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61 FR 69118
Dec. 31, 1996

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NUCLEAR ENERGY INSTITUTE

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Ralph E. Beedle

SENIOR VICE PRESIDENT AND
CHIEF NUCLEAR OFFICER,
NUCLEAR GENERATION

January 28, 1997

Mr. David L. Meyer, Chief
Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Proposed Generic Communication: Steam Generator
Tube Inspection Techniques - (61 Fed. Reg. 69118 -
December 31, 1996) - Request for Public Comment

These comments are submitted on behalf of the nuclear power industry by the Nuclear Energy Institute (NEI)¹ in response to the December 31, 1996, *Federal Register* notice of opportunity for public comment concerning the proposed generic letter, "Steam Generator Tube Inspection Techniques."

The stated purposes of the proposed generic letter are to:

- Emphasize to addressees the importance of performing steam generator tube in-service inspection using qualified techniques; and
- Request information from addressees to verify if in-service inspection (ISI) practices comply and conform with their respective current licensing basis.

The industry believes that these purposes can be achieved more effectively through the guidance being developed as part of the NRC-industry interactions on the steam generator rule, its associated regulatory guide, and industry guidance developed in response to the rule.

The issues of ISI qualification and safety assessment discussed in the proposed generic letter are captured in the NRC draft Steam Generator Tube

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including regulatory aspects of generic operational and technical issues. NEI members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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Integrity regulatory guide. As a result of discussions with NRC staff on that document, the industry through EPRI is revising the PWR Steam Generator Tube Examination Guidelines to clarify criteria and considerations for the qualification of ISI techniques.

One item yet to be resolved is the issue of supplemental performance demonstration. The industry ISI community is working with the NRC staff to better understand performance demonstration issues as presented in the draft regulatory guide. More effort is required to finalize the approach.

The industry through NEI is developing guidance to address steam generator programmatic issues, including safety assessments based on NRC-approved performance criteria. The industry is working closely with the NRC staff on the development and application of these criteria.

We believe these issues can be better addressed after more progress is made in the steam generator rulemaking activities.

In the event the generic letter is issued, we recommend:

- That the response period be increased to 90 days; and
- Delete the requirement for an "interim 30-day required response." The interim response places a needless burden on licensees without adding any value to the process. Licensees understand their obligation to respond to a § 50.54(f) request for information within the time period allotted by the generic letter.

We appreciate the opportunity to comment on this proposed generic letter. Please direct any questions on our comments to Clive Callaway at 202-739-8114.

Sincerely,



Ralph E. Beedle

RCC/ec

c: Gus Lainas, NRC
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