

CP&L

Carolina Power & Light Company
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411 Fayetteville Street Mall
Raleigh NC 27602

J. Shapahn
P. Rush

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61 FR 69118
Dec. 31, 1996

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Serial: PE&RAS-97-020

March 14, 1997

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D-69
Washington, DC 20555-0001

Subject: Comments on Two Proposed NRC Generic Letters:
Degradation of Steam Generator Internals (61 FR 69116), and
Steam Generator Tube Inspection Techniques (61 FR 69118) *

Dear Sir or Madam:

Carolina Power & Light Company (CP&L) offers the following specific comments on the proposed generic letter on degradation of steam generator internals:

- The proposed generic letter requests the licensee to provide a "... [discussion] of the program in place, if any, to detect degradation of steam generator internals and a description of the inspection plans, including the inspection scope, frequency, methods, equipment and criteria, *and plans for corrective action in the event degradation is found.*" [emphasis added] While CP&L certainly has no specific objection to providing a general description of its inspection program, we question whether it is possible to specify a plan for corrective action prior to assessing any damage found during these inspections. CP&L recommends that this aspect of the request be clarified.

CP&L offers the following specific comments on the proposed generic letter on steam generator tube inspection techniques:

- The requested information, as expressed in the proposed generic letter, is unclear. For example, the use of the word "defect" used in the Requested Information section of the proposed generic letter is inconsistent with the definitions in the Technical Specifications at CP&L plants. CP&L's Technical Specifications for the Robinson Nuclear Plant and the Harris Nuclear Plant define "defect" as "... an imperfection of such severity that it exceeds the plugging limit." The word "defect" should be

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March 14, 1997

replaced with the word "indication" as used in EPRI Guideline NP-6201, "PWR Steam Generator Tube Examination Guidelines," Rev. 4.

- The proposed generic letter requests licensees to inform the NRC:
 - (1) Whether it is their practice to leave steam generator tubes with defects in service, based on sizing, and (2) if the response to item (1) is affirmative, those licensees are requested to submit a written report that includes, for each type of steam generator degradation mechanism, a description of the associated nondestructive examination method being used and the technical basis for the acceptability of the technique used."

CP&E recommends for clarity that "degradation mechanism" be replaced with "type of indication," e.g., circumferential cracking, axial cracking, large volumetric indication (wastage), small volumetric indication (pitting), denting, primary versus secondary side indication.

If you have any questions regarding these comments, please contact me at (919) 546-6901, or Mike Murdock at (919) 546-3193.

Sincerely,



T.D. Walt
Manager, Performance Evaluation
& Regulatory Affairs

MLM/

cc: Mr. L. A. Reyes, Regional Administrator - Region II
Mr. J. B. Brady, USNRC Resident Inspector - HNP, Unit 1
Mr. B. B. Desai, USNRC Resident Inspector - HBRSEP, Unit 2
Mr. N. B. Le, USNRC Project Manager - HNP, Unit 1
Ms. B. L. Mozafari, USNRC Project Manager - HBRSEP, Unit 2

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RULES REVIEW
UNITED STATES

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