

Parks, Jazel

From: Richards, Stuart
Sent: Tuesday, September 21, 2010 4:13 PM
To: Sheron, Brian
Cc: Koshy, Thomas; Lin, Bruce; Burke, John; Case, Michael; Lyons, James
Subject: RE: Final Reg Guide words on Coatings

Brian

NRR and NRO have concurred. It is with OGC now.

Stu

From: Sheron, Brian
Sent: Tuesday, September 21, 2010 4:06 PM
To: Richards, Stuart
Cc: Koshy, Thomas; Lin, Bruce; Burke, John; Case, Michael; Lyons, James
Subject: RE: Final Reg Guide words on Coatings

I know I agreed to the wording. I was wondering where it is in the process.

From: Richards, Stuart
Sent: Tuesday, September 21, 2010 3:59 PM
To: Sheron, Brian
Cc: Koshy, Thomas; Lin, Bruce; Burke, John; Case, Michael; Lyons, James
Subject: RE: Final Reg Guide words on Coatings

Brian

Regarding the coatings RG, you replied to the proposed wording on 7/28 (see below).

The present version of the RG (in concurrence) reads as follows:

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.

There's been a little word-smithing, but I think it is consistent with the wording that was proposed back on 7/27.

Stu

From: Sheron, Brian
Sent: Wednesday, July 28, 2010 7:54 AM
To: Richards, Stuart; Lyons, James
Cc: Koshy, Thomas; Lin, Bruce; Burke, John; Case, Michael
Subject: RE: Final Reg Guide words on Coatings

Delete the last sentence. We're essentially telling them we've already concluded that epoxy chips won't transport. All we've concluded is that the chips we tested won't transport under the conditions we tested them

B-4/5

The licensee needs to make the case for their plant, taking into account their particular kind of paint, flow path flow rates, geometry considerations, etc.

From: Richards, Stuart

Sent: Monday, July 26, 2010 4:09 PM

To: Sheron, Brian; Lyons, James

Cc: Koshy, Thomas; Lin, Bruce; Burke, John; Case, Michael

Subject: Final Reg Guide words on Coatings

Brian

You provided a comment on RG 1.54 on containment coatings. We talked with NRR and propose the words below. We'll come up and discuss it with you if you have a concern with the proposed words.

Thanks

Stu

Brian's markup:

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, 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.