



NUCLEAR ENERGY INSTITUTE

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November 5, 1999

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**SUBJECT:** Steam Generator Degradation Specific Management Database,  
Addendum 3

**PROJECT NUMBER:** 689

**References:**

1. NEI (D. J. Modeen) letter to NRC (Document Control Desk), Same Subject, dated September 22, 1999
2. NEI (D. J. Modeen) letter to NRC (G. C. Lainas), Steam Generator Degradation Specific Management (SGDSM) Database Protocol, dated January 15, 1999
3. NEI (R. C. Callaway) letter to NRC (T. J. Sullivan), Steam Generator Degradation Specific Management Tube Pull Database Addendum and Protocol, dated October 29, 1997

Reference 1 transmitted Addendum 3 to the Steam Generator Degradation Specific Management Database. One of the items requested in the letter was NRC review and approval of Addendum 3 for ARC applications by October 15, 1999. For the reasons presented below, we believe that NRC approval of the Addendum is not necessary, and we therefore withdraw that request.

Reference 2 and 3 submitted the SGDSM Database Protocol that was ultimately adopted by the NRC and industry. Protocol 3 states:

*"Utilities may request approval of modifications to the database and correlations in accordance with the guidance provided in GL 95-05. Examples which would require specific approval include questionable data, application of revised exclusion criteria, or use of a revised probability of detection. The annual update of the correlations discussed in item 1 above will occur regardless of specific requests for NRC approval of changes to the database or correlations. If specific*

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*approval of modifications to the database or correlations is requested from the NRC Staff, the modifications will not be used until the NRC approves the correlations."*

Furthermore, Protocol 5 states in part:

*"...If the inclusion of the new data results in a non-conservative and significant shift in the correlation predictions, industry representatives will discuss potential database changes with the NRC staff and/or issue a new database and associated correlations. If a revision to the correlations is required, the NRC will be notified, and it will be issued and effective within three (3) months of submittal of the 90 day report."*

The database changes incorporated in Addendum 3 did not result in significant, non-conservative shift in the correlations. The exclusion criteria were not revised, nor was a revised probability of detection or questionable data used. Therefore, in accordance with the SGDSM Protocol, NRC approval of the database changes is not required. The industry will proceed with use of the new database correlations.

Please note that the industry is still seeking NRC approval of the other four issues contained in Reference 1. It is important that the requested completion dates be met in order to support plant outages. We therefore request that the NRC develop a timetable for completion of its review and meet with the industry to discuss any items necessary to bring these issues to closure. In the interim, you should expect plant specific submittals on these items.

As noted in my earlier letter, the requested reviews address information that might be helpful to NRC staff when evaluating licensee submittals provided in response to Generic Letter 95-05. As such, they are exempt from the fee recovery provision contained in 10 CFR Part 170 based on the exemption criterion contained in §170.21, Schedule of Facility Fees, Footnote 4.

If you have any questions regarding this information, please contact Dr. Govinda Srikantiah of EPRI at (650) 855-2091. He should be called to discuss the review schedule and arrange a meeting to address any issues related to these reviews.

Sincerely,



David J. Modeen

JHR/rs

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c: Mr. Ted Sullivan, U.S. Nuclear Regulatory Commission  
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Mr. John Arhar, PG&E  
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