

September 17, 2007

MEMORANDUM TO: Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

FROM: Edmund J. Sullivan, Senior Level Advisor **/RA/**
Division of Component Integrity
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE AUGUST 30, 2007, CATEGORY 2 PUBLIC
MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) ON
OPERATIONAL LEAKAGE (TAC NO. MD5109)

On August 30, 2007, a Category 2 public meeting was held between the U. S. Nuclear Regulatory Commission (NRC) staff and industry representatives at the NRC offices in Rockville, Maryland. A list of attendees is enclosed. The purpose of this meeting was for the NRC staff and industry representatives to discuss the development of NRC staff and industry guidance related to operational leakage in ASME Code Class pressure boundary components. This project was undertaken to address industry concerns raised in the NEI White Paper on Operational Leakage provided to the NRC in May 2006 (Agencywide Documents Management System (ADAMS) Accession No. ML061320347). NEI provided Revision 1 to this white paper in October 2006 (ADAMS Accession No. ML063250490) and Revision 2 in May 2007 (ADAMS Accession No. ML071590195). The NRC staff previously met with the NEI to discuss this issue on August 16, 2006, and on February 15, 2007 (ADAMS Accession No. ML070540243).

The August 30, 2007, public meeting was held primarily to discuss the interim guidance issued by the NRC staff on June 22, 2007, to the NRC Regional Offices (ADAMS Accession No. ML071700204) and draft revisions to Part 9900 Appendices C.11 and C.12 issued by NRC letter from Michele G. Evans to Jack Roe of NEI on August 14, 2007 (ADAMS Accession No. ML072260488). The NRC interim guidance indicates that high-energy American Society of Mechanical Engineers (ASME) Code Class piping systems with through wall leakage should be declared inoperable immediately. The draft revision to Part 9900 indicates that it is the NRC staff view that for ASME Class 2 moderate or high energy (HE) components and Class 3 HE components with identified through-wall leakage, the staff considers that it is not feasible to make an immediate operability determination that a reasonable expectation of operability exists. Industry representative discussed some scenarios that could occur in ASME code Class 2 components and Class 3 HE components to illustrate their view that such an immediate operability determination may be feasible. As a result of discussions, industry representatives indicated that they had a better understanding of the NRC staff view and offered to prepare draft industry guidance to address the NRC staff concerns in this area. NRC staff indicated it would review NEI comments in meeting handouts and consider revising the draft Part 9900 Appendices. During this meeting, NRC staff and industry representatives also discussed use of the ASME Code and ASME Code Cases for evaluation of structural integrity and for structural integrity acceptance criteria for pressure boundary components with through-wall leakage.

Some general examples were discussed. NRC staff agreed with industry's view that a system could be operable without meeting all code requirements. NRC staff indicated that its concern is related to the methods and criteria that will be used to assess operability. Currently, the NRC staff has concluded that the ASME Code Sections XI and III, ASME Code Case N-513, and Generic Letter 90-05 contain acceptable methods and acceptance criteria for evaluating the operability of systems with through-wall leakage. The NRC staff indicated that it wants to understand and agree with the methods and acceptance criteria that are used to assess operability. Industry representatives indicated they would prepare more specific example situations to facilitate further exchanges on this topic at a future meeting.

At the conclusion of the meeting, NRC staff indicated that it would work on setting up another meeting in the near future to develop guidance and would set aside several hours for this meeting. The NRC staff presentation and industry handouts for the meetings are available in ADAMS as Accession No. ML072540821, ML072540824, and ML072540825.

Members of the public were in attendance. No public meeting feedback forms were received.

Project No. 689

Enclosure:

1. List of Attendees
2. Slide Presentation
3. Operability Determinations for Through-wall Flaws
4. NEI Comments on NRC draft C.11 and C.12

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M. Evans

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List of Attendees for August 30, 2007	
Name	Organization
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Edmund Sullivan	NRC/NRR/DCI
Carl Schulten	NRC/NRR/DIRS/ITSB
Terence Chan	NRC/NRR/DCI/CPNB
Timothy Lupold	NRC/NRR/DCI/CPNB
Tim Kobetz	NRC/NRR/DIRS/ITSB
Edward Weinkam	NMC
Guy Davant	Entergy
Kevin Scherich	Wolf Creek
Joseph Weicks	Entergy
Mike Schoppman	NEI
Steve Lewis	Entergy
Mike Melton	NEI
Ned Tyler	Constellation Nuclear
Steven Dolley	Platts-Inside NRC
Terry Beltz	NRO/DCIP/CTSB

Enclosure

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Project No.
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