

March 25, 2008

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Exelon Generation Company, LLC
FPL Energy Seabrook, LLC
Luminant Generation Company, LLC
South Carolina Electric and Gas Company
South Texas Project Electric Generating Company
Southern Nuclear Operating Company

FACILITIES: Palo Verde Nuclear Generating Station, Unit 2
Waterford Steam Electric Station, Unit 3
Braidwood Station, Unit 2
Seabrook Station, Unit 1
Comanche Peak Steam Electric Station, Unit 2
Virgil C. Summer Nuclear Station
South Texas Project, Unit 1
Vogtle Electric Generating Plant, Unit 1

SUBJECT: SUMMARY OF MARCH 13, 2008, MEETING TO DISCUSS EMERGING
METALLURGICAL ISSUES WITH EIGHT OPERATING NUCLEAR POWER
PLANT LICENSEES

On March 13, 2008, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of eight operating nuclear power plant licensees at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss emerging metallurgical issues regarding certain welds in the coolant system for pressurized-water reactors (PWRs).

This was a Category 1 meeting between the NRC and the industry. The public was invited to observe and participate after the business portion of the meeting. This NRC normally notices public meetings at least 10 days before the meeting to allow for ample time for interested individuals to make plans to attend the meeting. Because of the emerging nature of the information and potential safety significance, it was necessary to conduct the meeting without the preferred 10-day time frame for public notification. Consequently, the NRC took extra steps to notify members of the public, including Federal, state, and local stakeholders, as well as public interest groups and local interested individuals. The NRC issued a press release and informed participants at the ongoing NRC Regulatory Information Conference in Rockville, Maryland. The NRC also arranged for interested persons to participate via a telephone bridge line.

Background

In early 2007, the NRC issued Confirmatory Action Letters (CALs) to PWR licensees regarding dissimilar metal welds in the pressurizer surge, spray, and safety/relief nozzle-to-safe end welds. The CAL and the supporting commitment letters confirmed that licensees would conduct enhanced leakage monitoring and inspect and/or mitigate certain welds by December 31, 2007, but indicated that inspection and mitigation actions may be conducted during the spring 2008

refueling outage contingent on the industry providing an analysis that demonstrates an acceptable level of safety to the NRC.

On August 13, 2007, the NRC received MRP-216, Rev. 1, "Materials Reliability Program [MRP]: Advanced FEA [Finite Element Analysis] Evaluation of Growth of Postulated Circumferential PWSCC [Primary Water Stress-Corrosion Cracking] Flaws in Pressurizer Nozzle Dissimilar Metal Welds." Based on its review of this report and independent staff analysis, NRC concluded that the analysis provided adequate justification to permit inspections during the spring 2008 refueling outages, and that the analysis was applicable to nine power plants that planned to complete spring 2008 outages. On September 7, 2007, the NRC issued CAL supplement letters to nine licensees informing them that a plant shutdown by December 31, 2007, was no longer needed and that their units could continue to operate until the spring 2008 outage.

NRC Staff Presentation

NRC staff representatives discussed the extensive NRC staff and industry experience with stress corrosion cracking beginning with intergranular stress-corrosion cracking in boiling water reactors in the 1980s. The NRC staff described the role of the "Primary System Piping Butt Weld Inspection and Evaluation Guidelines (MRP-139)" industry initiative in managing PWSCC and the activities that followed the identification of large circumferential flaws in the Wolf Creek pressurizer nozzles in October 2006. The NRC staff noted that PWR licensees made commitments to implement enhanced leakage monitoring and inspect and/or mitigate certain piping welds by December 31, 2007, but nine plants were allowed to operate until their spring 2008 outages based on the results of advanced FEA undertaken by industry. The advanced FEA required extensive information from each plant and was analyzed independently by the NRC staff. At the time of the March 13, 2008 meeting, one of the nine plants had already shut down for spring 2008 refueling. Consequently, representatives from the remaining eight facilities were requested to participate in this meeting.

The NRC staff summarized the results of inspections performed in February 2008 on the nozzle welds of a retired PWR pressurizer (Agencywide Documents Access and Management System (ADAMS) Accession No. ML080701017) and displayed the flaw profile of the safety "A" nozzle weld provided by Electric Power Research Institute (EPRI) in a letter dated March 4, 2008 (ADAMS Accession No. ML080701020). The NRC staff noted that the EPRI reports had been reviewed by staff and contractor experts. These reviews led to NRC staff questions concerning the severity of the indications represented by the flaw profile. The NRC staff stated that the profile raised questions about the continued applicability of the advanced FEA to allow the remaining eight plants to operate until their spring 2008 outages. The staff also described the activities NRC had undertaken since receiving the March 4, 2008, EPRI letter, including discussing potential safety concerns associated with the new information and sending NRC staff representatives to the Studvik-Race facility in Memphis, TN, where the retired pressurizer nozzles were undergoing more extensive examinations and inspections.

Industry Presentation

Industry representatives acknowledged that inspection information from the retired pressurizer also led to industry questions concerning the applicability of using the advanced FEA as the basis for the continued operation of nine plants until their spring 2008 outages. Industry representatives stated that each of the nine licensees performed an assessment of the effect of the March 4, 2008, EPRI letter on the immediate operability of their plants. They noted that each licensee's operability determination concluded that the plants remained operable.

Industry representatives described the inspection activities that commenced on March 8, 2008, at the Studvik-Race facility. The inspections included ultrasonic, radiographic, and eddy current testing techniques. Industry representatives stated that the ultrasonic inspection technique was encoded phased array and briefly described the difference between the encoded phased array used over the past week and the manual phased array technique used in the February 2008 analysis. The results of these inspections, as presented by industry, were that the indications detected were from fabrication-induced inclusions in the welds. Industry representatives described efforts to locate the fabrication records and how the results of weld residual stress analyses of the safety nozzle welds, based on those records, were used to calculate a weld residual-stress profile for the retired pressurizer safety nozzle welds. Industry representatives indicated that, based on those calculations, the residual-stress state near the inner surface of the weld is compressive. Industry representatives suggested that the growth of cracks from PWSCC would not be expected in a weld determined to have a compressive weld residual-stress state at the inner surface of the weld. Industry representatives concluded that the advanced FEA remains valid and the examinations and analysis performed by industry support continued plant operation until the scheduled inspections and/or mitigation during the spring 2008 refueling outages.

Summary

The NRC staff asked a number of questions to fully understand the basis for industry's conclusions regarding the findings of the inspections and that the advanced FEA continue to be applicable. At the conclusion of the meeting, the NRC staff informed the industry representatives that the NRC would, based on the information presented and the NRC's independent reviews, reach its conclusions by the end of the day March 14, 2008, on whether any further regulatory action needs to be taken.

The NRC opened the meeting for public participation. Only two non-NRC meeting attendees asked questions. No questions were asked by members of the public participating via the telephone bridge. A list of attendees is enclosed. The meeting agenda (ADAMS Accession No. ML080710008) and meeting handouts (ADAMS Accession Nos. ML080800039 and ML080800506) are available to the public.

Please direct any inquiries to me at 301-415-5723 or mtm@nrc.gov.

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Docket Nos. 50-457, 50-446, 50-529, 50-443,
50-395, 50-498, 50-424, and 50-382

Enclosure:
List of Attendees

cc w/encl: See next page

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