

March 28, 2012

TSTF-12-09  
PROJ0753

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

SUBJECT: Correction to TSTF-510-A, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection"

TSTF-510-A, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection," was approved by the NRC on October 27, 2011 (75 FR 66763). It is applicable to all pressurized water reactors.

One of the editorial improvements in TSTF-510-A revised references to "tube repair criteria" to "tube plugging [or repair] criteria." Not all plants have approved tube repair criteria, so references to tube repair are bracketed to indicate they are plant-specific.

In the Steam Generator Tube Inspection Program in Section 5.5 of the Technical Specifications, there are three versions of Paragraph d.2 (one each for 600MA tubing, 600TT tubing, and 690TT tubing). All three versions contain the following statement:

"If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube repair criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated." (Emphasis added.)

The TSTF has determined that this paragraph contains an administrative error. The underlined phrase in Paragraph d.2 should state "tube plugging [or repair] criteria," consistent with the other changes made in TSTF-510-A.

The model Safety Evaluation, referenced in the Notice of Availability for TSTF-510-A and available at ADAMS Accession Number ML112101513, repeats the statement given above, with the administrative error, in several locations.

The model application for TSTF-510 states that it is available under the Consolidated Line Item Improvement Process (CLIP). The TSTF is concerned that plant-specific license amendment requests to adopt TSTF-510-A that include a revision to Paragraph d.2 to correct the

administrative error will result in the submittal being removed from the CLIIP and subjected to technical staff review. That will result in additional review resources for the NRC and added expense to licensees.

In order to avoid this unnecessary expenditure of resources, the TSTF proposes that licensees include an explanation similar to the following paragraphs in their license amendment request to adopt TST-510-A, under the Section 2.2 of the model application titled, "Optional Changes and Variations":

"The proposed change corrects an administrative inconsistency in TSTF-510, Paragraph d.2 of the Steam Generator Tube Inspection Program. In Section 2.0, "Proposed Change," TSTF-510 states that references to "tube repair criteria" in Paragraph d are revised to "tube plugging [or repair] criteria." However, in the following sentence in Paragraph d.2, this change was inadvertently omitted, "If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube repair criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated" (Emphasis added).

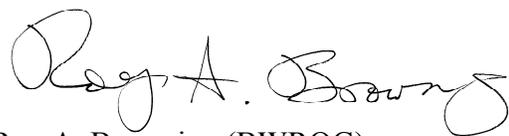
[LICENSEE] [does/does not] have an approved tube repair criteria. Therefore, the sentence is revised to state ["tube plugging"/"tube plugging or repair"] criteria."

The TSTF requests that the NRC respond in writing regarding whether incorporation of this change in a plant-specific license amendment request would result in the review being removed from the CLIIP.

Should you have any questions, please do not hesitate to contact us.



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