

**From:** Mahesh Chawla  
**To:** Kelly.root@exeloncorp.com  
**Date:** 6/1/01 9:23AM  
**Subject:** Exelon Submittal dated February 9, 2001 & May 18, 2001 - SG Inspection Frequency for Braidwood 1  
**File:** C:\Program Files\Adobe\Acrobat 4.0\PDF Output\RAIs for SG Freq.wpd

Following is the list of questions we would like to discuss with you on the subject amendment. Please let me know your availability to have a teleconference to discuss these.

#### REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS ON STEAM GENERATOR INSPECTION REQUIREMENTS

Braidwood 1

In its letter dated May 18, 2001, the licensee submitted a response to the request for additional information (RAI) from the staff regarding changes to the Technical Specifications (TSs) associated with the steam generator tube surveillance requirements. The NRC staff has reviewed the response and has questions about the response to Question 1 of the previous RAI.

1. Please provide the scope of MRPC examinations and a summary and a summary of results of previous inspections (including pre-service inspections) of the replacement SGs during which MRPC had been performed.
2. Page 1, Paragraph 3, of the response referenced a "technical justification" developed by Exelon for the exception taken to the EPRI SG Examination Guidelines. Please provide the staff a copy of the "technical justification".
3. The response stated that only bobbin coils will be used during its eddy current inspections.  
(a) For the low-row U-bends in the replacement SGs, specify what probes are qualified to detect specific types of degradation. (b) If MRPCs were not used for the TTS and low row U-bends during the previous outage, please explain how the inspection met 10 CFR50, Appendix B, requirements. 10 CFR50 Appendix B requires non-destructive testing to be controlled by "qualified personnel using qualified procedures". (c) How would Exelon acquire operating experience concerning TTS and low-row U-bends if other plants are taking the same exception? Please elaborate on data available for your SGs. If operating experience for 600TT tubes is relied upon, how are differences in design and operation accounted for. (d) If these MRPC exams are not scheduled in the first 60 EFPs, when would they be performed?
4. Regarding page 4 of the response, Analysis Quality Checks Section, what is the technical justification for only performing 20% of the manual review instead of 100% as required by the Guidelines? If there was a technical justification performed for the previous outage, please provide the staff a copy.

**CC:** Z Fu

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Frequency for Braidwood 1

**Creation Date:** 6/1/01 9:23AM

**From:** Mahesh Chawla

**Created By:** MLC@nrc.gov

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