U.S. Nuclear Regulatory Commission Staff Disposition of Comments to June 20, 2011 (76 FR 35923), *Federal Register* Notice, "Notice of Opportunity to Provide Written Comments on Proposed Model Safety Evaluation for Plant-Specific Adoption of TSTF-510, Revision 2, 'Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection'"

The U.S. Nuclear Regulatory Commission (NRC) staff evaluated the public comments received on the model safety evaluation (SE) published in the *Federal Register* on June 20, 2011 (76 FR 35923). Comments were received from Mr. Clayton Webber of Tennessee Valley Authority (TVA) on June 30, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11238A001) and the Technical Specifications Task Force (TSTF) on July 17, 2011 (ADAMS Accession No. ML11201A231). The TSTF and TVA comments along with the NRC staff disposition of each comment are as follows.

TVA Comment:

> Revision 2 of the TSTF-510 provides description of intervals and periods. In ASME [American Society of Mechanical Engineers] codes, Periods combined make up an Interval. The Intervals are 10 years. The NRC has suggested that Intervals combined make up a Period. Is there a basis for not using similar terminology as the ASME code, since it is familiar to inspection personnel?

NRC disposition:

No changes were made to the SE; the terminology contained in TSTF-510 and the Technical Specifications (TS) remains unchanged. The current TS and TSTF-510 wording maintains consistency with current Industry Guidance. Changing the definition of Period and Interval to match the ASME Code use would create conflicts and inconsistencies with Industry Guidance and cause differences between plants that implement TSTF-510 and those that do not; adding to more confusion. Therefore, TSTF-510 use of Period and Interval remains unchanged.

TSTF Comment 1:

> The model Safety Evaluation, Section 3.9, Page 11, the section titled, "Proposed Change," contains an inconsistency with TSTF-510, Revision 2. The first sentence in the model Safety Evaluation states: "After the first refueling outage following SG installation, inspect each SG at least every 72 effective full power months or at least every other refueling outage (whichever results in more frequent inspections)." (Emphasis added.)
>
> TSTF-510, Revision 2, states:
> "After the first refueling outage following SG installation, inspect each SG at least every 72 effective full power months or at least every third refueling outage (whichever results in more frequent inspections)." (Emphasis added.)
>
> The model Safety Evaluation should be revised to be consistent with TSTF-510, Revision 2.

Note that the model Safety Evaluation correctly reflects the TSTF-510, Revision 2, requirements in the "Assessment" section (Page 12, second paragraph): "Under the proposed changes to paragraph 5.5.9.d.2, the required minimum inspection frequency for alloy 690 TT (every 72 EFPM or every third refueling outage (whichever is less)) would remain materially unchanged."

NRC Disposition:

The NRC staff agrees that the SE should state “every third” instead of “every other.” The model SE has been revised to be consistent with TSTF-510, Revision 2.

TSTF Comment 2:

The model Safety Evaluation, Section 3.9, Page 11, the section titled, "Proposed Change," contains an inconsistency with TSTF-5 10, Revision 2. The second sentence in the model Safety Evaluation states: "In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a b and c below." (Emphasis added.)

TSTF-5 10, Revision 2, states: "In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b c and d below." (Emphasis added.)

The quoted paragraph in the proposed Technical Specifications is followed by Items a through d. The model Safety Evaluation should be revised to be consistent with TSTF 510, Revision 2.

NRC disposition:

The NRC staff agrees that the SE should include item d. The model SE has been revised to be consistent with TSTF-510, Revision 2.

TSTF Comment 3:

The model Safety Evaluation, Section 3.11, "Specification 5.6.7, 'Steam Generator Inspection Report'," Page 14, discusses the elimination of the word "Active" from Item b but does not discuss the elimination of the word "active" in Item e, as shown in TSTF-510, Revision 2. The justification for the elimination of the word "active" is the same for both Item b and Item e. The model Safety Evaluation should be revised to discuss the elimination of the word "active" from Specification 5.6.7, Item e.

NRC disposition:

The NRC staff agrees that the SE should discuss the elimination of the word "active" in Item e. The model SE has been revised to be consistent with TSTF-510, Revision 2.