

**From:** [RICK MAURER](#)  
**To:** [Klein, Paul](#)  
**Subject:** [External\_Sender] Minor Comment on TSTF-577 Draft SE  
**Date:** Thursday, April 01, 2021 10:03:03 AM

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Paul,

The draft safety evaluation for TSTF-577 was posted to ADAMS yesterday along with the cover letter to the Task Force. I understand that the NRC is not soliciting comments from the public on the SE but I had one minor comment which you may wish to consider.

In section 3.1 under Alloy 690TT SG Tubing is the following statement:

*The NRC staff notes that the 96 EFPM between inspections is the maximum permissible time between inspections and, as such, is only applicable if the unit-specific OA justifies the interval.*

In section 3.1 under Detection of Cracking is the following statement:

*...the NRC staff concludes that a conditional extension to the time to the next inspection is also acceptable. Therefore, following detection of crack indications, the NRC staff concludes that it is acceptable to perform the next inspection at the second refueling outage (for Alloy 600TT only), if the enhanced probe inspection method was performed.*

Although it is understood among those knowledgeable in the area of steam generator tube integrity that the Operational Assessment must also justify skipping the inspection at the next refueling outage, it is not explicitly stated. I would suggest that similar wording as used in the 690TT section be added; that is: “*is only applicable if the unit-specific OA justifies the interval*”.

Regards,

Rick