

NRCREP Resource

From: ROBERTSON, GEORGE A [GROBERTSON@scana.com]
Sent: Wednesday, June 24, 2009 2:57 PM
To: NRCREP Resource
Cc: THOMPSON, BRUCE L; CRIBB, ARNIE J JR; RAILEY, DONNA W; ROBERTSON, GEORGE A
Subject: Comment on DG-1220, Performance-Based Containment Leak-Test Program

South Carolina Electric & Gas Company (V.C. Summer Nuclear Station) provides the following comment on Draft Regulatory Guide DG-1220, "Performance- Based Containment Leak-Test Program"-

In the draft of DG-1220 (Proposed Revision 1 of Regulatory Guide 1.163) the NRC endorsed NEI technical report TR-94-01, Revision 2-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J". The NRC Safety Evaluation (Reference 4) of this report in Section 3.1.4 stated that licensees referencing NEI 94-01, Revision 2, in support of a request to amend their TS should also explore/consider such inaccessible degradation-susceptible areas (in containment) in plant-specific inspections, using viable, commercially available NDE methods (such as boroscopes, guided wave techniques, etc.) – see Report ORNL/NRC/LTR-02/02, "Inspection of Inaccessible Regions of Nuclear Power Plant Containment Metallic Pressure Boundaries," June 2002 (ADAMS Accession No. ML061230425), for recommendations to support plant-specific evaluations. However, the "Recommendations" section of ORNL/NRC/LTR-02/02 reports that guided wave techniques provide potential methods for performing inspections of inaccessible areas, but these wave techniques are not currently commercially viable and need to be investigated in more detail. Therefore, DG-1220 should provide specific guidance on how licensees are to address the examination of inaccessible areas in containment.

4/24/09

74 FR 18748

①

RECEIVED

2009 JUN 25 PM 4:58

RULES AND DIRECTIVES
BRANCH
10/15/08

SUNSE Review Complete
Template = ADH-013

FRIDS = ADH-03
Add = B. Lin. (BPL1)
E. O'Donnell (exo)