

From: Harold Stiles <harold.stiles@pgnmail.com>
 To: <infocollects@nrc.gov>
 Date: 7/15/03 9:02AM
 Subject: Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Harold Stiles (harold.stiles@pgnmail.com) on Tuesday, July 15, 2003 at 09:02:39

Document_Title: Proposed Generic Communication; NRC Generic Letter 2003-XX: Requirements for Steam Generator Tube Inspections

Comments: The following comments were submitted by letter:

1. Progress Energy considers that the utility and staff resources to generate and review the responses, respectively, would be much better utilized by focusing on completing initiatives already underway to address the issues identified in the proposed generic letter. Both the industry and the NRC recognize that the existing Technical Specifications for steam generator surveillance need to be improved. The appropriate method for addressing the issues in the proposed generic letter is by modifying plant steam generator technical specifications by implementation of the generic steam generator Technical Specification License Change process.

2. To provide sufficient time to complete preparation of the requested information, the response time in the proposed generic letter should be at least 90 days.

3. The NRC should differentiate among the plants based on varying levels of concern and use more cost-effective methods to address the concerns raised in the proposed generic letter. The proposed generic letter resulted from the NRC's concerns with the practices of a very small number of plants. While the NRC's concerns are being presented in the form of a generic letter, plant operational conditions, chemistry programs, operating experience, and materials of construction are not generic. The proposed generic letter primarily addresses concerns with those plants with susceptible tubing (600 LTMA). The industry is aware that the NRC is not as concerned with plants having advanced materials, such as 600TT and 690TT.

a. The NRC should resolve the issues with plants of concern and communicate the lessons learned to the rest of the industry via an Information Notice versus the method currently chosen.

b. Alternately, the proposed generic letter should require responses to provide different levels of detail based on the levels of concern. For plants with advanced materials, the required response might be limited to a description of the inspection program; a safety assessment would be unnecessary for those plants.

4. The proposed generic letter should be clarified to permit responses to reflect each plant's commitment to NEI 97-06. The proposed generic letter first identifies a concern with circumferential cracking within the tube sheet for those plants that have identified cracking at the top of tube sheet. Later, the proposed generic letter focuses in a more generalized sense on inspecting for degradation types with qualified techniques. However, the extent of inspections chosen is based on the guidance set forth in NEI 97-06 and the EPRI Guidelines based on the individual plant's operating experience and the particular steam generator material fleet's operating experience.

5. The proposed generic letter states, "However, it is the staff's position that pending the submission of a license amendment request clarifying the acceptability of a more limited inspection approach, licensees are required under existing requirements (TS in conjunction with 10 CFR part 50, Appendix B) to employ inspection techniques capable of detecting all flaw types which may potentially be present at locations which are required to be inspected pursuant to the TS."

In order for the licensees to reach a lasting agreement with the staff, via the license amendment process, the proposed generic letter should establish clear guidance on what potential degradation mechanisms

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 Add = P. Klein (PAK)
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may occur over the life of a steam generator.

6. The proposed generic letter should acknowledge that the Technical Specifications were not written based on today's emerging technology. The current Plant Technical Specifications regarding steam generator surveillance have been silent on the method of inspection technique since initial plant operation. The standard method of inspection, and the basis for the Technical Specification requirement, has been with the bobbin probe. While new inspection technology has brought the capability to use different techniques to monitor the condition of the tubing, this new technology does not invalidate the use of bobbin probe inspection used since initial plant operation.

7. For the industry to understand the full implications of this proposed generic letter, it needs to address the Staff's position on the use of sampling to determine whether potential degradation exists.

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