

October 2, 2003

MEMORANDUM TO: Cathy Haney, Program Director
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager */RA/*
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF SEPTEMBER 4, 2003 MEETING WITH NUCLEAR
ENERGY INSTITUTE (NEI) ON THE STATUS OF STEAM GENERATOR
INTEGRITY ISSUES

On September 4, 2003, Nuclear Regulatory Commission (NRC) staff met with representatives from NEI and industry at the NRC's office in Rockville, Maryland. The purpose of the meeting was to discuss the status of steam generator integrity issues. Attachment 1 is a list of those that attended the meeting. Attachment 2 is the information provided by NEI at the meeting (ADAMS Accession No. ML032530347).

After introductions, Bill Bateman, of the NRC, stated that there had been a great effort to resolve technical issues pertaining to the Catawba submittal, but that one issue pertaining to the structural integrity performance criteria (SIPC) still remains open. Mr. Bateman acknowledged the complexity of the SIPC issue, but stated it was time to push for a resolution of this issue.

Mr. Riley gave a short discussion of the history of the SIPC and how that history related to the Catawba submittal. He then turned the presentation over to Morris Sample, of Duke Energy, to discuss the July 30, 2003 Catawba submittal which concerned the SIPC. Mr. Sample described the Catawba submittal and presented a slide with the July 30, 2003 submittal text. The Catawba submittal contained safety factors of 3.0 against burst under normal full power operation primary-to-secondary differential pressure and a safety factor of 1.4 against burst applied to the design basis accident differential pressure loads. The text proposed that loads that significantly affected burst must be determined and assessed in combination with the loads due to primary-to-secondary pressure differential using safety factors that are consistent with the licensing basis criteria. Mr. Sample explained that industry had developed this proposal to allow it to be applied generically to plants with differing licensing bases. He stated that for the majority of plants the safety factors in the text of 3.0 and 1.4 with respect to differential pressure thermal loads were limiting but that for a few plants they may not be and the sentence requiring certain loads to be assessed consistent with the licensing basis was added to address those plants.

The NRC staff questioned the proposed text because it did not provide a specific safety factor that could be used to assess these additional loads nor did it reference a method that would be used. Therefore, the NRC could not know what safety factor was being used. The group discussed this issue for some time. A proposal was made that the NRC would issue a request for additional information (RAI) as each plant submitted its license amendment request. This approach would allow the NRC to know what safety factors were applicable to each plant as they submitted their request and the technical basis for these safety factors, including how these factors were derived from the licensing basis design criteria. The NRC would evaluate the adequacy of the individual responses on a plant-by-plant basis. The NRC staff stated that it would need to check with the Office of the General Counsel to see if this would be an acceptable approach.

At this point, the NRC asked if there were any comments or questions from the public and as there were none the meeting continued.

The industry presented the objectives, approach, and expected use of the results of the Steam Generator Materials Program (SGMP) impact study on the effect of the combined load safety factors on structural limits. The objectives, approach, and expected use of the study results are detailed in Attachment 2. The impact study is expected to be complete in October 2003. No significant comments were made by the NRC as the impact study was mainly an industry effort. Industry stated it would brief the NRC on the results of the study when it was completed and involve the NRC in the development of any guidance that may result from the study. Industry noted that the guidance should help each licensee in providing an adequate response to the RAI discussed above regarding the TS license amendment request.

The NRC again asked if there were any public comments or questions and there were none. The group continued discussion of the agenda items.

C. Haney

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Having reached the tentative agreement on an approach for the SIPC and having discussed the current status of the impact study, the group agreed to meet again after October. At this point, the meeting was adjourned.

PROJECT No. 689

Attachments: As stated

cc: Jim Riley, NEI

C. Haney

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ADAMS Accession No.: **ML032760044**

*see previous concurrence

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List of Attendees for 09/04/03 meeting on SG Integrity Issues

<u>Name</u>	<u>Organization</u>
Jim Riley	NEI
Forrest Hundley	Southern Co.
Mohammed Behraves	EPRI
Dan Mayes	Duke Energy
Russell Cipolla	APTECH Engineering
Morris Sample	Duke Energy
Ed Fuller	EPRI
Jim Begley	Framatome ANP
Hermann Lagally	Westinghouse
David Ayres	Westinghouse
Larry Rudy	Duke Energy
Kevin Sweeney	Arizona Public Service
Emmet Murphy	NRC\NRR\EMCB
Joseph Birmingham	NRC\NRR\RPRP
Louise Lund	NRC\NRR\EMCB
Bill Bateman	NRC\NRR\EMCB
Ken Karwoski	NRC\NRR\EMCB
Steve Long	NRC\NRR\SPSB
Elaine Hiruo	McGraw Hill