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General Comment

Subject: Comment to proposed 10 CFR 50.55a(b)(2)(xxx):

Section XI Condition: Steam Generator Preservice Examinations

The text of the proposed rule states: "The NRC proposes to add 50.55a(b)(2)(xxx) to require a full length examination of 100 percent of the tubing in each newly installed steam generator prior to plant startup. This requirement would be instead of the unapproved provisions in IWB-2200(c) pertaining to steam generator tube preservice inspections (PSI)."

This language is unclear as to what kind of examination is required, and what acceptance criteria apply. Since this requirement will replace the provisions of Section XI, something needs to be specified for examination type and acceptance criteria. Do the examinations required by NB-2000 satisfy this requirement?