



NUCLEAR ENERGY INSTITUTE

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September 13, 2007

Ms. Catherine Haney
Director, Division of Operating Reactor Licensing
Mail Stop O-8 E1A
Washington, DC 20555

Subject: TSTF 449 Rev. 4, "Steam Generator Tube Integrity", (Federal Register 70 FR 24126 dated May 6, 2005)

Project Number: 689

Dear Ms. Haney:

The NEI Steam Generator Task Force (SGTF) has been engaging the NRC Staff on clarifying technical positions regarding steam generator inspection period start points, midpoints and end points, and current applicable wording approved by the NRC in TSTF 449 Rev 4, "Steam Generator Tube Integrity," (Federal Register 70 FR 24126 dated May 6, 2005).

This issue has been discussed in detail with the staff on a conference call, March 19, and during a public meeting in Charlotte, NC, May 2-3, 2007. From these discussions and NRC internal reviews, the staff has communicated that the wording in the Improved Standard Technical Specifications (ISTS), Administrative Controls, Paragraph 5.5.9.d.2 does not allow certain implementation strategies in inspection planning flexibility such that inspection start points and end points may be different than intended. More specifically, the staff feedback is summarized by NEI as follows:

1. Addition of New Sample Plans: NRC staff and industry agree that new sample plans (i.e., the size of the new sample at each scheduled inspection), which are required by the degradation assessment to be added after the start of an inspection period may be prorated according to the number of scheduled inspections completed and remaining in the inspection period.
2. Inspection Period Starting Point: NRC staff agreed with the industry position on start of inspection period based on effective full power months (EFPM) which is: The starting point of the first period is the day the plant starts up after the first in-service inspection (ISI). The starting point of each sequential period thereafter is after the accumulation of the EFPMs listed in the technical specifications.

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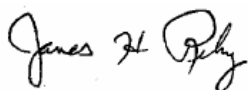
3. Inspection Period Mid-Point: The NRC staff and industry have agreed that the midpoint inspection can be after the midpoint provided it's the outage nearest the midpoint.
4. Inspection Period End Point: Industry intended that requirements for an inspection period can be satisfied ". . . by the refueling outage nearest the end of the period," thus permitting a refueling outage immediately after the actual EFPM end point to be used for this purpose provided it's closer to the end point than the refueling outage preceding it.

Per NRC staff feedback, the current ISTS 5.5.9.d.2 wording does not permit using an outage just after the endpoint to complete inspections for the period. The requirement shall be satisfied for any outage following the date of TSTF-449 implementation. This means that the licensee must determine its sampling status at the time of TSTF-449 implementation and ensure that the succeeding inspections support meeting the 100 percent inspection requirement before the specified EFPM endpoint. The staff has also stated that each plant that has adopted TSTF 449 Rev.4 by plant-specific license amendment are to use the positions described above to determine which sequential period they are in, where they are in the period and develop future inspection sample plans in accordance with the requirements.

NEI requests an official clarification and confirmation of the new sample plans and inspection periods discussed above. An official written response is important considering the potential impact of the staff interpretation of the ISTS 5.5.9.d.2 wording for plants planning to skip inspections in upcoming refueling outages. A response by the end of 2007 is requested.

If you have any questions or comments, please contact me at 202.739.8137; jhr@nei.org or Mike Melton 202.739.8049; mam@nei.org.

Sincerely,



James H. Riley

c: Mr. Allen L. Hiser, Jr., Branch Chief, NRC
Mr. Kenneth J. Karwoski, Senior Level Advisor, NRC
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NRC Document Control Desk

NEI Steam Generator Task Force