

D930920

Mr. James M. Taylor
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: PROPOSED RULE AMENDING FRACTURE TOUGHNESS REQUIREMENTS
FOR LIGHT WATER REACTOR PRESSURE VESSELS, PROPOSED RULE
REGARDING REQUIREMENTS FOR THERMAL ANNEALING OF REACTOR
PRESSURE VESSELS, AND DRAFT REGULATORY GUIDE ON FORMAT
AND CONTENT OF APPLICATION FOR APPROVAL FOR THERMAL
ANNEALING OF REACTOR PRESSURE VESSELS

During the 401st meeting of the Advisory Committee on Reactor Safeguards, September 9-10, 1993, we discussed the subject proposed rules and draft regulatory guide. Our Subcommittee on Materials and Metallurgy reviewed these matters in detail at a meeting on August 16, 1993. During these meetings, we had the benefit of discussions with representatives of the NRC staff. We also had the benefit of the document referenced.

The need for these proposed rules and the draft guide was, in part, highlighted during the evaluation of the integrity of the Yankee Nuclear Power Station's reactor pressure vessel. We believe these rules and this guide should prove useful to the licensees and the NRC staff and recommend that they be issued for public comment. We would like an opportunity to review the proposed final version of these rules and guide after the public comments have been reconciled and before publication.

Additional comments by ACRS Members Ivan Catton and William J. Lindblad are presented below.

Sincerely,

J. Ernest Wilkins, Jr.
Chairman

Additional Comments By ACRS Members Ivan Catton and William J. Lindblad

Although we agree with the essence of the above letter, we oppose the elimination of the provision in Appendix H which currently permits a reduction of testing in Integrated Surveillance Programs where "initial results agree with predictions." The licensee's program is, after all, subject to staff approval on a "case-by-case basis." Licensees should have some flexibility in scheduling when they actually test specimens. This does not mean that specimens would not be irradiated.

Reference:

Memorandum dated August 20, 1993, from Allen L. Hiser, Jr., Office of Nuclear Regulatory Research, for Elpidio G. Igne, ACRS, Subject: Response to Request at ACRS Subcommittee Meeting, with the following:

- a. Federal Register Notice for Proposed Rule, 10 CFR Part 50, "Fracture Toughness Requirements for Light Water Reactor Pressure Vessels"
- b. A proposed rule (10 CFR 50.66) on thermal annealing of the reactor pressure vessel, "Requirements for Thermal Annealing of the Reactor Pressure Vessel"
- c. Amendments to 10 CFR Part 50 Appendix G, "Fracture Toughness Requirements"
- d. Amendments to 10 CFR Part 50 Appendix H, "Reactor Vessel Material Surveillance Program Requirements"
- e. A draft regulatory guide (DG-1027), "Format and Content of Application for Approval for Thermal Annealing of Reactor Pressure Vessels"