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POWER SYSTEMS

July 9, 1980
LD-80-041

Mr. Richard P. Snaider
Generic Issues Branch
Division of Safety Technology
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Comments on NUREG-0577, "Potential for Low Fracture Toughness and Lamellar Tearing on PWR Steam Generator and Reactor Coolant Pump Supports"

Dear Mr. Snaider:

Combustion Engineering (C-E) has reviewed the subject report, NUREG-0577, "Potential for Low Fracture Toughness and Lamellar Tearing on PWR Steam Generator and Reactor Coolant Pump Supports" and the following comments are offered.

NUREG-0577 is the result of a review of operating plant steam generator and reactor coolant pump support materials. The objective was to determine if enough information is available to assure the integrity of the supports under severe environmental and accident conditions. The conclusions of the report are that sufficient information is not available for a number of plants and, therefore, a plan for obtaining the information and evaluating the support integrity is described.

The May 19, 1980 letter from D. G. Eisenhut to All Power Reactor Licensees significantly modified the support integrity evaluation implementation plan presented in NUREG-0577. The revised procedure will result in a very conservative integrity evaluation. If, however, integrity cannot be assured by this procedure the licensee is required to recommend appropriate action and provide a schedule for accomplishing the recommended action. C-E believes that other evaluation procedures or acceptance criteria could also provide a sufficient demonstration of support integrity. These procedures could include detailed stress analysis and/or fracture mechanics to demonstrate flaw tolerance.

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Additionally, constant ancillary heating appears to be the fix most frequently recommended by NUREG-0577 to assure integrity of the supports. C-E does not believe that constant ancillary heating to assure integrity during a highly improbable event is the most suitable fix. We therefore recommend that every path to integrity demonstration be left open to the licensees. We also recommend that the design basis loadings be reviewed in light of recent developments in piping integrity evaluation (e.g. NUREG-0484, Rev. 1). The application of newly emerging criteria may significantly reduce the loadings to which the supports are subjected.

If any questions arise concerning our comments, please contact me or Ms. J. C. Ennaco of my staff at (203)688-1911, Extension 2595.

Very truly yours,

COMBUSTION ENGINEERING, INC.

A. E. Scherer
Director
Nuclear Licensing

AES:dag