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2003 JUL 15 AM 11:21

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Your ref: Accession Number ML031270171
Our ref: LTR-NRC-03-34

5/14/03
68 FR 25909
(7)

July 14, 2003

Subject: Westinghouse Comments on Proposed Generic Letter 2003-XX, "Requirements for Steam Generator Tube Inspections"

Please find attached Westinghouse Electric Company's comments on the proposed Generic Letter 2003-XX, "Requirements for Steam Generator Tube Inspections." The publication date and page number for the Federal Register Notice is May 14, 2003 and the page number is 25909.

Based on the review of the draft GL 2003-XX, "Requirements for Steam Generator (SG) Tube Inspections," Westinghouse concludes that the steam generator tubesheet region inspection issue does not adversely impact tube integrity or tube bundle leaktightness and that one path to resolution of the issue is to revise the tube inspection and tube plugging limit definitions in the plant technical specifications. Westinghouse concurs with the industry position that appropriate probes are currently used to detect degradation in areas that are significant to the operation of the steam generators. The use of the rotating pancake coil probe for the partial-length inspection of the tube joint based on the development of an acceptable length of undegraded hardroll, explosive, or hydraulic expansion of the tube in the tubesheet assures that the steam generator tube performance criteria of NEI 97-06, Rev. 1, "Steam Generator Program Guidelines" are met. The inspection issue addressed in the draft GL is not about technical adequacy of the eddy current inspection criteria discussed above, it is about whether or not the use of the bobbin probe meets the technical specification surveillance requirement that the full length of the hot leg portion of a tube must be inspected within the tubesheet. The bobbin probe is an appropriate tool for locating and identifying axially oriented stress corrosion cracks and volumetric tube wall loss in the tubesheet region of steam generators.

This circumstance clearly represents one more argument for adopting the framework of the NEI 97-06, Rev. 1 steam generator program initiative. Under this effort, the steam generator inspection scope would be defined in the SG Program procedures and not within the technical specifications. Inspection scope is defined by the degradation assessment that considers all potential degradation morphologies and locations.

F-EDS = ADM-03

A BNFL Group company

Added = J. Shapaker (JWS)
P. Klein (PAK)

Template = ADM-013

Please contact Gary Whiteman of my staff at 724-722-5584 if you have any questions on the attached comments.

Very truly yours,

A handwritten signature in black ink, appearing to read 'H. A. Sepp', with a stylized flourish at the end.

H. A. Sepp, Manager
Regulatory Compliance and Plant Licensing

Attachment

cc: D. Holland
B. Benney