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

June 24, 1996

Carl D. Terry, Vice-President
Nuclear Engineering
Niagara Mohawk Power Company
Post Office Box 63
Lycoming, NY 13093

Dear Mr. Terry:

On Tuesday, April 30, 1996, you and I spoke via conference call on several subjects, including issues related to full implementation of actions required to address the suction strainer bulletin by the end of the first refueling outage after January 1, 1997, the Boiling Water Reactors Vessel & Internals Project (BWRVIP) proposal to reduce requirements for beltline inspections of the reactor vessel, and a Nine Mile Point Unit 1 plant-specific Technical Specification (TS) change request. I would like to take this opportunity to clarify my remarks.

Regarding the suction strainer issue, on May 6, 1996, the staff issued NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors." The bulletin requests holders of operating licenses or construction permits for boiling-water reactors (BWR), except Big Rock Point and holders of possession-only licenses, to implement appropriate procedural measures and plant modifications to minimize the potential for clogging of emergency core cooling system (ECCS) suppression pool suction strainers by debris generated during a loss-of-coolant accident (LOCA). The bulletin also requires two responses from addressees. The first response is to notify the NRC whether and to what extent the requested actions will be taken. This response is due 180 days from the date of the bulletin. The second required response is to notify the NRC when any actions associated with this bulletin are complete.

All licensees are requested to implement the actions associated with the bulletin by the end of the first refueling outage commencing after January 1, 1997. Recently, you and other members of the BWROG have raised concerns regarding whether or not utilities having refueling outages during the spring of 1997 will be able to meet the requested implementation deadline. Your concerns have been based primarily on two main points. The first is whether or not a licensee proposing a modification has an unreviewed safety question which must be first reviewed and approved by the NRC before the licensee can implement the modification. The second is whether or not licensees have sufficient lead time to accomplish the design and procurement to support their modifications. The staff will work with the BWROG to resolve these questions, and will review extension requests on a plant specific basis. The staff notes that the bulletin's implementation date was selected because it was believed that licensees (particularly those with primarily reflective metallic insulation) could bound the problem and implement appropriate action. In

96-46 ID & NRC Facility Licensee

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fact, at least one licensee appears to be doing just that. Lead time for strainer procurement appears to be that utility's main problem.

In regard to extension requests, licensees are cautioned that the staff will expect licensees to demonstrate that they have attempted to take expeditious action in response to the bulletin, and are unable to meet the implementation date for reasons beyond their control. Licensee requests for extensions in implementation should include a discussion on any compensatory measures taken by the licensee, and licensees should implement any portions of their resolution plan that they can (e.g., suppression pool cleaning, installation of components that they are able to procure in time for their refueling outage, etc.).

Regarding the BWRVIP proposal to reduce requirements for beltline inspections of the reactor vessel, the NRC staff is presently reviewing the EPRI Topical Report TR-105697, "BWR Vessel and Internals Project, BWR Reactor Pressure Vessel Shell Weld Inspection Recommendations (BWRVIP-05)," dated September 28, 1995. To aid in this review, the NRC staff has sent two requests for additional information (RAIs), dated April 2, and May 20, 1996. As stated in the second RAI, the staff's position is that the augmented inspection requirements of 10 CFR 50.55a(g)(6)(ii)(A)(3) are still appropriate and that all BWR licensees should perform inspections per this regulation.

This position is based on the fact that most earlier BWR vessels did not receive baseline inspections, few BWR vessels have received beltline inservice weld examinations, and previous reliefs granted because of inaccessibility are no longer warranted based on improved inspection technology. Nonetheless, the staff is continuing review of this report in that it may provide additional technical support for granting limited relief under 10 CFR 50.55a when the coverage requirement of "more than 90% of the examination volume of each weld" cannot be fully met due to physical interferences.

Further, the staff, including myself and William Russell, has agreed to a meeting on July 11, 1996, with you and other members of the BWRVIP, to discuss the technical merits of the BWRVIP-05 proposal.

Regarding the Nine Mile Point Unit 1 plant-specific TS change request on scram solenoid pilot valve (SSPV) testing, several BWR plants have noted the trend toward slower scram insertion times to notch 46 (5-percent insertion) after about 6 months in service. It is believed that the slow scram times resulted from adherence of the exhaust Viton diaphragm to the brass valve seat in the Dual-type SSPVs. The BWR Owners Group RRG issued interim recommendations to address the Viton SSPV response time delay issue on February 16, 1996, which supplement the requirements in each utility's current TSs. General Electric and ASCO are currently pursuing three potential hardware alternatives to the Viton diaphragm. In addition, we understand that the industry has not ruled out the option of an analytical solution to allow an increase in the 5-percent scram insertion time.

In this regard, several licensees have recently made inquiries to the NRC staff about amendments to the TSs which would increase the 5-percent scram

time while maintaining the other scram insertion times (e.g., 20-, 50-, and 90-percent scram insertion times). Although the NRC staff recognizes that the 5-percent insertion time does not affect a safety limit, the NRC staff believes that it is important for indication of SSPV degradation. Therefore, the NRC staff will not entertain changes to the 5-percent scram insertion time technical specification at this time.

I trust that the above more fully clarifies the NRC staff's position on the three topics we discussed. However, if further technical information is required, please feel free to contact Mr. Robert Elliott at (301) 415-1397 regarding suction strainer issues, Mr. C. E. (Gene) Carpenter, Jr. at (301) 415-2169 regarding BWRVIP issues, or Ms. Kerri Kavanagh at (301) 415-3743 regarding SSPV testing.

Sincerely,

/S/

Ashok C. Thadani, Associate Director
for Technical Review
Office of Nuclear Reactor Regulation

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M. E. Mayfield (RES)
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