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Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
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Rules and Directives

SUBJECT: Comments on Proposed Generic Communication  
Requirements for Steam Generator Tube Inspection - 68 FR 25909

Florida Power & Light Company (FPL), the licensee for the St. Lucie Nuclear Plant, Units 1 and 2, and the Turkey Point Nuclear Plant, Units 3 and 4, and FPL Energy Seabrook, LLC (FPL Energy Seabrook) the licensee for Seabrook Station, hereby submit the following comments on the above-referenced proposed Generic Letter (GL).

The draft GL questions whether current inspection practices meet existing Technical Specification (TS) requirements. The issue being addressed in the draft GL stems from information obtained from supplemental eddy current inspections performed by licensees using newer eddy current technologies. FPL and FPL Energy Seabrook agree that the regulatory implications of the new inspection technology and inspection information must be addressed. However, we disagree with the proposed approach of reinterpreting the current TS requirements to address the new technologies. FPL and FPL Energy Seabrook firmly believe that the NRC and industry efforts to develop sound inspection criteria through the Steam Generator Generic Licensing Change Package (SGGLCP) provides the optimum resolution for NRC concerns regarding the integrity of steam generator tubes. The SGGLCP provides the framework that will allow the appropriate engineering judgement to be utilized to ensure that the criteria of 10CFR50, Appendix A and B are addressed in an integrated and disciplined approach that ensures the maximum tube integrity. Further, processing licensee responses to the GL at the same time as the SGGLCP is nearing closure would unnecessarily divert NRC and industry resources. This diversion of resources is coupled with what FPL and FPL Energy Seabrook believe to be an insufficient response time to complete preparation of the requested information in the proposed GL.

It is concluded in the proposed GL that current TSs require that tube inspections use modern eddy current technology to meet original plant licensing TS. The eddy current inspection technology (bobbin coil) accepted during initial plant licensing should remain as the accepted compliance technique for the current TS requirements until they are modified by a license amendment. The development and use of new technology should not automatically constitute a change in the current licensing basis. Instead, FPL and FPL Energy Seabrook believe the NRC's concern with the utilization of new inspection technology is more appropriately addressed by individual licensees, when required, following the guidance of Administrative Letter (AL) 98-10.

FPL is concerned that the draft GL language may not be clear enough to prevent misinterpretation or allow a complete understanding of NRC expectations. For example, the draft GL discusses in detail the tubesheet inspection issue along with raising other issues within the body of the letter: tube geometry variations, small radius U-Bends, dents and dings, deposits, structures, probe wobble, cold working, permeability variations, and noise. It is not

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clear if the Staff is requesting safety assessments on inspection for these other areas. The language is also unclear as to whether the staff expects licensees to inspect the entire depth of the tubesheet with specialized probes regardless of previous inspection results, or only if cracking is detected in the portion typically inspected with specialized probes. The language may be interpreted to imply that detection of degradation at the repair limit (typically 40% through-wall) is always expected when, in fact, detection is a function of many variables. In this regard, the draft GL does not sufficiently address "probability of detection."


The Staff should clarify that they approve of the current methodology in the EPRI guidelines for performing a degradation assessment and sampling critical areas where degradation is not currently active, but is a potential. The Staff should also clarify that their concern is with cases where degradation is known to exist, the utility has documentation that there is no structural or leakage concerns associated with the degradation, but has not submitted the documentation to the NRC for their review. The Staff should clarify that they are requesting safety assessments on tubesheet inspections.

Additionally, FPL and FPL Energy Seabrook suggest that the technical insights derived from inspections and analysis to date be used to modify the existing TS definition of tube inspections in the tubesheet region. It should read: "Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg excluding the portion of the tube within the tubesheet below XX inches (as measured from the top of the tubesheet)." The exclusion length (XX) would be established based on SG model and physical characteristics. This revision will remove any misinterpretation or misunderstanding of NRC expectations.

FPL and FPL Energy believe that this GL would not provide the NRC, or licensees, with any new information or insights about steam generator tube inspection. Completing the actions requested in the GL would only serve to confirm the already well known limitations of existing technical specification requirements. Rather, it is suggested that the NRC and the industry focus on moving quickly towards a solution. The most direct and effective path to the resolution of outstanding steam generator tube inspection issues is for NRC and industry representatives to redouble their efforts and bring current initiatives to final resolution.

In summary, FPL and FPL Energy Seabrook consider that the issue raised by the Staff does not affect compliance with existing TS requirements and can be resolved with a simple generic TS change that is supported by data and analysis performed to date. In the interim, licensees should control the augmented inspections in accordance with the guidance of AL 98-10, "Disposition of Technical Specifications That Are Insufficient to Assure Plant Safety."

Sincerely yours,

  
R. S. Kundalkar  
Vice President  
Nuclear Engineering