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September 20, 1983

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Docket Nos. 50-317  
50-318

Dear Mr. Eisenhut:

This letter provides the comments of the Baltimore Gas & Electric Company regarding the proposed NRC Steam Generator Generic Requirements presented to the Steam Generator Owners Group in Bethesda on July 6, 1983.

1. VISUAL INSPECTION OF SECONDARY SIDE & IMPROVED QUALITY CONTROL PROCEDURES

We agree with the need to inspect the secondary side of our steam generators and to ensure quality procedures to preclude the introduction of foreign objects into this space. However, sufficient flexibility must be allowed in any generic requirement to allow inspections to be conducted consistent with perceived financial and safety risks.

2. TUBE INSERVICE INSPECTIONS

A. Supplemental Tube Inspections

We disagree strongly with the proposed requirement to inspect 100% of the tubes based on one defective tube or 5% degradation in the initial sample. Experience with the current Standard Technical Specification requirements to escalate the inspection population in a controlled manner has proved industrywide that problems are effectively identified and resolved. Immediate escalation to 100% inspection is inconsistent with the ALARA concept and has no potential for a significant safety benefit. In fact, the proposed requirement could act as a disincentive to perform enhanced inspections over minimum requirements, since the "penalty" for identifying degradation would be of substantial financial consequence with no real perceived benefit.

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B. Full Length Inspections

We agree with the concept of inspecting both cold and hot legs. However, flexibility should be allowed to only require cold leg inspections where there is a history of degradation or recognized conditions which could lead to such degradation.

3. SECONDARY WATER CHEMISTRY PROGRAM

We agree that an aggressive secondary water chemistry program is necessary at all nuclear power plants. However, we do not believe that the NRC should issue prescriptive requirements and limits in this area. The chemistry programs must be site and plant specific. Imposition of the Owners Group Guidelines as a requirement would be inappropriate.

4. CONDENSER INSERVICE INSPECTION PROGRAM

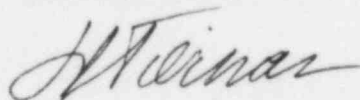
Condenser performance and leakage are not safety issues; the NRC should not issue requirements for such programs. Good steam generator water chemistry programs are sufficient from the safety aspect. The financial incentive to operate with efficient, high integrity condensers is very strong and is sufficient to ensure appropriate inspection programs.

5. COOLANT IODINE ACTIVITY LIMITS

Such limits are appropriate, but should only be based upon plant/site specific analyses. Generic requirements regarding low head safety injection pumps should not be issued.

We appreciate the opportunity to comment on these matters. Should you have questions regarding these comments, we would be pleased to discuss them with you.

Sincerely yours,



JAT/RED/gla

cc: R. E. Denton  
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