



NUCLEAR ENERGY INSTITUTE

Alexander Marion
SENIOR DIRECTOR, ENGINEERING
NUCLEAR GENERATION DIVISION

February 4, 2005

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Steam Generator Tubing Outside Diameter Stress Corrosion
Cracking at Tube Support Plates Database for Alternate
Repair Limits – Addendum 6

PROJECT NUMBER: 689

The purpose of this letter is to submit Addendum 6 to the Outside Diameter Stress Corrosion Cracking (ODSCC) at Tube Support Plates database report (NP-7480-L) for your review. Addendum 6 is a complete update to the database and replaces Addendum 5 in its entirety. The addendum 6 changes include updates to the databases for 3/4 and 7/8 inch tubing and five new or revised methods for evaluating data base information.

The new methods are:

1. Allowances for extreme growth values in operational assessments,
2. ARC noise analysis requirements, and
3. Preventive repair guidelines.

The revised methods are:

1. Major changes to the Probability of Prior Cycle Detection and
2. Voltage dependent growth analysis methods.

The specific changes are described in the attached report.

The proprietary information in Enclosure 1 is supported by the signed affidavit in Enclosure 2. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity, the consideration listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, we respectfully request that the information, which is proprietary to EPRI, be withheld from public disclosure in accordance with 10 CFR 2.790. A non-proprietary version of this information is provided in Enclosure 3.

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Consistent with previous submittals supporting NRC review of the industry ARC for steam generator tubes with ODS/CC at TSP locations, we believe any NRC staff review of the enclosed report is exempt from the fee recovery provision contained in 10 CFR Part 170. This submittal provides information that may be helpful to NRC staff when evaluating licensee submittals provided in response to Generic Letter 95-05. Such reviews are exempted under §170.11, Exemptions, Subpart (a) (1) (iii). This provision states, (a) "No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for...(1) A special project that is a request/report submitted to the NRC--(iii) As a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts".

We would be pleased to meet with you or provide any support necessary to expedite acceptance of the outstanding issues regarding the database. If you have any questions on this matter, please contact me (202-739-8080; am@nei.org) or Jim Riley (202-739-8137; jhr@nei.org).

Sincerely,



AlexMarion

Enclosures

c: Mr. Richard Barrett, U. S. Nuclear Regulatory Commission
Ms. Louise Lund, U. S. Nuclear Regulatory Commission
Mr. Kenneth Karwoski, U. S. Nuclear Regulatory Commission
Mr. Emmett Murphy, U. S. Nuclear Regulatory Commission
Ms. Helen Cothron, TVA
Mr. Greg Kammerdeiner, First Energy
Mr. Richard Pearson, NMC
Mr. Rick Mullins, Southern Nuclear
Mr. Ron Baker, South Texas
Mr. Bob Exner, PG&E
Mr. John Arhar, PG&E
Mr. John Jensen, AEP
Mr. Tim Olsen, WPS
Mr. Tom Pitterle, Westinghouse
Mr. Bob Keating, Westinghouse
Mr. Edward Blandford, EPRI
Mr. Steve Swilley, EPRI