



Date: December 9, 2021

To: Steve Bloom, Branch Chief, Corrosion and Steam Generator Branch

Subject: Clarification of Inspection Requirements in Technical Specification Task Force (TSTF) 577

References:

1. Final Safety Evaluation by the Office of Nuclear Reactor Regulation for Technical Specifications Task Force Traveler TSTF-577, Revision, "Revised Frequencies for Steam Generator Tube Inspections" Using the Consolidated Line Item Improvement Process (EPID L-2020-PMP_0005), ML21098A188
2. Letter to U.S. Nuclear Regulatory Commission from the Technical Specifications Task Force dated March 1, 2021, TSTF-20-07 PROJ0753, "TSTF Response to NRC Questions on TSTF-577, Revision 0, "Revised Frequencies for Steam Generator Tube Inspections," and Submittal of Revision 1, ML21060B434

The purpose of this letter is to obtain the NRC's interpretation of two TSTF-577 sections.

Clarification #1

Section 5.5.9.d.3 states, "If crack indications are found in any SG tube [excluding any region that is exempt from inspection by alternate repair criteria], then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage." The industry interprets this as a requirement to inspect the tubing in the region of interest where cracking was identified. For example, if cracking is only identified at the hot leg top of tubesheet, and 100% of the hot leg top of tubesheet was inspected with the enhanced probes, at the next outage, the minimum inspection scope required is the hot leg top of tubesheet for the affected and unaffected SGs in accordance with the Technical Specification.

Clarification #2

Page 9 of the NRC Regulatory Safety Evaluation Report (Reference 1), Section 3.1 states, "In addition, the NRC staff concludes that there is reasonable assurance that tube integrity is maintained for Alloy 600TT plants up to 72 EFPM between tube inspections, provided that the following two conditions are met: 1. SCC cracking has not been detected during tube inspections (excluding tube end cracking that is already covered by an ARC) AND 2. An enhanced probe inspection method is performed at the 100 percent tube inspection entering each 72 EFPM inspection interval." Section 5.5.9.d.2 states, "If none of the SG tubes have ever experienced cracking other than in regions that are exempt from inspection by alternate repair criteria and the SG inspection was performed with enhanced probes, the inspection period may be extended to 72 effective full power months." The industry interprets the Technical Specification to allow a utility to inspect a sample of tubes after the first 100% inspection prior to the next 72 EFPM period. This would permit a utility to stagger the inspections between the SGs or by tube

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sample populations for outage execution. No tube would operate longer than 72 EFPM between inspections. This was the subject of RAI 1b and 1c from the NRC (Reference 2).

Your interpretation of these two sections is needed as some of the Alloy 600TT fleet make plans for inspections.

Best regards,

A handwritten signature in black ink that reads "C. Lee Friant". The signature is written in a cursive style with a large initial "C" and a distinct "F".

C. Lee Friant,
Steam Generator Task Force Chairman