

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

50-460

August 19, 1983

Mr. D. G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Subject: COMMENTS ON PROPOSED STEAM GENERATOR REQUIREMENTS

On July 6, 1983, the NRC staff met with the Steam Generator Owner's Group to discuss the staff's latest position on Steam Generator Generic Requirements. We have reviewed the material presented by the staff as it would apply to our WNP-1 (B&W) and WNP-3 (CE) plants and offer the following comments for your consideration:

1. We are concerned over the impact of the Supplemental Tube Inspection Plan which would involve NRC projected implementation costs of \$1.7M for WNP-3 and \$4.9M for WNP-1. These added costs are to be offset by NRC estimates of avoided costs ranging from \$1.3M to 5.4M. The bases for the value impacts do not appear to consider items such as the cost of added downtime or the fact that the seven man rem increased exposure is to a limited pool of eddy current inspectors. To remain within annual dose limits, added downtime or plant modification to reduce exposure for the extra inspection could be required. The Supply System considers that for a Babcock and Wilcox reactor, the value impact of supplemental tube inspection will be unfavorable.

We recommend that the staff proposal for 100% inspection of remaining (i.e., not tested) tubes in the affected Steam Generator be deleted. The appropriate inspection would appear to be a statistical sample of sufficient size to assure that a specified level of confidence can be achieved.

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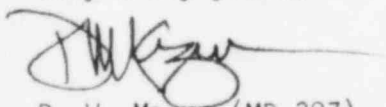
COMMENTS ON PROPOSED STEAM GENERATOR GENERIC REQUIREMENTS

2. Condenser Inservice Inspection Program (CISIP) should not be required by license conditions. The major concern is the ability to achieve and maintain good secondary water chemistry. CISIP may be proposed as part of an overall plan to control chemistry which considers all areas with cleanup systems and coolant treatment.

We request clarification on whether the water chemistry requirements stated in the draft plan are steady state or absolute limits. As absolute limits, they form restrictive licensing conditions.

3. Full length tube inspections are voluntarily conducted at many plants but that does not form the basis for a requirement to inspect all cold legs. The staff should perform a cost benefit analysis for this new requirement to determine if there is an increase in safety commensurate with the added cost of plant inspection.

Very truly yours,



D. W. Mazur (MD 387)
Managing Director

cc: SJ Green (EPRI)
V Stello (NRC)
JJ Ray (ACRS)