

Parks, Jazel

From: Lin, Bruce
Sent: Wednesday, July 21, 2010 9:38 AM
To: Richards, Stuart; Case, Michael
Cc: Burke, John
Subject: RE: Final Reg Guide words on Coatings

Stu,

Per our discussion yesterday, what if we delete "it is recommended that" and just say licensees should account for..... See markup below.

Bruce

From: Lin, Bruce
Sent: Tuesday, July 20, 2010 8:42 AM
To: Case, Michael
Cc: Richards, Stuart; Burke, John
Subject: RE: Final Reg Guide words on Coatings

Mike,

We got some comments back from Matt yesterday. Below is what we proposed to put in RG1.54 to reflect Brian's comment. I have also attached the redline and clean versions of the final RG.

Brian's comment:

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.

Proposed words:

While the ASTM D5163-08 standard provides reasonable assurance that qualified 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, ~~it is recommended that~~ licensees should account for the potential that some degraded coatings are not identified during visual inspections. 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.

Bruce

From: Case, Michael
Sent: Tuesday, July 20, 2010 7:53 AM
To: Lin, Bruce; Burke, John
Cc: Sheron, Brian; Richards, Stuart
Subject: Final Reg Guide words on Coatings

Hi guys, can we get the "final words" of the Coatings RG that reflect Brian's comments to a point that we can get them up to Brian for his review. I know it's close (I think you were waiting for Matt Yoder to get back). Brian leaves for vacation in the next few weeks so I don't want to miss the window of opportunity.

Thanks.