

November 23, 2001

Mr. Alan Nelson  
Nuclear Energy Institute  
1776 I Street, NW., Suite 400  
Washington, DC 20006-3708

Mr. David Lochbaum  
Union of Concerned Scientists  
1707 H Street, NW  
Suite 600  
Washington, DC 20006-3919

SUBJECT: PROPOSED REVISION OF CHAPTERS II AND III OF GENERIC AGING  
LESSONS LEARNED (GALL) REPORT ON AGING MANAGEMENT OF  
CONCRETE ELEMENTS

Dear Messrs. Nelson and Lochbaum:

The purpose of this letter is to provide you with the opportunity to comment on the proposed revision of Chapters II (Containment) and III (Structures) of the GALL report. The need for the proposed clarification on concrete in these GALL chapters was discussed with the Nuclear Energy Institute (NEI) during the lessons learned meeting on the license renewal demonstration project held on October 11, 2001. This issue is listed as item No. 3.9 in the letter to Alan Nelson of NEI, from Christopher Grimes of NRC, dated October 3, 2001. This process is consistent with our goal to more efficiently resolve license renewal issues identified by the staff or the industry as outlined in NRR Office Letter No. 805, "License Renewal Application Review Process."

The staff has revised sections of Chapters II and III of the GALL report and a brief description of the basis for the clarification and its changes is provided in Enclosure 1. Since the proposed changes also affect other parts of the guidance documents, all pertinent changes in Chapters II and III of GALL Volume 2 and Table 5 of GALL Volume 1 (NUREG-1801), and Table 3.5-1 of Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (NUREG-1800) have been included as Enclosure 2.

We are requesting your comments on the proposed markup, and we request that you submit comments within 45 days following the date of this letter to ensure a timely resolution of this issue. The staff plans on incorporating this position into the improved renewal guidance documents in a future update. If you have any questions regarding this matter, please contact Peter Kang at 301-415-2779.

Sincerely,

*/RA/*

Christopher I. Grimes, Chief  
License Renewal and Standardization Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures: As stated

cc w/encl: See next page  
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Project No. 690

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**Description of the Basis for the Clarification  
and Changes for Concrete Elements  
(Item No. 3.9 in a letter to NEI dated October 3, 2001)**

Basis:

The staff position is that aging of concrete elements of the containment and other Class 1 structures should be managed. Contrary to this position, the staff observed during review of the Nuclear Energy Institute (NEI) license renewal demonstration project that the participants misinterpreted the staff's license renewal guidance on this issue and determined that there were no aging effects requiring management for concrete elements for the above structures. The reasons for the misinterpretation were that: (1) applicable aging management programs (AMPs) for concrete elements in the current Generic Aging Lessons Learned (GALL) report were not clearly stated and (2) some inconsistencies were found between Chapters II and III of the GALL report for the concrete elements. During the review, all participants agreed that each AMP should be divided into accessible and inaccessible areas that are addressed separately. The staff agreed that applicable AMPs for degradation of concrete should be clarified in the GALL report and the Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (SRP-LR) of the improved renewal guidance documents.

Changes:

Under the "Aging Management Program (AMP)," column for concrete elements in the containment and Class 1 structures in Chapter II of the GALL report, the staff replaced the current AMP with a new AMP that addresses accessible and inaccessible areas separately based on: (1) the inspection for accessible areas would be required to be performed in accordance with ASME section XI, Subsection IWL under the requirements of 10 CFR 50.55a (existing mandated program) and (2) a plant-specific aging management program is required for inaccessible areas if the below grade environment is found to be aggressive or exposed to flowing water. Therefore, with the existing mandated program, the plant-specific AMP for concrete elements in the containment and Class 1 structures is only required to address inaccessible areas. For Chapter III, the staff again replaced the current AMP with a new AMP that addresses accessible and inaccessible areas separately. The inspection for accessible areas would be required in accordance with a "Structural Monitoring Program" based on the requirement of 10 CFR 50.65 (Maintenance Rule), while a similar plant-specific program would be required for inaccessible areas by closely following the Chapter II example.

The staff chose not to change the answer in the "Further Evaluation" column of the GALL report, but has clarified when further evaluation is required following the "Yes" or "No" response. The staff has determined this was an efficient and effective method for updating the license renewal guidance documents.