

Parks, Jazel

From: Cupidon, Les
Sent: Friday, October 08, 2010 12:25 PM
To: Bayssie, Mekonen
Subject: RE: RG 1.54.

Mekonen,

Thanks for the information.

I have talked with John Butler and he informs me that his main concern however is located on page 7 of the RG. He says that four exceptions were introduced that were not include in the one that industry commented on. He states, that the most troubling was exception "d" which introduces a term "conclusive assurance" that creates the problem.

Also, he states that the comment was raised by the author of the RG, a John Burke (?).

Below is the excerpt:

4. 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. 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 conditions:

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 guarantee 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.

From: Bayssie, Mekonen
Sent: Friday, October 08, 2010 12:22 PM
To: Cupidon, Les
Subject: RG 1.54.

Les,

There were a couple of words that needed correction which requested for replacement in ADAMS. Now, the document is replaced in ADAMS internally & it will be updated in the external website.

You can see the attached is the correct one.

Mekonen