



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

October 18, 1983

Honorable Nunzio J. Palladino
Chairman
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Dr. Palladino:

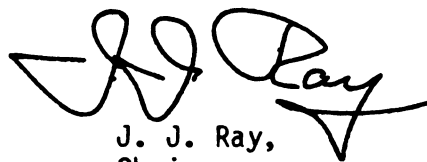
SUBJECT: ACRS COMMENTS ON THE NRC INTEGRATED PROGRAM FOR THE RESOLUTION OF UNRESOLVED SAFETY ISSUES A-3, A-4 AND A-5 RELATING TO PWR STEAM GENERATORS

During its 282nd meeting, October 13-15, 1983, the Advisory Committee on Reactor Safeguards heard a report from its Metal Components and Decay Heat Removal Systems Subcommittees and presentations from the NRC Staff regarding a proposed Integrated Program for the Resolution of USIs A-3, A-4 and A-5 relating to PWR steam generator tube integrity. During our review, we had the benefit of discussions with representatives of the Electric Power Research Institute, the Steam Generator Owners Group, and the NRC Staff. The Committee also had the benefit of the document referenced.

The Staff has proposed a list of improved practices for maintaining the integrity of steam generator tubing. We believe the proposals have considerable merit and that their implementation will be of benefit to the nuclear power industry. However, the argument for their implementation lies not in a significant reduction of risk to health and safety of the public, e.g., core melt frequency, but in a reduced rate of challenge to safety systems and in economic benefits to the consumers of electric power.

There is, thus, a question of whether the Commission wishes to impose on the industry new regulations whose main effect would be to assure the wider use of sound operating practice. We believe the proposals should not be implemented as new regulatory requirements but instead as recommended industry actions.

Sincerely,



J. J. Ray,
Chairman

Reference:

1. U.S. Nuclear Regulatory Commission, "NRC Integrated Program for the Resolution of Unresolved Safety Issues A-3, A-4, and A-5 Regarding Steam Generator Tube Integrity," NUREG-0844, For Comment, dated July 1983.