## NRC Requested Coatings Information

**The following is copied directly from the March 2008 Review Guidance for GSI-191 (Attachment 2, ADAMS ML080230462) and describes the information necessary for the NRC staff to accept a PWR licensee's coatings analysis. This is the same information that the NRC would expect a BWR licensee to provide when attempting to show that their previous strainer blockage analysis is bounding, unless the BWROG has an acceptable alternate approach to providing this information.**

Supplemental Response Content:

As described in the "Revised Content Guide for Generic Letter 2004-02 Supplemental Responses," issued by letter to NEI dated November 21, 2007 (ML073110389), the staff believes that the following broad categories of information should be sufficient to support closure of the aspects of generic letter related to protective coatings:

> Provide a summary of type(s) of coating systems used in containment, e.g., Carboline CZ 11 Inorganic Zinc primer, Ameron 90 epoxy finish coat.
>
> Describe the containment coating condition assessment program.
>
> Describe and provide bases for coatings debris generation assumptions. For example, describe how the quantity of paint debris was determined based on ZOI size for qualified and unqualified coatings.
>
> Describe what debris characteristics were assumed, i.e., chips, particulate, size distribution and provide bases for the assumptions.
>
> Describe and provide bases for assumptions made in post-LOCA paint debris transport analysis.
>
> Discuss suction strainer head loss testing performed as it relates to both qualified and unqualified coatings and what surrogate material was used to simulate coatings debris. Provide bases for the choice of surrogates.

**The BWROG specifically asked the NRC staff about the information requested in the area of "Coatings Assessments." Note that this is the second item listed above. The following is also copied from the March 2008 guidance in the specific area of assessment.**

> Licensees should describe their program for monitoring containment coatings. This description should include the frequency, extent, and method of coating assessment. It should also discuss qualification of personnel. A description of how degraded coatings are reported, tracked, remediated, and/or scheduled for future remediation should also be provided.

**To summarize, the following information is requested to address the issue of Coatings Assessments.**

- **Frequency of Inspection** – How often are inspections performed?
- **Extent of Inspection** – What is the scope of inspection? All coatings? Some percentage of total? ***What about submerged coatings?
- **Method of Assessment** – Visual? Physical Testing? ASTM standards?
- **Qualification of Personnel** – Who is performing the inspection and what training do they have?
- **Tracking** – How are degraded coatings tracked and remediated?

**The NRC staff is prepared to discuss BWROG proposed approaches to providing this information.**

## Considerations for BWR Coating Assessments

**Why are the existing licensing basis documents for BWRs not sufficient to address this issue?**

The existing documentation of coatings programs for BWR plants lacks sufficient detail for the NRC staff to determine whether the previous assessment methods, scope, and frequency are adequate when compared to the assessment methods used by PWRs in their recent strainer blockage analysis. For example, many Generic Letter 98-04 responses do not provide details of coating assessment programs. Some responses state that "programs are being developed." Also, plants may not be committed to Regulatory Guide 1.54. Those plants that are committed to the Reg Guide are likely committed to Revision 0 from 1973, which references obsolete ANSI standards. Revision 1 to the Reg Guide endorses ASTM standards. The latest Revision (Rev.2) has been through a public comment period and will be issued soon. This latest revision updates references to include the most current ASTM standards. In short, the staff does not have assurance that BWR licensees are using current inspection techniques in a manner consistent with staff expectations, and industry standards. The staff seeks additional information from the BWROG and/or licensees in order to reach reasonable assurance that the current coating assessment techniques are adequately identifying and accounting for degraded coatings.

**How does the NRC staff expect the BWROG to address this issue?**

The staff is receptive to any means of addressing the issue that the BWROG proposes. However, given that the programs for assessing coatings are likely to be highly plant-specific, it may be difficult to provide a generic resolution to the question. The staff expects that survey responses to the questions on the previous page may provide a broad spectrum of responses. Absent a fleet-wide assessment procedure, the staff will likely need to see plant-specific responses.

**Submerged Coatings:**

Unlike the PWR containments, BWRs will have submerged coatings in suppression pools. How are these coatings inspected? Divers? Cameras? Drain down? Is the inspection frequency different than the coatings in the drywell? This is an area that was not addressed for PWRs due to different physical containment designs. The BWROG should consider this when addressing the issue of coatings assessments.