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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 7, 1996

MEMORANDUM TO: William T. Russell, Director  
Office of Nuclear Reactor Regulation

THRU: Ashok C. Thadani, Associate Director  
for Technical Review

FROM: *B* Brian W. Sheron, Director  
Division of Engineering  
Office of Nuclear Reactor Regulation

SUBJECT: SPECIALIZED EDDY CURRENT DATA ANALYSIS CAPABILITIES AND  
REGIONAL INSPECTOR TRAINING IN STEAM GENERATORS

The purpose of this memorandum is to address the question you raised at a briefing on steam generator issues regarding the staff's eddy current data analysis capabilities. This memorandum also discusses broad plans for regional steam generator inspections and associated training for inspectors.

For the past ten or more years we have relied upon the expertise of Dr. Caius Dodd, formerly of Oak Ridge National Laboratory (ORNL). Early last year Dr. Dodd retired from ORNL and has been retained by NRR under a personal services contract. He has assisted the staff in analyzing eddy current test (ECT) data on a number of occasions, frequently as a participant on a regional inspection. He has also assisted us in performing certain technical specification reviews such as the recently approved Byron/Braidwood amendment involving tube support locking.

In a recent conversation with Dr. Dodd, the EMCB staff discussed with him his interest in continuing the current personal services arrangement. He indicated that he is very interested in the work that we have been requesting him to perform, would like to work at a level of 0.5 FTE or more, and is interested in continuing this relationship with the NRC for the indefinite future.

Prior to this conversation, we had considered the possibility of soliciting the services of an ECT analyst through a competitive procurement. However, we have reconsidered this approach for the following reasons: There is not enough need for the specialized services of even one individual except on a part-time basis either currently or in the future. Therefore, Dr. Dodd can fulfill our needs in this area for the foreseeable future. Also, Dr. Dodd has never worked for the nuclear industry so he brings to the NRC the advantages of not having an industry bias while at the same time he is highly regarded by the industry ECT community.

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However, in order to provide a back-up to Dr. Dodd and to plan for the long-term, we are modifying our user need memorandum to the Office of Nuclear Regulatory Research for support regarding steam generators. We are requesting that as part of their program they include a task for developing an individual or individuals with capabilities similar to Dr. Dodd's so that those personnel can participate in NRC inspection activities, and provide a back-up to Dr. Dodd.

Regarding regional steam generator inspections, the staff is preparing an inspection module that will be issued in the near future to the regions for comment. The draft module will also be presented at the upcoming SG workshop being held in Charlotte, NC, in mid-February. We anticipate finalizing the module prior to the spring outage tube inspections. This module has been prepared to be used with the current SG regulatory framework, recognizing that when the new performance-based SG rule is issued, the module will need to be revised.

Many of the regional inspectors are already well equipped to perform these inspections. However, the NRR staff is planning to provide guidance and training opportunities to ensure that all the inspectors that will be involved in this area can capably implement the module. The February SG workshop is being designed to convey information in the areas of degradation modes, examination technology, tube integrity assessment, experience from recent SG inspections, information notices, and generic letters, as well as rulemaking plans, severe accident issues, and research. In addition to presenting the draft inspection module, enforcement guidance that is under preparation will be discussed. Based on feedback from the regions, we will prepare and provide training on the inspection module. We will also recommend that inspectors from each region attend industry sponsored training on eddy current data interpretation. The objective for this training should be to permit inspectors to identify obvious problems and recognize the need for further specialized assistance. Lastly, the capability to implement the module will increase with on the job experience through inspections and participation in meetings with licensees and in meetings with industry on generic SG issues.

\*See Previous Concurrence

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