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61 FR 69120

Dec. 31, 1996

Log # TXX-97051  
File # 10140

(12)

1997 MAR -3 PM 3:30

RULES REVIEW  
USNRC **TU**ELECTRIC

February 28, 1997

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

SUBJECT: SOLICITATION FOR PUBLIC COMMENTS,  
PROPOSED GENERIC COMMUNICATION; EFFECTIVENESS OF  
ULTRASONIC TESTING SYSTEMS IN INSERVICE INSPECTION  
PROGRAMS, FEDERAL REGISTER VOLUME 61, NUMBER 252, PAGE 69120

On December 31, 1996, in the Federal Register Volume 61, Number 252, page 69120, the Nuclear Regulatory Commission solicited comments on the Draft Generic Letter, "Effectiveness of Ultrasonic Testing Systems in Inservice Inspection." The original deadline (January 31, 1997) for comments was extended to February 28, 1997, by a followup notice (62 FR 3064). This letter is submitted to provide comments on the proposed Generic Letter.

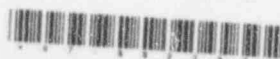
TU Electric recognizes the importance of using ultrasonic testing systems which are capable of reliably detecting and sizing flaws in the performance of comprehensive examinations of reactor vessels and piping welds. TU Electric is aware of ongoing industry efforts in the areas of inservice inspection. TU Electric believes, for the reasons stated below, that the proposed Generic Letter is unnecessary at this time.

The proposed generic letter is not required for the following reasons (as acknowledged within the proposed generic letter):

- o A safety concern does not exist which would warrant immediate backfitting of Appendix VIII, "Performance Demonstration for Ultrasonic Examination Systems," in advance of the rulemaking that has been initiated.
- o After completion of the rulemaking, Appendix VIII to Section XI will become a requirement for all licensees.
- o The NRC has already approved requests submitted by some licensees to utilize Appendix VIII performance demonstrations as an alternative examination for selective ASME Code, Section XI requirements.

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The proposed generic letter does not show an increase in safety commensurate with the cost associated with implementation of Appendix VIII performance demonstrations. A missing element in the discussion about applying new requirements is a means to quantify the value of such improved inspections by factoring all of the potential costs and benefits. Costs associated with implementation of new requirements include examiner training, testing, and retesting, equipment upgrades, procedure revisions and the technical evaluation (some on critical path time) of an increased number of detected acceptable indications (impact on ALARA). The benefits associated with implementation of new requirements are unclear. Additional benefits might be gained if the current, and very conservative, ASME Code acceptance criteria were revised based on the more reliable flaw sizing achieved through Appendix VIII examinations.

The proposed generic letter implies that the experiences obtained by two licensees that have voluntarily implemented Appendix VIII examinations would be generically applicable to all licensees. It is not conclusive that unacceptable indications identified by Appendix VIII type examinations would not have been detected using current Code acceptable methods. Even under current Code acceptable practices, the industry practices have improved and will continue to improve, resulting in better examinations than those performed in the past. Equipment improvements, procedure development and an increased examiner experience base contribute to more reliable examinations being performed each outage.

The proposed generic letter requires a response that potentially places licensees in an awkward regulatory position. The body of the letter indicates that the implementation of a current ASME Code acceptable ISI program does not constitute a safety concern while it also indicates those ASME Code acceptable ISI programs might not provide reasonable assurance that flaws can be reliably detected and sized in certain areas. If the results of a licensee's evaluation of an ISI program indicates the program meets current Code requirements, the program may be judged to be ineffective by the NRC based on the contents of the proposed generic letter even though the requirements of Appendix VIII have not been formally incorporated into the regulations as a requirement.

Since no safety concern exists that warrants an immediate backfit, TU Electric recommends that the proposed generic letter be suspended and the issue be addressed by rulemaking.

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If you have any questions, please contact Mr. Carl B. Corbin at  
(817) 897-0121.

Sincerely,

*C. L. Terry*

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