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MEYER, D. L. Rules & Procedures Branch

SUBJECT: Comments re proposed SRP Section 3.6.3, "Leak-Before-Break Evaluation Procedure."

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Harold W. Keiser
*Vice President-Nuclear Operations*
215/770-7502

August 28, 1987
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OCT 19 1987

Mr. David L. Meyer, Chief
Rules and Procedures Branch
Division of Rules and Records
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON SRP 3.6.3
PLA-2932 FILE R41-2, A17-11

Dear Mr. Meyer:

The following are Pennsylvania Power & Light Company's comments on the proposed revision to SRP 3.6.3.

1. Item II - The requirement that leak-before-break will be only applicable to an entire piping system will require unnecessary analytical work to be performed for Licensee's who wish to eliminate specific jet impingement shields.

2. Item III.3 - Application of the margin of ten on the leakage prediction requires clarification. The basis for the margin application should be on the ability to correlate leak detection with leakage flow size. This margin should not be applied to the maximum Technical Specification Limit allowable which for most BWR's is 5 gpm. Application of the margin in this manner will eliminate BWR's from consideration in the use of leak before break technology.

3. Item III.6 - Exception is taken to the requirement that two mitigating methods be applied within the first two years of service for piping susceptible to IGSCC. Licensee's should have the opportunity of demonstrating effective IGSCC mitigation beyond the two year of service criteria in order to use leak-before-break. As written, older plants will be required to remove piping to utilize leak-before-break rather than implementing technological improvements to existing piping.



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letter sent 10/26/87

4. Item III.6 - We do not believe that hydrogen water chemistry should be an absolute requirement for use of leak-before-break for piping susceptible to IGSCC. We have followed the use of hydrogen water chemistry in the industry and consider the results to be inconclusive as to demonstrating IGSCC mitigation. We currently consider controlling water chemistry along with the implementation of induction heating stress improvement to be adequate mitigation of IGSCC. This has been demonstrated by the results of pipe inspections performed to date.

Very truly yours,

H. W. Keiser
Vice President-Nuclear Operations

cc: NRC Document Control Desk (original)
NRC Region I
Mr. L. R. Plisco, NRC Resident Inspector
Mr. M. C. Thadani, NRC Project Manager