



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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July 16, 2001

MEMORANDUM TO: William Bateman, Chief
Materials and Chemical Engineering Branch
Office of Nuclear Reactor Regulation

FROM: Arthur T. Howell, Director **/RA/ 7/16/01**
Division of Reactor Safety

SUBJECT: REVIEW OF REVISED INSPECTION PROCEDURE 71111.08,
"INSERVICE INSPECTION ACTIVITIES," AND DRAFT 9900
TECHNICAL GUIDANCE, "STEAM GENERATOR TUBE PRIMARY-
TO-SECONDARY LEAKAGE"

Region IV has reviewed the subject documents. We found that the guidance in the draft IP 71111.08 and Part 9900 provided useful information for inspectors to utilize during the inspection of activities associated with steam generator tube integrity and for the assessment of tube leaks.

Regarding the draft Part 9900 guidance, the 3 gpd leakage criterion and the associated actions are not described in any resident inspection performed baseline inspection procedure or Inspection Manual Chapter (IMC) 2515D, "Plant Status." We recommend that guidance be included in IMC 2515D for resident inspectors to monitor steam generator tube leakage and initiate action to inform the regional office and NRR when leakage exceeds 3 gpd. Additionally, responsibility for performing the followup inspection also needs to be addressed. If additional inspection is required to be performed by the resident inspectors, then the inspection requirements identified in Part 9900 should be addressed in a baseline inspection program inspection procedure used by the resident inspectors.

Regarding draft IP 71111.08, it appears that in order to be capable of performing meaningful inspections of steam generator activities, inspectors performing this procedure will require specialized training in inservice inspection techniques, including eddy current testing, flaw depth sizing techniques, welding, and codes and standards associated with inservice inspection. While we have some capability in this area, additional training will be required. The scheduling and completion of this training are likely to be prolonged. As a result, we recommend that interim short-term specialized training be provided to the cognizant inspection staff, similar to what has been done recently in the fire protection area.

We noted, in the review of the revised Inspection Procedure 71111.08, that there was a significant increase in the required resources. We agree that this increase is appropriate given the importance of this area. The revised level of effort is an accurate reflection of the resources needed to perform meaningful inspections. However, the proposed increase should be considered in the broader context of all other baseline inspection program resource

adjustments that are currently being considered. In addition to the increase in direct inspection, inspection-related travel will also likely increase. Most inservice inspection activities are performed early in the refueling outage while most of the steam generator work is performed late in the refueling outage. This may result in having to make two separate trips per outage.

In Sections 02.02 and 02.03, the regions are given discretion to determine whether to increase or decrease (omit) the level of inspections. This optional inspection requirement is somewhat unique in the context of the baseline inspection program. What would be the mechanism for documenting the basis for exercising discretion?

Section 02.03a. requires the notification of NRR/DE staff if the inspectors identify situations noted in Appendix A. It is not clear, however, how these situations will be resolved in the context of the baseline inspection program.

Section 02.03a.7 notes that if adequate expertise for the review of "raw" eddy current data does not exist, then NRR/DE can provide this resource. The process used to accomplish this should be detailed in the inspection procedure.

Section 02.03b. requires clarification. Is it intended that the level of baseline inspection effort be increased further up to the maximum if more than one of the factors of Section 02.03b.1-5 apply (or the operating experience is more significant), or is the level of effort to be increased even beyond the maximum resource estimate for those situations?

Section 02.02e. requires clarification. Is it one or two repairs and one or two replacements?

Section 02.03a. requires the inspector to schedule the inspection. This should be changed to read, "The inspection should be scheduled towards the end"

On a related matter, a number of licensees are implementing or planning to implement risk-informed inservice inspection programs using EPRI guidelines. As such, we recommend that the procedure be revised, as appropriate, to provide guidance for reviewing these risk-informed programs.

If you have any questions regarding our comments, please contact Charles Marschall at 817/860-8185.

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