Project Manager's Note: This draft was handed out at the September 22, 2010, meeting with the BWROG. It is a draft version of a section of Rev. 2 to RG 1.54, "Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants" -Joe Golla

*This is what is in the RG now for condition assessments*

ASTM D 5163-08, "Standard Guide for Establishing a Program for Condition Assessment of Coating Service Level I Coating Systems in Nuclear Power Plants" (Ref. 24), provides guidelines that the NRC staff finds acceptable for establishing an in-service coating monitoring program for Service Level I coating systems in operating NPPs and for Service Level II and other areas outside containment (as applicable) with the following exceptions:

a. Licensees should establish an acceptable condition assessment program using qualified personnel and should perform condition assessments at a periodicity that would allow them to detect potential coating degradation and to implement repairs before such degradation would adversely impact postaccident safety systems.

b. Licensees should perform condition assessments under the direction of a nuclear coating specialist, as defined in ASTM D 7108-05.

c. Licensees should evaluate degraded coatings identified during condition assessments for their impact on the ECCS postaccident function consistent with the guidance in RG 1.82 "Water Sources for Long-Term Recirculation Cooling Following a Loss-Of-Coolant Accident," (Ref. 25) and in accordance with applicable licensing-basis documents.

d. Although the ASTM D 5163-08 standard provides reasonable assurance that qualified coatings left in service after a visual inspection will remain adhered to their substrates under accident conditions, it does not provide conclusive assurance that visual inspection will detect degraded coatings. Therefore, the NRC recommends that licensees account for the potential that visual inspections may not identify some degraded coatings by using margin in debris-generation calculations for ECCS strainer performance or by using a debris transport analysis to show that the debris will not reach the strainer.