

May 25, 2001

MEMORANDUM TO: File

FROM: Peter J. Kang, Reactor Systems Engineer */RA/*
Engineering Section
Licensing Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

SUBJECT: NEW GALL DISCREPANCIES FROM NEI

On May 22, 2001, Mr. Chris Grimes received an electronic mail from Mr. Alan Nelson of NEI transmitting discrepancies found in the Closed-Cycle and Open-Cycle Cooling System Programs with the new GALL. Mr. Grimes responded that the staff plans to build a list of improvements and will be incorporated later in the GALL report.

Project No. 690

Attachment: As stated

cc: PUBLIC

From: Christopher Grimes
To: Alan Nelson
Date: 5/22/01 2:15PM
Subject: Re: New GALL Discrepancies

Thanks for the feedback. We'll start building a list of improvements to include with the results of the Demo Project and the outcome of the ACRS recommendation on enhanced presentation of scoping information.

>>> "NELSON, Alan" <apn@nei.org> 05/22/01 01:36PM >>>
Chris:

> In updating the Closed-Cycle and Open-Cycle Cooling System Programs with
> the New GALL, we would like to bring to your attention the following
discrepancies:

>
> 1. XI.M21, Closed-Cycle, states "Per EPRI TR-107396, performance
> and functional tests are performed at least every 18 months to demonstrate
> system operability, and tests to evaluate heat removal capability of the
> system and degradation of system components are performed every five
> years." EPRI TR-107396 does not contain this statement or these
> requirements. Originally GALL's Closed-Cycle Program referenced ASME OM
> S/G Part 2. NEI rightfully argued that the performance and functional
> tests were active indicators and did not indicate the degree of
> degradation. They implied "detection" (i.e., inspection) as the mode of
> degradation degree. The EPRI TR-107396, entitled "Cooling Water Chemistry
> Guideline", is primarily focused on Chemistry and only contains a few
> pages regarding non-Chemistry monitoring. These pages appropriately
> dictate that the form of non-Chemistry Monitoring be dependent upon the
> system, conditions, trending, past operating experience, etc....not
> necessarily a set frequency. I believe the discrepancy originated because
> the original wording related to this statement had OM S/G Part 2, and the
> NRC simply replaced OM S/G Part 2 with EPRI TR-107396. In fact, it
> appears that the NRC has repeatedly replaced the OM S/G Part 2 with this
> EPRI TR-107396 throughout this XI.21 Program, when the EPRI document does
> not address the material. I will note this discrepancy in my EA, but I
> would think the NRC would want to ensure this is revised.

>
> 2. The Revision of EPRI TR-107396 date stated in the References
> Section of XI.21 says "November 1997". My copy, and the ERPI web, states
> "October 1997".

>
> 3. XI.21, Closed -Cycle, Section, Item # 10, Operating
> Experience, still contains the error of referencing to LERs without a
> plant name.

>

Attachment

There may be other's identified by the staff as well. It may be best to collect these and revise after the industry and the staff has had an opportunity to utilize.

Thanks
Alan Nelson
202 739 8110

CC: David Solorio; Doug Walters; Pao-Tsin Kuo; Samson Lee; Sikhindra Mitra; Stephen Hoffman