

ATTACHMENT 4

DIFFERING PROFESSIONAL OPINION

VIEW

Recent experience at the Trojan plant indicates that present inspection techniques are not sufficiently sensitive to detect steam generator tube degradation. The problem is inherent in the eddy current probe design and its use. It is essentially impossible to detect tight through the wall cracks, especially at the tube support plate regions.

The plants were not designed to operate continuously with a large number of tubes containing through the wall cracks.

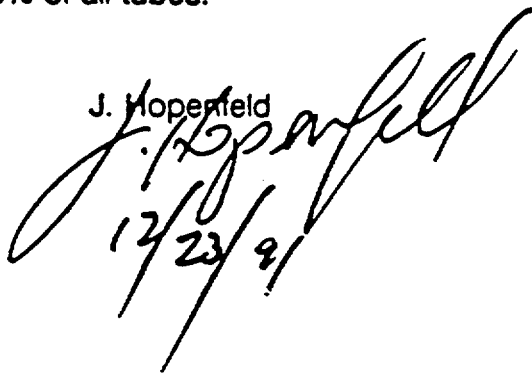
My concern is that a Main Steam Line Break (MSLB) outside containment could trigger a multiple steam generator tube failure which would then result in a core melt because of depletion in coolant inventory.

NRC is currently addressing the uncertainties in the in-service inspection procedures by considering the possibility of allowing affected utilities to operate with tube imperfections beyond the 40% tech specs through the wall plugging limit.

While the above action is useful for the long term, I believe it is not focused on the main issue. The main issue is whether the core can be maintained intact and radioactivity release prevented with a MSLB outside containment and multiple steam generator tube rupture. While considerable research will be required to define a new plugging limit and change the SRP, the result will not increase plant safety. The basic problem is with the NDE procedures and their inability to predict tube degradation and leakage.

Rather than concentrating efforts on alternate plugging limits, the NRC should request all affected licensees to provide warranties that they have the capability to keep the core intact and prevent allowable dose releases with a MSLB and a multiple tube rupture of no less than 80% of all tubes.

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