



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

November 12, 1997

Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Gentlemen:

**NUCLEAR REGULATORY COMMISSION (NRC) - OPPORTUNITY FOR PUBLIC COMMENTS ON PROPOSED GENERIC LETTER (GL), "POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN THE CONTAINMENT"**

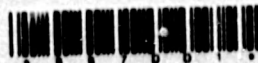
On May 13, 1997, NRC published a proposed generic communication related to containment coatings for public comment (Federal Register FR26331). TVA provided comments by letter dated June 27, 1997. On September 24, 1997, NRC met with industry representatives to discuss Electric Power Research Institute guidelines on protective coatings programs. During the meeting, TVA comments were referenced and interpreted in a manner not intended by TVA. This letter clarifies the original comments.

During the meeting on September 24, 1997, the staff referred to the following TVA comment:

*Since coating performance degrades toward the end of effective life, some degree of loss of adherence should be expected and included in the coating evaluations.*

The phrase, ". . . toward the end" is a reference to localized loss of adherence such as flaking or peeling. Our position is that all coatings (including qualified coatings) fail at the end of their effective life. These failures are identified and mitigated at the earliest possible moment to insure the quantities are not large enough to affect plant safety-related operation. We do not believe that adherence strength degrades in such a manner that adherence can be meaningfully measured and used to predict coating failure.

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The comment is an acknowledgment that engineered coatings can meet their safety function with some amount of localized failure. The proposed GL considers coating failures in an absolute sense (i.e., coatings must be demonstrated to withstand environmental conditions without detaching from their substrates). TVA believes that localized adherence failures should not be equated as complete failure of the coating system.

Sincerely,



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