POLICY ISSUE
(Information)

January 5, 2006 SECY-06-0006

FOR: The Commissioners

FROM: Luis A. Reyes
Executive Director for Operations /RA/

SUBJECT: ISSUANCE OF NUCLEAR REGULATORY COMMISSION GENERIC LETTER 2006-XX, "STEAM GENERATOR TUBE INTEGRITY AND ASSOCIATED TECHNICAL SPECIFICATIONS"

PURPOSE:

This paper informs the Commission that the staff intends to issue the attached generic letter. In the generic letter, the staff asks operating pressurized-water reactor (PWR) licensees to commit to modify their technical specifications for steam generator (SG) tube integrity or to describe their program for ensuring SG tube integrity. No response to the generic letter is necessary from licensees that have already modified their technical specifications to address the issues discussed in the generic letter. This paper does not address any new commitments or resource implications.

BACKGROUND:

Steam generator tubes are an integral part of the reactor coolant pressure boundary and also serve to isolate radiological fission products in the primary coolant from the secondary coolant and the environment. Given the importance of SG tube integrity, all current PWR licensees have technical specifications governing the surveillance of SG tubes.

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The staff of the U.S. Nuclear Regulatory Commission (NRC) has informed the Commission of its actions related to ensuring SG tube integrity in several previous communications. Most recently, the staff issued SECY 03-0080, "Steam Generator Tube Integrity (SGTI) - Plans for Revising the Associated Regulatory Framework," dated May 16, 2003; and the staff briefed the Commission on SG issues in May 2003.

As reported to the Commission in SECY 03-0080, the staff continued to work with the industry and other stakeholders to improve the SG regulatory framework (i.e., the surveillance requirements in plant technical specifications). These efforts involved reviewing changes to the technical specifications both through a plant-specific (i.e., lead plant) and a generic licensing process.

After issuing SECY 03-0080, the staff reviewed and approved plant-specific changes to the technical specifications for several units and generically approved changes to the standard technical specifications. These new technical specifications are performance-based in that they focus on ensuring that the tubes satisfy performance criteria that are commensurate with assurance of adequate tube integrity. In addition, the technical specifications are consistent with the Nuclear Energy Institute's (NEI's) initiative referred to as NEI 97-06, "Steam Generator Program Guidelines" (ADAMS Accession Number ML052710007).

DISCUSSION:

Working with the industry and other stakeholders on the SG regulatory framework, the staff envisioned that all plants would adopt the new technical specifications because the surveillance requirements in the current technical specifications may not ensure the SG tubes will have adequate integrity for the intervals between tube inspections. Although the staff is aware that many plants plan to submit applications to adopt these new technical specifications, the staff does not know when the applications will be submitted or whether all plants plan to adopt these new technical specifications.

As a result, the staff is issuing this generic letter to licensees whose technical specification requirements may not ensure tube integrity during the intervals between inspections. The generic letter requests addressees to either submit a description of their program for ensuring steam generator tube integrity for the interval between inspections or to adopt alternative technical specification requirements for ensuring steam generator tube integrity. The purpose of the information request is to verify that plants are maintaining tube integrity in accordance with their design and licensing basis and applicable regulatory requirements.

A draft of this generic letter was placed in the *Federal Register*. The staff's responses to public comments on the draft and the revised generic letter are attached.

COORDINATION:

The staff briefed the Committee to Review Generic Requirements (CRGR) on the proposed generic letter during a meeting on September 27, 2005, and has addressed the Committee's comments. The CRGR has endorsed the proposed generic letter.

The Office of the General Counsel has reviewed the proposed generic letter and has no legal objections to its content.

The Office of the Chief Financial Officer has reviewed the proposed generic letter and has no objections to its content.

The staff intends to issue the attached generic letter on January 20, 2006.

/RA William Kane Acting for/

Luis A. Reyes
Executive Director
for Operations

Enclosures:
1. Proposed Generic Letter 2006-XX
2. Resolution of Public Comments

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Package No.: ML053110447
SECY Paper Accession No.: ML053000570
Encl 1: Proposed Generic Letter No.: ML052780204
Encl 2: Resolution of Public Comments: ML053110454

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