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SUBJECT: Submits comments on draft NUREG-1477, "Voltage-Based  
 Interim Plugging Criteria for SG Tubes-Task Group Rept."  
 NUREG recommendations do not take into consideration plants  
 that are operating w/interim plugging criteria.

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Donald C. Cook Nuclear Plant Units 1 and 2  
Docket Nos. 50-315 and 50-316  
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DRAFT NUREG-1477 COMMENTS

Rules and Review Directives Branch  
Division of Freedom of Information and  
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Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

August 16, 1993

Gentlemen:

We appreciate the opportunity to comment on the draft NUREG-1477, "Voltage-Based Interim Plugging Criteria for Steam Generator Tubes - Task Group Report".

Our review of the draft NUREG-1477 was done in conjunction with the EPRI Ad-hoc Committee on Steam Generator Alternate Repair Criteria, of which we are members. The committee solicited, reviewed, and consolidated our and other committee member comments which were then forwarded to you by EPRI. In addition we are cognizant of the comments recently forwarded to you by Westinghouse Electric Corporation. Overall we are in accord with both sets of comments and are hopeful they will resolve a number of NRC issues with interim and alternate plugging criteria for outside diameter stress corrosion cracking at support plate intersections.

A number of industry comments relate to NUREG recommendations the industry considers longer term issues which would be addressed under the Steam Generator Degradation Specific Management program and not as part of an interim plugging criteria. However, the more immediate concerns for plants such as Donald C. Cook are those NUREG recommendations requiring more tube pull samples, not allowing use of motorized rotating pancake coil (MRPC) testing to disposition indications, unnecessarily restrictive requirements regarding probe response characteristic and probe diameter, need for fuel cycle to cycle approval of interim plugging criteria, changes in probability of deletion (POD) requirements and leak rate calculation methodology.

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PDR NUREG  
1477 C PDR



We believe the NUREG recommendations do not take into consideration the plants that are operating with an interim plugging criteria. We at Donald C. Cook Nuclear Plant have applied the industry recommended inspection guidelines and operational changes, defined the degradation based on past tube pull samples and eddy current testing, limited tube degradation growth rate, and demonstrated favorable tube inspections results. The NUREG should make provisions for these actions already completed under an interim plugging program. This is an important aspect to consider knowing that the review cycle for the Steam Generator Degradation Specific Management program can conceivably take up to 24 months and plants could need a continuance of the interim plugging criteria.

If you have any questions regarding these comments, please feel free to contact Mr. J. Jensen at (614) 223-1975.

Sincerely,



E. E. Fitzpatrick  
Vice President

dr

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