December 8, 2000

MEMORANDUM TO: Stuart A. Richards, Director
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Robert E. Moody, Project Manager, Section 1 ***/RA/***
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MEETING HELD ON NOVEMBER 16, 2000, WITH THE COMANCHE PEAK REGULATORY AFFAIRS STAFF TO DISCUSS VARIOUS LICENSING ITEMS

On November 16, 2000, Mr. David H. Jaffe, Comanche Peak Steam Electrc Staton (CPSES), Senior Project Manager, and Mr. Robert E. Moody, Project Manager, met with members of the CPSES licensing staff to discuss various licensing items. The meeting was held at CPSES in the Main Conference Room in the Support Services Building. The meeting started at 1:00 p.m. and concluded at 3:30 p.m. Enclosure 1 lists the U. S. Nuclear Regulatory Commission (NRC) staff and CPSES licensing staff members who participated in some or all of the discussions.

The following items currently on the docket were discussed:

- Item: Prior to the meeting, the licensee had brought to the attention of the NRC staff the need to clarify wording in the Safety Evaluation for a license amendment related to designating personnel to close containment penetrations in the event of a fuel-handling accident inside containment during outages (TAC No. MA9071 and MA9072).

  Status: The NRC staff will revise the Safety Evaluation and send a correction letter.

- Item: The licensee had recently received approval to use Code Case N-573, which relates to the use of other welding and brazing procedures approved by other utilities (TAC Nos. MA9406 and MA9407). The licensee commented that the following sentences contained in the letter transmitting the approved American Society of Mechanical Engineers (ASME) Code relief request might be considered a backfit issue: "Therefore, the use of this alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the second ten-year interval (August 13, 2000, to August 13, 2010) of the ISI [inservice inspection] Program for CPSES, Unit 1, and for the first ten-year interval (August 3, 1993, to August 3, 2003) of the ISI Program for CPSES, Unit 2, or until ASME Code Case N-573, Section XI, Division 1, is approved for general use by reference in Regulatory Guide (RG) 1.147. After that time, the licensee must follow the conditions, if any, specified in RG 1.147."

  Status: The licensee may work with the industry to resolve a potential back-fit issue related to these words.

- Item: The license amendment request related to steam generator repair using laser welded sleeves was discussed (TAC Nos. MA9950 and MA9951). The questions in Enclosure 2 of this letter were reviewed with the licensee, and the licensee had no questions. A conference call was initiated with Mr. John Tsao, the NRC staff reviewer, to discuss weld width and the NRC's review of the pending licensee's response.

  Status: The licensee intends to provide a draft response to the NRC's questions by the end of November 2000.

- Item: The license amendment request related to the Pressure and Temperature Limits Report was also discussed (TAC MA9834 and MA9935).

  Status: The NRC staff expects approval of the amendment request by the end of November 2000.

- Item: The licensee's Security Plan amendment request was discussed (TAC Nos. MA8885 and MA8886).

  Status: The NRC staff intends to issue a partial denial to the request by mid-December 2000.

- Item: The Technical Specification amendment request related to the re-racking of the spent fuel pool was discussed (TAC Nos. MB0207 and MB0208).

  Status: The NRC staff expects to issue a letter related to the proprietary information contained in the amendment request by mid-December 2000. The NRC staff also expects to issue a notice, which includes provision for a public hearing, in the *Federal Register* by December 1, 2000. The licensee agreed to the revised, planned amendment approval date of September 30, 2001, proposed by the NRC staff. The licensee also discussed the following four items which may involve supplements to the original amendment request: 1) the licensee will provide information related to a potential non-conservatism in the Westinghouse generic axial burnup reactivity basis as stated in their application; 2) the licensee will supplement the amendment request should the issue identified in the CPSES corrective action program related to the effect of the revised building responses on the balance of Fuel Building structures, systems, and components not being properly considered, result in modification of the balance of the Fuel Building; 3) The licensee will supplement the amendment request should the issue identified in the CPSES corrective action program related to the change in various heat loads not being properly considered (collectively) in the ultimate heat sink analysis change the conclusions of the analysis; and 4) the licensee will supplement the amendment request should the issue identified in the CPSES corrective action program related to the impact of spent fuel pool loads and heat loads of previous modifications being improperly maintained current in the CCW thermal loads analysis change the conclusions of the analysis.

- Item: The letter transmitting Technical Specification Bases changes made by the licensee was discussed (TAC Nos. MB0222 and MA0223).

Status: The NRC staff intends to issue the letter by the end of December 2000.

- Item: The status of the license amendment related to the setpoints for the 6.9KV preferred and alternate off-site power sources was discussed (TAC Nos. MA9030 and MA9031).

  Status: The licensee intends to submit a supplement by the end of January 2001.

- Item: The August 23, 2000, inspection report of the Safe Shutdown Impoundment Dam was discussed (TAC Nos. MB0033 and MB0034).

  Status: Since the comments in the report were similar to those in the previous inspection report, the licensee intends to respond by referencing much of the information provided in the previous response. The NRC staff will discuss the licensee's response with a Federal Energy Regulatory Commission representative to address closure of the recurring comments. The next dam inspection is planned for February 2001.

Also, the following non-docketed licensing items were discussed:

- Item: The possibility of a license amendment related to a power uprate for one or both units was discussed.

  Status: The licensee intends to submit a request to uprate one or both units by the end of December 2000.

- Item: Control Room air in-leakage testing was discussed.

  Status: In coordination with the other Strategic Teaming and Resource Sharing utilities, the licensee may submit a testing methodology that does not involve the use of a tracer gas.

- Item: Schedule of licensing submittals was discussed.

  Status: As done in the past, the licensee will provide a response to the periodic letter from the NRC staff requesting a brief description of potential future licensing activities.

Docket Nos.: 50-445 and 50-446

Enclosures: As stated

cc w/encls: See next page

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cc w/encls: See next page
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MEETING TO DISCUSS LICENSING ISSUES

AT

COMANCHE PEAK STEAM ELECTRIC STATION
NOVEMBER 16, 2000

LIST OF ATTENDEES

NAME	ORGANIZATION
David Jaffe	NRC
Robert Moody	NRC
John Tsao (by telephone)	NRC
Roger Walker	CPSES
Don Woodlan	CPSES
Carl Corbin	CPSES
Neil Harris	CPSES
Obaid Bhatty	CPSES
Manu Patel	CPSES
Rob Slough	CPSES

Laser Welded Sleeves Repair for Steam Generator Tubes Questions

I. Questions Related to Proposed Technical Specifications (TSs)

1. The proposed changes to Table 5.5-2, Steam Generator Tube Inspection, are not implemented in accordance with Section 3.0 of Electric Power Research Institute (EPRI) Steam Generator Examination Guideline, Revision 5, TR-107569-V1R5, September 1997. Specifically, EPRI recommends a 20% sample for initial sleeve inspection. In addition, the staff has approved past sleeving license amendments based on TSs that included a separated, stand-alone table specifically for sleeve inservice inspection and expansion criteria.

2. The proposed sleeve plugging limit of 43% does not correspond to any of the plugging limits shown on page 3-16 of WCAP-15090, Revision 1. Clarify the discrepancy. Also, confirm that the 43% plugging limit is derived using the current operating conditions in Unit 1 and not the power uprate conditions.

3. The disposition procedures for degraded sleeve(s) is not clear to the NRC staff. TS 5.5.9e.1.f proposed a 43% plugging limit for the degraded sleeve. However, Section 7.6 of WCAP-13698 specifies that "...[A]ny change in the eddy current signature of the sleeve and sleeve/tube joint region will require further inspection by alternate techniques prior to acceptance. Otherwise the tube containing the sleeve in question shall be removed from service by plugging..." This implies that tubes with eddy-current indications in the sleeve region may be left in service. Discuss eddy-current probe types and qualifications for sleeve inspection and the disposition procedures for degraded sleeve(s) at Comanche Peak Unit 1.

4. In proposed TS 5.5.9e.1.n, WCAP-15090, Revision 0, is referenced. However, in the amendment request package, WCAP-15090, Revision 1, is included. Clarify the discrepancy in the revision number.

5. In proposed TS 5.5.9b (page 5.0-13), it is stated that "When referring to a steam generator tube, the sleeve shall be considered as part of the tube if the tube has been repaired per Specification 5.5.9e.1n." Specification "5.5.9e.1n" should be corrected to "5.5.9e.1.n." for consistency.

II. Questions Related to WCAP-13698, Revision 3

1. In the spring of 2000, the NRC staff reviewed an amendment request from Kewaunee regarding its Westinghouse laser welded sleeves. In that review, the staff questioned whether the weld width of the laser welded sleeves is in compliance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). As a result of the NRC staff review, Westinghouse stated (in Reference 1) that it will revise its inspection and installation procedures for the laser welded sleeves to require that the average weld width be greater than 0.02 inch for the 7/8 inch inside diameter tubing. In Reference 2, Westinghouse stated that the field inspection procedure has been revised to verify that the average weld width of new sleeves is equal to and greater than 0.021 inch. It was staff's understanding that the

0.021 inch will be applicable to the 3/4 inch diameter tubing. However, in WCAP-13698, Revision 3, it is stated that the weld width limit is 0.015 inch. (1) Why is the weld width limit of 0.021 inch not implemented in WCAP-13698? (2) Will the weld width limit of 0.021 inch be implemented in the sleeve acceptance criteria and installation procedures at Comanche Peak? (3) Confirm how any weld having an average weld width of less than 0.021 inch will be dispositioned.

2. In Section 7.3 of WCAP-13698, it is stated that the Cecco-5/bobbin probe provides baseline examination of the sleeves and tubes. In Section 7.4 of WCAP-13698, it is stated that Cecco-5 probes have been qualified to Electric Power Research Institute (EPRI) Appendix H requirements for detection in 3/4 and 7/8 inch diameter sleeved tubing. The staff understands that most licensees use the plus point probe to inspect the sleeves. If the Cecco-5 probe is used, the staff requests the following information regarding the Cecco-5 probe: Flaws in the qualification data set, noise level and signal-to-noise ratio in the qualification data set, comparison of the noise level and signal to noise expected from sleeves installed in the plant, and examination technique specifications sheet (ETSS). In addition, clarify what eddy current probes will be used in the in-service inspection of sleeves in the future refueling outages?

3. In Section 7.1 of WCAP-13698, it is stated that the sleeve welds will be inspected ultrasonically to verify the minimum required weld width. In Table 6.1, it is stated that the sleeves will be inspected ultrasonically on a sample plan. (1) Discuss the sample plan. (2) If all sleeve welds will not be inspected ultrasonically because of the sample plan, what measures will be taken to assure the acceptability of the width and condition of all welds? (3) What is the minimum required weld width referred to in Section 7.1?

4. In Section 7.5.3 of WCAP-13698, Westinghouse stated that other advanced examination techniques may be used to inspect the in-service sleeves as long as they can be shown to provide the same degree or greater of inspection rigor as the initial methods. (1) Clarify whether the advanced techniques would be qualified in accordance with EPRI guidelines, and (2) how would the licensee implement the advanced techniques at Comanche Peak?

III. References

1. Letter dated February 23, 2000, from Mark L. Marchi of Wisconsin Public Service Corporation to NRC Document Control Desk, Subject: Additional Information for Proposed Amendment 158, “Plugging Limit Changes for Westinghouse Mechanical Hybrid Expansion Joint Sleeves and Laser Welded Sleeves.”

2. Letter dated March 23, 2000, from H.A. Sepp of Westinghouse Electric Company to NRC Document Control Desk, Subject: Laser Welded Sleeves Licensing Information.

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