

**From:** Kenneth R. Worthington <krworthington@aep.com>  
**To:** <infocollects@nrc.gov>  
**Date:** 12/3/04 12:17PM  
**Subject:** Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Kenneth R. Worthington (krworthington@aep.com) on Friday, December 03, 2004 at 12:14:04

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Document Title: NRC Draft Generic Letter 2004-XXX, Steam Generator Tube Integrity and Associated Technical Specifications.

Comments: 1. In recirculating steam generators, the largest tube loads occur in the upper bundle (U-bend) region. Wear marks from debris can have a strong circumferential character, but are typically not found in the upper bundle. Since the primary bending moments acting on the tubes near the tubesheet are small, the assessment of such wear marks is not expected to be impacted by the new SIPC. However, if definite evidence is needed that an analysis based on pressure differential is in fact bounding, it may be necessary to calculate the plant specific tube loads near the tubesheet. These are not available in the present tube stress evaluation conducted in accordance with Regulatory Guide 1.121 since this location does not see the highest loads. This will require a considerable expense to each utility to backfit and, for most utilities, will also require the assistance of the original equipment manufacturer to perform the calculations since appropriate tube loads to perform!

m the calculations do not currently reside in the plant specific stress reports. Requiring each utility to provide a plant specific analysis to show that the analysis based on pressure differential is bounding appears to be overly burdensome and does not significantly contribute to increasing the health and safety of the public.

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**Mail Envelope Properties**

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**Subject:** Response from "Comment on NRC Documents"  
**Creation Date:** 12/3/04 12:14PM  
**From:** Kenneth R. Worthington <krworthington@aep.com>

**Created By:** krworthington@aep.com

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