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Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
United States Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

**SUBJECT:** Comments on Proposed Generic Communication; Steam Generator Tube Integrity  
and Associated Technical Specifications (69 FR 60193)

Ladies and Gentlemen:

On October 7, 2004, the NRC published in the Federal Register (69 FR 60193) a proposed generic letter concerning steam generator tube integrity and associated technical specifications.

Enclosed are the comments of Carolina Power & Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), and Florida Power Corporation, now doing business as Progress Energy Florida, Inc. (PEF).

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

Tony Groblewski  
Supervisor - Regulatory Affairs

HAS  
Enclosure

*STSP Review Complete*

*Template = ADM-013*

*E-RFDS = ADM-03  
Call = C. Petrone (COP)  
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M. Banerjee (MXB)*

Comments on Proposed Generic Communication on  
Steam Generator Tube Integrity and Associated Technical Specifications

1. It is recommended that the NRC allow sufficient time between when the Notice of Availability is published in the Federal Register and when the new generic letter "**Steam Generator Tube Integrity and Associated Technical Specifications**" is published in the Federal Register to allow licensees to make an appropriate license amendment request through the Consolidated Line Item Improvement Process (CLIIP).
2. In the sample Technical Specification, Section b, item 3, there is a statement regarding operational primary-to-secondary leakage that "...For limits currently greater than 150 gallons per day, the LCO limit should be lowered to a value less than or equal to 150 gallons per day."

It is recommended that "from any single steam generator" be added to the end of the sentence. This would then be consistent with Nuclear Energy Institute (NEI) 97-06.

3. Sample Technical Specification, Section d, item 2 provides the sequential periods over which 100 percent of the SG tubes of various materials are to be inspected. Although written in a manner similar to the Electric Power Research Institute (EPRI) Guidelines, the sample Technical Specification does not contain an important provision contained in the EPRI Guidelines. The EPRI Guidelines had an additional provision that "...if the end of the sequential period occurs while the plant is not in a refueling outage, deferring examination until the next refueling outage is acceptable...". This is an important provision for plants that operate on 24 month cycles, since the sequential periods are multiplier of 18 month duration. It is suggested that the EPRI Guideline provision cited above be maintained in the sample Technical Specifications since the deletion of the provision will significantly increase the required number of inspections at many plants on 24 month operating cycles.
4. The second item under "Purpose" and the final paragraph under "Discussion" section includes the statement, "...non-pressure related loads such as bending loads...". The sentences should be revised to specify: "...such as primary bending loads...", because bending loads may also be secondary, in accordance with ASME Section III, Division 1, Subsection NB.
5. The results of an Industry Impact Study shows that the revised Structural Integrity Performance Criterion (SIPC) is not expected to be a significant issue for the vast majority of licensees. It also shows that many licensees may need to update their licensing basis analyses to determine the site specific non-pressure-related loads. The finite industry resources may not have adequate time to update the analyses necessary to define the site specific non-pressure-related loads. If the non-pressure-related loads are not clearly defined in the licensing basis to support calculation of site specific structural limits, it is recommended that the results of the Industry Impact Study be accepted, as an interim measure, for use in the safety assessment to demonstrate that the steam generator tubes will have adequate structural and leakage integrity at the time of the next steam generator tube inspection until the necessary analyses can be updated.
6. It is recommended that the need for comments on the sample Technical Specification would be reduced if the final generic letter included Technical Specification Task Force (TSTF) 449 in its final form.