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April 7, 2010

To: SGMP Technical Advisory Group
PMMP Executive Committee

Subject: SGMP-IG-10-01, Interim Guidance Regarding Steam Generator Management Program: Steam Generator Integrity Assessment Guidelines, Revision 3, EPRI, Palo Alto, CA: 2009. 1019038

This interim guidance provides needed elements as defined in NEI 03-08, is effective immediately, and shall remain in affect until Revision 4 of the Steam Generator Integrity Assessment Guidelines is issued.

Purpose
This interim guidance is being distributed for three reasons.

1. To make the following needed element of the Steam Generator Integrity Assessment Guidelines, Revision 3, Section 4.2.1, effective immediately, rather than waiting for the September 1, 2010 required implementation date:

   The Tools for Integrity Project has developed a system POD for one of the degradation mechanisms (ODSCC) using a Performance Demonstration. This process will continue until all ETSSs include system performance uncertainties. These ETSSs or site specific ETSSs developed to the rigor of Appendix I shall be used if applicable for the assessment of tube integrity as they become available.

2. To clarify definitions in the Integrity Assessment Guidelines.

3. To provide a discussion of recently identified inconsistencies in implementation of requirements in the Integrity Assessment Guidelines.

Needed Element to be Effective Immediately
The primary goal of the Tools for Integrity Assessment Project was to provide generic, system performance indices for each degradation mechanism developed in accordance with the rigorous process defined in Appendix I of the PWR Steam Generator Examination Guideline. This would ensure accurate and consistent application of probability of detection and sizing uncertainties. It was the intent of the Steam Generator Management Program that utilities would use the ETSSs as they became available. Appendix I ETSSs are now available for axial ODSCC. If axial ODSCC is an existing or potential mechanism as specified in the Examination Scope Section of

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Inconsistencies in Implementation of the Integrity Assessment Guidelines

1. Section 7.6 of the Integrity Assessment Guidelines, Revision 3 states that "a comparison of the CM results to the previous cycle OA predictions shall be performed." This requirement was unchanged from Revision 2. The purpose of the comparison is to ensure the forthcoming OA methodology includes the appropriate input values. The following requirement is being added to the Integrity Assessment Guidelines as interim guidance: "A comparison table or discussion shall be documented in the OA report, with conclusions regarding validity of the prior cycle OA methodology or needed changes implemented in the current cycle OA methodology."

2. The Integrity Assessment Guidelines do not address performing condition monitoring on tubes that are scheduled for inspection but are unable to be inspected and, as a result, may be plugged (e.g., obstructed tube, permeability variations). However, technical specifications require that condition monitoring be performed on all tubes inspected or plugged. The following statements are being added to the Integrity Assessment Guidelines as interim guidance: "When meeting the performance criteria cannot be demonstrated based on the results of qualified inspection techniques, an engineering analysis, augmented inspection method(s) (e.g., ET diagnostic techniques, PT, video probe), or in situ pressure testing are acceptable alternatives. CM by engineering analysis or augmented inspection methods shall include a rational basis for concluding the performance criteria have been met."

If you have questions, please contact Helen Cothron at 865-773-4033 or e-mail hcothron@epri.com.

Sincerely,

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