Duke Energy Corporation
526 South Church Street
P.O. Box 1006
Charlotte, NC 28201-1006

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68 FR 25909
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Chief, Rules and Directives Branch
Division of Administrative Services, Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

Subject: Comments on Proposed Generic Letter GL 2003-XX
Requirements for Steam Generator Tube Inspections
68 FR 25909 Dated May 14, 2003

Duke Energy Corporation (Duke) offers the attached comments relative to the solicitation for public comments regarding the proposed Generic Letter 2003-XX, "Requirements for Steam Generator Tube Inspections" as published in the Federal Register on May 14, 2003. Duke also fully endorses the industry comments provided by NEI regarding this draft Generic Letter.

Please address any questions to L. B. Jones at 704-382-4753.

Very truly yours,

W. R. McCollum, Jr.
Senior Vice President, Nuclear Support

Attachment

ERDS = ADM-03
Add = J. Shapaker (JWS)
P. Klein (PAK)

Template = ADM-013

Attachment

Duke Energy Corporation
Comments on Proposed Generic Letter 2003-XX
Requirements for Steam Generator Tube Inspections
Federal Register Notice of May 14, 2003

1. There are ongoing industry initiatives focused on improving Steam Generator inspections. The NRC staff should consider monitoring these initiatives before making a final decision to publish a Generic Letter.

2. The scope of this proposed Generic Letter is very broad and does not adequately accommodate diverse material types and industry operating experience and inspection methods that have been developed based on these factors.

3. Proposed wording for the requirements:

   "Addressees using Alloy 600 MA, HTMA or sensitized tubing should provide a description of the SG tube inspections performed at their plant during the last inspection. Specifically, these addressees should describe their tubesheets (i.e., length of expansion, expansion method and depth), and address how the inspections are performed in the tubesheet (the technique, the inspection extent, and the number of tubes inspected). If the expansion and the expanded region is not being inspected full length, the addressees should discuss their proposed corrective actions (e.g., changing inspection practices consistent with the NRC's position, or submitting a TS amendment request with the associated safety basis for limiting the inspections). The staff has included Attachment 1, if addressees choose to change their TS. Attachment 1 suggested changes to the TS definitions for a tube inspection and for plugging limits to show what may be acceptable to the staff in cases where the extent of the inspection in the tubesheet region is limited.

   Addressees using Alloy 600 TT and Alloy 690 TT tubing should provide a description of the SG tube inspections performed at their plant during the last inspection. Specifically their plants should describe their tubesheets (i.e. length of expansion, expansion method and depth), and address how the inspection are performed in the tubesheet (the technique, the inspection extend, and the number of tubes inspected).

4. Additional time should be provided to respond. A 90 day response period would provide adequate time to prepare a response. There does not appear to be a safety issue warranting a shorter response period.

5. With respect to the item requesting that Addressees discuss whether the techniques employed during the tube inspections ensured flaws could be detected such that the plugging or repair limits could be implemented:

   This Generic Letter should only address Steam Generator inspections previously used in the industry. Industry techniques can not ensure that all flaws are found at the repair criterion. This issue has been addressed by the Generic License Change Package (GLCP) developed by the industry.

   The words in the GLCP are as follows: "The number and portions of the tubes inspected and method of inspection shall be performed with the objective of detecting flaws of any type (for example, volumetric flaws, axial and circumferential cracks) that may be present along the

length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria."

bxc:

L. E. Nicholson – ON03RC
C. J. Thomas – MG01RC
G. D. Gilbert – CN01RC
D. B. Mayes – EC07E
W. M. Sample – EC07E
ELL