



MRP Materials Reliability Program _____ MRP 2008-047

(via email)

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U. S. Nuclear Regulatory Commission
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Attention: Chief, Rulemaking, Directives and Editing Branch, Division of Administrative Services

Subject: Industry Comments on NRC Regulatory Issue Summary 2008-XX; Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components

The purpose of this letter is to provide written comments on the NRC Regulatory Issue Summary (RIS) 2008-XX; 'Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components' contained in the Federal Register, Volume 73, Number 85, page 24094 on Thursday, May 1, 2008.

EPRI has collected industry responses on (RIS) 2008-XX; 'Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components' from utility members of the Materials Reliability Program and the BWWR Vessels Internals Project. These comments are enclosed in Attachment 1 and are provided for NRC consideration.

If you have any questions on this subject please contact David Steininger at 650-855-2019 or by e-mail at dsteinin@epri.com

Sincerely,

David Steininger
EPRI
Technical Director, Nuclear Materials & Chemistry

SUNSI Review Complete
Template = ADM-013

E-REDS = ADM-03
Add = J. B. FAIR (JRF)

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Attachment 1: NRC Regulatory Issue Summary (RIS) 2008-XX; 'Proposed Generic Communication; Fatigue Analysis of Nuclear Power Plant Components'

#	Comment
1	While the focus of the RIS is fundamentally on License Renewal Applications, the door has been opened to any previous use of the questionable methodology. This is found in the RIS statement; "Licensees may have also used the simplified Green's function methodology in operating plant fatigue evaluations for the current license term."
2	The description of the issue is vague and lacks sufficient specificity to understand the problem and develop appropriate plans to addressing it. It states that the Green's function methodology is not in question, but that simplifying assumptions used in its application may cause non-conservative results. It cites one non-conservative case that was found, but does not provide any details about this case that may be used to understand the problem with the simplified approach. This could be a similar issue for many analytical methods used in the design qualification of nuclear power plant components. Additional details on the non-conservative case would be appropriate and needed to find and resolve the issue.
3	All engineering analysis is approximate to some degree and uses imperfect data. The focus of the RIS in imposing more exacting levels of legacy methods of analysis, which themselves were based on approximate data and methods is a misdirection of engineering resources when previous work must be revisited and revised. It is sufficient that some analysis using the traditional and approximate methodologies has been performed and that plant evolutions and transients are monitored. Issues identified by the analysis and the adverse trends identified by the monitoring provide the bulk of the benefit of such activities. Further refinement of the effort provides a diminishing increment of safety benefit (if any at all), which must be balanced against the lost opportunity of the misapplied resources.

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