

From: James Wiggins
To: David Lew, Edwin Gray, Michael Modes
Date: Thu, Apr 6, 2000 12:50 PM
Subject: Re: EPRI SG GUIDELINES

Mike -

I like your approach. Hopefully you'll be able to share that approach with our other staff doing SG ISI work.

Jim

>>> Michael Modes 04/06 9:41 AM >>>

I left this interesting field about 4 years ago so my knowledge is not exactly current.

"Do we have copies of those guidelines?" Not to my knowledge.

"Have we studied?" See first question. I read through them when I was at NRR on rotation two years ago.

"As I understand it, those guidelines include both "mandatory" and "non-mandatory" elements." Isn't that an oxymoron? Mandatory guideline. I don't recall the guideline specifically being laid out that way ... but two years is a long time.

Do we know what to expect to see as we inspection SG ISI activities??? Yes ... it takes a little bit of work but this is how I do it:

Request, from the licensee, at least two weeks before the inspection:

their S/G degradation analysis,

S/G inspection plan,

S/G analysis guidelines,

procedure on control of the guideline (almost as important considering you have analysts sitting in Benita, CA; Lynchburg, VA, and Isquaha, WA looking at data from S/Gs from all over the country during the outage season),

eddy current exam procedure,

and plugging/sleeving plan. (I picked this all up from Calvert on my last inspection there)

Then dig from the records: FSAR S/G reference, Tech Spec surveillance requirement, all available previous tech. spec. required S/G reports, and the license amendment SERs including the ones detailing plugging and sleeving expectations. Take a week to digest this information and extract the technical highlights.

The week before the inspection the licensee should fax or email the current S/G inspection status broken down by eddy current technique. Then follow it up with a telephone call during which you get clarification on technical points, ask questions and sort out the logistics. I try to get it down to who, and when so I minimize the delays when I am at the site and the impact I have on the outage. The last thing I do is find the tech. reviewer in Sullivan's shop nominally responsible for the plant and have a discussion with them, in addition to talking to the resident, the BC, and the PM.

Develop a plan, adjust it based on the last call with the licensee and then work the plan when you get there.

An answer longer than you wanted I am sure but I hope it helps.

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Thanks,
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