

June 18, 1997

Mr. L. Joseph Callan
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Callan:

SUBJECT: PROPOSED GENERIC LETTER, "POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN THE CONTAINMENT"

During the 442nd meeting of the Advisory Committee on Reactor Safeguards, June 11-14, 1997, we met with representatives of the NRC staff to discuss the subject Generic Letter. We also had the benefit of the document referenced.

Conclusions and Recommendations

The information requested in this Generic Letter should enable the staff to determine whether licensees' use of protective coatings inside reactor containments is in compliance with the current licensing basis.

As a result of several generic communications on the subject of loss of Emergency Core Cooling System and Containment Spray System functions caused by foreign material inside the containment, licensees have put in place programs and procedures to deal with this problem. Because these generic communications have failed to rectify this problem, it is essential that the NRC increase its efforts to ensure that the industry brings this issue to closure.

Recent failures of qualified coatings at two PWRs call into question the validity of licensee analyses that assume qualified coatings are effective over the lifetime of the plant and will survive in a loss-of-coolant-accident environment. Additional research is needed to determine whether there are generic problems with the qualified coating application or the qualification process.

The failure to detect foreign materials, which, in some cases, have been present since construction, raises questions about the effectiveness of inspection programs.

Adequate tools are not available for inspectors to evaluate the quality of protective coatings. This may be a suitable topic for NRC-sponsored research.

We wish to have an opportunity to review the proposed final version of this Generic Letter after the staff has reconciled the public comments.

Sincerely,

/S/

R. L. Seale
Chairman

Reference:

1. Memorandum dated May 7, 1997, from Marylee M. Slosson, Office of Nuclear Reactor Regulation, to David L. Meyer, Office of Administration, transmitting Proposed Generic Letter, Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in the Containment (TAC No. M97146)