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July 8, 2003

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

5/14/03

NL-03-1394

68 FR 25909  
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Southern Nuclear Operating Company  
Comments on  
NRC Generic Letter 2003-XX: Requirements for  
Steam Generator Tube Inspections, 68 FR 25909, May 14, 2003

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JUL 11 AM 9:44  
Rules and Directives

Dear Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC), the licensed operator for the Joseph M. Farley Nuclear Plant and the Vogtle Electric Generating Plant, has reviewed draft NRC Generic Letter 2003-XX: Requirements for Steam Generator Tube Inspections, published in the Federal Register on May 14, 2003 (68 FR 25909). SNC offers comments that are provided in the Enclosure.

Sincerely,

J. B. Beasley, Jr.

JBB/TMM

Enclosure:

cc: Southern Nuclear Operating Company  
Mr. J. B. Beasley, Vice President, Plant Farley  
Mr. J. T. Gasser, Vice President, Plant Vogtle  
Document Services RTYPE: CGA02.001

Template = ADM-013

F-RIDS = ADM-03  
Cell = J. Shapaker (JWS)  
P. A. Klein (PAK)

Enclosure

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Comment 1

The following passage is taken from the Background section of the draft generic letter:

“As a result of these limitations, the industry practice is to supplement the bobbin probe inspection with inspections by specialized probes, such as the rotating pancake coil or plus point probe, that are qualified for and capable of detecting degradation that is not detectable with the bobbin probe. However, inspecting tubes with these specialized probes is slower than with the bobbin probe. Therefore, these slow-speed probes are typically not applied over the entire length of a tube that is subject to inspection, but only at tube locations where degradation which cannot be detected with the bobbin probe (e.g., circumferential cracks, axial cracks in U-bends and expansion transitions) is known to be present or considered to have a potential to occur. This practice involves a degree of engineering judgment to determine the locations in which potential degradation mechanisms may exist that could lead to degradation that is not detectable using a bobbin probe. The EPRI Steam Generator Examination Guidelines provide guidance on assessing the potential for degradation to occur at various locations.”

The following passage is taken from the Discussion section of the draft generic letter:

“However, it is the staff’s position that pending the submission of a license amendment request clarifying the acceptability of a more limited inspection approach, licensees are required under existing requirements (TS in conjunction with 10 CFR Part 50, Appendix B) to employ inspection techniques capable of detecting all flaw types which may potentially be present at locations which are required to be inspected pursuant to the TS. The staff is concerned that in instances similar to those cited above, failure to expand the scope of the specialized probe inspection deeper into the tube sheet to detect cracks likely to be present poses a potential compliance issue with respect to the plant TS in conjunction with 10 CFR Part 50, Appendix B.”

These sections together indicate that the determination of the potential for degradation to occur “involves engineering judgment” and that the Steam Generator Examination Guidelines provide guidance for assessing the potential for degradation to occur. Confusion may arise by having this discussion split between two different sections. A clearer statement of the Staff’s position can be developed by including the two passages together in the same section of the generic letter.

Comment 2

The draft generic letter does not take a clear position on inspection sampling, therefore, the following interpretations will be made:

- It remains acceptable to perform a sample in accordance with industry guidance, e.g., 20% sample, to determine if potential degradation is occurring.

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- Sample expansion into the tube sheet is acceptable as opposed to inspecting the entire tube sheet when degradation is found. For example, if a sample of  $\pm 3$  inches at the top of the tube sheet is inspected with a rotating coil probe and a flaw is found in the lower inspection region of the tube sheet (lower 3 inches), it is acceptable to expand the inspection to +3 inches, -6 inches, instead of inspecting the entire tube sheet depth with a rotating probe.

Accordingly, if the draft generic letter does not clearly address inspection sampling then current industry sampling practices as stated above will continue.