

# **RIC 2001 Steam Generator Issues Session TH2**

NEI 97-06 Generic License Change Package

Jim Riley, Senior Project Manager

Nuclear Energy Institute

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# SG Generic License Change Package

- Intended to address the regulatory aspects of the implementation of NEI 97-06, *Steam Generator Program Guidelines*, and its referenced EPRI Guidelines
- Content was the subject of numerous meetings between the industry and NRC
- Submitted to the NRC on Feb 4 and revised on Dec 11, 2000



# SG Generic License Change Package

## ■ Consists of:

- SG Tech Spec and Bases changes
- Licensee controlled document (TRM)
- TRM Bases
- Amendment cover letter template
- Safety analysis
- Significant hazards consideration
- NEI 97-06, revision 1 (background)



# SG Generic License Change Package

- NRC Review scheduled to be complete in October 2001
- All PWRs committed to adopting the TS changes as proposed after NRC approval
- NRC is in general agreement with the package content
- Industry and NRC will continue to work on technical and regulatory comments



# SG Generic License Change Package

- Technical issues identified to date are listed in the NRC SG Action Plan
  - Need not hold up NRC approval
- EPRI SGMP IIG and NEI SGTf will take the industry lead on the technical issues
- Industry and the NRC will address the issues through a series of working level meetings



# SG Generic License Change Package

- Improvement items resolved as part of the ongoing work on SG issues
- Industry options for technical changes
  - Incorporated into the appropriate Guideline when it is next revised
  - Interim guidance may be issued
  - Industry has recently issued interim guidance on pressure testing



# SG Generic License Change Package

## ■ Regulatory Issues

- Operational Leakage TS surveillance
  - ◆ Should the Operational Leakage Criterion or all three Performance Criteria be verified in the TS
- Will need resolution before NRC approval

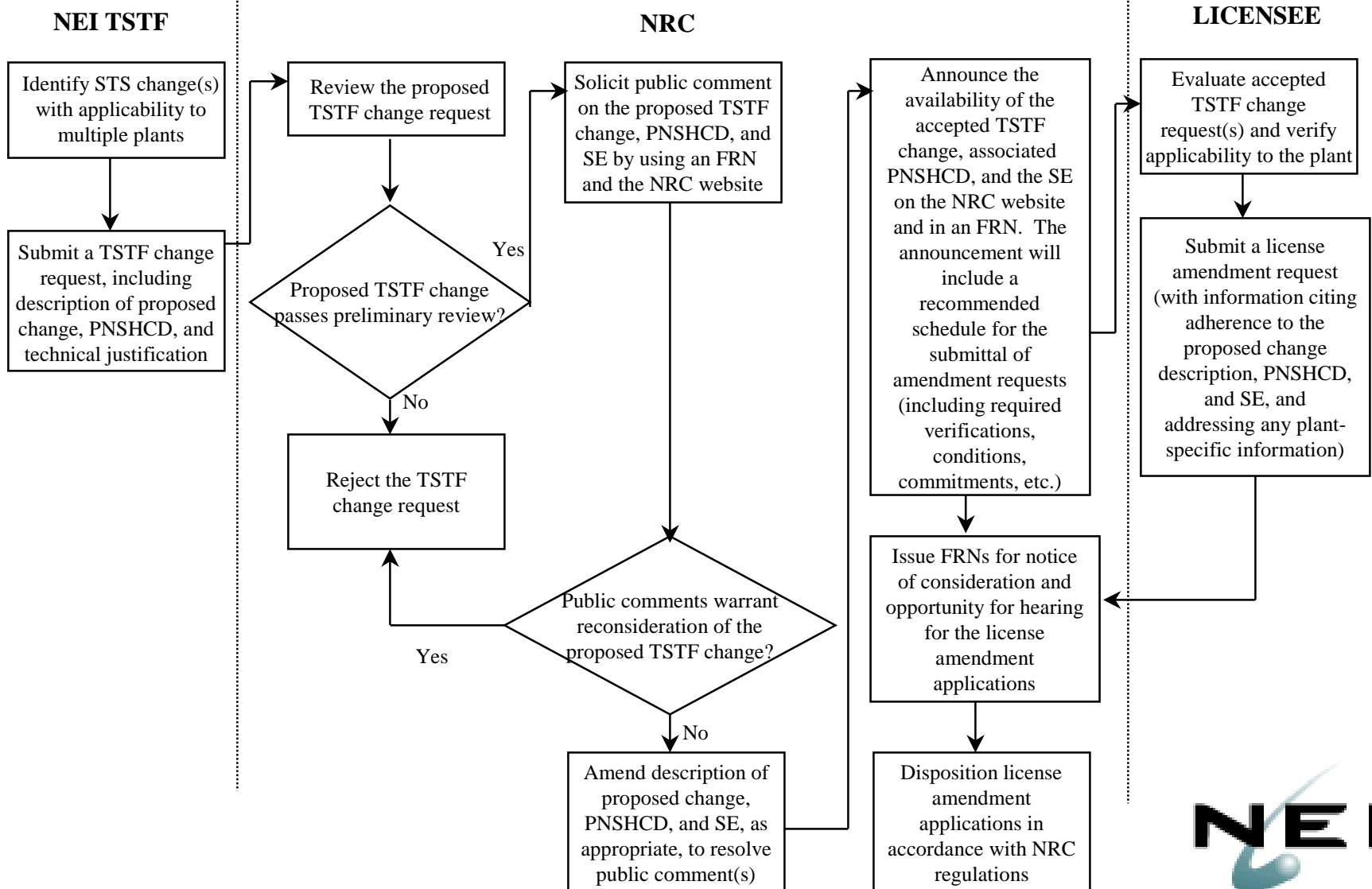
## ■ Use of the “CLIIP” being investigated

- Complex issue but template is developed and generic applicability is apparent



# Consolidated Line Item Improvement Process (CLIIP) Flow Chart

## NRC Regulatory Issue Summary 2000-06





# SG Generic License Change Package

- Licensee implementation
  - Important to retain key elements of package
    - ◆ Commitment to NEI 97-06 (integrity elements) as it is revised from time to time
    - ◆ Documenting justifications for deviation from the intent of NEI 97-06
    - ◆ Generically approved Performance Criteria, Repair Criteria and Repair Method change control under 10CFR50.59



# SG Generic License Change Package

- Licensee implementation (continued)
  - Plant specific changes
    - ◆ Adjustments to establish consistency with design basis are expected
    - ◆ Previously approved items unchanged - Alternate Repair Criteria
- NEI SG Change Package Implementation Workshop June 5 and 6 in Portland Maine



# SG Program Guidelines

- NEI 97-06 included in Package for background information (no NRC approval)
- NEI 97-06 rev 1 issued to industry on January 8, 2001
  - Includes improvements resulting from the industry and NRC work over the last several years
  - Implementation requirements



# Summary

- SG Generic License Change Package represents a significant improvement in SG operational requirements
- Package should be approved in October 2001 - No known major issues
- PWRs committed to adopt TS changes as proposed
- Associated documents are designed to change in response to new knowledge and technologies

