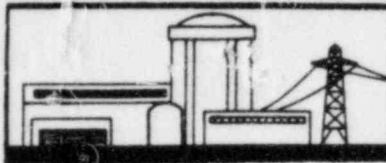


THE B&W OWNERS GROUP

Arkansas Power & Light Company
Duke Power Company
Florida Power Corporation
GPU Nuclear Corporation
Sacramento Municipal Utility District

ANO-1
Oconee 1, 2, 3
Crystal River 3
Trophy
Rancho Seco



Toledo Edison Company
Tennessee Valley Authority
Washington Public Power Supply
System
Babcock & Wilcox Company

Davis Besse
Bellefonte 1, 2
WNP 1

Working Together to Economically Provide Reliable and Safe Electrical Power

July 17, 1985

Suite 220
7910 Woodmont Avenue
Bethesda, Maryland 20814
(301) 951-3344

Mr. Hugh L. Thompson, Jr.
Director Division of Licensing
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Thompson:

The B&W Owners Group (BWO) Steam Generator Committee has reviewed the draft of NUREG 0844, submitted for public comment in April 1985. While we believe the NRC Staff has done a commendable job in developing NUREG 0844 as a vehicle to resolve Unresolved Safety Issues A-3, 4, and 5, we, nevertheless, have concerns that we believe are significant and hope that our comments will be the basis for revision.

The BWO Steam Generator Committee does not agree with many of the recommendations and requirements; and continue to disagree with the economic analyses, since our operating experience has indicated the costs cited are generally underestimated and in some cases significantly underestimated.

Our specific comments are as follows:

1. Section 2.1.1, Secondary Side Visual Inspections

The Committee believes the requirements that visual inspections of all steam generators at each plant should be performed at the next planned outage for eddy current testing should not be mandatory. We concur that visual inspections for loose parts should be a preservice requirement.

As written, this requirement does not give adequate credit for years of operation without any loose part problem nor that no significant loose parts have ever been found in the B&W type steam generators. Furthermore, many plants have already completed visual loose part inspections and should be exempt from the performance of a duplicate inspection. To require all plants to visually inspect their steam generators would be costly and result in additional radiation exposure to inspection personnel.

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Hugh L. Thompson, Jr.
July 17, 1985

2. Section 2.2.1, Steam Generator Supplemental Tube Inspections

The Committee believes the NRC Staff recommended action should permit a utility to define special interest zones or areas where tubes have been shown to be degraded. These zones or areas should be intensely inspected but should not be included in the inspection population that triggers a 100-percent steam generator tube inspection.

3. Section 2.6, Condenser Inservice Inspection Program

Generic letter 85-02, Section 3.b, states that the inspection program should be defined in plant-specific safety-related procedures, while NUREG 0844 does not require a safety-related procedure. The Committee believes that any condenser inservice inspection program should not require safety-related procedures.

All condensers with B&W supplied nuclear steam supply systems are designed to permit the isolation of a single inlet water box with a modest power reduction so that leaking tube(s) may be removed from service without an expensive unscheduled shutdown. The Committee believes that the requirements - shutdown for inspection if more than one condenser leak causing a power reduction occurs in three months - does not adequately recognize the operating techniques available. An appropriate inspection could be carried out at the next scheduled outage or when an extended unscheduled outage is required. As written, there could be a reluctance to reduce power to find a condenser leak but rather to rely on the condensate demineralizer to remove the impurities introduced.

4. Section 2.8, Primary-to-Secondary Leakage Limits

It appears that the leakage limits identified, 0.35 gpm (500 gpd) per steam generator or 1.0 gpm for all steam generators do not adequately consider plants with only two steam generators per unit. The Committee believes the 1.0 gpm limit for all steam generators should apply on a unit basis regardless of the number of steam generators. Thus, the limit 0.35 gpm per steam generator should not be applicable to plants with only two steam generators per unit.

The Committee hopes that you will consider our comments and will make appropriate revisions in the draft NUREG 0844 prior to issue.



H. A. Mahlman, Chairman
B&W Owners Group Steam
Generator Committee

cc: B&W Office Bethesda
BWOG Steam Generator Committee
D. C. Almond