

BWR OWNERS' GROUP

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BWROG-94021
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U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Donald S. Brinkman
Office of Nuclear Reactor Regulation

Subject: **BWROG LETTERS REGARDING VESSEL INTERNALS INSPECTIONS**

One of the action items identified in the January 5, 1994, meeting between the NRC and the BWR Owners' Group is for the BWROG to provide information on letters to its member utilities regarding vessel internals inspections. In response to that action item, provided below are references to these letters and excerpts from them of the pertinent information.

1. Letter, W. A. Zarbis (GE-BWROG Projects) to BWROG Primary Representatives and Materials Issues Coordination Committee, February 5, 1992 (a summary of a January 28, 1992, meeting with the NRC):

"[I]t's clear that the NRC would like the BWR industry, under the leadership of the BWR Owners' Group, to continue to be as proactive, or even more proactive, on identifying and inspecting components susceptible to stress corrosion cracking. As a result of the Yankee Rowe experience, the NRC sensitivity on materials issues has been heightened. Thus, if the potential exists for a BWR issue comparable to the Yankee Rowe issue, it's important for the BWR industry to identify the issue and mitigate its potential effects (including regulatory effects) beforehand. In particular, the NRC expressed interest in stub tubes fabricated from Inconel 600. The NRC also supported development of an improved internals inspection program through ASME Section XI, but recognized that Code revisions take time and therefore felt utilities should adopt an enhanced interim inspection program."

2. Letter, R. D. Binz IV (BWROG Chairman) to BWR Owners' Group Executives, March 19, 1992 (an update of significant BWROG activities):

"The NRC stated they would like the BWR industry, under the leadership of the BWROG, to continue to be at least as proactive as they are now on identifying and inspecting components susceptible to stress corrosion cracking. The NRC also supported development of an improved internals inspection program, and recommended that in the interim utilities adopt an enhanced inspection program."

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In addition to these two letters, utilities are regularly briefed on this subject at the BWROG General Meetings and Executive Oversight Committee meetings held several times a year and in the minutes of those meetings. The BWROG also periodically updates the NRC on activities related to this subject, most recently at the January 5, 1994, meeting and before that in June 1993. The minutes of these and similar meetings are routinely distributed to the BWROG utilities for their information.

These examples demonstrate the responsiveness of the BWROG on communicating to its members information regarding inspections of vessel internals. The BWROG has also initiated its own efforts to address the issue of internals cracking. For example, the BWROG has begun work on developing a model vessel inspection program which we plan to submit to the NRC for review later this year. The intent of this activity is to develop an inspection program for vessel welds, attachments and internals that focuses inspections on the areas of most interest while addressing NRC requirements. The BWROG is also continuing its work on identification and proactive analyses of high priority internals and attachments susceptible to stress corrosion cracking. These analyses will determine allowable flaw sizes and will provide the basis for either continuing operation or implementing repair/replacement options when a flaw is detected. The Staff is aware of both of these activities, and the BWROG will continue to provide updates to the NRC whenever possible. A schedule for these items will be provided later.

We trust that these excerpts provide the information you requested. If you have any questions, please contact either Robin Dyle (BWROG Materials Issues Coordination Committee Chairman, 205-877-7121), Bill Zarbis (GE-BWROG Projects, 408-925-5070) or the undersigned.

Very truly yours,



L. A. England, Chairman
BWR Owners' Group

WAZ/LAE/waz

cc: R. A. Pinelli, BWROG Vice Chairman
R. L. Dyle, BWROG Materials Issues Coordination Committee Chairman
S. J. Stark, GE
BWROG Primary Representatives
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