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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

April 19, 2000

MEMORANDUM TO: T. Kress, Chairman, Severe Accident Management Subcommittee

W. Shack, Chairman, Materials and Metallurgy Subcommittee  
R. Seale, Member, Materials and Metallurgy Subcommittee

FROM: P. Boehnert, Senior Staff Engineer 

SUBJECT: NRR USER NEED REQUEST RELATED TO STEAM GENERATOR SEVERE ACCIDENT RESPONSE AND TESTING OF STEAM GENERATOR TUBES

Attached for your perusal is a copy of the subject NRR user need letter. NRR is requesting RES assistance in two related areas dealing with steam generator tube integrity. These areas are: (1) steam generator tube integrity in response to severe accident conditions, and, (2) investigation of the behavior of cracks in steam generator tubes under pressure differentials and elevated temperatures associated with "high-dry" severe accident sequences<sup>1</sup>. Specifically, the work products requested for Areas (1) and (2) are given on Pages 1-2 of Attachment 1 (Items 1-7), and, Page 2 of Attachment 2, respectively.

While NRR notes that the information sought for both issues will allow the staff to make better risk-informed decisions regarding future licensing action requests, it is also worth noting that Area (1) arose as a result of the problems encountered by the staff during its review of the electrosleeve tube repair process at the Callaway plant, and that for Area (2) the products being requested (Page 2 of Attachment 2) appear similar, if not identical, to the issues raised by Dr. J. Hoppenfeld of the RES staff in his on-going DPO.

It should also be noted that NRR is requesting RES engage in discussions relative to providing assistance in review of the MAAP code. NRR notes that MAAP is being used by licensees to support risk-informed submittals for beyond-design-basis and severe accident

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<sup>1</sup> I understand that the work under Area (2) will be performed at Argonne National Laboratories under the purview of Dr. Shack.

analyses. A set of concerns relative to this code are cited (Page 2, Attachment 1 - "Future Discussions").

You were recently provided a copy of a SECY Paper, SECY-00-0078 - copy attached. This Paper discusses the staff's current plans to revise the regulatory framework to address the issue of steam generator tube integrity. It would appear that a portion of the above user need work would have applicability to the staff's resolution of the tube integrity issue. Based on discussions with Noel Dudley (cognizant ACRS staff engineer), it is my understanding that review of the tube integrity regulatory framework by the ACRS should be timely in the fall of this year. NRR is requesting that results for key elements of the tube testing work be made available around the same time, i.e., fourth quarter of FY-2000.

I have contacted the cognizant RES personnel regarding their response to this user need request and to discuss the scheduling of a presentation on this matter to the ACRS in the near future. RES noted that they have just initiated work on this request, and that since this effort requires a coordinated presentation from different divisions within both RES and NRR, they suggested that a staff presentation to the ACRS would not be feasible in the near term. They also suggested that the Committee should coordinate its review of this matter as well.

I recommend that the Planning and Procedures Subcommittee discuss this matter, relative to the need for review by the Committee. Information could be provided on the tube testing program in conjunction with the Committee's review of the staff's resolution approach for the tube integrity issue. Resolution of the issues associated with tube behavior under severe accident conditions is a longer-term program (to conclude in summer, 2001). A Program Plan for this work is due to be issued in June of this year. Review of this Program Plan by the Severe Accident Management Subcommittee would appear prudent sometime this summer.

I will be in contact with you in the near future regarding this matter.

Attachments: As Stated

cc: Balance of ACRS Members  
R. Savio

cc w/o attach (via E-mail):  
J. Larkins  
H. Larson  
S. Duraiswamy  
ACRS Technical Staff & Fellows



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 8, 2000

MEMORANDUM TO: Ashok C. Thadani, Director  
Office of Nuclear Regulatory Research

FROM: *Samuel J. Collins*  
Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation

SUBJECT: USER NEED REQUEST RELATED TO STEAM GENERATOR SEVERE  
ACCIDENT RESPONSE AND TESTING OF STEAM GENERATOR  
TUBES DURING SEVERE ACCIDENT CONDITIONS

This memorandum requests that the Office of Nuclear Regulatory Research (RES) develop a confirmatory research program to address two areas associated with steam generator tube integrity during postulated severe-accidents in pressurized-water reactors (PWRs). Although the two areas that confirmatory research is being requested in are closely related, the Office of Nuclear Reactor Regulation (NRR) has divided this user need request into two areas since the lead for these areas are in different organizational divisions, both in NRR and RES. Both requests are considered high priority in that the information is important to confirm the robustness of risk-informed licensing decisions and to provide reduced uncertainty and improved technical bases for expected future licensing requests. The confirmatory research will support the agency's efforts to maintain safety while reducing unnecessary regulatory burden through more realistic assessments. The confirmatory research will improve the agency's knowledge where uncertainties in our technical understanding exist and where safety margins are not well characterized. Internal efficiencies will be gained with use of the models developed. The improved understanding of margins that result from this research should improve public confidence. The schedule for each request is discussed in the two attachments.

Attachment 1 is a request for RES to develop and provide us with models and/or methods capable of investigating thermal hydraulic and dose consequences associated with steam generator tube integrity during postulated severe accidents in PWRs. The Division of Systems Safety and Analysis (DSSA) has the lead in NRR for this area. Attachment 2 is a request for RES to provide us with models and/or methods capable of investigating steam generator tube structural behavior under postulated severe accident conditions. The Division of Engineering (DE) has the lead in NRR for this area. Both NRR divisions have already had very constructive discussions with your staff about some of the key issues identified in the attachments. We look forward to continued close cooperation with your staff to develop the research program in these areas.

Attachments: As stated

CONTACTS: Walton Jensen, SRXB/DSSA  
415-2856

James Andersen, EMCB/DE  
415-1437

**DIVISION OF SYSTEMS SAFETY AND ANALYSIS (DSSA)**

**OFFICE OF NUCLEAR REACTOR REGULATION**

**USER NEED REQUEST RELATED TO**

**STEAM GENERATOR SEVERE ACCIDENT RESPONSE**

This attachment requests that the Office of Nuclear Regulatory Research (RES) develop a plan to investigate severe-accident behavior in pressurized-water reactors as it relates to steam generator tube integrity. Issues raised by both NRR and RES staff members during the recent review of the electrosleeve steam generator tube repair process at Callaway have indicated a need for improvement in our understanding in this area. These issues relate to uncertainties in the analysis of time to failure of reactor coolant pressure boundary components during a postulated severe accident and specifically the items listed below. Our objective is to reduce uncertainties and, therefore, improve our ability to assess the likelihood of steam generator tube failures in such accidents. These accidents, when accompanied by SG tube failures, will likely result in containment bypass and release of radioactive materials to the environment. The plan should focus on issues associated with assuring acceptable modeling of the high-temperature and high-pressure thermal-hydraulic conditions within the primary system and the mechanical response of the structures and components that make up this system during severe- accident scenarios. NRR would like the following information in areas that play a significant role in understanding and modeling these types of events:

- (1) Identification of accident scenarios that lead to high-temperature and high-pressure conditions within the reactor coolant system that have a high likelihood of challenging the integrity of the reactor coolant pressure boundary;
- (2) Models and/or methods that provide improved understanding of time-dependent thermal-hydraulic conditions in the hot leg, surge line, steam generator tubes, and other critical systems, structures, and components (SSCs) in the scenarios of interest, leading to a reduction in uncertainties in modeling and assessment of these events;
- (3) Models and/or methods for predicting the response of the SSCs identified in Item (2) resulting from exposure to those thermal-hydraulic conditions, to improve prediction of reactor coolant pressure boundary failure locations and modes (the materials response aspects of this subtask are within the purview of the Division of Engineering (DE) and interactions on this should be with DE);
- (4) An assessment of the effect, if any, each SSC failure has on the potential for containment bypass and steam generator tube failures;
- (5) Models and/or methods for predicting system interaction effects and associated risk implications as a function of steam generator tube crack size
- (6) Improved methods and/or models to evaluate the offsite dose consequences from a tube rupture by attenuation of fission product releases through transport and deposition mechanisms in the secondary system;

- (7) Improvement of probabilistic safety assessment modeling of these scenarios, including the effects of operator actions.

Per the September 19, 1995, Memorandum of Understanding on RES and NRR Interactions (D. L. Morrison to W. T. Russell), NRR staff from DSSA and DE will work with RES staff to develop RES' Program Plan for the steam generator severe-accident program.

#### Schedule

We request that you provide a plan to address the needs identified by Items 1 through 7 by June 15, 2000. We would like test results from supporting experimental facilities provided by January 2001 and reports supplying the requested evaluations should be provided by the summer of 2001. However, we will work with your staff to find mutually agreed upon delivery dates for each of the products requested.

#### Priority

These requests should be considered high priority in that the information is important to confirm the robustness of risk-informed licensing decisions and to provide reduced uncertainty and improved technical bases for expected future licensing requests.

#### Future Discussions

In addition to the work specified above, NRR would like to begin discussions with RES concerning assistance in the review of MAAP, which has been used to support risk-informed licensing submittals, particularly with regard to beyond-design-basis and severe-accident analyses performed to justify or support proposed licensee actions. Specific areas of concern include success criteria, end states, timing, and system thermodynamic responses associated with these analyses. We would also like to discuss the level of guidance that should be incorporated in the Probabilistic Risk Assessment (PRA) Standard with regard to these key analytical areas.

Following these discussions, we will provide you with an additional user request for any additional work that is concluded to be necessary in this area.

**DIVISION OF ENGINEERING**

**OFFICE OF NUCLEAR REACTOR REGULATION**

**USER NEED REQUEST RELATED TO TESTING OF**

**STEAM GENERATOR TUBES DURING SEVERE ACCIDENT CONDITIONS**

**Background**

In considering the issues involving severe accidents and risk, the staff concludes that core damage conditions, particularly those associated with high primary pressure, dry steam generator secondary side events, have the potential to cause failure of degraded steam generator tubes and subsequent containment bypass under the high temperatures associated with these events. The staff considered high temperature effects in its risk assessment work (refer to NUREG-1570, "Risk Assessment of Severe Accident Induced Steam Generator Tube Rupture") that supported the draft steam generator rule and assessed the potential for plant-specific vulnerabilities due to particular forms of steam generator tube degradation. Uncertainties exist in our understanding of various forms of steam generator tube degradation, in particular, degraded tube behavior under severe accident conditions. We recognized and accounted for this uncertainty by taking a risk-informed approach to reviewing and approving recent alternate repair criteria and methods for degraded steam generator tubes. Nevertheless, we believe it would be beneficial to obtain additional information on degraded steam generator tube performance to reduce current uncertainties.

**Technical Issue**

Additional information is desired regarding the behavior of cracks in steam generator tubes under pressure differentials and elevated temperatures associated with the "high-dry" severe accident sequences. Based on available data and analyses, through-wall cracks as long as 0.4 inches are not expected to rupture under these conditions, but are expected to open significantly. Leakage of superheated steam through the opening would create a jet that would impinge on adjacent tubes. A concern has been raised that the impinging jet could cut open the neighboring tube during the course of the accident. This could alter the course of the accident so that containment would be bypassed. Staff risk evaluations have assumed that this effect would occur for cracks that are long enough to produce substantial leakage, but the staff would like additional information to better define the appropriate crack length threshold to apply to this assumption. Below some length, the staff expects the leakage to be too small to produce a steam jet that will cause gross tubing failure in the time available during the accident sequence.

In order to better address this issue, the staff would like to be able to predict the opening of subcritical through-wall cracks under severe accident conditions and to predict the cutting rate, if any, of gas jets emanating from such cracks. In particular, the staff is interested in evaluating the possibility that a jet of superheated steam, hydrogen, and entrained particles emanating from a cracked tube may penetrate the neighboring tube during severe-accident transients. In addition, the staff would like the ability to calculate the leak rate from tubes with through-wall cracks of various lengths under severe-accident conditions. The staff is interested in knowing if

(and how) creep and creep crack growth play a role in the crack opening areas developed under the time/temperature/pressure exposures during severe accidents. Also, information is desired on whether the fluid escaping the crack will cause erosion of the crack walls, thereby increasing the crack opening areas.

### Regulatory Application

Licenses are expected to continue to submit a number of licensing action requests pertaining to steam generator tube repair criteria and methods over the next several years. These licensing action requests may be risk-informed or may have potential risk implications. A better understanding of the phenomena and materials behavior should lead to reduced uncertainties and a more robust and accurate assessment of risk. The results from the RES work will allow the staff to make better risk-informed decisions regarding these matters.

### Products

This attachment to the user need memorandum requests RES to conduct analysis, testing and modeling to determine (1) the effects of jet impingement on neighboring steam generator tubes during severe-accident transients, (2) the crack opening area, which will be used to calculate leak rate from steam generator tubes with through-wall cracks of various lengths under severe-accident conditions, (3) the critical flow through cracks in steam generator tubes, (4) if (and how) creep and creep crack growth play a role in the crack opening areas developed under severe-accident conditions, and (5) whether the fluid escaping the crack will cause erosion of the crack wall, thereby increasing the crack opening areas. Finally, the data and modeling developed above for evaluating jet impingement and leak rates from cracked tubes may need to be validated by testing of cracked tubes under simulated severe accident conditions. A decision point on the need for this type of integrated testing should be included in the RES program plan.

### Schedule

As discussed in a meeting with members of your staff in November 1999, the arrangement and actual conduct of the tests to support an initial assessment for items (1) and (2) were thought to be relatively straightforward. We would like to receive the results of these tests in the fourth quarter of fiscal year 2000. Validation of results, including considerations of items (3) and (4), is requested by the fourth quarter of fiscal year 2001. We will work with your staff to ensure these are achievable schedules.

### Priority

High Priority - The requested information is important to confirm the robustness of risk-informed licensing decisions and to provide reduced uncertainty and improved technical bases for expected future licensing requests.



# **POLICY ISSUE**

(NEGATIVE CONSENT)

March 30, 2000

SECY-00-0078

**FOR:** The Commissioners

**FROM:** William D. Travers  
Executive Director for Operations

**SUBJECT:** STATUS AND PLANS FOR REVISING THE STEAM GENERATOR TUBE  
INTEGRITY REGULATORY FRAMEWORK

**PURPOSE:**

This paper informs the Commission of the staff's progress with the Nuclear Energy Institute (NEI) and the nuclear power industry on the industry's initiative, NEI 97-06, "Steam Generator Program Guidelines." The paper describes plans for related NRC activities that will be implemented unless directed otherwise. Implementation of the guidelines through the restructured regulatory framework will provide reasonable assurance that licensees will maintain steam generator tube integrity, while providing added flexibility to licensees to achieve this objective in a cost-effective manner. On the basis of the progress made as of February 2000 and assuming the staff does not have any significant issues with the final submitted version of the industry initiative (submitted February 4, 2000), it is the staff's intent to cancel work on draft Generic Letter (GL) 98-XX, "Steam Generator Tube Integrity." NRC interactions with NEI and the industry on this effort have been conducted in a public forum and opportunity for other stakeholder input will also be provided during the staff's review of this effort.

**BACKGROUND:**

In SECY-95-131, "Continuance of Proposed Rulemaking on Steam Generator Maintenance and Surveillance," dated May 22, 1995, the staff informed the Commission that it intended to continue with the development of a rule addressing steam generator tube integrity. The rule would have required development and implementation of a risk-informed, performance-based program to maintain steam generator tube integrity. Existing programs were thought to be prescriptive, out of date, and not fully effective for purposes of ensuring steam generator tube integrity. However, following a regulatory analysis, the staff concluded that existing regulations provided an adequate regulatory basis for dealing with steam generator issues, but that steam generator tube surveillance technical specification (TS) requirements should be upgraded to maintain steam generator tube integrity.

**CONTACT:** James Andersen, EMCB/DE  
415-1437

In COMSECY-97-013, "Steam Generator Rulemaking," dated May 23, 1997, the staff informed the Commission of its conclusion that a steam generator rule was not necessary, and that it would (1) develop a generic letter containing model technical specifications (TSs) for SG tube surveillance and maintenance that requests licensees to address problems with current TSs; (2) develop guidance to support implementation of the generic letter model TSs; and (3) give licensees the option to pursue alternate SG tube repair criteria supported by an appropriate risk assessment. The staff also stated that it would evaluate, as part of the individual plant examination followup program, plants that appear to have a higher potential for core damage sequences that can challenge steam generator tubes. In a staff requirements memorandum (SRM) dated June 30, 1997, the Commission approved the revised regulatory approach.

By letter dated December 16, 1997, the NRC staff was informed that the industry, through the NEI Nuclear Strategic Issues Advisory Committee, had voted to adopt NEI 97-06 as a formal industry initiative. NEI explained that when an initiative is approved by 80% of its membership, it is then adopted by all of the industry as a formal initiative which means all of the industry adopts and implements it. The purpose of the NEI 97-06 initiative is to provide a consistent industry approach for managing steam generator programs and for maintaining steam generator tube integrity. The NEI 97-06 guidelines were intended to improve both the quality and the consistency of steam generator programs throughout the industry.

In SECY-98-248, "Proposed Generic Letter 98-XX 'Steam Generator Tube Integrity,'" dated October 28, 1998, the staff informed the Commission of its intent to delay the issuance of GL 98-XX while the staff worked with the industry to resolve NRC concerns about the industry initiative. The staff stated that its objective was to avoid duplication by endorsing the industry initiative as an acceptable approach to resolving current problems associated with ensuring steam generator tube integrity. The staff concluded that this approach makes the best use of available staff resources, gives appropriate credit to the industry initiative, and is consistent with DSI-13, "The Role of Industry." The staff also stated that it intended to release for public comment a draft regulatory guide (DG-1074, "Steam Generator Tube Integrity"), a differing professional opinion (DPO) consideration document dealing with issues about steam generator tube integrity, and a memorandum from the DPO author to the Commission dated September 25, 1998. In an SRM dated December 21, 1998, the Commission approved the revised approach.

In January 1999, the staff issued for public comment the draft regulatory guide, the draft DPO consideration document, and the memorandum from the DPO author. The comment period expired on June 30, 1999, and no public comments were received on the DPO consideration document or the DPO author's memorandum; however, numerous comments were received on the draft regulatory guide. On September 22, 1999, the staff transmitted the DPO consideration document to the EDO. In a memorandum to the DPO author dated November 1, 1999, the EDO transmitted the DPO consideration document and stated that existing steam generator programs related to steam generator tube integrity are adequate to ensure public health and safety, and, for this reason, resolution of the DPO concerns does not depend on reaching agreement with the industry on NEI 97-06 issues and the accompanying revised regulatory framework. Resolution of the DPO is proceeding separately.

**DISCUSSION:**

Throughout the development of the proposed generic letter and its predecessor, the draft steam generator rule, as well as during plant-specific reviews, the staff and the industry have had extensive public interactions on the development of steam generator guidance. The focus of these interactions has been on what actions are necessary to ensure steam generator tube integrity and what regulatory framework is needed to ensure that these actions are implemented. During this process, the staff assembled DG-1074, which proposed one acceptable means for complying with the governing regulations and plant licensing bases to maintain tube integrity. At the same time, and in response to the staff's ongoing regulatory development effort, the industry focused its efforts on improving existing steam generator inspection guidance and developing additional guidelines on other programmatic elements related to steam generator tube integrity. The industry's efforts to improve industry guidance culminated in the NEI 97-06 initiative.

The NEI 97-06 initiative commits pressurized-water reactor (PWR) licensees to a programmatic approach conceptually similar to that recommended by DG-1074. NEI 97-06 references two types of lower tiered documents for guidance on the implementation of individual programmatic features: Electric Power Research Institute (EPRI) guidelines that are directive in nature (licensees must meet the intent of the directives) and EPRI guidelines that are nondirective in nature (licensees may use them as general guidance).

In the last year, the staff shared its technical and regulatory concerns about the industry initiative with the industry. On October 5, 1999, the staff and industry representatives reached preliminary resolution on all major issues regarding the NEI 97-06 initiative and on the necessary changes to the regulatory framework to facilitate full implementation of the NEI 97-06 guidelines. NEI then prepared a draft program package, which included a proposed revision to NEI 97-06 and a proposed template for preparing plant-specific license amendments (including generic TS and a generic technical requirements manual section). The draft program package has undergone industry review, and NEI submitted the final package, which is publicly available, to the NRC for review on February 4, 2000. NEI has determined that the changes to NEI 97-06 are not significant enough to require a revote by the applicable licensees; therefore, NEI 97-06 will remain a formal industry initiative.

The proposed generic TSs require that a program be established and implemented to ensure that NRC-approved steam generator tube integrity performance criteria are maintained. The performance criteria would be defined in a licensee-controlled document (e.g., technical requirements manual), subject to the requirements of 10 CFR 50.59, and would include structural, accident-induced leakage, and operational leakage criteria. Within the revised regulatory framework, the NRC staff would still approve new steam generator tube repair criteria and methods and changes to the steam generator performance criteria.

The process for reviewing NEI's program package will continue to be conducted in an open forum. After performing its review, the staff will prepare a safety evaluation (SE) documenting its findings. In accordance with SECY-99-143, "Revisions to the Generic Communication Program," dated May 26, 1999, the staff intends to issue a Regulatory Issue Summary (RIS) (with the SE attached) to document NRC endorsement of the agreed-upon changes to NEI 97-06 and to the regulatory framework pertaining to steam generator tube integrity. Before the RIS

is issued, the staff intends to submit the appropriate documents to the Advisory Committee on Reactor Safeguards and the Committee To Review Generic Requirements regarding the new regulatory framework and to brief them on the issue, if desired. In addition, the staff plans to publish the draft SE for public comment in the Federal Register. The staff has concluded that this approach makes the best use of available industry and staff resources, gives appropriate credit to the industry initiative, and provides opportunity for participation by all the interested stakeholders. After the RIS is issued, individual licensees would be expected to commit to the revised NEI 97-06 guidelines and to submit an accompanying TS change request adopting the new steam generator regulatory framework.

At the time of writing this paper, resolution of the root cause of the Indian Point Unit 2 steam generator tube failure is not complete. As the staff prepares the SE that documents our review of the industry initiative, it will assess the implications of the Indian Point Unit 2 experience with regard to the new regulatory framework.

In addition to the review process described above, the staff is evaluating whether to revise DG-1074 to incorporate the comments received and to make it consistent with the new steam generator regulatory framework. The staff will make the determination on the basis of its assessment of the lower tiered documents (EPRi guidelines) and its experience with the NEI 97-06 initiative after it is implemented. The NRC's endorsement of NEI 97-06, Revision 1 and the issuance of the RIS do not depend on issuing a final version of the regulatory guide.

In summary, the initiatives discussed herein maintain safety while reducing unnecessary regulatory burden by providing reasonable assurance that licensees will maintain steam generator tube integrity while allowing added flexibility to licensees to achieve this objective in a cost-effective manner. The NRC and industry interactions on this effort have been conducted in a public forum and opportunity for other stakeholder input will also be provided during the implementation phase of this effort. The framework is an improvement over existing requirements because it improves both the quality and the consistency of steam generator programs throughout the industry. In addition to the opportunity to participate in the development and implementation of this framework, the improvement in the quality and consistency of steam generator tube integrity programs should increase public confidence. It also translates into improved internal efficiencies for the staff because we need not spend as many resources reviewing and inspecting dissimilar tube integrity programs.

If individual plants do not incorporate the new steam generator regulatory framework (including TS changes) following the NRC's endorsement of NEI 97-06, Revision 1 and the issuance of the RIS, the staff will need to determine whether to revisit the generic letter or to take a plant-specific approach to ensure that all plants implement an acceptable program to maintain steam generator tube integrity.

## RESOURCES

The resources needed to review the NEI 97-06 initiative and associated generic TS changes total 0.7 FTE and are included in the current NRR budget for Fiscal Year (FY) 2000. This project includes completion of the review, as well as meetings with stakeholders, and can be accomplished with in-house resources. The staff expects all PWR licensees to submit a TS change request adopting the new steam generator regulatory framework after the staff

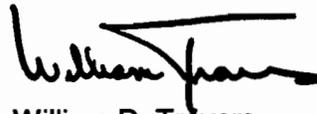
completes its review. It is expected that most of the TS changes will occur in FY 2001. Resources totaling 2.2 FTE are included in the FY 2001 budget for the TS changes. The staff plans to issue a generic safety evaluation for internal use by the NRR Project Managers, which will reduce the resource burden for NRR.

COORDINATION:

The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objections to its content. The Office of the General Counsel has no legal objection to this paper.

RECOMMENDATION:

That the Commission note that unless directed otherwise and assuming the NEI initiative is acceptable and all PWR licensees implement it, the staff intends to follow the review process as described in the discussion section, to endorse the NEI 97-06, Revision 1 initiative, and to cancel the proposed GL. If the industry only partially implements the initiative, the staff will either revisit the GL or take some other plant-specific approach. The staff requests action within 10 days of the date of this Commission Paper. Action will not be taken until the SRM is received. We consider this action to be within the delegated authority of the EDO.



William D. Travers  
Executive Director  
for Operations

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Friday, April 14, 2000 that the Commission, by negative consent, assents to the action proposed in this paper.

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