

Parks, Jazel

From: Lin, Bruce
Sent: Monday, July 19, 2010 2:33 PM
To: Wong, Emma; Yoder, Matthew; Burke, John
Subject: RE: RG 1.54

Looks good to me.

Bruce

From: Wong, Emma
Sent: Monday, July 19, 2010 10:52 AM
To: Yoder, Matthew; Burke, John
Cc: Lin, Bruce
Subject: RE: RG 1.54

I like it.

From: Yoder, Matthew
Sent: Monday, July 19, 2010 10:49 AM
To: Burke, John; Wong, Emma
Cc: Lin, Bruce
Subject: RE: RG 1.54

Emma is right. I think we need to make some modifications. Lets pound out a version that will make all parties happy. I propose we start with what I have done to Bruce's latest attempt below:

While ~~this~~ the ASTM D5163-08 standard provides reasonable assurance that qualified epoxy-coatings left in service subsequent to a visual inspection will remain adhered under accident conditions, it does not provide conclusive assurance that all degraded coatings will be detected by visual inspection. Therefore, it is recommended that licensees account for the potential that some degraded coatings are not identified during visual inspections. ~~the standard is acceptable for use in performing coating condition assessments provided licensees also demonstrate that any~~ This may be accomplished using margin in debris generation calculations for ECCS strainer performance or by using debris transport analysis to show the debris will not reach the strainer. For example, it is possible to show that degraded epoxy coating that might detach during accident conditions will be in a form (e.g. chips) such that they will not be transported to the ECCS sump strainer.

From: Burke, John
Sent: Monday, July 19, 2010 10:19 AM
To: Wong, Emma; Yoder, Matthew
Subject: RE: RG 1.54

Look at the version Bruce emailed on 7/12. I think Emma's concern was addressed.

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From: Wong, Emma
Sent: Monday, July 19, 2010 10:17 AM
To: Yoder, Matthew
Cc: Burke, John
Subject: RE: RG 1.54

Matt we need to talk about this. I objected to the comment, and John and I talked about it...

From: Yoder, Matthew
Sent: Monday, July 19, 2010 10:16 AM
To: Burke, John; Wong, Emma
Subject: RE: RG 1.54

I do not object.

From: Burke, John
Sent: Thursday, July 08, 2010 8:53 AM
To: Yoder, Matthew; Wong, Emma
Subject: RG 1.54

BRIAN SHERON SUGGESTS WE ADD THE SENTENCE IN PURPLE. ANY COMMENTS?

1. Maintenance of Coatings

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. 17), 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:

An acceptable condition assessment program would be performed with qualified personnel and at a periodicity that would be able to detect potential coating degradation, and then implement repairs, before such degradation would adversely impact post-accident safety systems.

The condition assessments should be performed under the direction of a Nuclear Coating Specialist as defined in ASTM D7108.

Degraded coatings identified during condition assessments should be evaluated for impact on ECCS post-accident function in accordance with RG 1.82 and applicable license bases documents.

While this ASTM standard provides reasonable assurance that coatings left in service subsequent to a visual inspection will remain adhered under accident conditions, it does not provide conclusive assurance that degraded coatings will be detected by visual inspection. Therefore, the standard is acceptable for use in examine coating condition provided licensees also demonstrate that any degraded coating that might detach during accident conditions will be in a form (e.g. chips) such that they will not be transported to the ECCS sump strainer.

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