programs in response to the lessons learned. Mr. Tuckman also discussed the formation of an ad hoc committee to address tube integrity issues, such as eddy current and flaw assessment data requirements.

Mr. Tuckman also mentioned that NEI had sent a letter to the Chief Nuclear Officers at the nuclear utilities, emphasizing the implementation of the lessons learned and the EPRI guidelines. NEI issued lessons learned letters in September and October of 2000, based on information from IP2, recent integrity assessments, and INPO SG review visit findings. The letters also contained recommendations on a number of technical issues and interim guidance on pressure testing. The SG Review Board also posts interpretations on the NEI web site in the form of frequently asked questions. Applicable information from the lessons learned will also be included in the appropriate EPRI Guidelines, as they are revised.

Mr. Tuckman discussed the action items from the SG action plan that were directed to the industry. They are addressing the recommendations one-by-one, and will provide a written response to each item. Out of 27 recommendations, the industry agrees with 9 which will lead to changes in the guidance. Five recommendations are being evaluated for further action. They are satisfied with their guidance on the other 13, and will document the resolution of all of the recommendations as a package for the NRC.

Mr. Tuckman remarked that the technical issues that they are currently working on will not affect the resolution of the Generic Licensing Change Package. Mr. Sullivan agreed with that assessment, noting that it was prudent to go ahead with improvements to the framework because the technical issues were not a part of the framework. Mr. Tuckman also stated that all utilities with pressurized water reactors have agreed to this technical specifications change process. In fact, some had asked NEI if they could submit amendments for the generic license change packages before the NRC had finished its review. NEI had discouraged them from submitting early.

Mr. Tuckman also voiced appreciation for the educational forum that the NRC Steam Generator Workshop will provide at the end of February. He also noted that there would be a working meeting of the technical staff on February 28, 2001 to work on the issues that need to be resolved on the generic license change package. He expected that the SG Task Force and the NRC staff would meet regularly to resolve open items. He suggested that each side write down their technical position on operability and other issues before the working meeting, to provide clarity in comparing their respective positions at the meeting. He also suggested that the NRC staff consider using the formal request for additional information process if other issues arise to add a little rigor to the process.

Edmund J. Sullivan

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Summary

Both NRC and NEI management expressed satisfaction with the progress and direction on the NEI 97-06 review. NRC management expressed their support for the NEI 97-06 initiative, and their support for trying to meet the established schedule.

Attachments: As stated

cc: See attached list

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cc: See attached list

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