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EISENHUT,D. Division of Licensing

SUBJECT: Forwards summary of comments sent to all PWR owners re proposed steam generator generic requirements presented at 820729 meeting.Comments intended to facilitate review by all PWR owners.

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FLORIDA POWER & LIGHT COMPANY

September 1, 1982

Mr. Darrell Eisenhut
Director of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

My letter of August 18, 1982 transmitted to you a copy of our initial correspondence with U.S. Pressurized Water Reactor owners relative to proposed steam generator generic requirements that you presented in our meeting of July 29, 1982.

We have received comments on those proposed requirements from participants in the July 29, 1982 meeting and sent them to all PWR owners for their review and further comment.

I have enclosed a summary of the comments sent to all PWR owners to keep you informed of our progress. However, I want to emphasize that these comments are just a first step, intended to facilitate the review and comments by all PWR owners. As additional comments are obtained, discussed, and resolved, there are likely to be changes in the enclosed summary.

Very truly yours,

A. D. Schmidt
Chairman
SGOG Executive Committee

ADS/nfb
Attachment

cc: D. Adams, Louisiana Power & Light
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T. Tramm, Commonwealth Edison
L. White, Rochester Gas & Electric
T. Ziegler, TVA

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DRAFT COMMENTS ON DRAFT NRC REQUIREMENTS

II.1 Prevention and Detection of Loose Parts and Foreign Objects

General Comment: The frequency of occurrence and the potential tube degradation associated with the secondary side debris in S/G's makes it prudent to perform secondary side inspections at the next scheduled refueling outage for operating plants and prior to start-up for plants under construction.

Suggested wording for the "REQUIREMENT" section:

- o During the next scheduled refueling outage, perform secondary side visual examination of the entire periphery (and tube lane), at and above the tubesheet, using an appropriate visual technique such as fiber optics or TV camera.
- o Additional inspections/corrective actions (if required) should be site specific and should be appropriate and consistent with the findings of the secondary side visual examinations. However, should these examinations reveal secondary side tube wear, a secondary side LPMS shall be installed and operated on each S/G.
- o Review current QA/QC procedures and improve as appropriate to preclude introduction of foreign objects in S/G primary/secondary sides.

II.4 Improved Eddy Current Techniques

Requirement:

1. ". . . and discriminating among multiple defects" should be deleted from text. (Error on NRC's part)

4. The emphasis on wear type defects is overplayed. The significant issue is the presence of long/gradual discontinuities which can be missed with the differential coil. It will be difficult in practice to generate a conservative standard; the defect mechanism must exhibit a known regularity in its growth before a standard can be identified.

II.5 Primary to Secondary Leakage Limit

No Comment.

II.7 Secondary Water Chemistry Program

It should be made clear that plants shut down for steam generator repairs would be required to commit to a water chemistry program, but not to actually implement the program, prior to restart. Further, unless the repairs are due to corrosion phenomenon, no commitment should be required.

II.8 Condenser Inservice Inspection Program

As with II.7, plants shut down for steam generator repairs would be required to commit to, but not to implement, a condenser inspection program prior to restart. Further, unless the corrosion was related to a condenser problem, no commitment should be required.

More definition of the condenser inspection program is needed in order to assess its impact.

II.9 Upper Inspection Ports

General Comment: The requirement to add upper inspection ports on S/G's should be evaluated on a case-by-case basis for all plants.

Discussion:

Upper inspection ports are a minimal value on a generic basis such that a backfit requirement, independent of a plant specific problem, is not technically justified, nor is it cost effective.

- From an inspection standpoint, the only meaningful use for upper inspection ports is to monitor flow slot hourglassing (as a warning to U-bend cracking at the apex of row 1 tubes due to displacement of the U-bend "legs"). This problem is unique to the Westinghouse design, so a requirement to include all recirculating S/G's is not appropriate. Additionally, this problem can/has been dealt with effectively in alternate ways, i.e., eddy current testing of tight radius U-bends and preventive plugging of row 1 tubes. Thus, the upper ports are of very minimal benefit even with S/G's having the flow slot configuration. Other U-bend problems (i.e., tube cracking at the transition between the bend and the straight portion of the tube) would have to be detected using eddy current methods. Obviously, a visual inspection would not detect this condition. The only real benefit of additional ports would be to assist in removing tubes (should a condition develop which would necessitate a tube pull). However, this should be a plant specific consideration because:

  1. low probability of this occurrence,

  2. a pre-established upper port may not be located in the appropriate location to address a future problem,

  3. initial cost is significantly high (Note: 1976 dollars; approximate cost in excess of $200,000 to add 1 upper inspection port at Turkey Point Unit 4) such that with the high time value of money, "front end" implementation of upper ports becomes wastfully expensive. This is probably also true for a pre-operational plant, but must also be looked at on a case-by-case basis because the costs will be related to where the plant is in their construction/start-up sequence. This will obviously affect the cost of the modification, and more significantly, could affect schedule.

III.1.1 RCS Pressure Control During SGTR

This requirement is vague and should be revised prior to issuance as written. This requirment could result in a very extensive analytical and procedure revision effort, which is not warranted.

At the July 29 meeting, the NRC stated that the objective of this requirement was to ensure that the 1/2 hour assumed for equalization of primary and secondary pressure was met.

Rather than set an arbitrary goal for the elapsed time to primary system depressurization, it is suggested that the goal be stated in terms of radioactivity releases to the environment. The ability of a given plant to achieve the initial primary cooling, depressurization of the primary below the secondary safety valve lift pressure, and the isolation of the affected steam generator prior to overfilling the unit could then be evaluated. The objective would be to show that the release limit for that particular unit and site should not be exceeded.

III.1.3.1 Safety Injection Signal Reset

No Comment.

III.1.3.2 Containment Isolation and Reset

No Comment.

V.1.4 Standard Technical Specification Limit for Coolant Iodine Activity

No comment on the first requirement. The additional requirement for low pressure plants is without basis. First, the basis for the current Ginna specification is extremely conservative and assumes that all RCS iodine was released to the environment. Secondly, analyses are currently being performed by RG&E relating to this issue. Thus, any requirement would be premature at this time. Thirdly, a requirement such as imposed here could have a substantial impact. A number of plants have, in the past, exceeded the proposed NRC special limit. The existence of such a reduced limit in those cases would have had severe financial impact, including a requirement for additional fuel purchases to replace leaking fuel and reduce a plant output or additional outage time while waiting for fuel delivery.

NRC Proposed Actions

These proposed activities could have significant impact on utilities. For example, several steam generator sleeve designs are complete at this time. NRC guidance on sleeve design at this time could have severe financial impact on the utilities wishing to use sleeves. Additional information and technical interchanges between the NRC and industry would be helpful in assessing the potential impact of the proposed actions.