April 4, 2003

Mr. Douglas E. Cooper Site Vice President Palisades Nuclear Plant Nuclear Management Company, LLC 27780 Blue Star Memorial Highway Covert, MI 49043-9530

SUBJECT: PALISADES PLANT - STEAM GENERATOR TUBE INSERVICE INSPECTION

Dear Mr. Cooper:

Inservice inspections (ISI) of steam generator (SG) tubes play a vital role in assuring that adequate structural integrity of the tubes is maintained. As required by the Palisades Technical Specifications, reporting requirements range from submitting a special report within 15 days following completion of each ISI of SG tubes that identifies the number of tubes plugged and/or repaired, to submitting a special report within 12 months following completion of the inspection that provides complete results of the SG tube ISI. The special report containing the complete results shall include the following:

- 1. The number and extent of tubes inspected.
- 2. The location and percent of wall-thickness penetration for each indication of an imperfection.
- 3. Identification of tubes plugged and/or repaired.

A teleconference has been arranged with members of your staff to discuss the ongoing results of the SG tube inspections to be conducted during the current Palisades refueling outage. This phone call will occur after the majority of the tubes have been inspected, but before the SG inspection activities have been completed. Enclosed is a list of discussion points to facilitate this teleconference.

The Nuclear Regulatory Commission staff plans to document a brief summary of the conference call, as well as any material that you may have provided to the staff in support of the call.

Sincerely,

#### /**RA**/

Johnny H. Eads, Project Manager, Section 1 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: List of Discussion Points

cc w/encl: See next page

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**Palisades Plant** 

cc:

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# STEAM GENERATOR TUBE INSPECTION DISCUSSION POINTS

### PREPARED BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## PALISADES PLANT

### DOCKET NO. 50-255

The following discussion points have been prepared to facilitate the teleconferences arranged between the Nuclear Regulatory Commission (NRC) staff and the Nuclear Management Company, LLC (the licensee), to discuss the results of the steam generator (SG) tube inspections to be conducted during the current Palisades Plant refueling outage. This teleconference is scheduled to occur towards the end of the planned SG tube inspection interval, but before the unit exits its refueling outage.

The NRC staff plans to document a brief summary of the teleconference, as well as any material that the licensee may provide to the NRC staff in support of the teleconference.

- 1. Discuss whether any primary-to-secondary leakage existed in this unit prior to shutdown.
- 2. Discuss the results of secondary side pressure tests.
- 3. For each SG, provide a description of areas examined, including the expansion criteria utilized and type of probe used in each area. Also, be prepared to discuss the inspection of the tube within the tubesheet, particularly the portion of the tube below the expansion/ transition region.
- 4. Discuss any exceptions taken to the industry guidelines.
- 5. Provide a summary of the number of indications identified to date, of each degradation mode and SG tube location (e.g., tube support plate, top-of-tubesheet, etc.). Also provide information (such as voltages) and estimated depths and lengths of the most significant indications.
- 6. Describe repair/plugging plans for the SG tubes that meet the repair/plugging criteria.
- 7. Discuss the previous history of SG tube inspection results, including any "look backs" performed. Specifically for significant indications or indications where look backs are used in support of dispositioning (e.g., manufacturing burnish marks).
- 8. Discuss, in general, new inspection findings (e.g., degradation mode or location of degradation new to this unit).
- 9. Discuss the use or reliance on inspection probes (eddy current or ultrasonic) other than bobbin and typical rotating probes, if applicable.
- 10. Describe in-situ pressure test plans and results, if applicable and available, including tube selection criteria.

- 11. Describe tube pull plans and preliminary results, if applicable and available, including tube selection criteria.
- 12. Discuss the assessment of tube integrity for the previous operating cycle (i.e., condition monitoring).
- 13. Provide the schedule for SG related activities during the remainder of the current outage.
- 14. If SGs contain thermally treated tubing (Alloy 600 or 690), discuss actions taken (if any) based on Seabrook's recent findings (Reference Information Notice (IN) 2002-21).