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SUBJECT: Responds to NRC request for addl info re GL-95-03 dated 950627 re "Circumferential Cracking of Steam Generator Tubes".

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ROBERT C. MECREDY
Vice President
Nuclear Operations

March 22, 1996

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Generic Letter (GL) 95-03 dated April 28, 1995
"Circumferential Cracking of Steam Generator Tubes"
Response to NRC Request for Additional Information (RAI)
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

References: (a) Letter from R.C. Mecredy (RG&E) to A.R. Johnson (NRC), Subject: Response to Generic Letter 95-03, dated June 27, 1995
(b) Letter from A.R. Johnson (NRC) to R.C. Mecredy (RG&E), Subject: Request for Additional Information (RAI) Circumferential Cracking of Steam Generator Tubes (TAC No. M92244), dated December 19, 1995.

Dear Mr. Johnson:

RG&E provided its 60-day response to GL 95-03 by letter dated June 27, 1995 (Reference a). NRC requested additional information relative to our response by letter dated December 19, 1995 (Reference b). The Reference (b) RAI requested, within 30 days of receipt, detailed information involving seven (7) individual topic areas related to circumferential cracking of the existing and replacement steam generators.

Due to administrative oversight, Reference (b) was not available to our staff to prepare responses until February 28, 1996, therefore, a written response was not submitted within the 30-day allotted time. Subsequent telephone conversations with NRC staff clarified that additional time would be acceptable, during which we could prepare and submit the necessary information.

Nonetheless, due to time constraints imposed by critical path outage work (outage scheduled to commence on April 1) on the RG&E staff knowledgeable of our Eddy Current Inspection activities, we respectfully must request additional time to prepare and submit responses to Questions 1-4 and 6, which are associated with the existing (old) steam generators. We will attempt to provide this data by July 1, 1996 following completion of the refueling outage.

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The additional information requested by Questions #5 and #7, which are associated with the replacement steam generators, is provided herein.

Question #5 - Clarify baseline inspections to be performed on the replacement steam generators prior to startup.

The eddy current baseline examination was performed at Babcock & Wilcox International (BWI) Cambridge, Ontario, Canada in the BWI manufacturing facility. Examination personnel were from BWI and BWNT (Framatome). The examination data was acquired with the Zetec MIZ-30 multi frequency acquisition system and stored onto optical disk media. The Zetec "Eddynet" software was used for both data acquisition and data analysis. The examinations for "A" steam generator (BWI unit #34), and "B" steam generator (BWI unit #35) included a 100% tube end to tube end examination utilizing the Zetec .620 MULC and .610 MULC bobbin coils. The data underwent an independent two (2) party analysis review and then a third party resolution analysis process. The eddy current data was analyzed for: data quality, evidence of wall loss indications, loose parts detection, and any manufacturing anomalies.

The bobbin data was further analyzed with the Zetec profilometry software within the inlet and outlet tubesheet regions for 100% of the tubes. This analysis consisted of a single review and a Q.A. review to assure consistency of results. This analysis identified any hydraulic tubesheet expansions that were out of tolerance or unique.

The baseline also included data acquisition utilizing the Zetec .610 plus point MRPC (+point .115//36/S80) probe. Data was acquired in areas with unique indications to establish a more thorough set of baseline information, such as: tube expansions beyond the secondary face; tube expansion anomalies within the tubesheet; normal tubesheet expansion transitions; U-bend transitions; and a cross section of Mechanical Burnish Marks (MBM's), which would include large amplitude indications, and all bobbin indications that measured $\geq 15\%$ thru wall.

These examinations were all in accordance with the applicable acquisition and analysis procedures.

An eddy current bobbin examination is planned for post steam generator installation and prior to plant startup to supplement the baseline examination. The examination plan is for all periphery tubes in both generators which encompasses an approximate 10% examination of the tube population. This examination will be done primarily for loose parts detection associated with any steam generator secondary side work, but we will also do a thorough data analysis consistent with an inservice inspection activity.

Question #7 - Discuss whether terrain plots will be used to analyze the RPC eddy current data at locations susceptible to circumferential cracking during the next steam generator tube inspection.

The replacement steam generators were given baseline inspections as discussed in question #5 which did include RPC (Rotating Probe Coil) utilizing the plus point probe. The data analysis included the plotting of terrain plots in the areas of unique indications, to further enhance the RPC detection capabilities. For the Future RPC inspections we plan to employ the same RPC data analysis technique's.

Very truly yours,


Robert C. Mecredy

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