

No objection. See attached comments.



Nils J. Diaz
Nils J. Diaz 11/16/98

POLICY ISSUE

(NEGATIVE CONSENT)

October 28, 1998

SECY-98-248

FOR: The Commissioners

FROM: William D. Travers
Executive Director for Operations

SUBJECT: PROPOSED GENERIC LETTER 98-XX "STEAM GENERATOR TUBE INTEGRITY"

PURPOSE:

This paper informs the Commission of the staff's intent to delay the issuance for public comment of proposed Generic Letter 98-xx, "Steam Generator Tube Integrity," while the staff works with the Nuclear Energy Institute (NEI) and the nuclear power industry to resolve concerns with the industry initiative entitled NEI 97-06, "Steam Generator Program Guidelines." It is the staff's objective to avoid having to issue a generic letter and instead to endorse the industry initiative as an acceptable approach to resolving current problems associated with steam generator (SG) tube integrity. Nonetheless, the staff intends to release now for public comment the following three documents: (1) Draft Regulatory Guide DG-1074, Steam Generator Tube Integrity; (2) Differing Professional Opinion (DPO) Consideration Document; and (3) Memorandum dated September 25, 1998, to the Commission from Joram Hopenfeld, the DPO submitter.

BACKGROUND:

In COMSECY-97-013, the staff informed the Commission that it would (1) develop a generic letter containing model technical specifications (TSs) for SG tube surveillance and maintenance that requests licensees to address problems with current TSs; (2) develop guidance to support implementation of the generic letter model TSs; (3) give licensees the option to pursue alternate SG tube repair criteria supported by an appropriate risk assessment; and (4) evaluate, as part of the individual plant examination followup program, plants that appear to have a higher potential for core damage sequences that can challenge SG tubes. The staff also stated that the proposed generic letter package being issued for public comment would contain an assessment of issues raised in a differing professional opinion (DPO) concerning SG tube integrity. In the

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SECY NOTE: In the absence of instructions to the contrary, W/11
SECY will notify the staff on Friday, November 13, 1998 that the Commission, by negative consent, assents to the action proposed in this paper.

-- REC'D BY NJD

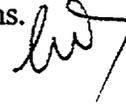
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COMMISSIONER DIAZ' COMMENT ON SECY-98-248

I concur with the staff recommendation to delay issuance of the proposed Generic Letter 98-XX, "Steam Generator Tube Integrity" while the staff continues to work with industry to reach agreement on NEI 97-06, "Steam Generator Program Guidelines." I also concur with staff's plan to issue for public comment the draft Regulatory Guide DG-1074 on steam generator tube integrity, the Differing Professional Opinion (DPO) Consideration Document, and the September 25, 1998, memorandum from J. Hopenfeld (DPO author) to the Commission.

The public notice should make clear that the staff has not had an opportunity to respond to the September 25, 1998, memorandum from the DPO author and will do so as part of the staff's response to public comments.

The staff should work with industry to resolve the technical differences and to incorporate technically sound and practical features from DG-1074 into NEI 97-06, with the objective of endorsing the resulting guide as an acceptable method for monitoring and maintaining steam generator tube integrity. This should be accomplished in early 1999. While DG-1074 is out for public comment, the staff should ensure that it is not used in inspections.

A handwritten signature in black ink, appearing to be 'LDZ', is located at the end of the third paragraph.