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From: Thomas Alexion
To: MILLAR, DANA
Date: 3/15/04 10:52AM
Subject: COMMENTS ON PROPOSED TS CHANGE - METAMIC COUPON SAMPLING PROGRAM

Dana,

See the attached.

Tom

- docket 50-313
- PM is T. Alexion

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Creation Date: 3/15/04 10:52AM

From: Thomas Alexion

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COMMENTS ON ENTERGY'S PROPOSED TECHNICAL SPECIFICATION
METAMIC COUPON SAMPLING PROGRAM
ARKANSAS NUCLEAR ONE, UNIT 1 (ANO-1)

Proposed:
TS 5.5.17 Metamic Coupon Sampling Program

A coupon surveillance program will be implemented to evaluate performance of the Metamic absorber material that is exposed to the SFP environment. The purpose of the program is to establish the following:

Comment 1: Define that the coupons will be made of the same lot as the full length inserts used in the racks.

a. Withdrawal schedule and examination completion intervals:

1. One coupon will be examined on a two year basis for the first three intervals with the first inspection being performed on or before December 2006. Based on acceptable performance during the initial testing phase, the testing interval will be increased to 5 years over the remaining service life of the inserts.

Comment 2: How is an interval defined? "...on a two year basis for the first 6 years..." What is "acceptable performance"? How is this defined (i.e., consistent with assumptions in criticality analyses)? B-10 density Criteria?

2. The examination results will be completed within 18 months of removing the coupon from the SFP.

Comment 3: Basis for 18 months to complete examination results? (assume that 6 months is reasonable). How does the timing of the coupon examination results ensure that the criticality analyses remain valid (i.e., consider the effect of coupon surveillance results which indicate that the panels do not have the assumed B-10 content)? (The licensee has indicated that the pool will remain subcritical because of a minimum of 800 ppm of boron is needed - pool has 1600 ppm.)

b. Acceptability of the Metamic absorber material by evaluating the following parameters:

1. Physical observations of the coupon surface appearance,
2. Dimensional measurements
3. Weight, and
4. Material composition to confirm the boron (B-10) content.

Comment 4: What is the minimum boron (B-10) content assumed in the criticality analyses? (Value needed)

Comment 5: Reporting requirements for adverse results should also be included.

- c. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Metamic Coupon Sampling Program

NRC notes that SR 3.0.2 allows 1.25 times the specified interval; and SR 3.0.3 allows 24 hours or up to the limit of the specified interval, whichever is greater, for missed surveillances.

Comment 6: What are the consequences of applying these provisions to the sampling and testing of the coupons on the criticality analyses submitted to support the amendment should the coupon test results indicate a boron content less than that assumed?