

November 20, 2001

MEMORANDUM TO: Louise A. Lund, Chief
Component Integrity & Chemical Engineering Section
Materials and Chemical Engineering Branch
Division of Engineering

FROM: Maitri Banerjee */RA/*
Lead Project Manager
Steam Generator Action Plan
Division of Licensing Project Management

SUBJECT: SUMMARY OF NOVEMBER 1, 2001, PUBLIC MEETING WITH THE
NUCLEAR ENERGY INSTITUTE REGARDING NEI 97-06

On November 1, 2001, staff of the Nuclear Regulatory Commission (NRC) met with representatives of the Nuclear Energy Institute (NEI) and industry at the NRC's office in Rockville, Maryland for a working level meeting on steam generator issues. The purpose of the meeting was to discuss the status of the generic license change package and the steam generator examination guidelines currently undergoing review and revision before formal submittal to the NRC, and staff concern related to the appropriate regulatory control to be implemented in the generic change package. Attachment 1 is a list of those attending the meeting.

Louise Lund, NRC started the meeting with an introduction of the agenda and the attendees. Jim Riley of NEI provided the status of industry review and comment resolution for the generic license change package (GLCP). He stated that the application of a safety factor of 1.4 to the steam generator (SG) performance criteria for structural integrity during main steam line break is generating concerns for some in the industry. For certain plants, application of this safety factor to the full spectrum of MSLB events may not be consistent with the plant design basis and may reduce the allowable flaw size. Also, industry had questions as to the application of the safety factor to the primary vs. the secondary stresses. The industry is developing a position paper which they plan to submit in the near future. Rick Mullins of Southern Company noted that the treatment of thermal loads was covered in an industry white paper developed a few years ago. The staff agreed to look into the comments the staff might have made or position taken on this white paper. The handouts containing the industry presentation slides are provided as Attachments 2, and 3.

The staff noted that progress seems to have stopped on the NRC/NEI protocol for addressing outstanding technical issues. The NRC and NEI agreed to review recent documents, such as meeting summaries, and determine what needs to be done to complete development of such a protocol.

Mr. Riley indicated that an industry ad hoc committee is currently resolving over 700 comments received from the industry and the NRC on the draft revision 6 to the EPRI steam generator

examination guidelines. NEI indicated that they do not intend to provide NRC with the next draft since they do not view that this draft will be ready for NRC comments. The final revision 6 is not expected to be ready before the second calendar quarter of 2002, and NEI agreed to provide another draft version to the staff before finalizing.

Emmett Murphy, NRC, described the staff position on regulatory control over inspection intervals. Mr. Murphy explained why the industry's counter-proposal on this subject was not acceptable to the staff. The staff indicated that a letter from NRR management to NEI would be forthcoming on this subject and proposed a senior level management meeting with NEI on the subject in near future. The staff reiterated its concern that to ensure that risk is not increased it needs to maintain regulatory control on inspection intervals, including extension of the plant specific or generic inspection intervals. The staff also indicated that the administrative TS can be written to permit an approach whereby, sometime in the future, the industry can submit for staff review a methodology for extending the inspection intervals, and once approved, the licensees can use this methodology for extension of intervals without prior NRC review and approval.

The staff indicated that there is a need for additional operating experience, including that of the foreign countries regarding SGs with TT-690 material. The industry is currently working on the funding for such an effort.

The draft agenda (attachment 4) for the upcoming ACRS Subcommittee meeting was discussed to ensure mutual understanding of the scope of the staff and industry presentations.

The following list of actions were discussed and agreed upon by both parties:

NEI will provide to staff the following:

- a white paper including their comments on the 1.4 safety factor,
- technical justification and definition of longer inspection intervals,
- revised generic license change package with response to the staff comments in the September 18, 2001 memorandum (ADAMS Accession No. ML012610664) incorporated in the submittal,
- a formal submittal of the recent industry proposal on regulatory controls,
- near-final draft revision 6 of the SG examination guidelines,
- a proposed date for the senior management meeting between the NRC and NEI, and
- a final submittal of the protocol for addressing outstanding technical issues.

The staff will provide NEI the following:

- staff comments made on the several years old industry position paper related to the safety factor of 1.4,

- NRC letter on its position regarding regulatory controls over inspection intervals, and response to the NEI revised proposal on regulatory controls,
- identification of staff comments, in previous correspondence, on the NRC/NEI protocol.

Attachment: As stated

cc: Jim Riley, NEI

- NRC letter on its position regarding regulatory controls over inspection intervals, and response to the NEI revised proposal on regulatory controls,
- identification of staff comments, in previous correspondence, on the NRC/NEI protocol.

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Attachments: As stated

cc: Jim Riley, NEI

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