

ATTACHMENT 1

Letter from C.R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

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Proposed Amendment 138a

Affected TS Page:

TS 4.2-3

1. Steam Generator Sample Selection and Inspection

The in-service inspection may be limited to one steam generator on a rotating schedule encompassing the number of tubes determined in TS 4.2.b.2.a provided the previous inspections indicated that the two steam generators are performing in a like manner.

2. Steam Generator Tube Sample Selection and Inspection

The tubes selected for each in-service inspection shall:

- a. Include at least 3% of the total number of nonrepaired tubes, in both steam generators, and 20% of the total number of repaired tubes in both steam generators. The tubes selected for these inspections shall be selected on a random basis except as noted below and in TS 4.2.b.2.b.

Tubes left in service as a result of application of the tube support plate plugging criteria shall be inspected by bobbin coil probe during all future REFUELING outages.

- b. Concentrate the inspection by selection of at least 50% of the tubes to be inspected from critical areas where experience in similar plants with similar water chemistry indicates higher potential for degradation.
- c. Include the inspection of all non-plugged tubes which previous inspections revealed in excess of 20% degradation. The previously degraded tubes need only be inspected about the area of previous degradation indication if their inspection is not employed to satisfy 4.2.b.2.a and 4.2.b.2.b above.

Implementation of the steam generator tube support plate voltage-based plugging criteria requires a 100% bobbin coil inspection for hot leg and cold leg tube support plate intersections down to the lowest cold leg tube support plate with known outside diameter stress corrosion cracking (ODSCC) indications. The determination of tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20% random sampling of tubes inspected over their full length.

- d. The second and third sample inspections during each in-service inspection may be less than the full length of each tube by concentrating the inspection on those areas of the tubesheet array and on those portions of the tubes where tubes with imperfections were previously found.