March 16, 2005

MEMORANDUM TO: Cathy Haney, Program Director
Policy and Rulemaking
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager ***/RA/***
Policy and Rulemaking
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF MEETING WITH INDUSTRY AND THE NUCLEAR ENERGY INSTITUTE (NEI) ON STEAM GENERATOR ISSUES

On November 10, 2004, NRC staff met with representatives of industry, the Electric Power Research Institute, and NEI to discuss the steam generator tube Structural Integrity Performance Criterion (SIPC) and industry comments on the draft Generic Letter on Steam Generator Technical Specifications. Industry had previously met with the staff on the SIPC, May 14, 2004, (ADAMS Accession No. ML041540500). A list of meeting attendees is in Attachment 1 and information provided by industry as a handout is in Attachment 2 (ADAMS Accession No. ML050620201).

After introductions, industry presented information on the final results of the SIPC. The information included the SIPC background, purposes, current status, interim guidance, and plans for implementation. The purposes of the SIPC impact study were to determine the impact of implementing the SIPC including the effects of the safety factors, non-pressure loads, and collapse. The study was also intended to support the Catawba technical specification change request, provide a methodology for evaluating the effects of loads other than pressure on structural limits, and provide guidance for implementing the revised SIPC. These purposes had been presented to and discussed with the staff as Phase 1 and Phase 2 of the SIPC during meetings in January and May of 2004. A statement of the revised SIPC including the revised safety factors is provided in Attachment 2.

Industry discussed with the staff updates of SIPC activity performed since industry last met with the staff in May 2004. The SIPC study had addressed two issues left open at the May meeting, part through-wall degradation, and treatment of thermal loads. Industry had completed the impact study report which has a validated burst model and a methodology for non-pressure loads. Industry had incorporated the revised SIPC into a technical specification task force traveler (TSTF) to facilitate licensee technical specification change requests. Industry had developed interim guidance for implementing the revised SIPC.

The staff asked several questions on the material presented during the above, particularly regarding whether the application of elastic/plastic analysis continued to be conservative and what should the safety factor be for this type of analysis. The group discussed the staff's questions and industry agreed to provide a response for the question on elastic/plastic analysis. The staff said it may have additional questions after it reviews the data supporting the revised SIPC more carefully.

Industry then discussed the interim guidance it had developed for utilities to assist in implementing the revised SIPC. The guidance highlights the changes to the SIPC including changes to safety factors, treatment of non-pressure loads, and the assessment of collapse. The guidance also defines the effects on In Situ Pressure Test Guidelines and incorporates the results of the SIPC impact study for evaluating non-pressure loads. The guidance provides screening criteria for licensees to use in their evaluations. The screening criteria as summarized by industry is in Attachment 2. The staff restated its concern that the guidance should address the application of elastic/plastic analysis for axial thermal loads and whether the safety factor remained conservative.

As a final topic, industry presented comments it had on the draft steam generator technical specifications (TS) generic letter (GL) that was published in the *Federal Register* in October 2004 (69 FR 60193). The GL addressed the issue of whether licensee tube integrity programs ensure tube integrity and are consistent with their TS. The industry commented that, because the GL would not be addressed to plants that have revised their TS as indicated in the GL, the timing of the GL was important as an effect on industry and NRC resources. Industry also commented that the addressees of the GL may not need to include those licensees who have submitted TS changes even though the changes have not been approved. Industry asked about the use of the TSTF traveler for the tube inspections as it regarded the generic letter. Lastly, industry asked about the use of the impact study as a bounding analysis. The staff agreed with industry about the importance of the timing of the letter and indicated it would consider the possibility of limiting the addressees. The staff discussed the TSTF and how it related to the GL. The staff indicated the TSTF was scheduled for issuance possibly in December with an associated Consolidated Line Item Improvement Process (CLIIP) in the April-May time frame.

Having addressed the agenda items the meeting was adjourned.

Project No. 689
Attachments: as stated
cc: jhr@nei.org

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Attendance for 11-10-04 Meeting
on SIPC and Draft GL

Name	Organization
Jim Riley	NEI
Forrest Hundley	Southern Co.
Mohammed Behravesh	EPRI
Russell Cipolla	APTECH Engineering
Ed Fuller	EPRI
Kevin Sweeney	Arizona Public Service
*Steve Bennett	Entergy
*Robert Cullen	Entergy
Rick Graham	Southern Nuclear
Joseph Matthew	OPPD/Fort Calhoun
Gary Boyers	Florida Power & Light
Emmet Murphy	NRC\NRR\EMCB
Louise Lund	NRC\NRR\EMCB
Ken Karwoski	NRC\NRR\EMCB
Joe Birmingham	NRC\NRR\RPRP
Kerri Kavanagh	NRC\NRR\DIPM
Lane Hay	SERCH Bechtel
Deann Raleigh	LIS\Scientech
Steven Dolley	McGraw Hill

* via telecon

Attachment 1

DISTRIBUTION: Mtg w/NEI Re Draft GL comments and the SIPC results, November 10, 2004
PUBLIC ACRS OGC

Email
RBarrett/CGrimes
DMatthews/FGillespie
CHaney
EMcKenna
JBirmingham
TChan
WBateman
WCullen
LLund
KKarwoski
EMurphy
WKoo
KKavanagh
CBrown
KManoly
PTKuo
AHsia, RES

Nuclear Energy Institute Project No. 689

cc: Jim Riley, Sr. PM, Engineering
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jhr@nei.org