

23-6

From: Steven Long *NRR*
To: Bill Bateman, Edmund Sullivan, Emmett Murphy, F... *NRR*
Date: Mon, Jul 19, 1999 1:48 PM
Subject: Re: Accident Leakage Reviewer's Note

Bob,

I talked to Rich about the problem with the misleading nature of the "accident Leakage" TRM criterion as proposed by NEI. We believe it should be stated as follows:

"(ii) **Accident Induced Leakage** criteria: The primary to secondary **accident leakage** rate for the limiting design basis accident shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all steam generators and ~~and~~ leakage rate for an individual steam generator, not to exceed 1 gpm [except for specific types of degradation at specific locations where the tubes are confined, as approved by the NRC on a risk-informed basis, and enumerated in conjunction with the list of approved repair criteria in this TRM]."

If you want to discuss this, please contact me. I can explain the source of the confusion and the need for this wording.

Also, did we agree that the list of criteria that are in the TRM and are not to be changed without NRC approval would be specifically enumerated in the T.S. (ie, structural criteria, accident-induced leakage and operational leakage)?

Steve

CC: Richard Barrett

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