July 27, 2009

MEMORANDUM TO: Stacey L. Rosenberg, Chief
Special Projects Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Holly D. Cruz, Project Manager **/RA/**
Special Projects Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE JUNE 25, 2009, CATEGORY 2 PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND THE PRESSURIZED WATER REACTOR OWNERS GROUP (PWROG) TO DISCUSS ISSUES RELATED TO PWROG TOPICAL REPORT BAW-2374, REVISION 2, "RISK-INFORMED ASSESSMENT OF ONCE-THROUGH STEAM GENERATOR TUBE THERMAL LOADS DUE TO BREAKS IN REACTOR COOLANT SYSTEM UPPER HOT LEG LARGE-BORE PIPING" (TAC NO. MD7404)

On June 25, 2009, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Pressurized Water Reactor Owners Group (PWROG) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss issues related to PWROG Topical Report (TR) BAW-2374, Revision 2, "Risk-informed Assessment of Once-Through Steam Generator Tube Thermal Loads Due to Breaks in Reactor Coolant System Upper Hot Leg Large-Bore Piping." A list of meeting attendees is enclosed and the meeting agenda is contained in the June 25, 2009, public meeting notice available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML091610560.

For this TR, the PWROG members attending included both representatives from AREVA NP Inc. (AREVA) and the owners of Babcock & Wilcox (B&W) plants. In summary, the NRC staff met with the PWROG, in a continuation of a May 13, 2009, public meeting (ADAMS Accession No. ML091210268) to discuss TR BAW-2374 and the ability of the affected steam generators (SGs) to withstand loads from a postulated design basis candy cane loss-of-coolant accident on a plant-specific basis.

Opening remarks were provided by Mr. Tim McGinty, Director, Division of Policy and Rulemaking, Office of Nuclear Reactor Regulation (NRR). Mr. McGinty thanked the members of the PWROG for their efforts to resolve the issues and reviewed the next steps that were agreed upon in the May 13, 2009, meeting (ADAMS Accession No. ML091811289).

The PWROG provided the information regarding the B&W steam generator integrity issue in its meeting handout dated June 25, 2009 (ADAMS Accession No. ML091810002). During the course of the meeting, the NRC staff and PWROG agreed to a number of next steps to bring this issue to resolution. The next steps follow:

1. The NRC requested that within 30 days after the issuance of the meeting summary, each B&W licensee submit a letter under oath and affirmation confirming the information they provided in the June 25, 2009, public meeting regarding the following:

    a. Confirmation that its justification for continued operation (JCO) for addressing tube integrity following a large break loss-of-coolant accident (LBLOCA) remains valid.
    b. Confirmation that compensatory measures, such as changes to emergency operating procedures, have been incorporated into plant procedures and operator training has been performed.
    c. Confirmation that 10 CFR 50.46(a)(3) reporting requirements have been satisfied.
    d. Confirmation that all LBLOCAs (including those in the candy-cane region) are considered as design basis accidents in the assessments of SG tube integrity following each SG tube inspection.
    e. Oconee and Crystal River - provide confirmation that the design of the replacement SGs is sufficient to withstand the loads associated with a LBLOCA including the thermal loads associated with a LBLOCA in the candy-cane region of the reactor coolant system (RCS).
    f. Davis-Besse - provide confirmation that the replacement SGs will be designed to withstand the loads associated with a LBLOCA including the thermal loads associated with a LBLOCA in the candy-cane region of the RCS.
    g. Three Mile Island and Arkansas Nuclear One (ANO)-1 - provide a commitment that an analysis will be performed to confirm that the design of the replacement SGs is sufficient to withstand the loads associated with a LBLOCA including the thermal loads associated with a LBLOCA in the candy-cane region of the RCS and to provide the results of that analysis by a specific date (e.g., January 31, 2010).
    h. Commitment to provide the structural limit associated with the most limiting LBLOCA for the replacement SGs as part of the next SG tube inspection report (required by the technical specifications) following completion of the next inspection of the tubes in the replacement SGs, unless previously submitted.
    i. The NRC staff will review the responses from licensees, and issue a letter back to each licensee documenting its review.

2. The NRC staff and Entergy will have further dialogue regarding the ANO-1 Alternate Source Term (AST) License Amendment Request (LAR) to ensure alignment on the information necessary to complete the NRC's safety review, including any appropriate licensing conditions. Entergy will submit a supplement to the AST LAR accordingly.

3. The PWROG will submit a letter within 30 days of the June 25, 2009, public meeting withdrawing TR BAW-2374. The NRC staff will review the PWROG letter, and issue an acknowledgement letter to the PWROG.

4. The NRC staff will review the Davis-Besse Amendment 252 regarding tubing circumferential defect assessments. The NRC staff and First Energy Nuclear Operating Company (FENOC) will have additional dialogue regarding continued reliance on a JCO until the Davis-Besse SG replacement in Spring 2014. The NRC staff and FENOC will discuss whether appropriate alternative options, such as a risk-informed Technical Specification amendment, would be appropriate.

The meeting handouts are available at ADAMS Accession Nos. ML091810002 and ML092080061.

Members of the public were in attendance. Public Meeting Feedback forms were not received.

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Project No(s). 694

Enclosure:
1. List of Attendees

cc w/encls: See next page

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ADAMS Accession No: ML091820002 (Package); ML091610560 (Notice); ML091820001 (Summary) NRC-001

OFFICE	PSPB/PM	PSPB/LA	PSPB/BC	PSPB/PM
NAME	HCruz	DBaxley (CHawes for)	SRosenberg	HCruz
DATE	7/1/09	7/ 13 /09	7/27/09	7/27/09

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List of Meeting Attendees for June 25, 2009

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List of Participants by Bridgeline

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ENCLOSURE

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