

March 26, 2009

TSTF-09-09  
PROJ0753Chief Financial Officer  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001**SUBJECT:** Request for Fee Exemption for TSTF-510, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection"

Dear Sir or Madam:

On May 6, 2005, the NRC published in the Federal Register the Notice of Availability for TSTF-449, Rev. 4, "Steam Generator Tube Integrity." This Traveler was developed in cooperation with the NRC, the Nuclear Energy Institute (NEI), and the Electric Power Research Institute (EPRI) and represented a significant improvement on licensee requirements on steam generator tube inspections. On January 20, 2006, the NRC issued Generic Letter 2006-01, "Steam Generator Tube Integrity and Associated Technical Specifications." This Generic Letter requested that licensees either submit a license amendment request to adopt TSTF-449 or provide a detailed description of their tube integrity program demonstrating that it provides protection equivalent to TSTF-449. TSTF-449 was used as a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts, and was granted an exemption from NRC review fees pursuant to 10 CFR 170.11 under the NRC's January 10, 2003 letter from Dr. W. Beckner to A. R. Pietrangelo.

In the intervening period, the industry and the NRC have determined that modified steam generator tube inspection guidance is required on inspection intervals, sample size selection, sampling of newly identified degradation mechanisms, applicability to new plants, and reporting requirements. Most of the changes result in more restrictive requirements on licensees. The industry has worked closely with the NRC technical staff to identify and address these shortcomings and developed TSTF-510, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection," to provide the needed Technical Specification changes.

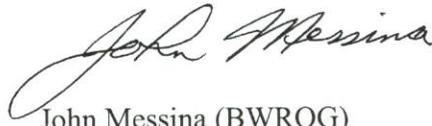
The TSTF requests that the NRC's review of TSTF-510 be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. This Traveler meets the exemption requirement in 10 CFR 170.11(a)(1)(iii), in that it is "a means of exchanging information between industry

organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts." In this case, the generic regulatory improvement effort is the NRC's resolution of steam generator tube inspection requirements. The central role of the TSTF Travelers in the NRC's generic regulatory efforts in this area is demonstrated by the NRC's approval of TSTF-449 and the issuance of Generic Letter 2006-01, which explicitly referenced TSTF-449.

Should you have any questions, please do not hesitate to contact us.



Kenneth J. Schrader (PWROG/W)



John Messina (BWROG)



Thomas W. Raidy (PWROG/CE)



Reene' Gambrell (PWROG/B&W)

Enclosure

cc: NRC Document Control Desk  
Robert Elliott, Technical Specifications Branch, NRC  
Joseph Williams, Special Projects Branch, NRC