

March 20, 2000

Dr. Dana A. Powers, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: SECY-00-0011, "EVALUATION OF THE REQUIREMENT FOR LICENSEES TO UPDATE THEIR INSERVICE INSPECTION AND INSERVICE TESTING PROGRAMS EVERY 120 MONTHS"

Dear Dr. Powers:

The NRC staff has proposed modifications to the requirement in Section 50.55a of Title 10 of the Code of Federal Regulations (10 CFR 50.55a) for licensees to update their inservice inspection (ISI) and inservice testing (IST) programs every 120 months to a recent edition of the American Society of Mechanical Engineers (ASME) Code incorporated by reference in the NRC regulations. Recent activities concerning these modifications have included: a briefing of the Advisory Committee on Reactor Safeguards (ACRS, 12/2/99), two ACRS letters to Chairman Meserve (12/8/99 and 2/8/00), a staff response to the 12/8/99 ACRS letter (1/13/00), and the proposed modifications (SECY-00-0011, "Evaluation of the Requirement for Licensees to Update their Inservice Inspection and Inservice Testing Programs Every 120 Months," 1/14/00). In SECY-00-0011 the staff continues to support Option 1.B: replace the current 120 month update requirement with a baseline set of ISI and IST requirements and allow voluntary updating of ISI and IST programs to entire subsequent NRC-endorsed ASME Code editions and addenda unless the baseline is revised in accordance with the backfit provisions of 10 CFR 50.109.

In the letter to Chairman Meserve dated February 8, 2000, the ACRS recommends that the Commission retain the 120-month update requirement for ISI and IST programs (referred to as Option 2 in SECY-00-0011). In support of the ACRS recommendation, you note that effective ISI and IST programs are crucial to demonstrating that any effects of aging on critical plant systems will be adequately managed and to ensuring public confidence in the license renewal process. The ACRS also points to significant changes to the ISI, IST, and operations and maintenance requirements that improved the effectiveness and efficiency of these programs over the past decade. The ACRS considers that participation by representatives of licensees on the ASME Code committees ensures changes to the ASME Code are not introduced frivolously. The ACRS continues to believe that 10 CFR 50.109 evaluations are not well suited to assess the appropriateness of defense-in-depth measures, such as the ASME Code updates.

We consider our January 13, 2000, letter and SECY-00-0011 to present the staff's position on the ISI/IST update requirement and to address the basic points made by the ACRS in its most recent letter dated February 8, 2000. Nevertheless, we recognize that a significant policy issue

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does exist in this area. As a result, the staff is planning to brief the Commission on the proposed modification to the ISI/IST update requirement on March 24, 2000, and we understand that other stakeholders, including the ACRS, will be briefing the Commission as well.

We appreciate your careful review of this issue and look forward to future discussions with you. If you would like to discuss this matter in more detail, please contact Jack Strosnider, Director, Division of Engineering, NRC Office of Nuclear Reactor Regulation, at 301-415-3298.

Sincerely,

/RA by Frank Miraglia Acting For/

William D. Travers
Executive Director
for Operations

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
SECY

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We consider our January 13, 2000, letter and SECY-00-0011 to present the staff's position on the ISI/IST update requirement and to address the basic points made by the ACRS in your most recent letter dated February 8, 2000. Nevertheless, we recognize that a significant policy issue does exist in this area. As a result, the staff is planning to brief the Commission on the proposed modification to the ISI/IST update requirement on March 24, 2000, and we understand that other stakeholders, including the ACRS, will be briefing the Commission as well.

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