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62FR 26331
May 13, 1997
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June 27, 1997

U. S. Nuclear Regulatory Commission
Chief, Rules Review and Directives Branch
Office of Administration
Mail Stop T6-D59
Washington, DC 20555-0001

Subject: Comments on the Proposed Generic Letter; Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in the Containment

CNRO-97/00015

Entergy Operations, Inc. appreciates the opportunity to comment on the subject proposed Generic Letter. Our comments are provided below.

1. General Comment:

   The proposed Generic Letter identifies three areas of concern:

   - Foreign material in containment
   - Design deficiencies and material condition deficiencies of ECCS structures, systems, and components inside containment
   - Problems with protective coatings inside containment

   NRC is requesting information pertaining to protective coatings, only. Presented in the proposed format, particularly when reference is made to inspections and aggressive enforcement, it appears the first two issues may overshadow the protective coatings issue. It may be of greater benefit to NRC and licensees to separate the first two issues from the third in order to provide proper focus to each. Because NRC is not requesting information

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pertaining to the first two issues, they may be presented in an Information Notice discussing their relationship to protective coatings while the third issue remains in the Generic Letter.

2. Protective Coatings section, third paragraph:

   The following sentence should be added: "Once in contact with sump screens or suction strainers, coating chips may impact the net positive suction head (NPSH) available to the ECCS/CSS pump." This sentence explains the potential impact of the coatings on pump performance.

3. Discussion section, eighth paragraph:

   The proposed Generic Letter makes the following statement: "To the extent that protective coatings meet these scoping criteria (sic), they are within the scope of the maintenance rule."

   NRC should recognize that coatings may not be included under the Maintenance Rule if they do not fall into one of the categories specified in 10CFR50.65.

4. Discussion section, twelfth paragraph:

   The proposed Generic Letter makes the following statement: "The NRC will consider violations in this area as significant regulatory failures and will, accordingly consider categorizing inadequacies at least as Severity Level III violations. The NRC will also consider the long history of generic communications on this issue as prior notice to licensees when the agency assesses civil penalties in accordance with ..."

   The proposed Generic Letter implies that determining violations and their associated severity levels has already been set and, therefore, NRC will not follow the criteria established in NUREG 1600 (Enforcement Policy). This policy for any inadequacy (minor or self-identified) could lead licensees to be less than vigorous in evaluating their protective coatings. NRC appears to base this policy on a "long history of generic communications on this issue". While we agree there is a long history regarding ECCS problems caused by debris and foreign material, there does not appear to be a "long history" of problems with containment coatings (7 of 54 items identified in Appendices A and B; and 4 of 20 identified in Appendix E of the proposed Generic Letter).

5. Required Information section, first paragraph:

   The Generic Letter specifies a written response within 75 days from the date of the letter. The requested information may be contained in several plant programs. A longer time period (e.g., 120 days) would be more appropriate to allow gathering the requested information from the various program sources.

6. Required Information section, Item (1):

   Item (1) states, in part: "Include a discussion of how the plant-specific program meets the applicable criteria of 10 CFR Part 50, Appendix B, as well as information regarding any applicable standards, plant-specific procedures or other guidance used for ... (c) surface preparation, application, surveillance and **maintenance activities** (emphasis added) for protective coatings."

   Entergy interprets "maintenance activities" as rework of identified degraded coatings. The expectations of maintenance activities should be specified in the Generic Letter to avoid confusion.

7. Appendix C, Item (1):

   Item (1) states, in part: "Class I Service Applications, which are applications of coatings or paints to SSCs that are essential to prevent or mitigate the consequences of postulated accidents."

   This definition is inconsistent with the industry interpretation of Service Level I coatings. The statement implies only safety-related SSCs need to have qualified coatings. Generally, the SSC's function is not considered when determining if qualified coatings are needed. Any surface area, on safety-related or nonsafety-related equipment, from which failed paint could make its way to the strainers, should have Service Level I coatings. There are nonsafety-related components directly above the suppression pool (e.g., handrails). By the above definition, such components need not have qualified coatings.

8. Appendix C, footnote 1:

   Footnote 1 states: "Coatings applied to non-safety-related small-scale components inside the containment structure, such as small lighting fixtures or small non-safety-related power buses, are an exception to this statement."

Paint on safety-related or nonsafety-related equipment has no bearing on the equipment's ability to perform its function. This statement should be revised to allow any small-scale component to be exempted regardless of safety classification. Such a position would be consistent with the general industry interpretation of ANSI N101.4, Section 1.2.4.

In addition to the above comments, Entergy endorses the comments submitted to the NRC by Nuclear Energy Institute (NEI).

Again, thank you for the opportunity to provide our comments.

Sincerely,

JGD/SJB/GHD/baa
attachment
cc: (see next page)

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