



NUCLEAR ENERGY INSTITUTE

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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.

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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 Therefore, we recommend that the proposed RIS be withdrawn.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,

A handwritten signature in black ink, appearing to read "John C. Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Butler

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