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February 5, 1983

DARRELL G EISENHUT DIRECTOR
DIVISION OF LICENSING
UNITED STATES NUCLEAR REGULATORY COMMISSION
WASHINGTON DC 20555

50-312

SUBJECT: COMMENTS ON POTENTIAL STEAM GENERATOR RELATED GENERIC REQUIREMENTS (GENERIC LETTER NO. 82-32)

REFERENCE: 1. NRC GENERIC LETTER NO. 82-32 DATED DECEMBER 9, 1982 RECEIVED BY THE DISTRICT DECEMBER 22, 1982

2. MATTIMOE TO EISENHUT LETTER, REGARDING DELAY IN PREPARATION OF COMMENTS ON GE #82-32, DATED JANUARY 6, 1983

The results of our comprehensive review of the subject Generic Letter are provided below. Due to the scope and volume of the material reviewed, our comments have taken longer to prepare than we originally anticipated. We hope that these comments will be useful in your evaluation of the proposed scope and need for implementation of programs presented in Generic Letter No. 82-32.

General

It should be noted that, overall, this study is quite outdated; for example, the phenomena affecting TMI 1 are not included. Many of the recommended actions are applicable to Westinghouse plants only.

Secondary Loose Parts Inspections

This report is very sensitive to the type of failure seen at Ginna. It recommends that an improved QA program be put in place in all plants which would prevent loose parts from being left on the secondary side of steam generators. It makes the claim that little additional exposure would result from inspections of the lower tube sheet on the secondary side of a steam generator. We do not believe this to be true. If this was mandated at Rancho Seco, it would result in significant additional exposure in the order of 5-10 man rem per outage. Plants which have had an aggressive QA program already assure that loose parts are not left in the steam generator following maintenance, and should be exempted for this "requirement." A plant such

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as Rancho Seco which has procedures in place to ensure that loose parts are not left in the steam generator should not be required to perform the proposed "one-time inspection."

Secondary Side Loose Parts Monitoring

The addition of a loose parts monitoring system on the secondary side should be avoided. This study implies that the primary side loose parts monitoring system would not detect a loose part on the secondary side. An option to demonstrate, by test, that primary side loose parts monitoring systems can detect loose parts on the secondary side should be allowed. The addition of a secondary side loose parts monitoring system at Rancho Seco would require considerable cost in materials and exposure. An aggressive QA program serves the same function.

Increased Steam Generator Tube Inspections

This report assumes that eddy current testing of steam generator tubes finds defects before they develop into primary to secondary tube leaks. Our steam generators typically do not respond in this manner. While it is wise to plug through wall indications, we have typically not seen prior indications in tubes which subsequently became "leakers." Because of this, the estimated benefit from increased in-service inspection is much higher than justified. The report tries to justify 100% eddy current examination of a steam generator found to have one "greater than 40% through-wall indication." Meanwhile, the report completely ignores the fact that a 100% eddy current examination of a steam generator would result in significant increased exposure to eddy current personnel due to: (1) probe wear, (2) equipment repair in the steam generator, (3) equipment replacement, and (4) dramatically longer time requirement. The report exaggerates the benefits and underestimates the costs of eddy current testing. Recent industry experiences where 100% eddy current inspections have been done should be factored into the report. This data from these 100% eddy current examinations would establish the cost/benefit of such testing in a Once-Through Steam Generator.

While the report recommends that all eddy current examinations address denting and wall thinning as well as defect examination, our vendor has dropped the recommendation for wall thinning examinations and denting remains to be observed as a concern in the OTSG.

It is imperative that you appreciate the additional costs in time, materials, and exposure which would result from the implementation of the requirement to perform 100% eddy current testing if one "greater than 40% defect" is found.

Primary to Secondary Leakage Limits

The proposed primary to secondary leakage limit of 0.35 gpm per steam generator is based on a Westinghouse leak-size-to-break-size correlation and a Westinghouse break-size-to-catastrophic-failure correlation. Neither of these are applicable to the Once-Through Steam Generator with its much smaller tubes.

RCS Iodine Limits

While there is no Technical Specification specific to RCS Iodine limit, the total activity in the primary coolant is limited, as is the total equivalent secondary iodine activity. Additional requirements in this area are not warranted.

Reactor Coolant System Pressure Control

The report discusses a study which would provide guidance for the operators to optimize reactor coolant system pressure control following a steam generator tube rupture. Recently developed Emergency Proced : Guidelines (EPG's) already address this issue satisfactorily.

Safety Injection Signal Reset

This is a Westinghouse unique problem. Rancho Seco EPG's cover the specific concern, which is cavitation of HPI pumps.

Containment Isolation

This concern is not applicable to Rancho Seco. We isolate the letdown line upstream of the letdown orifice; therefore, the letdown line cannot be "overpressurized" due to containment isolation.

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