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Nuclear

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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

SUBJECT: Comments on Proposed Generic Communication; Requirements for Steam Generator Tube Inspections

Reference: Federal Register, Vol. 68, No. 93/Wednesday, May 14, 2003, pp. 25909 - 25912.

In accordance with the above reference, Exelon Generation Company, LLC (Exelon), and AmerGen Energy Company, LLC (AmerGen), are submitting comments on the proposed Generic Letter, "Requirements for Steam Generator Tube Inspections".

Exelon and AmerGen are committed to working with both the industry and NRC to improve these inspections and the confidence in the integrity of steam generator tubes.

If you have any questions or require further information, please contact us at 610-765-5664.

Thank you for the opportunity to submit comments on this subject.

Sincerely,

Michael P. Gallagher
Director, Licensing & Regulatory Affairs
Exelon Generation Company, LLC
AmerGen Energy Company, LLC

Attachment: Responses to Request for Comments

E-RIDS = ADM-03
Add = J. Shapaker (JWS)
P. Klein (PAK)

Template = ADM-013

Draft Comments on Proposed NRC Generic Letter 2003-xx
Requirements for Steam Generator Tube Inspections

Background Section and Attachment 1 Sample Changes to the TS

1. The scope of the proposed GL requires clarification as to whether it applies only to expanded tubing within steam generator tubesheets, or to the entire length of the tubes. We believe the intent of the NRC is to inquire about individual plant tubesheet examination practices and compare them to the same plant's Technical Specifications requirements. Clarify whether or not the document pertains to tubesheet examinations only.

Requested Information Section

The proposed GL requests that plants submit a response within 30 days. This is too short a time to respond unless the requested information is general in nature. If detailed information is required, the requested response time should be 90 days.

2. The proposed GL references 10 CFR 50 Appendix B, Criterion IX, which states, "Measures shall be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements." The industry's examination techniques are and have been qualified in accordance with the ASME code. The interpretation has always been that the technique has to be proven to be capable of detecting the required reference flaws in the required calibration standard. The industry is proving sensitivity to machined flaws as small as 20% through wall during the Code procedure qualification process.

Clarify what published/NRC-endorsed/recognized documents other than the ASME Code are applicable to qualification of steam generator examinations. The intent of this comment is to understand if there is a back-fit issue associated with this proposed generic letter and to clearly understand the expected performance criteria.

The industry position is that the bobbin probe is the probe of TS compliance and that other techniques should be used as appropriate at areas of lesser sensitivity with the bobbin coil probe. Literal interpretation of having a fully qualified technique for possible cracking over the full length of tubing would mean that expanded tubing, dents, and other area of interfering signal such as MBM's, support structures, and U-bends would have to be examined with diagnostic probes (e.g., MRPC or array probes).

In summary, the proposed GL should clarify whether or not it pertains to tubing outside the tubesheet (as described above), and if historical interpretation regarding "full length exams" with "qualified" methods has changed.

3. The proposed GL asks that licensees assess their inspection practices in comparison to the "NRC's position." The "NRC's position" is unclear because it does not define the basis of the Appendix B qualification. One possible interpretation would be the ASME code qualification; another possible interpretation could be that all axial, circumferential, and volumetric flaws over the entire tube length have to be detectable; another possible interpretation could be that expected flaws in areas of concern have to be detectable.