

May 10, 2001

MEMORANDUM TO: William H. Bateman, Chief
Materials and Chemical Engineering Branch
Division of Engineering

FROM: Edmund J. Sullivan, Chief */ra/*
Component Integrity & Chemical Engineering Section
Materials and Chemical Engineering Branch
Division of Engineering

SUBJECT: SUMMARY OF APRIL 6, 2001, TELEPHONE CONFERENCE
BETWEEN NRC AND NEI REGARDING STEAM GENERATOR ISSUES
RELATED TO NEI 97-06

On April 6, 2001, a telephone conference was held between Emmett Murphy, Edmund Sullivan, and Bob Tjader of the NRC, Jim Riley of NEI and other industry representatives. Much of this teleconference relied on the draft documents from NEI that are contained in Attachment 1 to this memo.

This summary is organized by the five agenda items, discussed during this call:

1. Generic Change Package

Mr. Murphy suggested that SR 3.4.13.2 be streamlined by wording to say: "(d)etermine primary to secondary LEAKAGE." Mr. Riley indicated they are in basic agreement with this approach and will revise the TS accordingly.

Regarding TS 3.4.X on steam generator tube integrity, we indicated that we are in agreement with this approach for including the structural and accident-induced leakage integrity performance criteria in the TS with its accompanying surveillance requirements and action statement.

With respect to the TRM x.y LCO, Mr. Murphy suggested replacing the words "... below as determined by the steam generator program ..." with the words "... pursuant to ..." to streamline and clarify the wording. Mr. Riley indicated they were receptive to this suggestion. Regarding SR A, Mr. Murphy suggested rewording to state: "Verify steam generator tube integrity is in accordance with the performance criteria, pursuant to the steam generator program." He suggested that the accompanying frequency state: "In accordance with the steam generator program." Mr. Riley indicated they would consider these suggestions.

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Regarding TRM 6.X.1, Mr. Murphy expressed a concern that the words “ ... the basis for the planned operating period” may have the appearance of conflicting with TS 3.4.X. He suggested rewording to say “ ... the basis for the next planned operating period.” Mr. Riley indicated that they would consider this wording or suggest some alternative words.

Mr. Murphy recommended that the TS bases contain a tie between the SG program and NEI 97-06 since the steam generator programs are developed and being conducted in accordance with the NEI 97-06 steam generator program guidelines. Mr. Riley indicated that they would consider this comment as the TS bases are being developed.

The TRM bases in the generic change package state that operational leakage is measured at standard temperature and pressure conditions. This represents a proposed change from the approach used when the operational leakage limit was 500 gpd per steam generator. At Mr. Murphy’s request, Mr. Riley indicated he would provide an industry contact to NRC to discuss this further.

2. Minimum Margin to Tube Burst

After discussing this concept and the definition in the TRM on the Limiting Design Basis Accident, we concluded that there was mutual agreement in principle, but that developing a concise definition was difficult. This item requires further NEI action.

3. New Degradation Mechanisms

Mr. Sullivan requested this agenda item. He explained that there is NRC interest in knowing when a plant is experiencing a new degradation mechanism. Industry representative pointed out that it may be difficult to unambiguously define “new degradation mechanism” and, notwithstanding this point, it can be difficult to determine whether there is a new degradation mechanism on the basis of eddy current. Given these concerns, industry representatives indicated a reluctance to expose plants to potential violations that could arise from a TS reporting requirement triggered by new degradation mechanisms. Industry representatives indicated that they would consider addressing this request in the context of the IP2 lessons learned (LL) recommendation LL 2I, “tube integrity implications of new mechanisms.” It was indicated that they would consider: 1) developing discussion and an appropriate definition for the term “new degradation mechanism” and 2) reporting to NRC on new degradation mechanisms as a guideline recommendation.

4. NRC Access to Operational Assessments

NRC representatives agreed to put together a policy statement on this subject. This statement will likely be included in the safety evaluation for the NEI 97-06 generic change package. This item will be discussed further after NRC prepares a draft statement.

5. Protocol for Addressing Technical Issues

Mr. Murphy commented that NRC was in general agreement with the proposed protocol but indicated the purpose statement needs to be broadened. The NRC view is that the protocol is essentially a permanent agreement, not an agreement that will terminate with the conclusion of the review of the generic change package. He suggested that the purpose be revised to state that "the purpose of this protocol is to define a process for identifying, tracking, and resolving issues that may arise during NRC or industry review of guideline documents, plant-specific events, generic trends, and NRC research findings." Mr. Riley indicated that they would consider this wording and would develop a schedule for addressing technical issues, such as those contained in the Issue Matrix previously transmitted to NEI (see ML010520394).

Mr. Murphy also commented that there may be cases where an issue requires an urgent response. We indicated that the protocol should acknowledge that. Suggested words for the protocol are provided in the Attachment 2.

6. Upcoming Meeting

The next meeting with NEI on steam generator issues is scheduled for 8:30 am to 4:00 pm on April 26th. The preliminary agenda for the meeting will consist of two items: 1) Steam Generator Action Plan Technical Issues and 2) the NEI Generic Change Package.

Attachment: As stated

cc: J. Riley, NEI

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cc: J. Riley, NEI

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From: Emmett Murphy
To: Ejs
Date: 4/17/01 5:04PM
Subject: Insert on SG Issues Protocol

In our April 6 call, we said that we would provide some words regarding the need for NRC staff to sometimes act independently of the protocol.

I suggest the following words to appear at the end of the Purpose section (Section 1) and of the Issue Closure section (Section 4.4.1):

"In cases where the NRC staff determines an issue to be of immediate safety significance, the staff may act independently of this protocol in accordance with NRC regulations and policies."