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Westinghouse

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5/18/2010
75 FR 27838

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Fax

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Subject:	GALL Report Comments		

Comments:

PWR Owners Group Comments
concerning GALL Report, Section XI.M31
on Reactor Vessel Surveillance.

Please contact me via email for
Electronic Version (byrnest@westinghouse.com).

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Program Management Office
102 Addison Road
Windsor, Connecticut 06095

July 2, 2010

OG-10-225

Chief, Rulemaking and Directives Branch (RDB)
Division of Administrative Services, Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: PWR Owners Group
Transmittal of PWROG Comments on the NRC Revision to "Generic Aging Lessons Learned (GALL Report)", Docket ID NRC-210-0180 (PA-MS-0483)

In the Federal Register, Vol. 75, No. 95 dated May 18, 2010 the NRC announced the issuance of the revised NUREG-1801, "Generic Aging Lessons Learned (GALL) Report" for public comment. The PWROG is submitting comments to this report with the enclosure to this letter.

For technical questions regarding the enclosed PWROG comments, please contact Carol Heinecke (Westinghouse) at (412) 374-2758. If you have any additional questions or comments on the enclosed information, feel free to contact Jim Molkenthin in the PWROG office at (860) 731-6727 or me at (610) 765-5966.

Sincerely,

J. Molkenthin Approving for J. Cirilli

James J. Cirilli
Chairman, Materials Subcommittee

JJC:JPM:kpr

Enclosures: (1) – PWROG Comments to Revised GALL Report

NRC Rulemakings and Adjudications Staff
OG-10-225

July 2, 2010
Page 2 of 2

cc: PWROG Management Committee
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PWROG PMO
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Enclosure 1 to OG-10-225

XI.M31 REACTOR VESSEL SURVEILLANCE

Program Description

Reword the first sentence in the first paragraph to correct the citation to ASTM with the current title by replacing "American Society for Testing and Materials (ASTM) E 185 Standard" with "ASTM International Standard Practice E 185-82".

Reword the third sentence in the first paragraph to add "(current version)" after "10 CFR Part 50, Appendix H". The objective of this change is to enable an automatic update to the GALL to include the new provisions going into Appendix H within the next year or two.

Reword the first sentence of the second paragraph as follows:

The objective of the reactor vessel material surveillance program is to provide sufficient...

Reword the second sentence of the third paragraph as follows:

The data from this surveillance program are used to monitor neutron irradiation embrittlement and are used... (data is plural in this context)

Reword the last sentence of the third paragraph as follows:

It is recommended that untested... be maintained for possible future insertion or testing.

3. Parameters Monitored/Inspected:

Reword the second and third sentences as follows:

The program uses neutron dosimeters to benchmark the neutron fluence calculations. Low melting point elements or eutectic alloys may be used as a check on peak specimen irradiation temperature.

4. Detection of Aging Effects:

Reword the first sentence of the second paragraph as follows:

...shall have at least one capsule with... fluence equal to or exceeding the 60-year...

Delete the last sentence of the second paragraph; the meaning of "meaningful...fluence" is explained adequately in the preceding sentence.

Reword the first sentence of the third paragraph as follows:

Enclosure 1 to OG-10-225

It is recommended that the program retain additional capsules within the reactor vessel to support additional testing if, for example, the data from the required surveillance capsule turn out to be invalid or in preparation for operation beyond 60 years.

Delete the second sentence of the third paragraph:

“These additional capsules may be managed in a similar way for future use.”

Reword the last sentence of the third paragraph as follows (delete ‘the’):

...untested capsules in storage for future reinsertion and/or testing.

Replace the fourth and fifth paragraphs with the following:

It is recommended that all previously tested samples be retained for possible future use (unless already discarded before August 31, 2000). It is recommended that all surveillance capsules that were removed from the reactor vessel be retained for possible future use (unless already discarded before August 31, 2000).

Rationale for change: To retain the tested specimens and removed capsules must be stated as a “recommendation” to be consistent with prior NRC guidance. This does not change the requirement to submit changes to the NRC for approval of withdrawal schedule changes.

Reword the seventh paragraph as follows:

If all surveillance capsules have been removed, a licensee may manage aging of the vessel using either an alternative surveillance program or an alternative neutron fluence monitoring program as described in the following:

Reword point (a) of the seventh paragraph as follows:

(a) An Alternative Surveillance Program

This program may consist of (1) capsules from an integrated surveillance program, (2) reconstitution of specimens from tested capsules, (3) capsules made using available relevant archive materials, or (4) some combination of the three previous options. This program could be a plant-specific program or an integrated surveillance program.

Reword the eighth paragraph, third sentence as follows:

If the reactor vessel exposure conditions (neutron flux, irradiation temperature, etc.) are altered, then the basis for the projection to 60 or more years is reviewed and, if deemed significantly different, modifications need to be made to the vessel integrity projections.

Enclosure 1 to OG-10-225

Rationale: There is no way to evaluate the effects of likely changes to neutron spectrum on vessel embrittlement nor is there a conceivable change to core design that would change neutron spectrum enough to have an effect on vessel embrittlement. There are few options to change the reactor vessel surveillance program other than to recommend a reinserted surveillance capsule. The last sentence (submittal to and review by NRC of changes) will cover that aspect on a case-by-case basis.

5. *Monitoring and Trending*

In the second paragraph, change "(10 CFR 50.61 and 10 CFR 50.61a)" to "(10 CFR 50.61 or 10 CFR 50.61a)" to clarify that it is not necessary to perform the PTS TLAA using both rules.

In the second paragraph, point (b), first sentence, replace "must" with "may", or add the detailed provisions from Regulatory Guide 1.99, Revision 2 and from 10 CFR 50.61 with regard to application of surveillance data. Revision 1 of this document stated it as "may".

7. *Corrective Actions*

Under (b), replace "neutron spectrum" with "neutron fluence" because fluence can be effectively monitored and, because it is tied directly to the vessel integrity TLAAs, the need for monitoring can be unambiguously established.

10. *Operating Experience*

In the second paragraph, add after "...Appendix G of..." "...10 CFR Part 50 using Appendix K of..." to give reference to the current ASME Code "equivalent margins analysis" procedure.

References

Check the dates of the first, second and fifth references.