



UNITED STATES
NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D.C. 20555-0001

MAY 30 1995

MEMORANDUM TO: Edward L. Jordan, Chairman
 Committee To Review Generic Requirements (CRGR)

FROM: Frank J. Miraglia, Deputy Director
 Office of Nuclear Reactor Regulation (NRR) *Frank J. Miraglia*

SUBJECT: REQUEST FOR CRGR REVIEW OF GENERIC LETTER 95-XX, "VOLTAGE-BASED REPAIR CRITERIA FOR WESTINGHOUSE STEAM GENERATOR TUBES AFFECTED BY OUTSIDE DIAMETER STRESS CORROSION CRACKING"

This memorandum requests CRGR review and endorsement to issue the attached generic letter (Attachment 1) allowing industry to implement a voltage-based repair criteria for steam generator tubes. The generic letter gives guidance for requesting a license amendment to implement an alternate steam generator tube repair criterion applicable specifically to outside diameter stress corrosion cracking (ODSCC) at the tube-to-tube support plate (TSP) intersections in Westinghouse-designed steam generators having drilled-hole tube support plates. The voltage-based repair criteria are an alternative to the current through-wall depth-based criterion incorporated in licensees technical specifications.

The guidance in the attached generic letter has been under development since February 1993, when the staff established an interim plugging criteria task force to review the technical bases for, and outstanding issues related to, interim approval of voltage-based interim plugging criteria for ODSCC at the tube-to-TSP intersections of Westinghouse steam generators. The task group concluded that the interim plugging criteria were acceptable subject to the recommendations documented in draft NUREG-1477. Since that time, the staff has gained additional operating experience with the voltage-based repair criteria and developed the attached generic letter on this subject. The staff met with the CRGR on July 26, 1994, to discuss issuance of the draft version of the attached generic letter for public comment. The CRGR supported, and the staff subsequently published, the draft generic letter for a 30-day public comment period that began August 12, 1994. The staff met with the ACRS on August 3-4, 1994, to discuss the draft version of the generic letter. The ACRS supported issuance of the draft generic letter for public comment. Public comments were evaluated by the staff as discussed in Attachment 5 to this letter. In some cases, as noted in Attachment 5, the staff has revised the generic letter based on the public comments.

The staff has previously approved on a cycle-specific basis the use of voltage-based repair limits for several facilities, including Farley Unit 1, Farley Unit 2, Cook Unit 1, Catawba Unit 1, Braidwood Unit 1, Byron Unit 1, Beaver Valley Unit 1, and Trojan. The attached generic letter gives guidance to licensees to enable the implementation of voltage repair limits similar to those previously approved by the staff.

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Attachment 1 to this memorandum is a redlined version of Generic Letter 95-xx showing the significant revisions made to finalize the generic letter. Attachment 2 to this memorandum contains the responses to the CRGR Charter questions. Attachment 3 discusses the technical bases for the generic letter. Attachment 4 to this memorandum discusses technical concerns and a differing professional opinion expressed by three members of the steam generator task force with regard to voltage-based repair criteria for ODSCC. As mentioned above, Attachment 5 to this memorandum discusses the staff's resolution of the public comments on the draft generic letter.

Regarding the technical concerns and differing professional opinion expressed on the proposed generic letter, the staff placed the relevant information in the public document room and solicited public comment on the concerns as they relate to the proposed generic letter. The staff has considered the public comments submitted on the technical concerns during finalization of the proposed generic letter and as noted in Attachment 4 the staff has carefully considered the expressed technical concerns during the development of this generic letter. Additionally, the individuals having technical concerns discussed their concerns with the CRGR at the July 1994 meeting. The individual who submitted the DPO, was afforded the opportunity to discuss the DPO issues in detail with the ACRS at the August 1994 meeting on the draft generic letter. You should note that the RES has concurred on this package and that the staff has discussed the final generic letter with ACRS (421st meeting of the ACRS on May 4, 1995) and ACRS supports issuance of this generic letter. In light of the previous interactions regarding technical concerns on the voltage-based repair criteria, the CRGR may wish to offer the individuals expressing concerns an additional opportunity to discuss those concerns at the CRGR meeting on the proposed generic letter.

To support CRGR review, we would appreciate the opportunity to brief the CRGR on the proposed generic letter at the earliest available date. The Office of the General Counsel reviewed this generic letter and has no legal objections. The generic letter is sponsored by the Division of Engineering.

- Attachments:
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 2. Response to the CRGR Charter Questions
 3. Voltage-Based Steam Generator Tube Repair Criteria Technical Basis
 4. Technical Concerns Associated With the Generic Letter
 5. Generic Letter 95-xx Public Comment Resolution

cc: W.T. Russell

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