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Subject: YOUR RESPONSE TO RAI RE: ALLOY 800 - TACs MC0197 AND MC0198
Creation Date: 2/9/04 9:58AM
From: Mohan Thadani
Created By: MCT@nrc.gov

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From: Mohan Thadani
To: Internet:jhicks1@txu.com
Date: 2/9/04 9:58AM
Subject: YOUR RESPONSE TO RAI RE: ALLOY 800 - TACs MC0197 AND MC0198

Jack:
RESENT WITH CORRECTON IN BOLD UNDERLINED.

We have additional preliminary questions on your response of January 8, 2004. Please see the questions below. Also, please provide the date **in the revised TS page in the 1/8/2004 RAI response for revised WCAP-15918.**

ADDITIONAL QUESTIONS

1. In your proposed technical specifications for the Plugging or Repair Limit, you indicate that the plugging limit for leak tight sleeve is equal to 20% of the nominal wall thickness (which is consistent with the definition of an imperfection which indicates that indications below 20% of the nominal tube wall thickness may be considered as imperfections.

If it is not your intent to plug all tubes with indications in the sleeves upon detection (regardless of the depth of degradation), please provide the technical basis for this plugging limit. In your response, please describes the testing programs used in determining the growth rate and non-destructive examination uncertainty used in the determination of this plugging limit. If you do intend to plug all tubes with indications in the sleeves upon detection (regardless of the depth of degradation), please modify your technical specifications appropriately.

2. In your January 8, 2004 response to question 2, you indicate that if a tube flaw is below the sleeve, then it is allowed to stay in service due to the F* analysis. Please provide the technical basis for this proposal. Include in your response the test results showing that structural and leakage integrity will be maintained with just the sleeve/tube joint (i.e., ignoring the non-pressure boundary portion of the parent tube since its integrity will no longer be able to be relied upon). The staff notes that the basis for the F* criterion did not address whether the length of the parent tube at the rolled joint of a sleeve was adequate to ensure structural and leakage integrity given the assumed absence of the parent tube above this location (and spanned by the sleeve).

Alternatively, modify your proposed technical specifications to indicate that the plugging or repair limit will apply to defects located below the sleeve.

3. In your January 8, 2004 response to question 4, you indicate that operational experience to date has confirmed these calculated values to be conservative. The intent of question 4 was to obtain any operating experience (under any condition including operating conditions) in which Alloy 800 sleeves has leaked. Please provide this information.

Thanks.

Mohan

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