March 12, 2010

MEMORANDUM TO: Michele G. Evans, Director
Division of Component Integrity
Office of Nuclear Reactor Regulation

FROM: Timothy R. Lupold, Chief ***/RA/***
Piping and NDE Branch
Division of Component Integrity
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING ON FEBRUARY 26, 2010, WITH INDUSTRY REGARDING REGULATORY REQUIREMENTS FOR WELD OVERLAYS AND OTHER MITIGATION TECHNIQUES IN LEAK-BEFORE-BREAK PIPING SYSTEMS (TAC No. ME1040)

On February 26, 2010, the U.S. Nuclear Regulatory Commission (NRC) staff met with industry representatives at the NRC headquarters to discuss and seek public comment on a draft Regulatory Information Summary (RIS) on regulatory requirements for application of weld overlays and other mitigation techniques on piping welds within systems that have been previously analyzed for leak-before-break considerations.

One comment during the meeting requested that the draft RIS be noticed in the Federal Register for an additional period of public comment. In the public meeting, the NRC replied that it will provide a response to this comment to the industry by March 5, 2010. On March 5, 2010, Mr. John Lubinski of the NRC notified Mr. James Riley of the Nuclear Energy Institute that the draft RIS will not be noticed in the Federal Register for additional public comments, but will be revised considering the comments received at the public meeting.

The meeting attracted about 40 persons from various industry groups and organizations. The NRC staff finds that the meeting was productive and the public comments received will help the staff to revise the draft RIS for issuance. A summary of the meeting, public comments, and a list of meeting attendees are enclosed.

Enclosures: 1. Meeting Summary
2. Public Comments
3. List of Attendees

CONTACT: John C. Tsao, NRR/DCI
301-415-2702

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ADAMS PACKAGE ACCESSION NO.: ML100640590

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DATE	03/12/2010	03/12/2010	03/12/2010

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Meeting Summary

PUBLIC MEETING ON DRAFT REGULATORY ISSUE SUMMARY 2010-XX
REGULATORY REQUIREMENTS FOR APPLCIATION OF WELD
OVERLAYS AND OTHER MITIGATION TECHNIQUES IN PIPING
SYSTEMS APPROVED FOR LEAK-BEFORE-BREAK

FEBRUARY 26, 2010

On February 26, 2010, the U.S. Nuclear Regulatory Commission (NRC) staff met with industry representatives at the NRC headquarters to discuss and seek public comment on a draft Regulatory Information Summary (RIS) on regulatory requirements for application of weld overlays and other mitigation techniques on piping welds within systems that have been previously analyzed for leak-before-break considerations.

Mr. Edmund Sullivan of the NRC described the contents of the RIS in his presentation slides (ADAMS Accession No. ML100550922). Mr. James Riley of the Nuclear Energy Institute presented the industry comments (ADAMS Accession No. ML100640114). Participants asked if written comments could be provided. NRC staff indicated that it would accept any written comments received by end of day, February 26, 2010. Mr. William Sims of Entergy provided additional written comments (ADAMS Accession No. ML100620170). No other written comments were received. Enclosure 2 includes additional comments that were raised by meeting attendees.

The comments received were valuable and relevant. Most of the industry's comments were technical in nature relating to the interpretation of the changes to the LBB methodology (assumptions and input parameters) as a result of the weld overlay. The intent of the draft RIS is not to provide new regulatory and technical guidance on LBB evaluations, but to clarify the existing LBB regulation as a result of weld overlay installation on LBB piping.

The NRC staff will revise the draft RIS to reflect the public comments received, as appropriate, and will respond to the public comments as part of the RIS issuance. The NRC staff finds that the meeting was productive and the public comments will help the NRC to improve the contents of the RIS.

ENCLOSURE 1

PUBLIC COMMENTS TAKEN DURING THE PUBLIC MEETING
FEBRUARY 26, 2010

Mr. James Riley of Nuclear Energy Institute presented the industry comments (ADAMS Accession No. ML100640114). Mr. William Sims of Entergy provided written comments (ADAMS Accession No. ML100620170). In addition, the NRC staff recorded the following comments from meeting attendees:

1. A meeting attendee stated that it appears that the RIS allows only one method for the LBB evaluation and does not allow alternative methods.

2. A meeting attendee stated that the draft RIS is making conclusions where it should ask for evaluations. Also, the commenter objected to the wording “invalidate” and “obsolete” regarding the original LBB evaluation.

3. A meeting attendee remarked that statements in the draft RIS that invalidating the original LBB analysis appear to be a global statement requiring re-analysis of an entire piping system.

4. According to a meeting attendee, primary water stress corrosion cracking (PWSCC) should not be considered in the LBB analysis. The attendee asked that if it is considered, can a PWSCC evaluation be performed for SRP Section 3.6.3? How can PWSCC be analyzed under SRP Section 3.6.3?

5. A meeting attendee stated that some LBB license amendment requests (LAR) may result from an emergent weld overlay application. Would the NRC treat the review of the emergent LAR as an exigent or a normal review process?

6. A meeting attendee suggested that the RIS describe how a change in input parameters leads to a change in the LBB methodology, how a change in the LBB methodology leads to a change in the license basis, and how a change in the license basis leads to requiring a LBB amendment be submitted. The RIS needs to clarify what constitutes a change in the LBB methodology.

7. A meeting attendee asked whether the use of a different leakage detection capability is considered as using a different methodology.

8. A meeting attendee suggested that the draft RIS needs to be clarified/revised regarding ASME requirements on various mitigation techniques.

9. A meeting attended stated that from material properties, the stresses in the DMW should be lower. The thicker pipe after weld overlay would lead to a higher margin than in the original LBB evaluation. Therefore, the original LBB evaluation should bound the weld overlay application and should not be revised as a result of the weld overlay.

10. The industry will prepare a generic topical report to address the weld overlay in the LBB evaluation.

ENCLOSURE 2

11. A meeting attendee asked when a licensee should submit the LBB amendment request. Some licensees may have performed the updated LBB evaluation, but have not submitted the updated LBB evaluation. The attendee suggested that the RIS provide guidance on whether the updated LBB evaluation needs to be submitted.

LIST OF MEETING ATTENDEES

NAME	AFFILIATION	EMAIL ADDRESS
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ENCLOSURE 3