

September 9, 2002

Mr. James Riley
Nuclear Energy Institute
1776 I street, NW Suite 400
Washington, DC 20006-3708

SUBJECT: NEI STEAM GENERATOR GENERIC LICENSE CHANGE PACKAGE -
TECHNICAL SPECIFICATIONS - REVISION 6 OF STEAM GENERATOR
EXAMINATION GUIDELINES

Dear Mr. Riley:

This letter encloses a number of staff documents relating to the NEI Steam Generator (SG) Generic License Change Package (GLCP) and Revision 6 (draft) of the EPRI PWR Steam Generator Examination Guidelines. We are providing you these documents as background for our upcoming public meeting on September 11, 2002.

Enclosure 1 provides a sample draft of administrative technical specification 5.5.9, "Steam Generator Program," which the staff believes may constitute an acceptable approach for the GLCP.

Enclosure 2 documents the staff's review of industry responses, dated August 13, 2002¹, to staff comments dated September 18, 2001² on the draft version of Revision 6 of the examination guidelines that were presented to the staff on August 29, 2001³ dealing with sampling requirements for prescriptive based inspections.

NEI enclosed a revised draft of Revision 6 of the examination guidelines with its August 13, 2002 letter. This draft includes a number of additional guideline changes relative to the earlier version that the staff commented on in its September 18, 2001 letter. Enclosure 3 provides staff comments concerning the additional changes in Section 2, "Sampling Requirements for Prescriptive Based Examinations," of the guidelines.

The staff acknowledges that the guidelines are outside plant licensing bases and are not subject to NRC review and approval. However, the availability of effective industry guidelines

¹NEI letter dated August 13, 2002, "Steam Generator Inspection Intervals and Non Destructive Examination Requirements" Accession No. ML022390399

²NRC memorandum dated September 18, 2001, "NRC Staff Comments on Steam Generator Inspection Intervals" Accession No. ML0112610664.

³NRC memorandum dated September 21, 2001, "Summary of August 29, 2001 Public Meeting with the Nuclear Energy Institute Regarding NEI 97-06 Accession No. ML012690666.

for development of SG programs for ensuring tube integrity is an important element of the industry's NEI 97-06 initiative for managing tube integrity. The staff is relying on the industry's initiative to maintain the improvements in tube integrity performance that have been gained through the years and to ensure the frequency for meeting the tube performance criteria increases with time. The staff requests that the industry consider the staff's comments when finalizing Revision 6 of the examination guidelines and/or when issuing future revisions to the guidelines.

However, the staff wishes to highlight some of comments raised in enclosures 2 and 3 as priority issues which the staff believes should be resolved concurrent with submittal of a final GLCP. These issues are identified in enclosure 4. It would be highly desirable for the industry to address these issues in Revision 6 of the guidelines or in a supplemental guideline pending the next formal revision to the guidelines.

Sincerely,

Louise Lund, Chief **/RA/**
Component Integrity & Chemical
Engineering Section
Materials and Chemical Engineering Branch

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Sincerely,

Louise Lund, Chief
 Component Integrity & Chemical
 Engineering Section
 Materials and Chemical Engineering Branch

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