

From: Mahesh Chawla
To: Dale.Vincent@nmcco.com
Date: 10/25/2006 3:52:20 PM
Subject: Comments on TSTF 449 Amendment for PI

Dale,

These are the comments I received from Ken Karwoski on the information you provided.

1. Any strikeouts/underlines should be based on their current Tech Specs (not previous versions of their proposal since their previous versions are inconsequential). As currently written, it is almost impossible to read without spending an inordinate amount of time. All that matters is the currently approved TS and the current proposal. Prior versions of the proposal are immaterial. If they keep it as is, there will be a lot of effort involved in reviewing their submittal.
2. In TS 5.5.8.c.2(a)(1), they should broaden the exception to include the F*/EF* criteria (i.e., except if permitted to remain in service through application of the alternate tube repair criteria discussed in Specification 5.5.8.c.2(b) or Specification 5.5.8.c.2(c).
3. TS 5.5.8.c.2(a)(3) should be clarified to indicate that "Tubes with a flaw in a sleeve to tube joint that occurs in the original tube wall of the joint shall be plugged." (to avoid potential overlap with the prior requirement).
4. Regarding the F*/EF* criteria, reference should be made to TS 5.5.8.c.2(a)(1). That is, "...alternative to the depth based criteria in Specification 5.5.8.c.2(a)(1) (since it would be inappropriate to apply this to the depth based criteria of sleeves).
5. It would seem that it should be clear that the F* criterion does not apply to tubes that have a sleeve installed below the uppermost hardroll transition.
6. For the voltage based repair criteria, I have similar comments as made above regarding the F* criterion.
7. In 5.5.8.d.3.a, the term "periodic" is introduced. Since this is confusing it should be rewritten (e.g., one may interpret this as the 60 month periodic inspection and this would be inappropriate). I would suggest terminology such as "every 24 EFPMs or one refueling outage (whichever is less)." A similar comment applies to other uses of "periodic"
8. The frequency should be added to 5.5.8.d.3.d (i.e., every 24 EFPM or 1 RFO). The reference to sleeving is awkward (i.e., inspect 100% of the inservice tubes in the non-sleeved tubesheet region) since the tubesheet isn't sleeved. The easiest fix would be to delete non-sleeved. Alternatively wording such as the following should be considered, "For tubes with no portion of the sleeve within the [hot leg] tubesheet region, inspect 100% of the inservice tubes in the [hot-leg] tubesheet region,..... when the F* or EF* methodology has been implemented."
9. On page 5.0-40, requirement "b...", it does not appear that "to tube support plate intersections" is needed. In fact, maybe more appropriate wording should be, "When the alternate repair criteria discussed in..... are implemented, notify....."
10. On page B 3.4.19-2, there appears to be a typo "thes" should be "these".
11. On page B 3.4.19-3, the wording will need to be clarified since a sleeve installed below the F* and EF* region is still part of the tube (i.e., when a sleeve is installed, there is still an F*/EF* region - it's just no longer part of the pressure boundary).

CC: Kenneth Karwoski; Yamir Diaz-Castillo

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