

Doris Mendiola

From: Michael Lesar
Sent: Wednesday, June 18, 2008 1:06 PM
To: Doris Mendiola
Subject: FW: Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components
Attachments: 06-16-08_NRC_Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components.pdf

From: HUSSAIN, Saqib [mailto:sxh@nei.org] **On Behalf Of** BUTLER, John
Sent: Tuesday, June 17, 2008 6:09 PM
Subject: Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components

June 16, 2008

Mr. Michael T. Lesar
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

5/1/08
73 FR 24094
②

RECEIVED

2008 JUN 19 AM 10:03

RULES AND DIRECTIVES
BRANCH
USNRC

Subject: Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components

Project Number: 689

Dear Mr. Lesar:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI) is submitting comments on proposed Regulatory Issue Summary (RIS) RIS-2008-xx: *Fatigue Analysis of Nuclear Power Plant Components*, as requested by the Nuclear Regulatory Commission in the *Federal Register* on May 1, 2008 (73 *Fed. Reg.* 24094).

The proposed RIS addresses an NRC concern that involves a simplified input for applying the Green's function methodology to demonstrate the ability of nuclear power plant components to withstand cyclic loads. The stated intent of the proposed RIS is to "inform licensees of an analysis methodology [simplified Green's function] ... that could be nonconservative if not correctly applied."

The proposed RIS cites a single case where results using the simplified Green's function were less conservative than results obtained using more detailed analyses. However, both analyses demonstrated acceptable results for the component being analyzed. The proposed RIS fails to identify any instances in which the simplified Green's function methodology has been incorrectly applied or instances in which a nonconservative result was obtained.

While it is important, as noted in the proposed RIS, that proper judgment be used in performing Time Limited Ageing Analyses (TLAA), the proposed RIS provides no information to assist license renewal applicants to this end. Therefore, we recommend that the proposed RIS be withdrawn.

Instead, we support actions on the part of industry and NRC staff to develop more specific guidance on the conduct of TLAA. The NEI License Renewal Task Force (LRTF) will discuss this topic, and the means by which this can be accomplished, at an upcoming public meeting with NRC staff.

Please contact me or Julie Keys at (202) 739-8128; jvk@nei.org should you have any questions.

SUNSI Renewal complete
Template = ADM-013

1
E-RIDS = ADM-03
All = J.R. FAIR (JRF)

John C. Butler
Director, Safety Focused Regulation

Nuclear Energy Institute
1776 I Street NW, Suite 400
Washington, DC 20006
www.nei.org

P: 202-739-8108
F: 202-533-0113
E: jcb@nei.org

nuclear. clean air energy.

This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Sent through outbound.mailwise.com



John C. Butler
DIRECTOR, SAFETY FOCUSED REGULATION
NUCLEAR GENERATION DIVISION

June 16, 2008

Mr. Michael T. Lesar
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components

Project Number: 689

Dear Mr. Lesar:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ is submitting comments on proposed Regulatory Issue Summary (RIS) RIS-2008-xx: *Fatigue Analysis of Nuclear Power Plant Components*, as requested by the Nuclear Regulatory Commission in the *Federal Register* on May 1, 2008 (73 Fed. Reg. 24094).

The proposed RIS addresses an NRC concern that involves a simplified input for applying the Green's function methodology to demonstrate the ability of nuclear power plant components to withstand cyclic loads. The stated intent of the proposed RIS is to "inform licensees of an analysis methodology [simplified Green's function] ... that could be nonconservative if not correctly applied."

The proposed RIS cites a single case where results using the simplified Green's function were less conservative than results obtained using more detailed analyses. However, both analyses demonstrated acceptable results for the component being analyzed. The proposed RIS fails to identify any instances in which the simplified Green's function methodology has been incorrectly applied or instances in which a nonconservative result was obtained.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Mr. Michael T. Lesar

June 16, 2008

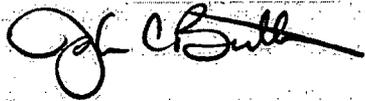
Page 2

While it is important, as noted in the proposed RIS, that proper judgment be used in performing Time Limited Ageing Analyses (TLAA), the proposed RIS provides no information to assist license renewal applicants to this end. Therefore, we recommend that the proposed RIS be withdrawn.

Instead, we support actions on the part of industry and NRC staff to develop more specific guidance on the conduct of TLAA. ~~The NEI License Renewal Task Force (LRTF) will discuss this topic, and the means by which this can be accomplished, at an upcoming public meeting with NRC staff.~~

Please contact me or Julie Keys at (202) 739-8128; jyk@nei.org should you have any questions.

Sincerely,



John C. Butler

c: Mr. Brian E. Holian, NRC
Mr. John R. Fair, NRC
NRC Document Control Desk