



NUCLEAR ENERGY INSTITUTE

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December 6, 2004

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

10/07/04

69 FR 60193

(2)

**SUBJECT: Transmittal of NEI Comments on Draft Generic Communication;
Steam Generator Tube Integrity and Associated Technical
Specifications (69 Fed. Reg. 60193, October 7, 2004)
Request for Comments**

PROJECT NUMBER: 689

Dear Sir or Madam:

The Nuclear Energy Institute (NEI)¹ submits these comments on the Draft Generic Communication on Steam Generator Tube Integrity and Associated Technical Specifications issued for public comment on October 7, 2004. NEI has coordinated an industry effort to collect and consolidate comments, although comments should also be expected from individual licensees.

NEI submits the following comments on the draft communication:

- The draft generic communication includes sample technical specifications. The technical specifications attached to the final version of the generic communication should be the approved version of TSTF-449, "Steam Generator Tube Integrity." In order to ensure there is no possibility for confusion, it would be even better to reference the TSTF, rather than attach the technical specifications.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

SISP Review Complete

F-RIDS = ADH-03

Att = C. Pattone (CDP)

*K. Karwoski (KJKI)
M. Banerjee (MXB)*

Template = ADM-013

- The draft generic communication is addressed to PWRs that have not already “modified their technical specifications to be consistent with those in the Attachment.” We understand that the technical specifications that will be included in the attachment when the generic communication is issued will be the approved version of TSTF-449. The industry submitted TSTF 449 with the intention of applying it to the Consolidated Line Item Improvement Process (CLIIP). Since the intention of the CLIIP is to facilitate licensee adoption of essentially identical technical specification changes, a licensee who has requested the TSTF-449 CLIIP should be treated the same as a licensee that has already received the associated technical specification amendment – they should not be addressed by the generic communication. This would save the licensee and NRC effort involved in processing responses to the generic communication for plants that either intend to adopt the new technical specifications or have already received the associated license amendment.
- In order to determine which licensees intend to adopt the new steam generator tube integrity technical specifications, the NRC should not issue the generic communication until an appropriate period of time after the TSTF-449 CLIIP Notice of Availability is published in the federal register. This will allow licensees time to make a license amendment request through the CLIIP to adopt TSTF-449.
- The industry recently completed a study of the impact of our new structural integrity performance criterion (SIPC) on steam generator tube integrity assessments. This study was undertaken as a result of changes to the SIPC identified during the development of TSTF-449. The NRC is aware of the changes to the SIPC has been briefed on the results of the Impact Study and will be given a copy of the Impact Study before the generic communication is issued. The results of the Impact Study show that the revised SIPC is not expected to be a significant issue for the vast majority of Licensees. The results also show that many licensees may need to update their licensing basis analyses to determine their site specific non-pressure-related loads. Considering finite industry resources, there may not be adequate time to update the analyses necessary to define the site specific non-pressure-related loads before the final generic communication is issued. In responding to Requested Information item 2 in the generic communication (demonstrate that “the SG tubes will have adequate structural and leakage integrity at the time of the next SG tube inspection, taking into account the effects of non-pressure related loads”),

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if non-pressure-related loads are not clearly defined in the licensing basis to support calculation of site specific structural limits, affected licensees should be able to cite the results of the SIPC Industry Impact Study in lieu of a plant specific analysis if the Impact Study bounds their plant specific conditions.

Please contact me (202-739-8080; am@nei.org) or Jim Riley (202-739-8137; jhr@nei.org) if you have any questions regarding this letter.

Sincerely,



Alexander Marion

c: William H. Bateman
Louise Lund
Kenneth Karwoski
Emmett Murphy