

NEI 97-06 Steam Generator Generic License Change Package

Commission Meeting

December 3, 2001

Louise Lund

Division of Engineering

Office of Nuclear Reactor Regulation

Current NRC SG Regulatory Framework

- **10 CFR Part 50, App. A and B**
- **10 CFR Part 100 Guidelines values**
- **ASME Code, Sections III and XI**
- **Plant Technical Specifications**
- **Reactor Oversight Process**

NRC SG Regulatory Framework

- **Rulemaking - 1994 to 1996**
- **Generic Letter - 1997 to 1998**
- **Consideration of industry's NEI 97-06 initiative - 1998 to present**
- **Review of NEI SG Generic License Change Package (GLCP) - 1/01 to present**

NEI 97-06

- **Generic license change package**
- **Formalizes revised framework through revised TSs**

NEI 97-06

- **Industry SG program initiative**
- **Currently implemented in conjunction with existing technical specifications (TSs)**
- **High level guidance for utility SG programs**
- **Detailed guidance in EPRI guidelines referenced in NEI 97-06**

NEI 97-06

- **Program incorporates a balance of:**
 - **prevention**
 - **inspection**
 - **evaluation**
 - **repair**
 - **maintenance**
 - **leakage monitoring**

NEI 97-06

- **Establishes performance criteria that define the basis for SG operability**

Revised Framework – NEI 97-06

- **Will rely on NEI SG Generic License Change Package (GLCP)**
- **Utilities to submit revised TSs based on NRC-approved GLCP**
- **GLCP to contain a commitment to follow NEI 97-06**
- **NEI 97-06 program guidelines translated into plant procedures**

Revised Framework – NEI 97-06

- **Revised TSs and bases**
 - **Revised Spec for operational leakage**
 - **New Spec: “Steam Generator Tube Integrity”**
 - **New Administrative TS: “Steam Generator Program”**

Revised Framework – NEI 97-06

- **Technical issues will still need to be resolved**
- **Issues exist under current framework, and will continue to be addressed under revised framework**

Review Status

- **Industry requests inspection intervals beyond current requirements**
- **Staff believes that approach must ensure that:**
 - **Tube integrity performance criteria will continue to be met**
 - **Tubing conditions not meeting the performance criteria will be promptly detected**

Review Status

- **Staff concluded that regulatory controls were needed**
- **Incorporate provision in Administrative TS regarding use of NRC-approved inspection intervals**

Review Status

- **Near Term Actions:**
 - **Staff to review anticipated package from industry defining generic inspection intervals**
 - **Recent meeting with NEI on final GLCP**
 - **Schedule for staff safety evaluation**

Review Status

- **Long Term Action:**
 - **Resolve outstanding issues with EPRI guideline documents to permit use of intended performance based approach and removal of prescriptive inspection interval requirements.**