

NEI Response to Potential License Renewal ISG on Corrosion of Mark I Steel Containment Drywell Shell

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Purpose

Provide information to the NRC in support of the position that this potential ISG is not generic but rather a plant specific issue.



NRC Position: *The GALL Report does not provide sufficient guidance when the drywell shell area is surrounded by concrete structure and the distance between the shell and the surrounding concrete is too small for performing visual examination (VT).*

The NRC concern being the ability to detect and monitor corrosion in the inaccessible areas of the drywell shell.



NEI Position: *Licensees have effectively responded to this issue via Generic Letter 87-05.*

GL 87-05 purpose is to determine if drywells have degraded by corrosion and if licensees have current and/or future plans to minimize the potential for this problem at their facility.



NRC Position: *Staff wants applicants to bring the refueling seal within the scope of license renewal (if the seal has been identified as the cause of the leakage.)*

NEI Position: *The refueling seal does not meet the scoping criteria of 10CFR54.4. Plant design features protect the drywell shell against exterior corrosion.*



Typical Design Features for Mark I Containments

- Refueling Cavity Stainless Steel Liner
- Refueling Bellows
- Bellows leakage control features (trough and drains)
- Sand cushion drains
- Sand cushion covers

Examples of Plant Mitigating Activities

- Inspections of sand cushion drains as a result of GL 87-05
- Ensured unobstructed air gap drain lines
 - Compressed Air
 - Vacuum Test
 - Visual Inspections
- UT drywell shell thickness measurements
- Core bore inspection holes through concrete shielding to conduct UT of inaccessible areas of the drywell shell
- Drywell Liner Inspections covered by IWE and included in plant ISI programs



NEI Position

- The safety and health of the public are already being achieved through the plants' existing designs and current inspection activities
- There has been no compelling information indicating the need for additional actions beyond the commitments provided in response to GL 87-05



NEI Recommendations

- Plants have sufficient design features and continue to perform activities ensuring drywell integrity which therefore eliminates the need for actions beyond those required by GL 87-05
- If, after considering the above, the NRC still intends to proceed with an ISG, NEI requests an opportunity to comment on the proposed ISG language

