

**From:** Peter Tam  
**To:** Carolyn Lauron; INTERNET:ALLENR@coned.com; internet:louier@coned.com  
**Date:** 8/14/01 2:56PM  
**Subject:** IP2: Conference Call re. Relief Request RR-58 (TAC MB1564)

**Who:** Carolyn Lauron, Peter Tam (NRC)  
Rich Louie et al. (Con Ed)

**When:** 8/16/01 (Thursday), 1:00 p.m.

**How:** Call NRC bridge at either 1-800-638-8081 or 301-231-5539. When prompted, enter passcode **7733#**.

**What:** The staff's proposed questions/comments on Con Ed's submittal on RR-58 (see below):

Code Case N-597 has not been endorsed by the NRC. The code case does not address inspection requirements and wall thinning rates and stipulates that the methods of predicting the rate of wall thickness loss and the predicted remaining wall thickness shall be the responsibility of the owner.

The licensee currently has stated on page 2 of 2 of its relief request, "Evaluations performed in accordance with Code Case N-597 will include an evaluation of the wall thickness measurements to determine the appropriate component thinning rate. The actual wall thickness used in the evaluation will account for any additional thinning expected before the next inspection period."

During a phone call on 6/1, the licensee clarified that for non-FAC, Section XI requirements will be followed. In addition, in a phone call on 7/24, the licensee stated that no procedures will be used to implement CC 597; the code case will be implemented through the licensee's ISI program. For example, pitting is non-FAC; therefore, the FAC evaluation methods of point-to-point and the band method are not applicable. The licensee also stated that there are no specific methods in the ISI program for evaluation and that the evaluation methods are left to the licensee. The licensee stated that FAC wear thinning will use the FAC approach.

Additional questions/ concerns: Based on the information provided through the phone calls, the relief request appears to be two-folded; i.e., the use of CC N597 for FAC as implemented through the FAC program and the use of CC N597 for non-FAC as implemented through the ISI program. If this is true, then the following two parts must be satisfied.

If the FAC program references NSAC 202-L, a clarification of the understanding of the terms "should" and "shall" must be provided for approval of the CC as implemented through the FAC program.

Since the licensee intends to implement the CC for non-FAC using the ISI program, the staff will need to know what specific types of non-FAC degradation this CC will be applied to, what Section XI requirements will be applied to qualifying and sizing the remaining wall thickness of the degraded areas, and what methods, including their bases, will be used to calculate the rate of wall thinning.

**THIS E-MAIL DOES NOT CURRENTLY STATE AN NRC STAFF POSITION, NOR DOES IT FORMALLY REQUEST FOR ADDITIONAL INFORMATION. DISPOSITION OF THE QUESTIONS/COMMENTS IN THIS E-MAIL WILL BE DISCUSSED WITH THE LICENSEE IN THE CONFERENCE CALL.**

Peter S. Tam, Senior Project Manager  
Project Directorate I-1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

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**CC:** Keith Wichman; Patrick Milano

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**Subject:** IP2: Conference Call re. Relief Request RR-58 (TAC MB1564)  
**Creation Date:** 8/14/01 2:56PM  
**From:** Peter Tam

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

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coned.com ALLENR (INternet:ALLENR@coned.com) louier (internet:louier@coned.com)	Transferred	08/14/01 02:57PM

nrc.gov owf2_po.OWFN_DO CLL (Carolyn Lauron) KRW CC (Keith Wichman)	Delivered Opened Opened	08/14/01 02:57PM 08/14/01 03:18PM 08/14/01 03:06PM
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MESSAGE	4927	08/14/01 02:56PM

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