

January 15, 2014

MEMORANDUM TO: Gloria J. Kulesa, Chief
Steam Generator Tube Integrity
and Chemical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation

FROM: Marioly Diaz Colon, Chemical Engineer */RA/*
Steam Generator Tube Integrity
and Chemical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE DECEMBER 18, 2013, CATEGORY 2 PUBLIC
MEETING TELECONFERENCE WITH THE INDUSTRY TO DISCUSS
PROTECTIVE COATING ISSUES

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a meeting via telephone with the industry on December 18, 2013, at the U.S. Nuclear Regulatory Commission One White Flint building in Rockville, MD. The purpose of the meeting was to discuss current coating topics with the coating industry. The enclosure is a list of those in attendance. This meeting was noticed as a public meeting and the meeting agenda is available in ADAMS under Accession Number ML13319B201.

During the meeting there was discussion on a number of issues related to protective coatings and information exchanged during the meeting is summarized below:

- The staff proposed a modification to the current Service Level (SL) III coating definition. The proposed draft definition for the revised SL III coating stated the following: "SL III coating include those (1) used in areas outside the reactor containment whose failure could adversely affect the safety function of a safety-related structure, systems, and components (SSC), or (2) applied to components whose failure could adversely affect the functions of an SSC that supports Nuclear Regulatory Commission regulations (i.e., fire protection (10 CFR 50.48), environmental qualification (10 CFR 50.49), pressurized thermal shock (10 CFR 50.61), anticipated transients without scram (10 CFR 50.62), and station blackout (10 CFR 50.63))."
- The industry stated that the proposed NRC definition for SL III coating will be discussed at the upcoming January 15 & 16, 2014, American Society of Testing Materials (ASTM) D33 meeting and will be balloted. It was noted that the major point of concern for the industry is the meaning of the word "failure" found in the proposed definition for SL III coating. An industry representative suggested that the word "failure" be modified to "disbondment."

- The industry stated that if this item is balloted by the January 15 & 16, 2014, ASTM D33 meeting, the ballot feedback/response could be received as early as mid-February 2014.
- Industry representatives also suggested modifying the word “failure” to “debris generation (failure)” since this may allow coating systems and monitoring to remain a special process control designation.
- The staff found the replacement of the word “failure” with “disbondment” acceptable, but expressed concerns with replacing it with the alternative, namely, “debris generation.” The staff stated that using the latter would exclude corrosion of base metal as a degradation mechanism from coating monitoring activities.
- The industry representatives noted that the focus of a coating monitoring program should be on monitoring coating behavior and ensuring that the coating is performing as intended.
- The staff stated that it plans to issue the draft License Renewal Interim Staff Guidance (ISG) document on SL III coatings in January 2014 and one of its objectives is to have the definition of SL III coatings in the ISG and the definition in the industry coating standard to be the same or similar.
- The staff stated that the purpose for including all five NRC regulated events in the draft definition for SL III coatings is so that the definition is comprehensive.
- The industry representatives stated that they will continue to discuss the draft definition amongst themselves and may correspond with the staff in preparation for the January 15 & 16, 2014 ASTM D33 meeting. The NRC staff person of contact for industry correspondence on coatings is Matthew Yoder.

CONTACT: Marioly Diaz Colon, NRR/DE/ESGB
(301) 415-2849

Enclosure:
Attendance List

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OFFICE	NRR/DE/ESGB	NRR/DE/ESGB	NRR/DE/ESGB
NAME	MDiazColon	Emma Wong for Matthew Yoder	GKulesa
DATE	01/09/2014	01/09/2014	01/15/2014

OFFICIAL RECORD COPY

Attendance List:

Teleconference Meeting between NRC staff and the Coating Industry
Wednesday, December 18, 2013.
[10:00 am – 12:00 pm EST]

Industry:

Albert Piha, Exelon
David Wootten, Entergy
Gary Alkire, Exelon Generation
Don Watson, Duke Energy
Garth Dolderer, NextEra Energy
Jon Cavallo, UESI Nuclear Services
David Scott, EPRI
Steve Dort, First Energy
Timothy Ridlon, First Energy
Jeffrey M. Owad, PSEG Nuclear LLC
Daniel L. Cox, Structural Integrity Associates Inc.
Andrew Taylor, Entergy Nuclear License Renewal Services
Michael Carter, Areva
James Melchionna, PSEG Nuclear

NRC:

Marioly Diaz Colon, NRR
Matthew Yoder, NRR
Aloysius Obodoako, NRR
John Burke, RES
William Holston, NRR
David Alley, NRR

ENCLOSURE