October 31, 2013

MEMORANDUM TO: Gloria J. Kulesa, Chief

Steam Generator Tube Integrity and Chemical Engineering Branch

Division of Engineering

Office of Nuclear Reactor Regulation

FROM: Marioly Diaz Colon, Chemical Engineer /RA/

Steam Generator Tube Integrity and Chemical Engineering Branch

Division of Engineering

Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE SEPTEMBER 26, 2013, CATEGORY 2 PUBLIC

MEETING WITH THE INDUSTRY TO DISCUSS PROTECTIVE

COATING ISSUES

The U.S. Nuclear Regulatory Commission (NRC) staff met with the industry on September 26, 2013, at the U.S. Nuclear Regulatory Commission Church Street building in Rockville, MD. The purpose of the meeting was to discuss current coating topics with the coating industry. The topics discussed are summarized in the meeting slides, which are available in the Agencywide Documents Access and Management System (ADAMS) under Accession Numbers ML13268A341, ML13273A453 and ML13273A425. The enclosure is a list of those in attendance. This meeting was noticed as a public meeting and the meeting agenda is available in ADAMS under Accession Number ML13254A388.

During the meeting there was discussion on a number of issues related to protective coatings. Information exchanged during the meeting that is not included in the slides is summarized below:

- The staff emphasized the need to define coatings that are installed on the internal surfaces of components that perform a current licensing basis intended function related to a Commission Regulated Event (e.g., Fire Protection and Station Blackout). The current definition of Service Level (SL) III does not address these coatings.
- The industry representatives discussed coating application practices, inspections, and repairs. The industry representatives stated that qualified coating programs are very important in managing protective coatings.

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- The industry representatives stated that some inspection frequencies are tied to
 preventative maintenance activities. It was further stated that frequencies of inspection
 should be based on the type of material, geometry of component being inspected,
 environment, and operating experience.
- The industry representatives stated that EPRI published a report (EPRI Report 3002000629, June 20, 2013) on aging of coatings.
- A discussion was held about the need to define coatings that are installed on the internal surfaces of components that perform a current licensing basis intended function related to a Commission Regulated Event (e.g., Fire Protection and Station Blackout). During the discussion, different options were suggested to define these coatings within the current coating categories (i.e., SL I, II or III). Some of the suggestions included defining these coating systems as SL IV or SL III augmented and adding safety related and non-safety related sections within the categories. The staff also emphasized that changes made to definitions for coatings installed on the internal surfaces of components that perform a current licensing basis intended function related to a Commission Regulated Event (e.g., Fire Protection and Station Blackout) will affect NRC and industry guidance and standards documents.
- The industry preferred not to use SL IV to identify coatings that are installed on the internal surfaces of components that perform a current licensing basis intended function related to a Commission Regulated Event (e.g., Fire Protection and Station Blackout), since some plants already use that designation for other purposes. The industry representatives stated that they will have further discussion on whether to modify SL I, II, and/or III coatings definitions at subsequent industry codes and standards meetings regarding coatings in 2014.
- The industry representatives provided the staff information on both the Tap and Coin coating test methods (ML13304A943, ML13304A986, and ML13304B135). The staff will provide the industry with the draft coating definitions discussed in the draft License Renewal Interim Staff Guidance document being developed for internal coatings on in-scope components.

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Enclosure: Attendance List

DISTRIBUTION: See Next Page

ADAMS ACCESSION Nos.:

Package: ML13301A060 Summary: ML13301A116 Meeting Notice: ML13254A388

NRC Perspectives on Protective Coatings: ML13268A341
The Evolution of Coating Definitions: ML13273A453
Path Forward for Protective Coatings: ML13273A425
EPRI/INPO CBT Buried Pipe Coating Course: ML13304A943
Hardness Testing of Organic Coatings: ML13304A986

Coin Tests: ML13304B135

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NAME	MDiazColon	Emma Wong	GKulesa
DATE	10/31/2013	10/24/2013	10/24/2013

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Memo to Gloria J. Kulesa from Marioly Diaz-Colon dated October 31, 2013

SUBJECT: SUMMARY OF THE SEPTEMBER 26, 2013, CATEGORY 2 PUBLIC MEETING WITH THE INDUSTRY TO DISCUSS PROTECTIVE COATING ISSUES

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Attendance List:

Meeting between NRC staff and the coating Industry September 26, 2013

<u>Industry</u>

Albert Piha, Exelon David Wootten, Entergy Eric Blocher, STARS Gary Alkire, Exelon Bob Walcheski, UESI Don Watson, Duke Energy Keith Miller, Sargent and Lundy Garth Doldever, NextEra Energy Jon Cavallo, UESI David Scott, EPRI Dan Cox, SIA Larry Seamans, Entergy License Renewal Services David B. Scott, EPRI David Shafer, Callaway Plant Andrew Burgess, Callaway Plant Justin Stollhans, Callaway Plant

NRC

Gloria Kulesa, NRR
Marioly Diaz Colon, NRR
Emma Wong, NRR
Matthew Yoder, NRR
Aloysius Obodoako, NRR
Chris Hunt, NRR
Andrew Johnson, NRR
John Burke, RES
William Holston, NRR
Maggie Watford, NRR
Alexa Sieracki, NMSS
Paul Klein, NRR
Amy Hull, RES
Eduardo Sastre, NRO
Konsaku Arai, JNES