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J. Shapovalov
D. Naujack

61 FR 69120
Dec. 31, 1996



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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801 NRC

February 28, 1997

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D-69
Washington, DC 20555-0001

Gentlemen:

NUCLEAR REGULATORY COMMISSION (NRC) - REQUEST FOR COMMENTS
ON PROPOSED GENERIC LETTER (GL): "EFFECTIVENESS OF ULTRASONIC
TESTING SYSTEMS IN INSERVICE INSPECTION PROGRAMS"

TVA is pleased to offer comments on the subject proposed GL published in 61 Federal Register 69120 - December 31, 1996, and 62 Federal Register 3064 - January 21, 1997. As stated in the proposed GL, the NRC is concerned with the effectiveness of ultrasonic testing systems in inservice inspection programs and proposes a GL to enable the NRC to determine if addressees are taking appropriate action to qualify future ultrasonic testing examinations. TVA has reviewed the proposed GL being considered by the NRC and supports the comments offered by the Nuclear Energy Institute (NEI) on behalf of the nuclear power industry. The industry comments were developed by an NEI task force comprised of representatives from utilities, the Electric Power Research Institute, and the Performance Demonstration Initiative (PDI).

The stated purpose of the GL is to request licensees to describe the extent to which their piping and reactor pressure inservice inspections activities are being qualified consistent with the objectives of Appendix VIII to Section XI of the ASME Code. We believe that the proposed GL essentially directs licensees to implement a performance-based ultrasonic test qualification program similar to Appendix VIII, even though the appendix has not been incorporated into the regulations.

At the outset, TVA believes that the proposed GL is an inappropriate regulatory vehicle to achieve licensees' use of new performance-based ultrasonic qualification methods. Actions of this type, which establish new requirements, are appropriately addressed only under the established rulemaking process.

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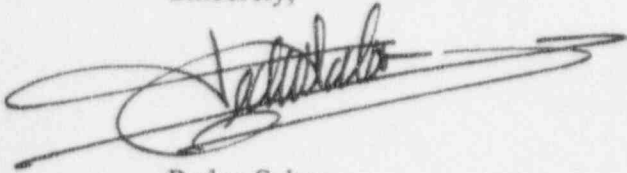
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Notwithstanding this difficulty, however, we understand that in the matter at hand the NEI 50.55a Task Force met with the NRC staff and proposed that implementation of Appendix VIII be voluntary rather than required by regulation. TVA believes this is an appropriate recommendation because a significant increase in plant safety will not be achieved through mandatory adoption of an Appendix VIII program.

Furthermore, the PDI has identified to the ASME Code committee several Appendix VIII provisions that are not practical to implement. Some of these impractical provisions have already resulted in Code changes. We understand that the ASME Code committee is continuing to evaluate the remaining PDI recommendations. We agree with NEI's recommendation that the NRC recognize the qualification practices developed by ~~the~~ as an acceptable alternative to Appendix VIII and permit licensees to voluntarily implement the PDI method, without seeking a plant-specific relief request per §50.55a(a)(3).

We appreciate the opportunity to respond to the subject proposed GL.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Pedro Salas', with a long horizontal flourish extending to the right.

Pedro Salas
Manager
Licensing and Industry Affairs

cc: See page 3

Chief, Rules Review and Directives Branch

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