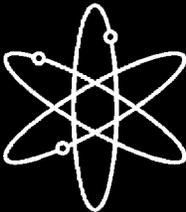


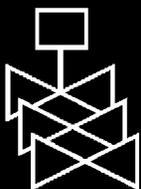
Safety Evaluation Report
Related to the License Renewal of
the Dresden Nuclear Power Station,
Units 2 and 3 and Quad Cities
Nuclear Power Station, Units 1 and 2



Docket Nos. 50-237, 50-249, 50-254, and 50-265



Exelon Generation Company, LLC (Exelon)



U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, DC 20555-0001



Safety Evaluation Report

Related to the License Renewal of
the Dresden Nuclear Power Station,
Units 2 and 3 and Quad Cities
Nuclear Power Station, Units 1 and 2

Docket Nos. 50-237, 50-249, 50-254, and 50-265

Exelon Generation Company, LLC (Exelon)

Manuscript Completed: July 2004

Date Published: October 2004

Prepared by
T.J. Kim, R. Auluck

**Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001**



THIS PAGE IS INTENTIONALLY LEFT BLANK

ABSTRACT

This safety evaluation report (SER) documents the technical review of the Dresden Nuclear Power Station (DNPS), Units 2 and 3 and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, license renewal application (LRA) by the U.S. Nuclear Regulatory Commission (NRC) staff (staff). By letter dated January 3, 2003, Exelon Generation Company (Exelon or the applicant) submitted the LRA for Dresden and Quad Cities (D/QCNPS) in accordance with Title 10, Part 54 of the *Code of Federal Regulations* (10 CFR Part 54 or the Rule). Exelon requests renewal of the operating licenses for DNPS Unit 2 (License No. DRP-19), DNPS Unit 3 (License No. DRP-25), QCNPS Unit 1 (License No. DRP-29), and QCNPS Unit 2 (License No. DRP-30) for a period of 20 years beyond the current license expirations of midnight, December 22, 2009; January 12, 2011; December 14, 2012; and December 14, 2012, respectively.

DNPS is located in Grundy County, Illinois, on the shore of a man-made cooling lake, with the Illinois River to the north and the Kankakee River to the east. The QCNPS is located in Rock Island County, IL, on the east bank of the Mississippi River opposite the mouth of the Wapsipinicon River, and about 3 miles north of Cordova, IL. DNPS, Units 1 and 2, and QCNPS, Units 2 and 3, each consist of a General Electric boiling-water reactor (BWR/3) authorized to operate individually at a steady state reactor power level not to exceed 2957 megawatts-thermal, or approximately 850 megawatts-electric.

This SER presents the status of the staff's review of information submitted to the NRC through June 22, 2004, the cutoff date for consideration in the SER. The staff identified open items and confirmatory items that had to be resolved before the staff could make a final determination on the application. Sections 1.5 and 1.6 of this report summarize these items and their resolutions. Section 6 provides the staff's final conclusion of its review of the D/QCNPS LRA.

The NRC license renewal project manager is Mr. Rajender Auluck. Mr. Auluck may be reached at (301) 415-1025. Written correspondence should be addressed to the License Renewal and Environmental Impacts Program, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

THIS PAGE IS INTENTIONALLY LEFT BLANK

TABLE OF CONTENTS

Abstract	-iii-
Table of Contents	-v-
Abbreviations	-xv-
1. Introduction and General Discussion	1-1
1.1 Introduction	1-1
1.2 License Renewal Background	1-2
1.2.1 Safety Reviews	1-3
1.2.2 Environmental Reviews	1-5
1.3 Principal Review Matters	1-5
1.4 Interim Staff Guidance	1-6
1.5 Summary of Open Items	1-8
1.6 Summary of Confirmatory Items	1-14
1.7 Summary of Proposed License Conditions	1-31
2. Scoping and Screening Methodology for Identifying Structures and Components Subject to Aging Management Review, and Implementation Results	2-1
2.1 Scoping and Screening Methodology	2-1
2.1.1 Introduction	2-1
2.1.2 Summary of Technical Information in the Application	2-1
2.1.2.1 Scoping Methodology	2-1
2.1.2.2 Screening Methodology	2-8
2.1.3 Staff Evaluation	2-10
2.1.3.1 Scoping Methodology	2-11
2.1.3.2 Screening Methodology	2-33
2.1.4 Conclusions	2-37
2.1.5 References	2-38
2.2 Plant-Level Scoping Results	2-39
2.2.1 Summary of Technical Information in the Application	2-39
2.2.2 Staff Evaluation	2-40
2.2.3 Conclusions	2-41
2.3 Scoping and Screening Results: Mechanical Systems	2-41
2.3.1 Reactor Vessel, Internals, and Reactor Coolant System	2-43
2.3.1.1 Reactor Vessel	2-43
2.3.1.2 Reactor Vessel Internals	2-47
2.3.1.3 Reactor Coolant System	2-53
2.3.1.4 Evaluation Findings	2-66
2.3.1.5 References	2-66
2.3.2 Engineered Safety Features Systems	2-67
2.3.2.1 High-Pressure Coolant Injection System	2-67
2.3.2.2 Core Spray System	2-69
2.3.2.3 Containment Isolation Components and Primary Containment Piping System	2-72

2.3.2.4	Reactor Core Isolation Cooling System—Quad Cities Only	2-78
2.3.2.5	Isolation Condenser—Dresden Only	2-81
2.3.2.6	Residual Heat Removal System—Quad Cities Only	2-86
2.3.2.7	Low-Pressure Coolant Injection System—Dresden Only	2-89
2.3.2.8	Standby Liquid Control System	2-92
2.3.2.9	Standby Gas Treatment System	2-95
2.3.2.10	Automatic Depressurization System	2-101
2.3.2.11	Anticipated Transient Without Scram System	2-102
2.3.2.12	Evaluation Findings	2-104
2.3.2.13	References	2-104
2.3.3	Auxiliary Systems	2-104
2.3.3.1	Refueling Equipment	2-104
2.3.3.2	Shutdown Cooling System (Dresden only)	2-107
2.3.3.3	Control Rod Drive Hydraulic System	2-111
2.3.3.4	Reactor Water Cleanup System	2-119
2.3.3.5	Fire Protection System	2-122
2.3.3.6	Emergency Diesel Generator and Auxiliaries	2-128
2.3.3.6A	Diesel Generator Room Ventilation	2-132
2.3.3.7	Main Control Room Heating, Ventilation, and Air Conditioning	2-134
2.3.3.8	HVAC—Reactor Building	2-138
2.3.3.9	Emergency Core Cooling System Corner Room HVAC	2-140
2.3.3.10	Station Blackout Building HVAC	2-143
2.3.3.11	Station Blackout System (Diesel and Auxiliaries)	2-146
2.3.3.12	Diesel Generator Cooling Water System	2-148
2.3.3.13	Diesel Fuel Oil System	2-151
2.3.3.14	Process Sampling System	2-154
2.3.3.15	Carbon Dioxide System	2-157
2.3.3.16	Service Water System	2-159
2.3.3.17	Reactor Building Closed Cooling Water System	2-162
2.3.3.18	Turbine Building Closed Cooling Water System	2-165
2.3.3.19	Demineralizer Water Makeup System	2-168
2.3.3.20	Residual Heat Removal Service Water System (Quad Cities Only)	2-174
2.3.3.21	Containment Cooling Service Water System (Dresden Only)	2-180
2.3.3.22	Ultimate Heat Sink System	2-184
2.3.3.23	Fuel Pool Cooling and Filter Demineralizer System	2-187
2.3.3.24	Plant Heating System	2-192
2.3.3.25	Containment Atmosphere Monitoring System	2-195
2.3.3.26	Nitrogen Containment Atmosphere Dilution System	2-197
2.3.3.27	Drywell Nitrogen Inerting System	2-199
2.3.3.28	Safe Shutdown Makeup Pump System (Quad Cities Only)	2-202
2.3.3.29	Circulating Water System	2-208
2.3.3.30	Dresden Laundry Treatment System	2-210
2.3.3.31	Zinc Injection System	2-212
2.3.4	Steam and Power Conversion Systems	2-214

2.3.4.1	Main Steam System	2-214
2.3.4.2	Feedwater System	2-221
2.3.4.3	Condensate and Condensate Storage Systems	2-225
2.3.4.4	Main Condenser	2-228
2.3.4.5	Main Turbine and Auxiliary Systems	2-232
2.3.4.6	Turbine Oil System	2-235
2.3.4.7	Main Generator and Auxiliary	2-238
2.3.4.8	Extraction Steam System (Quad Cities Only)	2-241
2.3.4.9	Feedwater Heater Drains and Vents System	2-243
2.4	Scoping and Screening Results: Structures	2-246
2.4.1	Primary Containment	2-250
2.4.1.1	Summary of Technical Information in the Application	2-250
2.4.1.2	Staff Evaluation	2-253
2.4.1.3	Conclusions	2-257
2.4.2	Reactor Building	2-258
2.4.2.1	Summary of Technical Information in the Application	2-258
2.4.2.2	Staff Evaluation	2-260
2.4.2.3	Conclusions	2-262
2.4.3	Main Control Room and Auxiliary Electric Equipment Room	2-262
2.4.3.1	Summary of Technical Information in the Application	2-262
2.4.3.2	Staff Evaluation	2-264
2.4.3.3	Conclusions	2-265
2.4.4	Turbine Building	2-265
2.4.4.1	Summary of Technical Information in the Application	2-265
2.4.4.2	Staff Evaluation	2-267
2.4.4.3	Conclusions	2-267
2.4.5	Diesel Generator Buildings	2-268
2.4.5.1	Summary of Technical Information in the Application	2-268
2.4.5.2	Staff Evaluation	2-270
2.4.5.3	Conclusions	2-270
2.4.6	Station Blackout Building and Yard Structures	2-270
2.4.6.1	Summary of Technical Information in the Application	2-270
2.4.6.2	Staff Evaluation	2-272
2.4.6.3	Conclusions	2-274
2.4.7	Isolation Condenser Pump House (Dresden)	2-275
2.4.7.1	Summary of Technical Information in the Application	2-275
2.4.7.2	Staff Evaluation	2-276
2.4.7.3	Conclusions	2-276
2.4.8	Makeup Demineralizer Building (Dresden)	2-277
2.4.8.1	Summary of Technical Information in the Application	2-277
2.4.8.2	Staff Evaluation	2-278
2.4.8.3	Conclusions	2-278
2.4.9	Radwaste Floor Drain Surge Tank	2-278
2.4.9.1	Summary of Technical Information in the Application	2-278
2.4.9.2	Staff Evaluation	2-279
2.4.9.3	Conclusions	2-280
2.4.10	Miscellaneous Foundations	2-280
2.4.10.1	Summary of Technical Information in the Application	2-280
2.4.10.2	Staff Evaluation	2-281

2.4.10.3	Conclusions	2-282
2.4.11	Crib House	2-282
2.4.11.1	Summary of Technical Information in the Application	2-282
2.4.11.2	Staff Evaluation	2-284
2.4.11.3	Conclusions	2-289
2.4.12	Unit 1 Crib House (Dresden)	2-289
2.4.12.1	Summary of Technical Information in the Application	2-290
2.4.12.2	Staff Evaluation	2-290
2.4.12.3	Conclusions	2-292
2.4.13	Station Chimney	2-292
2.4.13.1	Summary of Technical Information in the Application	2-292
2.4.13.2	Staff Evaluation	2-293
2.4.13.3	Conclusions	2-293
2.4.14	Cranes and Hoists	2-294
2.4.14.1	Summary of Technical Information in the Application	2-294
2.4.14.2	Staff Evaluation	2-295
2.4.14.3	Conclusions	2-300
2.4.15	Component Supports Commodity Group	2-300
2.4.15.1	Summary of Technical Information in the Application	2-300
2.4.15.2	Staff Evaluation	2-302
2.4.15.3	Conclusions	2-304
2.4.16	Insulation Commodity Group	2-304
2.4.16.1	Summary of Technical Information in the Application	2-304
2.4.16.2	Staff Evaluation	2-305
2.4.16.3	Conclusions	2-309
2.5	Scoping and Screening Results: Electrical and Instrumentation and Controls	2-309
2.5.1	Insulated Cables and Connections	2-310
2.5.1.1	Summary of Technical Information in the Application	2-310
2.5.1.2	Staff Evaluation	2-310
2.5.1.3	Conclusions	2-311
2.5.2	Bus Duct	2-312
2.5.2.1	Summary of Technical Information in the Application	2-312
2.5.2.2	Staff Evaluation	2-312
2.5.2.3	Conclusions	2-312
2.5.3	High Voltage Transmission Conductors and Insulators	2-313
2.5.3.1	Summary of Technical Information in the Application	2-313
2.5.3.2	Staff Evaluation	2-313
2.5.3.3	Conclusions	2-313
2.5.4	Electrical/I&C Penetration	2-314
2.5.4.1	Summary of Technical Information in the Application	2-314
2.5.4.2	Staff Evaluation	2-314
2.5.4.3	Conclusions	2-314
2.5.5	References	2-315
3.	Aging Management Review	3-1
3.0	Aging Management Review	3-1
3.0.1	The GALL Format for the LRA	3-2
3.0.2	The Staff's Review Process for GALL	3-3
3.0.3	Common Aging Management Programs	3-5

3.0.3.1	ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD (B.1.1)	3-8
3.0.3.2	Water Chemistry Program (B.1.2)	3-10
3.0.3.3	BWR Stress Corrosion Cracking (B.1.7)	3-14
3.0.3.4	Flow-Accelerated Corrosion (B.1.11)	3-16
3.0.3.5	Bolting Integrity (B.1.12)	3-18
3.0.3.6	Open-Cycle Cooling Water System (B.1.13)	3-21
3.0.3.7	Closed-Cycle Cooling Water System (B.1.14)	3-27
3.0.3.8	Compressed Air Monitoring (B.1.16)	3-30
3.0.3.9	Above Ground Carbon Steel Tanks (B.1.20)	3-33
3.0.3.10	One Time Inspection (B.1.23)	3-36
3.0.3.11	Selective Leaching of Materials (B.1.24)	3-40
3.0.3.12	Buried Piping and Tanks Inspection (B.1.25)	3-43
3.0.3.13	10 CFR Part 50, Appendix J (B.1.28)	3-47
3.0.3.14	Structures Monitoring Program (B.1.30)	3-49
3.0.3.15	Heat Exchanger Test and Inspection Activities (B.2.6)	3-53
3.0.3.16	Lube Oil Monitoring Activities (B.2.5)	3-58
3.0.3.17	Periodic Inspection of Ventilation System Elastomers (B.2.3)	3-62
3.0.3.18	Periodic Inspection of Components Subject to Moist Environments (B.2.9)	3-67
3.0.4	Quality Assurance For Aging Management Programs	3-69
3.0.4.1	Summary of Technical Information in Application	3-70
3.0.4.2	Staff Evaluation	3-71
3.0.4.3	Conclusions	3-72
3.0.4.4	References	3-72
3.0.5	Aging Management Review for Additional In-Scope Components	3-72
3.1	Reactor Vessel, Internals, and Reactor Coolant System	3-86
3.1.1	Summary of Technical Information in the Application	3-86
3.1.2	Staff Evaluation	3-86
3.1.2.1	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation	3-89
3.1.2.2	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, For Which GALL Recommends Further Evaluation	3-90
3.1.2.3	Aging Management Programs for Reactor Vessel, Internals, and Reactor Coolant System Components	3-98
3.1.2.4	Aging Management Review of Reactor Vessel, Vessel Internals, and Reactor Coolant System	3-125
3.2	Engineered Safety Features Systems	3-176
3.2.1	Summary of Technical Information in the Application	3-176
3.2.2	Staff Evaluation	3-177
3.2.2.1	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation	3-179
3.2.2.2	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which GALL Recommends Further Evaluation	3-180

3.2.2.3	Aging Management Programs for ESF System Components	3-188
3.2.2.4	Aging Management Review of Plant-Specific Engineered Safety Features Systems Components	3-192
3.3	Auxiliary Systems	3-225
3.3.1	Summary of Technical Information in the Application	3-226
3.3.2	Staff Evaluation	3-226
3.3.2.1	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation	3-230
3.3.2.2	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, For Which GALL Recommends Further Evaluation	3-230
3.3.2.3	Aging Management Programs for Auxiliary System Components	3-236
3.3.2.4	Aging Management Review of Auxiliary Systems	3-259
3.3.2.5	General Aging Management Review Issues	3-359
3.4	Steam and Power Conversion Systems	3-370
3.4.1	Summary of Technical Information in the Application	3-371
3.4.2	Staff Evaluation	3-371
3.4.2.1	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation	3-373
3.4.2.2	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which GALL Recommends Further Evaluation	3-373
3.4.2.3	Aging Management Program for the Steam and Power Conversion System Components	3-375
3.4.2.4	Aging Management Review of the Steam and Power Conversion Systems	3-377
3.5	Containment, Structures, and Component Supports	3-392
3.5.1	Summary of Technical Information in the Application	3-393
3.5.2	Staff Evaluation	3-393
3.5.2.1	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation	3-400
3.5.2.2	Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which the GALL Report Recommends Further Evaluation	3-400
3.5.2.3	Aging Management Programs for Containment, Structures, and Component Supports	3-418
3.5.2.4	Aging Management Review of Plant-Specific Structures and Structural Components	3-435
3.6	Electrical and Instrumentation and Controls	3-464
3.6.1	Summary of Technical Information in the Application	3-465
3.6.2	Staff Evaluation	3-465
3.6.2.1	Aging Management Evaluations in the GALL Report that Are Relied on for License Renewal, Which Do Not Require Further Evaluation	3-467

3.6.2.2	Aging Management Evaluation in the GALL Report That Are Relied on for License Renewal, For Which GALL Recommends Further Evaluation	3-468
3.6.2.3	Aging Management Programs for Electrical and I&C Components	3-468
3.6.2.4	Aging Management of Plant-Specific Components	3-482
3.7	Conclusion for Aging Management	3-495
4.	Time-Limited Aging Analyses	4-1
4.1	Identification of Time-Limited Aging Analyses	4-1
4.1.1	Summary of Technical Information in the Application	4-1
4.1.2	Staff Evaluation	4-2
4.1.3	Conclusions	4-2
4.2	Reactor Vessel and Internals Neutron Embrittlement	4-2
4.2.1	Summary of Technical Information in the Application	4-3
4.2.1.1	Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement	4-4
4.2.1.2	Adjusted Reference Temperature for Reactor Vessel Materials Due to Neutron Embrittlement	4-4
4.2.1.3	Reflood Thermal Shock Analysis of the Reactor Vessel	4-4
4.2.1.4	Reflood Thermal Shock Analysis of the Reactor Vessel Core Shroud and Repair Hardware	4-5
4.2.1.5	Reactor Vessel Thermal Limit Analyses—Operating Pressure-Temperature Limits	4-5
4.2.1.6	Reactor Vessel Circumferential Weld Examination Relief	4-6
4.2.1.7	Reactor Vessel Axial Weld Failure Probability	4-6
4.2.2	Staff Evaluation	4-7
4.2.2.1	Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement	4-7
4.2.2.2	Adjusted Reference Temperature for Reactor Vessel Materials Due to Neutron Embrittlement	4-12
4.2.2.3	Reflood Thermal Shock Analysis of the Reactor Vessel	4-13
4.2.2.4	Reflood Thermal Shock Analysis of the Reactor Vessel Core Shroud and Repair Hardware	4-14
4.2.2.5	Reactor Vessel Thermal Limit Analyses—Operating Pressure-Temperature Limits	4-15
4.2.2.6	Reactor Vessel Circumferential Weld Examination Relief	4-16
4.2.2.7	Reactor Vessel Axial Weld Failure Probability	4-18
4.2.3	Conclusions	4-21
4.3	Metal Fatigue	4-22
4.3.1	Summary of Technical Information in the Application	4-22
4.3.1.1	Reactor Vessel Fatigue Analyses	4-22
4.3.1.2	Fatigue Analysis of the Reactor Internals	4-23
4.3.1.3	ASME Code, Section III, Class 1 Reactor Coolant Pressure Boundary Piping and Component Fatigue Analysis	4-24
4.3.1.4	Reactor Coolant Pressure Boundary Piping and Components Designed to USAS B31.1, ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C	4-25
4.3.1.5	Fatigue Analysis of the Isolation Condenser	4-25

4.3.1.6	Effects of Reactor Coolant Environment on Fatigue Life of Components and Piping (Generic Safety Issue 190)	4-26
4.3.2	Staff Evaluation	4-27
4.3.2.1	Reactor Vessel Fatigue Analysis	4-27
4.3.2.2	Fatigue Analysis of the Reactor Internals	4-27
4.3.2.3	ASME Code, Section III, Class 1 Reactor Coolant Pressure Boundary Piping and Component Fatigue Analysis	4-28
4.3.2.4	Reactor Coolant Pressure Boundary Piping and Components Designed to USAS B31.1, ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C	4-29
4.3.2.5	Fatigue Analysis of the Isolation Condenser	4-29
4.3.2.6	Effects of Reactor Coolant Environment on Fatigue Life of Components and Piping (Generic Safety Issue 190)	4-30
4.3.3	Conclusions	4-31
4.4	Environmental Qualification	4-32
4.4.1	Environmental Qualification Program TLAA	4-32
4.4.1.1	Summary of Technical Information in the Application	4-32
4.4.1.2	Staff Evaluation	4-35
4.4.1.3	Conclusions	4-35
4.4.2	Generic Safety Issue 168, "Environmental Qualification of Low-Voltage Instrumentation and Control (I&C) Cables"	4-35
4.4.2.1	Summary of Technical Information in the Application	4-35
4.4.2.2	Staff Evaluation	4-36
4.4.2.3	Conclusions	4-37
4.5	Loss of Prestress in Concrete Containment Tendons	4-37
4.6	Fatigue of Primary Containment, Attached Piping, and Components	4-37
4.6.1	Summary of Technical Information in the Application	4-38
4.6.1.1	Fatigue Analysis of the Suppression Chamber, Vents and Downcomers	4-38
4.6.1.2	Fatigue Analysis of Safety Relief Valve Discharge Piping Inside the Suppression Chamber, External Suppression Chamber Attached Piping, and Associated Penetrations	4-39
4.6.1.3	Drywell-to-Suppression Chamber Vent Line Bellows Fatigue Analyses	4-40
4.6.1.4	Primary Containment Process Penetration Bellows Fatigue Analysis	4-40
4.6.2	Staff Evaluation	4-41
4.6.2.1	Fatigue Analysis of the Suppression Chamber, Vents, and Downcomers	4-41
4.6.2.2	Fatigue Analysis of Safety Relief Valve Discharge Piping Inside the Suppression Chamber, External Suppression Chamber Attached Piping, and Associated Penetrations	4-42
4.6.2.3	Drywell-to-Suppression Chamber Vent Line Bellows Fatigue Analyses	4-43
4.6.2.4	Primary Containment Process Penetration Bellows Fatigue Analysis	4-43
4.6.3	Conclusions	4-43
4.7	Other Plant-Specific Time-Limited Aging Analyses	4-44
4.7.1	Reactor Building Crane Load Cycles	4-44

4.7.1.1	Summary of Technical Information in the Application	4-44
4.7.1.2	Staff Evaluation	4-44
4.7.1.3	Conclusions	4-45
4.7.2	Metal Corrosion	4-45
4.7.2.1	Corrosion Allowance for Power-Operated Relief Valves	4-45
4.7.2.2	Degradation Rates of Inaccessible Exterior Drywell Plate Surfaces	4-46
4.7.2.3	Galvanic Corrosion in the Containment Shell and Attached Piping Components due to Stainless Steel Emergency Core Cooling System Suction Strainers	4-52
4.7.3	Crack Growth Calculation of a Postulated Flaw in the Heat Affected Zone of an Arc Strike in the Suppression Chamber Shell	4-54
4.7.3.1	Summary of Technical Information in the Application	4-54
4.7.3.2	Staff Evaluation	4-55
4.7.3.3	Conclusions	4-55
4.7.4	Radiation Degradation of Drywell Shell Expansion Gap Polyurethane Foam	4-56
4.7.4.1	Summary of Technical Information in the Application	4-56
4.7.4.2	Staff Evaluation	4-56
4.7.4.3	Conclusions	4-57
4.7.5	High-Energy Line Break Postulation Based on Fatigue Cumulative Usage Factor	4-57
4.8	Conclusion for Time-Limited Aging Analyses	4-57
5.	Review by the Advisory Committee on Reactor Safeguards	5-1
6.	Conclusions	6-1

Appendices

Appendix A:	Commitments for License Renewal	A-1
Appendix B:	Chronology	B-1
Appendix C:	Principal Contributors	C-1
Appendix D:	References	D-1

Tables

3.0.3-1	Common Aging Management Programs	3-5
3.0.3-2	System-Specific Management Programs	3-6
3.1-1	Summary of Aging Management Programs for Reactor Vessel, Internals, and Reactor Coolant System Evaluated in Chapter IV of the GALL Report	3-87
3.2-1	Staff Evaluation for Dresden and Quad Cities Engineered Safety Features System Components in the GALL Report	3-177

3.3-1	Summary of Aging Management for Auxiliary Systems Evaluated in Chapter VII of the GALL Report	3-227
3.3-3	Fire Protection Portions of Table 3.3-3—Staff Evaluation Table for Dresden and Quad Cities Auxiliary System Components Evaluated in the GALL Report	3-250
3.4-1	Summary of Aging Management Programs for Steam and Power Conversion Systems Evaluated in Chapter VII of the GALL Report	3-372
3.5-1	Staff Evaluation for Structures and Structural Components in NUREG-1801 (GALL)—Common Components of All Types of PWR and BWR Containment . . .	3-394
3.5-2	PWR Concrete (Reinforced and Prestressed) and Steel Containment, BWR Concrete (Mark II and III) and Steel (Mark I, II, and III) Containment	3-395
3.5-3	Class I Structures	3-397
3.5-4	Component Supports	3-399
3.6-1	Staff Evaluation Table for Dresden and Quad Cities Electrical Components Evaluated in the GALL Report	3-466
4.2-1	Comparison of Results from Staff and BWRVIP Calculations	4-19

ABBREVIATIONS

A	ampacity
AC	alternating current
ACAD	atmospheric containment air dilution system
ACI	American Concrete Institute
ACRS	Advisory Committee on Reactor Safeguards
ACSR	aluminum conductor steel reinforced
ADAMS	Agencywide Document Access and Management System
ADS	Automatic depressurization system
AEC	Atomic Energy Commission
AERM	aging effect requiring management
AFW	auxiliary feedwater
AFU	air filtration unit
AHU	air handling unit
AISC	American Institute of Steel Construction
ALARA	as low as reasonably achievable
AMG	aging management guideline
AMP	aging management program
AMR	aging management review
AMSAC	ATWS mitigation system actuation circuitry
ANS	American Nuclear Society
ANSI	American National Standards Institute
AOR	abnormal occurrence report
APCSB	Auxiliary and Power Conversion System Branch
AR	action report
ARI	alternate rod insertion
ART	adjusted reference temperature
ASME	American Society of Mechanical Engineers
ASNT	American Society for Nondestructive Testing
ASTM	American Society for Testing and Materials
ATWS	anticipated transient without a scram
AVT	all-volatile treatment
AWG	American wire gauge
BMI	bottom mounted instrument
BTP	branch technical position
B&W	Babcock and Wilcox
BWR	boiling-water reactor
BWROG	Boiling Water Reactor Owners Group
BWRVIP	Boiling Water Reactor Vessel and Internals Project
C	Celsius
CAM	containment atmospheric monitoring
CAR	corrective action report
CASS	cast austenitic stainless steel
CBF	cycle-based fatigue
CCST	contaminated condensate storage tank
CCSW	containment cooling service water

CCW	component cooling water
CDF	core damage frequency
CDHR c	container hydrogen detectors and recombiner
CD-ROM	compact disk-read only memory
CDWST	clean demineralized water storage tank
CF	chemistry factor
CFR	<i>Code of Federal Regulations</i>
CI	confirmatory item
CIC	contaminant isolation component
CLB	current licensing basis
CMAA	Crane Manufactures Association of America
CO	carbon monoxide
CO ₂	carbon dioxide
ComEd	Commonwealth Edison
C-RAI	clarification of request for additional information
CRD	control rod drive
CRDA	control rod drop accident
CRD(H)	control rod drive (hydraulic)
CRDM	control rod drive mechanism
CR HVAC	air handles heating/cooling
CS	containment spray system or carbon steel
CST	condensate storage tank
CUF	cumulative usage factor
CV	check valve
CW	circulating water
D/QCNPS	Dresden/Quad Cities Nuclear Power Station
DAM	data acquisition modules
DBA	design-basis accident
DBD	design baseline document
DBE	design-basis event
DC	direct current
DFO	diesel fuel oil
DG	diesel generator
DGB-HVAC	diesel generator building heating, ventilation, and air conditioning
DGCW	diesel generator cooling water
DGSW	diesel generator service water
DNI	drywell nitrogen inerting
DNPIS	drywell nitrogen purge and inerting system
DNPS	Dresden Nuclear Power Station
DPR	developmental power reactor
DR	drywell-to-refueling
D-RAI	draft request for additional information
DRS	development requirements specification
DSER	draft safety evaluation report
DWM	demineralizer water makeup
EC	engineering change
ECCS	emergency core cooling system

ECP	electrochemical corrosion potential
ECR-HVAC	emergency core cooling system corner room heating, ventilation, and air conditioning
EDG	emergency diesel generator
EDY	effective degradation years
EPFY	effective full-power year
EFWST	emergency feedwater storage tank
EGC	Exelon Generation Company, LLC
EHC	electrohydraulic control
EMA	equivalent margin analysis
EPN	equipment part number
EPR	ethylene propylene rubber
EPRI	Electric Power Research Institute
EPU	extended power uprate
EQ	environmental qualification
ESF	engineered safety features
ESS	electronic switching system
ESW	electroslag weld
EWCS	electronic work control system
F	Fahrenheit
FAC	flow-accelerated corrosion
FCC	Federal Communications Commission
F _{en}	environmental fatigue multiplier
FERC	Federal Energy Regulatory Commission
FOI	factor of improvement
FP	fire protection
FPP	fire protection program
FRP	fiberglass reinforced plastic
FSAR	final safety analysis report
FSER	final safety evaluation report
FSSD	fire safe shutdown
ft	foot, feet
ft-lb	foot-pound
FWRV	feedwater regulating valve
GALL	Generic Aging Lessons Learned (Report)
GE	General Electric
GEIS	generic environmental impact statement
GL	generic letter
GSI	generic safety issue
GTR	generic technical report
HCU	hydraulic control unit
HELB	high energy line break
HEPA	high efficiency particulate air
HIC	high integrity container
HPCI	high pressure coolant injection system

HRRM	high-range radiation monitor
HRSS	high radiation sampling system
HSLAS	high strength low alloy steel
HSO	hydrogen seal oil
HTK	high temperature kerite
HVAC	heating, ventilation, and air conditioning
HWC	hydrogen water chemistry
HX	heat exchanger
I&C	instrumentation and control
IA	instrument air
IASCC	irradiation-assisted stress-corrosion cracking
ID	inner diameter
IDR	inspection discrepancy report
IE	Inspection and Enforcement, Office of (NRC)
IEB	inspection and enforcement bulletin
IGA	intergranular attack
IGSCC	intergranular stress-corrosion cracking
IHSI	induction heat stress improvement
ILRT	integrated leak rate test
in.	inch, inches
IN	information notice
INPO	Institute of Nuclear Power Operations
IPA	integrated plant assessment
IR	insulation resistance
IRM	intermediate range monitor
ISG	interim staff guidance
ISI	inservice inspection
ISP	Integrated Surveillance Program
IST	inservice testing
J	joule
K_{eff}	effective multiplication factor
Kip	one thousand pounds
KV	kilovolt
LBB	leak before break
LER	licensee event report
LLRT	local leak rate test
LOCA	loss-of-coolant accident
LOOP	loss of offsite power
LPCI	low pressure coolant injection system
LPRM	local power range monitor
LR	license renewal
LRA	license renewal application

LRTI	license renewal technical instruction
LTOP	low-temperature over-pressurization
LWR	light water reactor
m	margin
M/G	motor generator
MCC	motor control center
MeV	one million electron volts
MG	motor generator
MIC	microbiologically influenced corrosion
mil/y	mils per year
MOV	motor-operated valve
MRV	minimum required value
MSIP	mechanical stress improvement method
MSIV	main steam isolation valve
MSL	mean sea level
MSV	main stop valve
MSIV	main steam isolation valve
MT	magnetic particle test
MWe	megawatt-electric
NACE	National Association of Corrosion Engineers
NaOH	sodium hydroxide
NBI	nuclear boiler instrumentation
NCAD	nitrogen containment atmospheric dilution
NCR	nonconformance report
NDE	nondestructive examination
ND-QAP	Quality Assurance Program for Station Operation
NEI	Nuclear Energy Institute
NEPA	National Environmental Policy Act of 1969
NFPA	National Fire Protection Association
NIS	nuclear instrumentation system
NMCA	noble metal chemical application
NNS	non-nuclear safety
NPAR	nuclear plant aging research
NPS	nominal pipe size
NPSH	net positive suction head
NRC	U.S. Nuclear Regulatory Commission
NSR	non-safety-related
NSSS	nuclear steam supply system
NUMARC	Nuclear Management and Resources Council (now NEI)
NUREG	Nuclear Regulatory Commission technical report
NUREG/CR	NUREG contractor report
OBE	operating based event
OD	outside diameter

OE	operating experience
ODSCC	outside diameter stress-corrosion cracking
OI	open item
OPT	operability test
P(F/E)	Conditional failure probability
P&I	pipng and instrumentation
P&ID	pipng and instrumentation diagram
PC	primary containment
PCIS	primary containment isolation system
PDT	pipng design table
PLL	predicted lower limit
PM	preventive maintenance
PMT	post-maintenance test
PORV	power operated relief valve
ppm	parts per million
PS	process sampling
psi	pounds per square inch
psig	pounds per square inch gauge
PT	penetrant test
P-T	pressure-temperature
PTS	pressurized thermal shock
PUAR	plant-unique analysis reports
PVC	polyvinyl chloride
PWHT	postweld heat treatment
PWR	pressurized-water reactor
QA	quality assurance
QAP	quality action plan
QCNPS	Quad Cities Nuclear Power Station
RAI	request for additional information
RAT	reserve auxiliary transformer
RBCCW	reactor building closed cooling water
RBH-HVAC	reactor building heating, ventilation, and air conditioning
RCCA	rod cluster control assembly
RCIC	reactor core isolation cooling
RCP	reactor coolant pump
RCPB	reactor coolant pressure boundary
RCS	reactor coolant system
RCU	refrigeration condensing unit
RFP	reactor feed pump
RG	regulatory guide
RHR	residual heat removal
RHRSW	residual heat removal service water
RIS	Regulatory Issue Summary

RMS	radiation monitoring system
RPS	reactor protection system
RPV	reactor pressure vessel
RT	radiographic test
RTD	resistance temperature detector
RT _{PTS}	reference temperature for pressurized thermal shock
RT _{NDT}	reference nil ductility transition temperature
RTV	room temperature vulcanizing
RV	reactor vessel
RVI	reactor vessel internals
RVID	Reactor Vessel Integrity Database
RVWLIS	reactor vessel water level instrumentation system
RWCU	reactor water cleanup
RWM	rod worth minimizer
RWST	refueling water storage tank
Sa	stress intensity
SAFW	standby auxiliary feedwater
SBGT	standby gas treatment
SBLC	standby liquid control
SBO	station blackout
SC	structures and components
SC-1	safety class 1
SC-2	safety class 2
SC-3	safety class 3
SCC	stress-corrosion cracking
SDCS	shutdown cooling system
SE	safety evaluation
SER	safety evaluation report
SFP	spent fuel pool
SFC&FS	spent fuel cooling and fuel storage
SFR	system function report
SG	steam generator
SI	safety injection
SIT	structural integrity test
SJAERM	steam jet air ejector radiation monitor
SLC	standby liquid control
SOC	Statements of Consideration
SOER	significant operating event report
SPCS	steam and power conversion systems
SPING	system-level particulate, iodine, and noble gas monitors
SRM	source range monitor
SRP	Standard Review Plan
SRP-LR	standard review plan—license renewal
SRV	safety relief valve
SS	safety significant or stainless steel

SSC	structure, system, and component
SSEL	safe-shutdown equipment list
SSMP	safe shutdown makeup pump system
SV	safety valve
SW	service water
T	thickness, also temperature
TASCS	thermal stratification, cycling, and stripping
TBCCW	turbine building closed cooling water
TCV	turbine control valve
TDAFW	turbine-driven auxiliary feedwater
TID	total integrated dose
TIP	transverse incore probe
TLAA	time-limited aging analysis
TR	topical report
TRM	technical requirements manual
TSC	technical support center
TS	technical specification
TT	thermal transients
UFSAR	updated final safety analysis report
USAS	United States of America Standard
USE	upper-shelf energy
UT	ultrasonic testing
UV	ultraviolet
V	volt
VAC	volts alternating current
VT	visual test
wt. %	percent by weight

1. INTRODUCTION AND GENERAL DISCUSSION

1.1 Introduction

This document is a safety evaluation report (SER) on the application to renew the operating licenses for the Dresden Nuclear Power Station (DNPS), Units 2 and 3, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, as filed by Exelon Generation Company (EGC or the applicant). By letter dated January 3, 2003, EGC submitted its application to the U.S. Nuclear Regulatory Commission (NRC or the Commission) for renewal of the DNPS and QCNPS operating licenses for up to an additional 20 years. The NRC received the application on January 3, 2003. The NRC staff (the staff) reviewed the DNPS/QCNPS license renewal application (LRA) for compliance with the requirements of Title 10, Part 54, of the *Code of Federal Regulations* (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," and prepared this report to document the results of its safety review. The NRC license renewal project managers for the DNPS and QCNPS safety review are Mr. Rajender Auluck and Mr. T. J. Kim. Mr. Auluck may be contacted by telephone at (301) 415-1025 or by electronic mail at RCA@nrc.gov. Alternatively, written correspondence can be sent to the following address:

License Renewal and Environmental Impacts Program
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: R. Auluck, Mail Stop O-11F1

In its January 3, 2003, submittal letter, the applicant requested renewal of the operating licenses issued under Section 104b of the Atomic Energy Act of 1954, as amended, for DNPS Unit 2 (License No. DPR-19), DNPS Unit 3 (License No. DPR-25), QCNPS Unit 1 (License No. DPR-29), and QCNPS Unit 2 (License No. DPR-30) for a period of 20 years beyond the current license expirations of midnight, December 22, 2009, January 12, 2011, December 14, 2012, and December 14, 2012, respectively. The DNPS is located in Grundy County, Illinois, on the shore of a man-made cooling lake, with the Illinois River to the north and the Kankakee River to the east. The QCNPS is located in Rock Island County, Illinois, on the east bank of the Mississippi River opposite the mouth of the Wapsipinicon River, and about 3 miles north of Cordova, Illinois. Units 2 and 3 of the DNPS and Units 1 and 2 of the QCNPS each consist of a General Electric boiling-water reactor (BWR/3) authorized to individually operate at a steady-state reactor power level not to exceed 2957 megawatts-thermal, or approximately 850 megawatts-electric. Details concerning the plant and the site are found in the updated final safety analysis report (UFSAR) for DNPS/QCNPS.

The license renewal process proceeds along two tracks, which include both a technical review of safety issues and an environmental review. The requirements for these two reviews are specified in NRC regulations 10 CFR Parts 54 and 51, respectively. The safety review for the DNPS and QCNPS license renewals is based on the applicant's LRA, docketed correspondence, and the answers to requests for additional information (RAIs) from the NRC staff. In meetings and docketed correspondence, the applicant has also supplemented its answers to the RAIs. Unless otherwise noted, the staff reviewed and considered information submitted through June 22, 2004. The public can review the LRA and all pertinent information and material, including the UFSAR, at the NRC Public Document Room, 11555 Rockville Pike, Rockville, Maryland 20852-2738. In addition, the DNPS/QCNPS LRA and significant

information and material related to the license renewal review are available on the NRC's web page at <http://www.nrc.gov>

This SER summarizes the findings of the staff's safety review of the DNPS/QCNPS LRA and delineates the scope of the technical details considered in evaluating the safety aspects of the proposed operation of the plants for up to an additional 20 years beyond the term of the current operating licenses. The staff reviewed the LRA in accordance with NRC regulations and the guidance presented in NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), which the NRC issued in July 2001.

Sections 2 through 4 of the SER document the staff's review and evaluation of license renewal issues that it considered during the review of the LRA. Section 5 is reserved for the report of the Advisory Committee on Reactor Safeguards (ACRS). The conclusions of this report are in Section 6 of the SER.

Appendix A is a list of commitments made by EGC. Appendix B is a chronology of the principal correspondence between the NRC and the applicant related to the review of the LRA. Appendix C is a list of the principal NRC staff reviewers and its contractors for this project. Appendix D is a list of the major references used in support of this SER.

In accordance with 10 CFR Part 51, the staff prepared plant-specific supplements to the generic environmental impact statement (GEIS). These supplements discuss the environmental considerations related to renewing the licenses for DNPS and QCNPS. The plant-specific supplements to the GEIS were issued separately. The NRC staff issued Supplement 17 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding the Dresden Nuclear Power Station, Units 2 and 3," on June 29, 2004, and Supplement 16 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding the Quad Cities Nuclear Power Station, Units 1 and 2," on June 30, 2004.

1.2 License Renewal Background

Pursuant to the Atomic Energy Act of 1954, as amended, and NRC regulations, operating licenses for commercial power reactors are issued for up to 40 years. These licenses can be renewed for up to 20 additional years. The original 40-year license term was selected on the basis of economic and antitrust considerations, rather than on technical limitations. However, some individual plant and equipment designs may have been engineered on the basis of an expected 40-year service life.

In 1982, the NRC anticipated interest in license renewal and held a workshop on nuclear power plant aging. The NRC team then established a comprehensive program plan for nuclear plant aging research (NPAR). On the basis of the results of that research, a technical review group concluded that many aging phenomena are readily manageable and do not pose technical issues that would preclude extending the life of nuclear power plants. In 1986, the NRC published a request for comment on a policy statement that would address major policy, technical, and procedural issues related to license renewal for nuclear power plants.

In 1991, the NRC published the license renewal rule in 10 CFR Part 54 (the Rule). The NRC participated in an industry-sponsored demonstration program to apply the Rule to a pilot plant

and develop experience to create implementation guidance. To establish a scope of review for license renewal, the Rule defined age-related degradation unique to license renewal. However, during the demonstration program, the NRC found that many aging mechanisms occur and are managed during the period of the initial license. In addition, the NRC found that the scope of the review did not allow sufficient credit for existing aging management programs (AMPs), particularly for the implementation of the Maintenance Rule (10 CFR 50.65), which also manages plant aging phenomena.

As a result, in 1995, the NRC amended 10 CFR Part 54. The amended license renewal rule establishes a regulatory process that is simpler, more stable, and more predictable than the previous license renewal rule. In particular, 10 CFR Part 54 was amended to focus on managing the adverse effects of aging rather than on identifying age-related degradation unique to license renewal. The Rule changes were intended to ensure that important systems, structures, and components (SSCs) within the scope of the Rule will continue to perform their intended functions during the period of extended operation. In addition, the integrated plant assessment (IPA) process was clarified and simplified to be consistent with the revised focus on passive, long-lived structures and components (SCs).

In parallel with these efforts, the NRC pursued a separate rulemaking effort to amend 10 CFR Part 51 to focus the scope of the review of environmental impacts of license renewal and to fulfill, in part, the NRC's responsibilities under the National Environmental Policy Act of 1969 (NEPA).

1.2.1 Safety Reviews

License renewal requirements for power reactors are based on two principles:

- (1) The regulatory process is adequate to ensure that the licensing bases of all currently operating plants provide and maintain an acceptable level of safety, with the possible exception of the detrimental effects of aging on the functionality of certain SSCs during the period of extended operation, as well as a few other safety-related issues.
- (2) The plant-specific licensing basis must be maintained during the renewal term in the same manner and to the same extent as during the original licensing term.

In implementing these two principles, 10 CFR 54.4 defines the scope of license renewal as including those plant SSCs (1) that are safety-related, (2) whose failure could affect safety-related functions, and (3) that are relied on to demonstrate compliance with the NRC's regulations for fire protection, environmental qualification (EQ), pressurized thermal shock (PTS), anticipated transients without scram (ATWS), and station blackout (SBO).

Pursuant to 10 CFR 54.21(a), the applicant for a license renewal must review all SSCs that are within the scope of the Rule to identify SCs that are subject to an aging management review (AMR). The SCs that are subject to an AMR are those that perform an intended function without moving parts, or without a change in configuration or properties, and that are not subject to replacement based on a qualified life or specified time period. As required by 10 CFR 54.21(a)(3), an applicant for a license renewal must demonstrate that the effects of aging will be managed in such a way that the intended function or functions of the SCs that are within the scope of license renewal will be maintained, consistent with the current licensing

basis (CLB), for the period of extended operation. Active equipment, however, is considered to be adequately monitored and maintained by existing programs. In other words, the detrimental effects of aging that may affect active equipment are more readily detectable and will be identified and corrected through routine surveillance, performance monitoring, and maintenance activities. The surveillance and maintenance programs for active equipment, as well as other aspects of maintaining the plant design and licensing basis, are required to continue throughout the period of extended operation.

Pursuant to 10 CFR 54.21(d), the LRA is required to include a supplement to the updated final safety analysis report (UFSAR). This UFSAR Supplement must contain a summary description of the applicant's programs and activities for managing the effects of aging.

Another requirement for license renewal is the identification and updating of time-limited aging analyses (TLAAs). During the design phase for a plant, certain assumptions are made about the initial length of time the plant will be operated, and these assumptions are incorporated into design calculations for several of the plant's SSCs. In accordance with 10 CFR 54.21(c)(1), these calculations must be shown to be valid for the period of extended operation or must be projected to the end of the period of extended operation, or the applicant must demonstrate that the effects of aging on these SSCs will be adequately managed for the period of extended operation.

In July 2001, the NRC issued Regulatory Guide (RG) 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"; NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR); and NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." These documents describe methods acceptable to the NRC staff for implementing the license renewal rule and techniques used by the NRC staff in evaluating applications for license renewal. The RG endorses an implementation guideline prepared by the Nuclear Energy Institute (NEI) as an acceptable method of implementing the license renewal rule. The NEI guideline, NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54—The License Renewal Rule," Revision 3, was issued in March 2001.

Exelon Generation Company is the fifth license renewal applicant to fully utilize the process defined in NUREG-1801, otherwise known as the GALL Report. The purpose of the GALL Report is to provide the staff with a summary of staff-approved AMPs for the aging of most SCs that are subject to an AMR. If an applicant commits to implementing these staff-approved AMPs, the time, effort, and resources used to review an applicant's LRA will be greatly reduced, thereby improving the efficiency and effectiveness of the license renewal review process. The GALL Report summarizes the aging management evaluations, programs, and activities credited for managing aging for most of the SCs used throughout the industry. The report also serves as a reference for both applicants and staff reviewers to quickly identify those AMPs and activities that the staff has determined will provide adequate aging management during the period of extended operation.

1.2.2 Environmental Reviews

In December 1996, the staff revised the environmental protection regulations in 10 CFR Part 51 to facilitate environmental reviews for license renewal. The staff prepared the "Generic

Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants” (NUREG-1437, Revision 1) to document its evaluation of the possible environmental impacts associated with renewing licenses of nuclear power plants. For certain types of environmental impacts, the GEIS establishes generic findings that are applicable to all nuclear power plants. These generic findings are identified as Category 1 issues in Subpart A of Appendix B to 10 CFR Part 51. Pursuant to 10 CFR 51.53(c)(3)(i), an applicant for license renewal may incorporate these generic findings in its environmental report. Analyses of the environmental impacts of license renewal that must be evaluated on a plant-specific basis (i.e., Category 2 issues) must be included in an environmental report in accordance with 10 CFR 51.53(c)(3)(ii).

In accordance with NEPA and the requirements of 10 CFR Part 51, the NRC performed a plant-specific review of the environmental impacts of license renewal, including whether new and significant information was not considered in the GEIS. Two public meetings were held, one near QCNPS on December 16, 2003, and one near DNPS on January 14, 2004, as part of the NRC's scoping process to identify environmental issues specific to each plant. The results of the environmental reviews and recommendations on the license renewal actions are documented in the NRC plant-specific Supplements 16 and 17 to the GEIS, which were issued on June 30, 2004 and June 29, 2004, for QCNPS and DNPS, respectively.

1.3 Principal Review Matters

The requirements for renewing operating licenses for nuclear power plants are described in 10 CFR Part 54. The staff performed its technical review of the DNPS/QCNPS LRA in accordance with Commission guidance and the requirements of 10 CFR Part 54. The standards for renewing a license are contained in 10 CFR 54.29. This SER describes the results of the staff's safety review.

In 10 CFR 54.19(a), the Commission requires a license renewal applicant to submit general information. The applicant provided this general information in Chapter 1 of its LRA for DNPS/QCNPS, submitted by letter dated January 3, 2003. The staff finds that the applicant has submitted the information required by 10 CFR 54.19(a) in Section 1 of the LRA.

In 10 CFR 54.19(b), the Commission requires that license renewal applications (LRAs) include “conforming changes to the standard indemnity agreement, 10 CFR 140.92, Appendix B, to account for the expiration term of the proposed renewed license.” The applicant stated the following in Section 1.1.10 of its LRA regarding this issue:

The current indemnity agreement for Dresden and Quad Cities state in Article VII that the agreement shall terminate at the time of expiration of the licenses specified in Item 3 of the Attachment to the agreement. Item 3 of the Attachment to the indemnity agreement, lists license numbers, DPR-19, DPR-25, DPR-29, and DPR-30. Applicant requests that any necessary conforming changes be made to Article VII and Item 3 of the Attachment, and any other sections of the indemnity agreement as appropriate to ensure that the indemnity agreement continues to apply during both the terms of the current licenses and the terms of the renewed licenses. Applicant understands that no changes may be necessary for this purpose if the current license numbers for each of the units are retained.

The staff intends to maintain the original license number upon issuance of the renewed license. Therefore, there is no need to make conforming changes to the indemnity agreement, and the requirements of 10 CFR 54.19(b) have been met.

In 10 CFR 54.21, the Commission requires that each LRA for a nuclear facility contain (a) an IPA, (b) CLB changes during staff review of the LRA, (c) an evaluation of TLAAs, and (d) a UFSAR Supplement. Sections 3 and 4 and Sections A and B of the LRA address the license renewal requirements of 10 CFR 54.21(a), (c), and (d), respectively.

In 10 CFR 54.21(b), the Commission requires that each year following submission of the application, and at least 3 months before scheduled completion of the staff's review, an amendment to the renewal application must be submitted that identifies any changes to the CLB of the facility that materially affect the contents of the LRA, including the UFSAR Supplement. The applicant's update to the LRA was issued on March 5, 2004.

In 10 CFR 54.22, the Commission outlines requirements regarding technical specifications. In Appendix D of the LRA, the applicant stated that no technical specification changes had been identified as being necessary to support issuance of the renewed operating licenses for DNPS/QCNPS. This adequately addresses the requirements of 10 CFR 54.22.

The staff evaluated the technical information required by 10 CFR 54.21 and 10 CFR 54.22 in accordance with the NRC's regulations and the guidance provided by the SRP-LR. The staff's evaluation of the LRA in accordance with 10 CFR 54.21 and 10 CFR 54.22 is contained in Sections 2, 3, and 4 of this SER.

The staff's evaluation of the environmental information required by 10 CFR 54.23 is contained in the final plant-specific supplement to the GEIS, which states the considerations related to renewing the licenses for DNPS/QCNPS. This was prepared by the staff separate from this report. The report of the ACRS, required by 10 CFR 54.25, is incorporated into Section 5 of this SER. The findings required by 10 CFR 54.29 can be found in Section 6 of this SER.

1.4 Interim Staff Guidance

The license renewal program is a living program. The staff, industry, and other interested stakeholders gain experience and develop lessons learned with each renewed license. The lessons learned address the Commission's performance goals of maintaining safety, improving effectiveness and efficiency, reducing regulatory burden, and increasing public confidence. The lessons learned are captured in interim staff guidance (ISG) for use by the staff and interested stakeholders until the improved license renewal guidance documents are revised.

The current set of relevant ISGs and the SER sections in which the issues are addressed by the staff are provided in the following table.

Interim Staff Guidance for License Renewal		
ISG Issue (Approved ISG No.)	Purpose	SER Section
Station Blackout (SBO) Scoping (ISG-02)	<p>The license renewal rule 10 CFR 54.4(a)(3) includes 10 CFR 50.63(a)(1)—SBO.</p> <p>The SBO rule requires that a plant must withstand and recover from an SBO event. The recovery time for offsite power is much faster than that of emergency diesel generators (EDG)s.</p> <p>The offsite power system should be included within the scope of license renewal.</p>	<p>2.5.1.5.2 3.5.2.4.2</p>
Concrete Aging Management Program (ISG-03)	<p>Lessons learned from the GALL demonstration project indicated that GALL is not clear whether concrete need an AMP.</p>	<p>3.5.2.2.1 3.5.2.2.2 3.5.2.4.1 3.5.2.4.2</p>
Fire Protection (FP) System Piping (ISG-04)	<p>This ISG clarifies the staff position on wall thinning of FP piping system in GALL AMPs XI.M26 and XI.M27.</p> <p>The new position is that there is no need to disassemble FP piping, as oxygen can be introduced in the FP piping which can accelerate corrosion. Instead, non-intrusive methods such as volumetric inspection should be used.</p> <p>Testing of sprinkler heads should be performed every 50 years and 10 years after initial service.</p> <p>This ISG eliminated Halon/carbon dioxide system inspections for charging pressure, valve line ups, and automatic mode of operation test from GALL. The staff considers these test verifications to be operational activities.</p>	<p>3.3.2.3.2 3.3.2.3.3 3.3.2.4.6</p>
Identification and Treatment of Electrical Fuse Holder (ISG-05)	<p>This ISG includes fuse holder AMR and AMP (i.e., same as terminal blocks and other electrical connections).</p> <p>The position includes only fuse holders that are not inside the enclosure of active components (e.g., inside of switchgears and inverters).</p> <p>Operating experience finds that metallic clamps (spring-loaded clips) have a history of age-related failures from aging stressors such as vibration, thermal cycling, mechanical stress, corrosion, and chemical contamination.</p> <p>The staff finds that visual inspection of fuse clips is not sufficient to detect the aging effects from fatigue, mechanical stress, and vibration.</p>	<p>3.6.2.4.1</p>

1.5 Summary of Open Items

As a result of its review of the LRA for QCNPS and DNPS, including additional information submitted to the NRC through June 22, 2004, the staff identified the following open items. An issue was considered open if the applicant had not presented a sufficient basis for resolution. Each open item (OI) has been assigned a unique identifying number. The items identified in this section have been properly closed by the technical staff.

OI-2.1-1: (Section 2.1.3.1.2 - Application of the Scoping Criteria in 10 CFR 54.4(a)(2))

The staff determined that the applicant did not provide a sufficient basis for limiting consideration of fluid spray interactions to only those non-safety-related SSCs located within 20 feet of an active safety-related SSC. In particular, the staff required additional clarification regarding the capability of active and passive safety-related SSCs located greater than 20 feet from a potential spray source to tolerate wetting, the specific operating experience that was relied upon to determine that it was not credible for fluid sprays to affect equipment greater than 20 feet from a failure location, specific methods to detect leakage in normally accessible and inaccessible areas, and justification for use of exposure duration in limiting the scope of potential failure mechanisms considered during scoping. This issue was identified as Open Item 2.1-1.

The applicant responded to Open Item 2.1-1 by letters dated April 9, 2004 and May 18, 2004 (ADAMS Accession Nos. ML041070456, and ML041480178). In addressing this open item, the applicant revised the scoping methodology for nonsafety-related moderate energy piping systems that have the potential to spatially interact with safety-related systems. Specifically, the applicant eliminated the 20 foot separation criterion and credit for the early detection of leakage that was previously used to exclude certain moderate energy nonsafety-related piping and components from the scope of License Renewal. The revised methodology assumes that all safety-related components, active as well as passive, could be adversely affected by spray or wetting from a non-safety moderate energy system located in the same general area of the plant. Therefore, the applicant stated that all components from moderate energy nonsafety-related systems located in the same general area as a safety-related component (active or passive) would be included within the scope of license renewal. The applicant defined "General area" as the same floor (elevation) of a major building with no barrier walls between the fluid source and the safety-related component. Barrier walls were defined as barriers that form the boundary of a room on the same elevation of a major building separating the safety-related components from a spray or leak generated by a non-safety-related component located on the other side of the barrier wall. The applicant stated that all barrier walls credited for protection of safety-related components were previously included within the scope of license renewal during structural scoping and subject to aging management review.

In accordance with the revised methodology, the applicant expanded the license renewal boundaries of seventeen systems previously determined to be within the scope of license renewal and identified an additional intended function for the main condenser at Quad Cities. Additionally, the applicant added the following five nonsafety-related systems to the scope of license renewal that were previously excluded from the scope of license renewal: circulating water (Dresden and Quad Cities), laundry (Dresden), zinc addition (Dresden and Quad Cities), extraction steam (Quad Cities), and feedwater heater vents and drains (Quad Cities). In its May

18, 2004 response to Open Item 2.1-1, the applicant identified LRA revisions, scoping results changes, and aging management program changes required as a result of the scoping methodology revision. The staff review of these revised scoping results and associated aging management programs are described in Sections 2.3 and 3.0.5 of this report.

On the basis of the above, the staff concludes that the applicant adequately resolved the issues identified in Open Item 2.1-1. Specifically, the elimination of the twenty foot limitation on spray interactions, consideration of potential adverse effects for both active and passive safety-related equipment, and elimination of credit for early detection of leakage adequately addressed the staff's methodology concerns. Furthermore, the staff determined that the applicant's revised methodology considered a reasonable spectrum of potential nonsafety-related spatial interactions with safety-related equipment. Therefore, the staff concludes that the revised methodology for scoping nonsafety-related equipment provides reasonable assurance that the applicant considered nonsafety-related SSCs whose failure could prevent satisfactory accomplishment of a safety-related intended function within the scope of license renewal. On this basis, Open Item 2.1-1 is resolved.

OI-3.5.2.3.2-1: (Section 3.5.2.3.2- ASME Section XI, Subsection IWF (B.1.27))

Some of the Class MC supports discussed by the applicant in the RAI responses regarding Class MC supports seemed to be inaccessible. Therefore, the staff needed to better understand how the applicant is treating these supports. This was identified as Open Item 3.5.2.3.2-1.

To resolve the concerns, the staff requested the applicant to provide the following information:

- (a) Identify each type of Class MC support by name and confirm whether the support will be inspected under IWF during the period of extended operation. Provide a technical explanation for those supports that are proposed to be inspected under another program (such as IWE or Structures Monitoring) or for cases where no inspection is planned.
- (b) Since Class MC supports are not currently being inspected, provide a commitment to perform a baseline inspection of typical samples of each type of Class MC component support prior to the period of extended operation, to identify and correct any problems affecting performance of intended functions.
- (c) Describe how the performance of Class MC component supports in inaccessible areas are currently being managed and how they will be managed during the period of extended operation. Clarify the commitment to the provisions of 10 CFR 50.55(a) covering inaccessible areas.
- (d) Review the response to RAI 2.4-2 and identify the aging management program applicable to each item (a) through (k). Also verify the consistency of this RAI response with the response to RAI 2.4-10.

The applicant submitted the responses by letter dated April 9, 2004. After reviewing the applicant's responses, the staff accepts the applicant's proposed use of its Structures Monitoring Program as an alternate AMP to the GALL's ASME IWF program for its Class MC piping supports, with the following modifications.

Modification #1 states that the sample size of the Class MC piping supports should be 15% of the support population, as stipulated in Table IWF-2500-1, because the ten sample supports proposed by the applicant were insufficient.

Modification #2 states that the person who performs the inspection should have demonstrated knowledge of inspection attributes on Class MC piping supports and should be under oversight guidance from the administrator or his designee during the initial inspection activity.

Modification #3 states that a baseline inspection should be performed on the sample supports prior to the period of extended operation.

The applicant submitted its revised responses in a letter dated June 22, 2004. The responses satisfactorily resolve the sample size and inspector's qualification issues. However, the staff was not sure whether the applicant intended to only revise its Structures Monitoring Program prior to the period of extended operation or actually have the MC supports and MC piping sample supports inspected prior to the period of extended operation. In a telephone conference on July 13, 2004, the applicant clarified that a baseline inspection would be performed for these supports prior to the period of extended operation. This is part of Commitment #30 in Appendix A of this SER. The staff considers the Open Item 3.5.2.3.2-1 resolved.

OI-4.2.1(c): (Section 4.2.2.1 - Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement)

In RAI 4.2.1(c), the staff requested the applicant to provide all fluence data for all welds and plates in the beltline and specify which one is bounding with respect to the RPV USE evaluation. In response to RAI 4.2.1(c), in a letter dated October 3, 2003, the applicant provided 54-EFPY surface fluences and 54 EFPY 1/4T fluences for all the beltline material but identified materials that are bounding with respect to the RPV material ART values at 54-EFPY. The applicant also needed to identify the USE for all beltline materials at 54-EFPYs and to identify the limiting materials for each unit. This was identified as Open Item 4.2.1(c).

The applicant's April 9, 2004, letter indicated that all beltline materials, except for the electrosag welds (ESWs) in Quad Cities Unit 2, will have predicted Charpy USE greater than 35 ft-lb, the minimum allowable USE based on the generic BWR equivalent margins analysis documented in BWROG topical report entitled, "10 CFR Part 50 Appendix G Equivalent Margin Analysis for Low Upper Shelf Energy in BWR/2 Through BWR-6 Vessels." Therefore, all beltline materials, except for the ESW in Quad Cities Unit 2, meet the margins of safety against fracture equivalent to those required by Appendix G of Section XI of the ASME Code.

The applicant reevaluated the USE value for Quad Cities Unit 2 ESW using all electrosag weld material surveillance test results from Quad Cities Unit 2, and performed a plant-specific EMA for the Quad Cities Unit 2 ESW. General Electric report GE-NE-0000-0027-0575-01, Revision 0, "The Upper Shelf Energy Evaluation for RPV Electrosag Welds at Quad Cities Unit 2," issued March 5, 2004, included in the applicant's April 9, 2004 letter, contains this analysis. Using the limiting surveillance capsule 18 data and the methodology in RG 1.99, Revision 2, the predicted Charpy USE for the ESW welds is 34.2 ft-lb, which is below the minimum established in the generic BWROG topical report. The applicant's plant-specific EMA was performed using methods and criteria contained in RG 1.161, "Evaluation of Reactor Pressure Vessels with Charpy Upper-Shelf Energy less than 50 Ft-Lb." and Appendix K of ASME Code, Section XI.

Appendix K and RG 1.161 provide acceptance criteria and evaluation procedures for determining acceptability for operation of a reactor vessel when the vessel metal temperature is in the upper shelf range. The methodology is based on the principles of elastic-plastic fracture mechanics. Flaws will be postulated in the reactor vessel at locations of predicted low upper shelf Charpy impact energy, and the applied J-integral for these flaws will be calculated and compared with the J-integral fracture resistance of the material to determine acceptability. The applicant's analysis showed that the applied J-integral of the postulated flaws and the J-integral material fracture resistance with a minimum USE of 32.4 ft-lb satisfies the criteria of Appendix K of the ASME Code, Section XI and RG 1.161.

The analysis methods in Appendix K of the ASME Code initially followed the methodology in RG 1.161. The analysis methods in Appendix K of the ASME Code, Section XI were changed in the 1995 Addenda to the 1995 Edition. The analysis method in the 1995 Addenda to the 1995 Edition of the ASME Code changed the method of calculating the contribution to the applied J-integral because of a radial thermal gradient. This change was incorporated into the ASME Code to more accurately represent the contribution to the applied J-integral due to a radial thermal gradient. The applicant's analysis was performed using the earlier analysis method, i.e., the methods contained in RG 1.161. The staff confirmed the EMA using the analysis methods in both Appendix K to the ASME Code, Section XI, 1995 Addenda to the 1995 Edition, and the earlier analysis method in RG 1.161. This analysis included the effects of the extended power uprate condition. Since the limiting end of extended life USE for Quad Cities Unit 2 ESW exceeds the minimum value of 32.4 ft-lb demonstrated in the applicant's plant-specific EMA, the staff concludes that all beltline materials, including the ESW in Quad Cities Unit 2 RPV meet the margins of safety against fracture equivalent to those required by Appendix G of Section XI of the ASME Code. Therefore Open Item 4.2.1(c) is closed.

OI-B.1.23-2: (Section 3.0.3.10.2 - One Time Inspection (B.1.23) - Plant Heating System components) and (Section 3.4.2.4.1 Main Steam System-One Time Inspection (B.1.23) - Plant Heating System components)

By RAIs B.1.23-1, B.1.23-2, B.1.23, and B.1.23-2.1 through B.1.23-2.6, the applicant was requested to justify use of the One-Time Inspection program to manage aging effects for various carbon steel, alloy steel, stainless steel, cast iron, and neoprene components in environments such as moist air, steam, water (condensate), and containment atmosphere. By letters dated October 3, 2003, January 26, 2004, and March 25, 2004, the applicant responded to the staff's RAIs as follows:

1) By RAIs B.1.23-1, B.1.23-2(a), B.1.23-2.3 and B.1.23-2.4, the staff questioned use of the One-Time Inspection program to manage loss of material and cracking for carbon steel, stainless steel, cast iron, brass or bronze, and iron components in lube oil and fuel oil environments. This was identified as Confirmatory Item B.1.23-1. By letters dated October 3, 2003, January 26, 2004 and April 9, 2004, the applicant stated that aging management program, B.2.5, "Lubricating Oil Monitoring Activities," will be expanded to manage loss of material and cracking for oil coolers and other components in lube oil, turbine electro-hydraulic control (EHC) fluid, and generator hydrogen seal oil environments for the emergency diesel generator system, station blackout diesel generator system, high pressure coolant injection system, electro-hydraulic control system, reactor core isolation cooling system (Quad Cities), and generator hydrogen seal oil system (Quad Cities). Aging management program, B.1.23, "Fuel Oil Chemistry," will be expanded to manage loss of material for components in a fuel oil

environment for the station blackout diesel generator system. The One-Time Inspection program will not be credited to manage the aging effects for these components since periodic inspections will be implemented. The staff considers the Lubricating Oil Monitoring Activities and Fuel Oil Chemistry aging management programs appropriate to manage these aging effects; therefore, staff finds this acceptable.

2) Table 3.3.2 of the LRA identifies components in the Plant Heating System which credit the One-Time Inspection program to manage aging effects for components in a saturated steam or condensate environment. By RAIs B.1.23-1 and B.1.23-2(a) & (b), staff requested the applicant to justify use of one-time inspections to manage the aging effects for these components. By letters dated January 26, 2004 and March 25, 2004, the applicant stated that Plant Heating System components in a saturated steam or condensate environment would be managed by aging management program, B.2.8, "Periodic Inspection of Plant Heating System." The program includes periodic inspections to manage cracking, loss of material, or leakage of selected brass/bronze, carbon steel, cast iron, and stainless steel components. The staff considers the Periodic Inspection of the Plant Heating System program appropriate to manage these aging effects; therefore, staff finds this acceptable.

3) For the main steam system flexible hoses in a containment nitrogen environment, Reference Number 3.4.2.18 of the LRA does not identify any aging effects for these neoprene hoses. By RAIs 3.4.1-3 and B.1.23-2.1, staff requested the applicant to justify with respect to temperature, radiation levels, and time, why neoprene hoses do not require aging management. In responses dated October 3, 2003 and January 26, 2004, further review by the applicant indicated that hoses in Reference Number 3.4.2.18 and 3.4.2.19 of the LRA are not comprised of an elastomer material as earlier reported but are made of stainless steel with an overall stainless steel outer braided jacket. Based on the hose material being stainless steel, the applicant will use the One-Time Inspection program to verify that the hoses are constructed of metal rather than an elastomer material. Any hoses found to be constructed of an elastomer during the one-time inspection will be replaced with metal flexible hoses. The One-Time Inspection program will perform inspections of the installed metal hoses for mechanical damage. This applies to Quad Cities only. The applicant has noted that stainless steel hoses are installed at Dresden. The staff considers use of the One-Time Inspection program acceptable to verify that stainless steel hoses are installed and to inspect the stainless steel hoses for damage.

4) For non-safety-related (NSR) vents or drains, piping, and valves in various systems, the LRA identifies loss of material due to corrosion for carbon steel, stainless steel, brass, or bronze in an environment of air, moisture, humidity, and leaking fluid. By RAI 3.3-2, the staff requested the applicant to describe the types of corrosion expected and to provide criteria for selecting one-time sample locations for these types of corrosion. The applicant stated in its letter dated October 3, 2003 that general, crevice, and pitting corrosion are expected in these components. The applicant compiled a list of the in-scope NSR vents and drains for the various systems throughout the plants. The One-Time Inspection program will inspect a selected number of NSR vent and drains for the affected systems. The sample population will be representative of all material and environment combinations but may not include components for every system. The criteria used for selection of susceptible inspection locations are as follows: 1) Corrosiveness of fluid passing through the vent, drain, or piping when in service. Those components servicing more corrosive fluids are given preference. 2) Duration of service when performing venting and draining operations. Those components with higher durations of service

are given preference. 3) Frequency of performance of venting and draining operations through the selected components. Those components with higher performance frequencies are given preference. 4) Period that component has been in service. Those components that have been in service longest are given preference. By RAIs B.1.23-2(b) and B.1.23-2.2, staff requested further justification that a one-time inspection is adequate to manage the aging effects for these vent, drains, and valves. By letters dated October 3, 2003 and January 26, 2004, the applicant stated that the NSR vents, drains, valves, and piping are normally outboard of closed safety relief valves or closed isolation valves and are not likely to contain moisture. Any appreciable leakage or condensation inside these vents and drains would be identified in the course of periodic operations or through the daily monitoring of unidentified inputs to radwaste by the operating department. Malfunctioning isolation valves or other degraded conditions are promptly repaired, replaced, or corrected. For the reasons stated above, the applicant considers the rate of material loss due to corrosion to be slow; therefore, one-time inspections will confirm the assumption that loss of material due to corrosion is occurring at a sufficiently slow rate for the subject components. In the event that the results of the one-time inspections fail to provide this confirmation, evaluations will be performed in accordance with the site corrective action process to identify actions, including possible periodic inspections of the vents and drains. Based on the applicant's response, staff concurs that the loss of material due to corrosion for the subject vents, drains, piping, and valves are considered to occur at a sufficiently slow rate such that a one-time inspection is adequate to manage this aging effect; therefore, staff finds this acceptable.

(5) By RAIs B.1.23-2 and B.1.23-2.6, the staff requested the applicant to provide justification for using one-time inspections to manage carbon steel, cast iron, alloy steel, elastomer, and neoprene components in a moist air environment that 1) varies with normal plant conditions, 2) is impractical to monitor or control routinely, and 3) is similar to the environments associated with the Aging Management References listed in part b of RAI B.1.23-2. This was identified as Open Item B.1.23-2. By letter dated March 25, 2004, the applicant concluded by further review that periodic inspections of components in this population would be appropriate. A new aging management program, B.2.9, "Periodic Inspection of Components Subject to Moist Air Environments," was developed for these components. Specifically, the applicant will perform periodic inspections of a representative sample of stainless steel, carbon steel, cast iron, aluminum, copper, brass, and bronze components normally exposed to environments of air and steam; moist air; saturated air; warm moist air; moist containment atmosphere; steam or demineralized water; and hot diesel engine exhaust gases containing moisture and particulates. In addition, the program inspects flexible hoses to detect age-related degradation prior to the loss of function.

The applicant considers a one-time inspection appropriate for managing aging effects for the standby gas treatment system and HVAC systems components with an internal environment of "occasional exposure to moist air" and an external environment of "ambient plant air" or "warm moist air." Components in these systems include doors, closure bolts, equipment frames, piping, fittings, valves, ducts, and filters fabricated of cast iron, carbon steel, brass, bronze, stainless steel, and copper. Based on the materials and environments for these ventilation system components, the applicant believes that either (a) an aging effect is not expected to occur but there is insufficient data to completely rule it out, or (b) an aging effect is expected to progress very slowly. Based on favorable operating history that revealed no widespread corrosion in the affected system, a limited number of components were selected as representative of the ventilation systems. The worst-case one-time inspection locations will

include the following: the air intake ductwork of the standby gas treatment system; main control room HVAC ductwork; emergency diesel generator HVAC air intake ductwork; reactor building HVAC ductwork downstream of the steam coils and chilled water cooling coils; and main control room HVAC drip pan and drainpipe. If the one-time inspection detects corrosion resulting in material loss, results of the examination will be evaluated by engineering to determine the rate of material loss and the need for additional inspections. Unacceptable results will be documented in the corrective action program.

Based on the applicant's response, staff considers the Periodic Inspection of Components Subject to Moist Air Environments acceptable to manage components in a moist air environment and the One-Time Inspection program acceptable to manage ventilation systems components where either (a) an aging effect is not expected to occur but there is insufficient data to completely rule it out, or (b) an aging effect is expected to progress very slowly. Therefore Open Item B.1.23-2 and Confirmatory Item B.1.23-1 are closed.

1.6 Summary of Confirmatory Items

As a result of its review of the LRA for QCNPS and DNPS, including additional information submitted to the NRC through June 22, 2004, the staff identified the following confirmatory items. An issue was considered confirmatory if the staff and the applicant have reached a satisfactory resolution, but the resolution has not yet been formally submitted to the staff. Each confirmatory item (CI) has been assigned a unique identifying number. The items identified in this section have been properly closed by the technical staff.

CI.2.3.4.2-3: (Section 3.1.2.4.1 - Reactor Vessel)

The staff needed the following information from the applicant so that it can evaluate the aging management of the capped CRD nozzles—(1) description of the configuration and location of the capped nozzle including the existing base material for the nozzle, piping (if piping remnants exist) and cap material, and any welds and material type (i.e., 82/182), (2) description of how these welds and caps are managed (e.g., the applicability of the BWRVIP-75 inspection requirements); and (3) discussion on whether the event at Pilgrim (leaking weld at capped nozzle, September 30, 2003) is applicable to Dresden and Quad Cities. A description of the Pilgrim event is discussed in LER 2003-006-00, dated November 24, 2003, which states that the cracking was in an 82/182 weld metal that was repaired extensively. The applicant also needed to include in the discussion the past inspection techniques applied, the results obtained, mitigative strategies followed, weld repairs carried out, and any other relevant information. This was identified as Confirmatory Item 2.3.4.2-3.

In the applicant's letters dated January 26, 2004, and April 9, 2004, the applicant responded to supplementary RAI 2.3.4.2-3. In the applicant's letters, the applicant provided information related to configuration and locations of the capped nozzles for each plant and described how they are managed. At Dresden and Quad Cities, the configuration consists of 304L and 316L SS caps and safe-ends welded to the original carbon steel nozzles. Aging management for these components includes examination in accordance with Section XI of the ASME Code for the nozzle as stated in AMP B.1.6, "CRD Return Line Nozzle," and one-time inspection in accordance with AMP B.1.23, "One-Time Inspections" for the remaining portion (safe-end, cap and welds). AMP B.1.2, "Water Chemistry" is also credited for these components.

In addition, the applicant stated that the Pilgrim event does not apply to Dresden and Quad Cities because (1) Pilgrim used an Alloy 600 cap welded directly to the nozzle whereas D/QCNPS used a SS cap and installed a SS safe-end between the cap and the nozzle, (2) Pilgrim used Alloy 82/182 welds whereas D/QCNPS used 308L and 309L SS welds, and (3) Pilgrim had initial weld defects (lack of fusion) that required repair, whereas D/QCNPS welds were completed without requiring any repair. D/QCNPS further stated that their nozzles and caps had radiographic and penetrant testing performed during installation, and had subsequent ultrasonic inspection of the nozzle-to-safe end welds and safe end-to-cap welds in response to the Pilgrim event with no reportable indications. Also, per the D/QCNPS ISI programs, penetrant testing had been performed on these welds with no recordable indications. In addition, Dresden and Quad Cities have placed their capped lines (small bore piping-less than 4 inches) in the One-Time Inspection Program, B.1.23. The staff finds the applicant's response acceptable because it uses low carbon stress corrosion resistant stainless steel safe-ends, caps, and weld material in lieu of Alloy 600, which has been known to be susceptible to stress corrosion cracking based on operating experience. In addition, the caps were welded using low carbon stainless steel weld metal (308L and 309L) with no weld repairs or recordable defects. Pilgrim used Inconel 82/182 and had initial weld defects that required weld repairs, which may have contributed to the cracking. Therefore, Dresden and Quad Cities capped return line nozzle configuration is not similar to Pilgrim and the use of AMPs B.1.2, B.1.6 and B.1.23 is acceptable for managing the aging of these components. Therefore, Confirmatory Item 2.3.4.2-3 is closed.

CI.3.0.3.14.2-1: (Section 3.0.3.14.2- Structures Monitoring Program (B.1.30))

The additional information provided by the applicant in its response to RAI B.1.30 sufficiently answers the questions posed by the staff, with two exceptions. It was not clear whether the category "Piping Component Supports including immediately adjacent piping/tubing," listed in the response to item (a) of the RAI is meant to include non-ASME piping supports. It also was not clear as to why the Structures Monitoring Program does not include "standard components such as snubbers, struts and spring cans." In order to completely resolve the response to this RAI, the staff requested that the applicant confirm the following:

- (a) the B.1.30 program covers non-ASME piping supports
- (b) there are no snubbers, struts and spring cans on non-ASME piping and components

This issue was identified as Confirmatory Item 3.0.3.14.2-1.

In its response to Confirmatory Item 3.0.3.14.2-1, dated December 5, 2003, the applicant stated:

Exelon has reviewed the supplemental Information Request and provides the following clarification and confirmation.

1)The Structure Monitoring Program, B.1.30, includes non-ASME piping supports for aging management. The selection of component supports includes a representation of supports throughout the plant, considering environmental conditions as well as configuration.

2)There are standard components such as snubbers, struts, and spring cans on non-ASME piping and components that are in-scope of the License Renewal, which are required to be managed for aging. The Structural Monitoring Program, B.1.30, will inspect the non-ASME component supports including the standard components. The in-scope non-ASME component supports are addressed in LRA Section 2.4.15, Table 2.4-15 under the Component Groups "Support Members" with a "Non-S/R Structural Support" component intended

function. Aging Management Reference 3.5.1.29 discusses the aging management of the non-ASME component supports.

The staff finds the applicant's response to Confirmatory Item 3.0.3.14.2-1 to be acceptable, because it clarified that the "Structural Monitoring Program," B.1.30, will inspect non-ASME piping and component supports, including snubbers, struts, and spring cans. This commitment is stated in the enhancements as "The program will provide for inspection of a sample of non-insulated indoor piping external surfaces at locations immediately adjacent to periodically inspected piping supports and inspection of standard components such as snubbers, struts, and spring cans." under B.1.30, Structures Monitoring Program, in the applicant's response to OI-3.5.2.3.2 1: (Section 3.5.2.3.2- ASME Section XI, Subsection IWF (B.1.27)), dated June 22, 2004. Therefore Confirmatory Item 3.0.3.14.2-1 is resolved. This is part of Commitment #30 in Appendix A of this SER.

CI.3.1.2.3.2-1: (Section 3.1.2.3.2 - BWR Vessel ID Attachment Welds Program)

In RAI 4.2-BWRVIPs, the staff requested the applicant to submit the necessary commitments, information, and changes for each of the following applicable BWRVIP reports:

- BWRVIP-05
- BWRVIP-18
- BWRVIP-25
- BWRVIP-26
- BWRVIP-27
- BWRVIP-38
- BWRVIP-41
- BWRVIP-42
- BWRVIP-47
- BWRVIP-48
- BWRVIP-49
- BWRVIP-74
- BWRVIP-75
- BWRVIP-76
- BWRVIP-78
- BWRVIP-86
- Other BWRVIP reports applicable to license renewal

In response to RAI 4.2-BWRVIPs, in a letter dated October 3, 2003, the applicant summarized the NRC's request for information in the seven elements listed below and presented its response to each of those elements.

(1) Verify that Dresden and Quad Cities are bounded by the conditions (materials configuration and inspection methodologies) specified in the applicable BWRVIP documents.

Response: The BWRVIP documents were assembled with participation from the NSSS supplier and a wide representation from the BWR Owners Group, providing a level of confidence in accuracy and bounding conditions of these documents. However, during a preliminary review when preparing this response, some material differences were noted. Exelon will perform a detailed review of the applicable BWRVIP documents and verify that Dresden and Quad Cities

are bounded by the conditions specified or identify and evaluate any exceptions noted.

(2) Provide a commitment to implement programs consistent with the applicable BWRVIP documents or identify the applicable exceptions.

Response: At the completion of the review noted in item 1 above, Exelon will provide a list of commitments to the applicable BWRVIP documents or identify specific exceptions taken.

(3) Describe how the commitments will be tracked.

Response: The commitments, once identified, will be placed in the site implementing procedures with traceability back to the license renewal commitment being made.

(4) Summarize a program description of the applicable BWRVIP documents in the LRA Appendix A, UFSAR Supplement.

Response: Several of the BWRVIP programs are identified in the LRA Appendix A, such as BWRVIP-75, A.1.7; BWRVIP-27, A.1.8; BWRVIP-48, A.1.4; BWRVIP-49, A.1.8; BWRVIP-78, A.1.22; and BWRVIP-86, A.1.22. Once the comprehensive list of commitments is identified in item 2 above, Exelon will update the LRA Appendix A to provide a summary program description to address each applicable BWRVIP document.

(5) Verify that technical specification changes needed to support implementation of the applicable BWRVIP documents have been identified and processed.

Response: There are no additional technical specification changes anticipated. However, once the detailed review summarized in item 1 above is complete, Exelon will confirm that no technical specification changes are needed or identify the needed changes to be processed prior to the start of the extended term of operation.

(6) Identify and evaluate any potential TLAAs identified by the applicable BWRVIP documents and/or commitments to perform future inspections when inspection tooling is made available.

Response: All applicable TLAAs are discussed in Section 4 of the LRA.

(7) Address items 1 through 6 above for the 16 specific BWRVIP documents listed in the RAI and identify and address other BWRVIP documents applicable to license renewal.

Response: Based on a preliminary review, there appears to be several other BWRVIP documents applicable to license renewal, such as BWRVIP-07 and BWRVIP-63 for core shroud repairs, and BWRVIP-26 for Water Chemistry. Once the detailed review is completed, Exelon will provide an amended response addressing items 1 through 6 for all BWRVIP documents applicable to license renewal.

The staff found the applicant's response incomplete. The response committed to perform a detailed review of the BWRVIP documents applicable to license renewal, prepare an amended response addressing items 1 through 7 for all of those documents applicable to license renewal, and submit it to the staff for review and approval. Therefore, this response was incomplete until

an amended response was submitted and approved by the staff. This was identified as Confirmatory Item 3.1.2.3.2-1.

In a letter dated April 9, 2004, the applicant submitted the following amended response to RAI 4.2-BWRVIPs addressing the seven items, which were listed in the initial response to RAI 4.2-BWRVIPs, for all of the BWRVIP documents applicable to license renewal.

1. Verify that Dresden and Quad Cities are bounded by the conditions (materials, configuration and inspection methodologies) specified in the applicable BWRVIP documents.

Amended Response: The site-specific procedures at D/QCNPS implemented all of the inspection methodologies contained in the applicable BWRVIP documents. Additionally, the materials and configurations at D/QCNPS are similar to those specified in the BWRVIP documents with an exception related to the steam dryer hold-down bracket attachment weld (addressed in response to Supplementary RAI B.1.4). Regarding inspection methodologies, the applicant has identified two exceptions related to BWRVIP-74: (1) use of risk-informed ISI to supplement the ISI and GL 88-01 programs for reactor pressure vessel nozzles and safe ends, and (2) use of an NRC-approved code case for the inspection of the reactor vessel leak detection line. The first exception is evaluated in SER Section 3.1.2.4.1 and the second one in SER Section 3.1.2.2.4.

2. Provide a commitment to implement programs consistent with the applicable BWRVIP documents or identify the applicable exceptions.

Amended Response: D/QCNPS provided a commitment for implementing the programs consistent with the applicable BWRVIP documents and identified several exceptions. These exceptions are associated with BWRVIP-38, BWRVIP-41, BWRVIP-74, and BWRVIP-75 and are described in SER Sections 3.1.2.3.6 and 3.1.2.4 as appropriate. In addition, the applicant has committed to implement several BWRVIP reports that are being reviewed by the NRC, and will identify any exceptions associated with these reports after the staff's reviews are completed. See amended response 7 for the several BWRVIP reports being reviewed by the NRC. This is part of Commitment #9 in Appendix A of this SER.

3. Describe how the commitments will be tracked.

Amended Response: All license renewal commitments are controlled by the Exelon commitment management process described in LS-AA-110, Commitment Management. Commitment tracking files will be generated for each individual activity credited to implement the requirements of the AMP. In addition, steps in site procedures that implement the various activities specified in the BWRVIP documents are annotated as NRC commitments and are referenced to commitment tracking files that contain sufficient documentation describing the source of the commitment.

4. Summarize a program description of the applicable BWRVIP documents in the LRA Appendix A, UFSAR Supplement.

Amended Response: The FSAR Supplement (LRA Appendix A) Programs A.1.1, A.1.2, A.1.4, A.1.8, A.1.9, and A.1.22 have been updated to reflect the applicable BWRVIP documents, and exceptions as noted in response to Item 2 above. A revised FSAR supplement incorporating

these changes was submitted to NRC in the attachment to Exelon transmittal letter dated March 5, 2004 as part of the annual update required by 10 CFR 54.21(b).

5. Verify that technical specification changes needed to support implementation of the applicable BWRVIP documents have been identified and processed.

Amended Response: The only Technical Specification change required for both sites involves revision to the site pressure temperature (P-T) curves. The existing P-T curves will be revised for 54 EFPY prior to the extended term of operation.

6. Evaluate any potential TLAA issue identified by the applicable BWRVIP documents and/or commitments to perform future inspections when inspection tooling is made available.

Amended Response: All applicable TLAA's were discussed in Section 4 of the LRA. The applicant also committed to perform future inspections, as recommended by the BWRVIP documents, when inspection tooling is made available. This commitment is discussed in SER Section 3.1.2.3.6.

7. Address Items 1 through 6 above for the 16 specific BWRVIP documents listed in the RAI and identify and address other BWRVIP documents applicable to license renewal.

Amended Response: In addition to the 16 specific BWRVIP documents listed in RAI 4.2-BWRVIPs, the applicant has identified four additional documents applicable to license renewal: BWRVIP-29, BWRVIP-79, BWRVIP-104, and BWRVIP-116. NRC has issued a safety evaluation report for the first document (BWRVIP-29) but not for the remaining three. However, the applicant has provided an amended response in their letter dated April 9, 2004, addressing items 1 through 6 for all 20 BWRVIP documents applicable to license renewal and has committed to implement these 20 BWRVIP documents as discussed in the amended response to Item 2.

The staff found the responses to RAI 4.2-BWRVIPs acceptable because they addressed all the license renewal applicant action items as identified in the applicable BWRVIP reports, which are listed in the response. In addition, the exceptions identified by the applicant are approved by the staff. The staff has reviewed the updated FSAR Supplement programs and found that they include adequate summary descriptions of the applicable BWRVIP documents. Thus the responses are consistent with the BWRVIP reports applicable to license renewal. Therefore, Confirmatory Item 3.1.2.3.2-1 is closed.

CI.3.1.2.3.6-1: (Section 3.1.2.3.6 - BWR Vessel Internals Program)

The staff issued RAI B.1.9-b requesting the applicant to confirm whether D/QCNPS follows the BWRVIP-25 guidelines for managing aging of the rim hold-down bolts and, if so, to identify and evaluate whether the projected stress relaxation in the rim hold-down bolts is a TLAA issue. In response to RAI B.1.9-b, in a letter dated October 3, 2003, the applicant stated that D/QCNPS follows the BWRVIP-25 guidelines for management of the hold-down bolts. However, the D/QCNPS core plates had wedges installed along with the repair of their shrouds with tie rods. The applicant further stated that BWRVIP-25 does not recommend inspection of rim hold-down bolts if wedges are installed. The staff reviewed BWRVIP-25 and confirmed the accuracy of the applicant's statements made in this response. The staff finds the applicant's response

acceptable because it follows the recommendations of BWRVIP-25, which is approved by the staff. However, the applicant did not identify whether stress relaxation in the rim hold-down bolts is a TLAA. This was identified as Confirmatory Item 3.1.2.3.6-1.

In response, the applicant stated that the stress relaxation of the rim hold-down bolts is not a TLAA for Dresden or Quad Cities. Dresden and Quad Cities have installed wedge retainers, which structurally replace the lateral load resistance provided by the rim hold-down bolts. As such, the failure of the bolts due to stress relaxation is no longer a concern and inspection of the bolts is not required. Therefore the stress relaxation of the rim hold-down bolts does not meet the TLAA Criterion 5 - "involve conclusions or provide the basis for conclusion related to the capability of the core plate to perform its intended function." Additionally, neither the rim hold-down bolts, nor the wedges meet TLAA Criterion 3 - "time-limited assumptions defined by the current operating term." The staff finds this response acceptable because the rim hold-down bolts no longer provide structural load and do not meet the definition of a TLAA as defined in 10 CFR 54.3(a)(3) and (5). In a letter dated January 26, 2004, the applicant submitted the information described above. Therefore, Confirmatory Item 3.1.2.3.6-1 is closed.

CI.3.1.2.3.8-1: (Section 3.1.2.3.8 - Reactor Vessel Surveillance program)

In response to Part 2 of Supplemental RAI B.1.22, in a letter dated November 21, 2003, the applicant stated that if staff does not approve the proposed BWRVIP-116, the applicant will provide a plant-specific surveillance plan for the license renewal period in accordance with 10 CFR Part 50, Appendices G and H, prior to entering the renewed license period. This is Commitment #22 in Appendix A of this SER. This is considered Confirmatory Item 3.1.2.3.8-1.

In response to Part 2 of Supplemental RAI B.1.22, in a letter dated November 21, 2003, the applicant stated that if the staff does not approve the proposed BWRVIP-116, Exelon will provide a plant-specific surveillance plan for the license renewal period in accordance with 10 CFR Part 50, Appendices G and H, prior to entering the renewed license period. This is part of Commitment #22 of Appendix A of this SER. This was identified as Confirmatory Item 3.1.2.3.8-1. The staff finds the response acceptable because the applicant commits to provide a plant-specific surveillance program for the license renewal period in accordance with 10 CFR Part 50, Appendices G and H, if the staff does not approve the proposed BWRVIP-116. In a letter dated April 9, 2004, the applicant concurred with Commitment #22. Therefore, Confirmatory Item 3.1.2.3.8-1 is closed.

CI.3.1.2.4.2-1: (Section 3.1.2.4.2 - Reactor Vessel Internals (Including Fuel Assemblies and Control Blades))

The response to RAI 3.1.7b states that Dresden and Quad Cities will implement the BWRVIP recommendations and manage the effects of aging of IASCC through AMPs B.1.2 (Water Chemistry) and B.1.9 (BWR Vessel Internals). AMP B.1.9 is consistent with NUREG-1801 which references the use of BWRVIP-26 for the inspection of the reactor vessel internals, including the top guide, and BWRVIP-76 for the inspection of the shroud. However, according to Table 2-1 of BWRVIP-76, when fluences exceed 5×10^{20} n/cm², a plant-specific analysis is required to be submitted to the NRC. This issue was identified as Confirmatory Item 3.1.2.4.2-1.

In response to Confirmatory Item 3.1.2.4.2-1, in a letter dated April 9, 2004, the applicant states that Table 2-1 of BWRVIP-76 provides inspection guidance for welds in un-repaired core

shrouds. Note 4 of Table 2-1 indicates that for plants where fluence at the shroud exceeds 5×10^{20} n/cm², a plant-specific analysis is required to be submitted to the NRC. However, this analysis is only for un-repaired core shrouds. Since the core shrouds at Dresden and Quad Cities have been repaired and the repairs structurally replace the horizontal welds, the plant-specific analysis suggested by Table 2-1 is not applicable to these shrouds. The applicant further states that the inspection frequencies for the D/QCNPS shrouds are determined using the guidance contained in Section 3 of BWRVIP-76. The applicant inspects the vertical core shroud welds in accordance with BWRVIP-76, Section 3. The staff finds the response consistent with BWRVIP-76. Since the applicant has committed to implement BWRVIP-76 when the staff SER is issued, this completes our review of this issue. Therefore, Confirmatory Item 3.1.2.4.2-1 is closed.

CI.4.2.1: (Section 4.2.2.1 - Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement)

The data for copper content in the limiting beltline plate and limiting beltline weld material presented in LRA Section 4.2.1 appear to be different from the data presented in Appendix F to the Dresden UFSAR. For example, LRA Table 4.2.1-2 lists 0.24 percent copper for the Dresden Unit 2 limiting beltline weld material, whereas Table 22 in Appendix F lists a maximum copper content of 0.21 percent for Dresden Unit 2. In RAI 4.2.1(b), the staff requested the applicant to resolve this apparent discrepancy. This was identified as Confirmatory Item 4.2.1.

In response to RAI 4.2.1(b), in a letter dated October 3, 2003, the applicant provided the following explanation:

For the beltline region, Table 21 (Shell Course 57—Lower Shell) and Table 22 (Shell Course 58—Lower-Intermediate Shell) of the Dresden FSAR gives values actual chemical analysis of these materials. Tables 21 and 22 contain the chemical analysis for electroslag welds contained in the original FSAR. Since the original publication of the FSAR, the accepted best estimate chemistry for Electroslag Weld (ESW) materials used in B&W vessels accepted by the NRC staff is 0.24% Cu and 0.37% Ni. These values are reported in BAW-2258, "Evaluation of RT_{NDT}, USE and Chemical Composition of Core Region Electroslag Welds for Dresden Units 2 and 3," Framatome Technologies, January 1996, and were previously accepted by the NRC in its review of pressure temperature (P-T) limit curve report GE-NE-B13-02057-04R1a. Exelon submitted reactor vessel chemistry values to the NRC in July 1998 in response to Generic Letter 92-01, Supplement 1. The information provided in that response is included in NRC database RVID.

The staff accepts the applicant's response because the staff has verified the percentage of copper content given in LRA Tables 4.2.1-1 to 4.2.1-8 for the limiting beltline USE materials with the corresponding data in RVID. Therefore, Confirmatory Item 4.2.1 is closed.

CI.4.2.1(a): (Section 4.2.2.1 Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement)

The peak EPU fluence on the vessel is located at approximately 82 inches above the bottom of active fuel and is applied to the lower-intermediate shell and axial welds. Additionally, axial flux distribution factors are applied to different elevations (by shell) in the beltline region. For the lower shell, the peak fluence is adjusted by the axial flux distribution factor based on an elevation approximately 42 inches above the bottom of active fuel, which represents the lower to lower-intermediate girth weld. The axial flux distribution factor for this location is 0.71. The applicant stated that it applied this factor for calculating the peak pre-EPU fluence for the lower

to lower-intermediate shell girth weld and all lower shell materials. In a followup question to RAI 4.2.1(a), the staff requested the applicant to describe how the pre-EPU axial flux profile compares with the EPU axial flux profile. The staff also requested that the applicant submit information about how the axial flux distribution factor was used in calculating the peak-EPU fluence for the lower to lower-intermediate shell girth weld and all lower shell materials. This was identified as Confirmatory Item 4.2.1(a).

In a letter dated April 9, 2004, the applicant referred to Figure 2 in a letter from Exelon to NRC, "Additional Information Regarding Request for License Amendment for Pressure-Temperature Limits," dated July 31, 2003. This figure shows the pre-EPU and EPU axial flux distribution at the inside surface of the reactor pressure vessel. The pre-EPU and EPU axial flux distribution profiles are different, since the pre-EPU flux peaks at an elevation higher than the mid-plane, whereas the EPU flux peaks at the mid-plane. The applicant stated that for determining the peak 54-EFPY surface fluences at the lower shell plate material, lower shell welds and the lower to lower-intermediate shell girth weld, the axial flux distribution factor of 0.71 is applied for pre-EPU and 0.74 is applied for EPU conditions. The staff has independently verified the axial flux distribution factors using the data presented in the figure mentioned above and also verified the peak surface fluences for the lower shell and associated welds as calculated by the applicant. The staff finds the response acceptable because the applicant has used appropriate axial flux distribution factors for calculating the peak 54-EFPY surface fluence for the lower to lower-intermediate shell girth weld and all lower shell materials when determining the limiting materials. Therefore, Confirmatory Item 4.2.1(a) is closed.

CI.4.2.1.6: (Section 4.2.1.6 - Reactor Vessel Circumferential Weld Examination Relief)

The applicant was required to submit an update to LRA Section 4.2.6 to include the circumferential weld examination relief analysis for Quad Cities in accordance with 10 CFR 54.3(a) upon staff's approval of the May 16, 2003, relief request. This issue was identified as Confirmatory Item 4.2.1.6.

In response to Confirmatory Item 4.2.1.6, in a letter dated March 5, 2004, the applicant submitted a revision to the UFSAR Supplement for the reactor vessel circumferential weld examination relief TLAA. The revised supplement refers to the documents related to RPV circumferential weld relief request extension for the license renewal term. The staff reviewed this supplement and found that it provides an adequate summary description regarding the evaluation of this TLAA. Therefore, Confirmatory Item 4.2.1.6 is closed.

CI.4.2.2: (Section 4.2.2.7 - Reactor Vessel Axial Weld Failure Probability)

This axial weld failure probability analysis is required to be performed as a license renewal action item in accordance with the staff FSER of EPRI report TR-113596 (BWRVIP-74) and compliance with the license renewal rule (10 CFR Part 54) enclosed in an October 18, 2001, letter from Mr. C.I. Grimes to Mr. C. Terry. This action item, as stated in the staff's March 7, 2000, letter to Mr. C. Terry, requires the license renewal applicant to monitor axial beltline weld embrittlement. One acceptable method is to determine that the mean RT_{NDT} of the limiting axial beltline weld at the end of the extended period of operation is less than the values specified in Table 1 of this FSER. Therefore this evaluation applies to Dresden Units 2 and 3, as well as to Quad Cities Units 1 and 2. In addition, Dresden and Quad Cities have the same mean RT_{NDT} , because the initial RT_{NDT} , chemical composition, and 54-EFPY surface fluence are the same for

the limiting beltline axial welds at Quad Cities and Dresden. Therefore, for Quad Cities and Dresden plants, the mean RT_{NDT} for the limiting beltline axial welds at 54-EFPYs is equal to 19 °C (67 °F). A comparison of the mean RT_{NDT} value of 33 °C (91 °F) for the Clinton axial weld from Table 4.2-1 of this SER with the Dresden and Quad Cities value of 19 °C (67 °F) shows that the NRC analysis of the Clinton axial welds bounds the Dresden and Quad Cities welds. The applicant should confirm that Quad Cities Units 1 and 2 have a mean value of 19 °C (67 °F) and address this TLAA of the axial welds for Quad Cities in the UFSAR Supplement. This was identified as Confirmatory Item 4.2.2.

In response to Confirmatory Item 4.2.2, in a letter dated March 25, 2004, the applicant compared the limiting axial weld 54-EFPY properties for Quad Cities 1 and 2 against the corresponding limiting values calculated by the NRC in the SER for BWRVIP-05 at 64 EFPY and the limiting Clinton values taken from Table 2.6-5 in the March 7, 2000, supplement to the SER. The applicant confirmed that the limiting axial welds at Quad Cities Units 1 and 2 have a mean 54 EFPY RT_{NDT} of 19°C (67°F), which is less than the value of 33°C (91°F) for Clinton. The comparison also shows that the conditional vessel failure probabilities for Quad Cities Units 1 and 2 are equal to 2.08×10^{-7} and 5.27×10^{-7} , respectively. These failure probabilities are less than the corresponding value for Clinton listed in Table 4.2-1 of this SER. The staff finds the applicant's evaluation for this TLAA acceptable because the conditional probability of failure of Quad Cities Unit 1 and 2 limiting axial welds at 54 EFPY is smaller than the corresponding values calculated by the NRC staff in the SER for BWRVIP-05 at 64 EFPY and the limiting Clinton values found in the March 7, 2000, supplement to the SER.

In a letter dated March 5, 2004, the applicant submitted a revision to the UFSAR supplement for the reactor vessel axial weld failure probability. The staff reviewed this supplement and found that it provides an adequate summary description regarding the evaluation of this TLAA. Therefore, Confirmatory Item 4.2.2 is closed.

CI.B.1.2-1: (Section 3.0.3.2 -Water Chemistry Program (B.1.2))

The staff noted that due to a potential difference in the concentration of sodium pentaborate in the system (the tank and suction piping are typically at a much higher concentration from the remainder of the system), that the proposed chemistry inspections may not provide information on the condition of the tank and pump suction piping. The staff requested in RAI B 1.2 -1 that the applicant provide supplemental information regarding how aging degradation of the SBLC tank and suction piping will be managed, since sampling chemistry downstream of the tank and receipt inspection of the chemicals used in the tank will not provide adequate assurance that degradation is not occurring in this section of the system. This issue was identified as Confirmatory Item B.1.2-1.

The applicant responded in letters dated December 22, 2003 and March 25, 2004, that it will perform an ultrasonic examination of portions of the SBLC tank. This is part of Commitment #23 of Appendix A of this SER. The ultrasonic examinations will be used to identify potential loss of material and stress corrosion cracking. The applicant will perform one ultrasonic inspection in each quadrant, near the bottom of the tank. The applicant considers this location to be the most susceptible location for degradation. The UT examinations will include a portion of the tank shell and vertical seam weld and, if accessible, a portion of a circumferential weld in accordance with the applicant's NDE procedures. If necessary, the exam results will be addressed by the applicant's corrective action program.

The staff finds that the applicant will adequately manage aging in the SBLC system through the combined use of inspection of the pump casing, ultrasonic inspection of the SBLC tank, and control of addition chemicals according to the applicant's receipt inspection program. Therefore, Confirmatory Item B.1.2-1 is closed.

CI.B.1.17: (Section 3.3.2.3.2 - BWR Reactor Water Cleanup System (B.1.17))

Since the applicant stated that the entire RWCU system piping was replaced with IGSCC-resistant piping in accordance with NRC GL 89-10, the staff subsequently requested the applicant to provide the following information to be verified by the NRC Audit-Inspection Team:

(i) Clarify whether the entire RWCU system piping was replaced with IGSCC-resistant material or whether only portions of the RWCU system piping for each plant were replaced.

(ii) Confirm that, if the entire RWCU system piping was replaced, the piping system includes all the RWCU welds inboard and outboard of the second isolation valves. Confirm whether the selection of material of the replaced piping and weld metal meet the material compositions as described in GALL AMP XI.M25.

(iii) Verify that, if only portions of the RWCU system piping were replaced, the entire RWCU system piping meets the screening criteria, 1(a), (b), and (c) in GALL AMP XI.M25 program element 1, Scope of the Program, as well as the material specifications in GALL AMP XI.M25 program element 2, Preventive Actions.

This was identified as Confirmatory Item B.1.17.

During the audit, the team confirmed the following technical information relating to this AMP with the applicant at the request of the NRC's technical staff:

- All in-scope portions of the RWCU system piping outboard of the second isolation valves were replaced with ASTM SA312 or SA376 Gr. TP316L with a carbon content of less than 0.035%. RWCU piping inboard of the second isolation valve have not been replaced with IGSCC resistant piping.
- The RWCU piping that is inboard of the second isolation valve is Class 1 and 2 piping that is managed by the ISI Program (B.1.1), ASME Section XI, Subsections IWB, IWC, and IWD. All of the RWCU piping and welds on the in-scope portion outboard of the second isolation valves were replaced. The replacement piping and weld metal meets the material compositions as described in NUREG-1801, AMP XI.M25.
- All the RWCU piping and welds on the in-scope portion outboard of the second isolation valves were replaced with piping and weld material that meet the material compositions as described in NUREG-1801, AMP XI.M25. Screening criteria 1(a), (b), and (c) of NUREG-1801, AMP XI.M25 do not apply to this piping.
- In a letter to the NRC, dated August 20, 1993, the licensee committed to replace all RWCU IGSCC susceptible outboard supply and return line piping and the regenerative heat exchangers with IGSCC resistant materials at both Dresden and Quad Cities.

License Renewal Boundary Drawings LR-DRE-M-30 and LR-QDC-M-47-1 show the piping design table for the in-scope portion of the RWCU piping outboard of the second isolation valves to be table AQ. Dresden specification K-4080 and Quad Cities specification R-4411 provide the material specification for piping design table AQ. Design table AQ provides the information on the piping material: all in-scope portions of the RWCU system piping outboard of the second isolation valves were replaced with ASTM SA312 or SA376 Gr. TP316L with a carbon content of less than 0.035%.

Based on the above information, the applicant confirmed that the ten elements of the GALL program, "BWR Reactor Water Cleanup System," as specified in NUREG-1801, AMP XI.M25 (with the exception of the Water Chemistry Program as noted in the LRA) are applicable to Dresden and Quad Cities, and that the applicant's program B.1.17 is consistent with GALL AMP XI.M25, with the exception as noted in the LRA.

On the basis of its review of this AMP, GALL AMP XI.M25, AMR topical report M.05, and the ISI Program plan, the audit team determined that this AMP is consistent with GALL AMP XI.M25, with the exception as noted in the LRA. Therefore, Confirmatory Item B.1.17 is closed.

CI.B.1.23-1: (Section 3.0.3.10 - One Time Inspection (B.1.23))

See response for Open Item B.1.23-2.

CI.B.1.23-2.5: (Section 3.3.2.3.7 Periodic Inspection of Plant Heating System (B.2.8))

The applicant concluded that the Periodic Inspection of Plant Heating System program provides assurance that plant heating system components are routinely inspected for deterioration and leakage, and will adequately manage the components aging effects. The applicant stated that the program provides reasonable assurance that intended functions are maintained consistent with the current licensing basis during the period of extended operation. The staff compared the program against BTP RLSB-1. This issue was identified as Confirmatory Item B.1.23-2.5.

By letter dated March 25, 2004, the applicant described its program to manage loss of material, cracking, and leakage in selected plant heating system components for Dresden and Quad Cities exposed to an environment of saturated steam and condensate. The staff reviewed this program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls are part of the site-controlled Quality Assurance Program. The staff's evaluation of the Quality Assurance Program is provided separately in Section 3.0.4 of this SER. The remaining seven elements are discussed below. The staff also reviewed the UFSAR supplements for Dresden and Quad Cities to determine whether they provide an adequate description of the program.

[Program Scope] The program will manage age related degradation of plant heating system components such as filter/strainer housings, piping and fittings, pump casings, sight glasses,

tanks, thermowells, traps, tubing, and valves. The staff finds that the scope is acceptable because it includes those components that rely on the program for aging management.

[Preventive or Mitigative Actions] The plant heating system periodic inspections do not provide any preventative actions. The inspections provide for condition monitoring to detect degradation prior to a loss of function. Preventative or mitigative actions are not needed for this condition monitoring program; therefore, the staff finds this acceptable.

[Parameters Monitored or Inspected] Visual inspections will be performed on a representative sample of brass or bronze valves, carbon steel piping and fittings, cast iron filter housings, pump casings and valves, and stainless steel thermowells and tubing used in the plant heating systems to determine if aging degradation is occurring. The components are inspected to ensure they are free of cracking, loss of material, and leakage. The inspection will consist of a visual inspection on the internal surface of components for the presence of general, crevice, galvanic, and pitting corrosion. The staff concludes that the applicant is inspecting the appropriate parameters to identify the aging effects; therefore, the staff finds this acceptable.

[Detection of Aging Effects] The plant heating inspections are performed a periodic intervals, and they detect aging prior to the equipment leaking so as to prevent spatial interaction with safety-related equipment. Inspections will be performed in accordance with ASME Code requirements and certified NDE examiners will conduct a VT-3 visual examination. The staff finds this acceptable because the inspections will identify the aging effects managed by this program.

[Monitoring and Trending] The condition of the components used in plant heating systems are monitored at intervals of approximately every 5 years, but not trended. Components are replaced if damage or unacceptable leakage is detected. Operating experience states that leaks were identified and corrected in a timely manner and did not result in a loss of function of any safety-related component. Staff finds that monitoring of these components periodically every 5 years is adequate to identify aging degradation; therefore staff finds this acceptable .

[Acceptance Criteria] The applicant stated that components are inspected for cracking, loss of material, and leakage. The components are replaced if a degraded condition is found. Inspections will be performed in accordance with ASME Code requirements and corrective actions state that evaluations are performed for inspection results that do not satisfy established criteria. The staff finds that the applicant's proposal to perform inspections in accordance with ASME Code requirements and use of engineering evaluations of degradation components will provide acceptance criteria against which the need for corrective actions will be evaluated; therefore, staff finds this acceptable.

[Operating Experience] The applicant stated that Dresden and Quad Cities have experienced leaks in the plant heating systems, but that these leaks were identified and corrected in a timely manner and did not result in a loss of function of any safety-related system, structures, or components. The staff notes that the plant heating system is in scope of license renewal due to the potential for spatial interactions. The staff finds that the operating experience of timely correction of system leaks plus the additional periodic visual inspections supports the applicant's conclusion that the program will be effective in managing aging of the components in the scope of this program; therefore, the staff finds this acceptable. Therefore Confirmatory Item B.1.23-2.5 is closed.

CI.B.1.25-1: (Section 3.0.3.12 - Buried Piping and Tanks Inspection)

The staff had additional concerns regarding concrete asbestos piping and buried carbon steel piping and requested clarifying information. Specifically, with regard to concrete asbestos piping, the applicant's operating history indicated that failures of the piping have occurred. On the basis of this experience, the staff requested justification for why a one-time inspection was not warranted, as well as confirmation that the soil environment for the piping was not aggressive. With regard to buried carbon steel piping, the applicant indicated that much of the piping may not be coated. Given that some of the piping may not be coated, the staff questioned why this was not identified as an exception to the GALL program. This was identified as Confirmatory Item B.1.25-1.

The applicant responded to the staff's request for supplemental information in letters dated December 12, 2003 and March 25, 2004. The applicant indicated that the buried concrete piping likely failed as a result of ground shifting or heavy loads transported in the vicinity of the piping. This piping is located in a soil and ground water environment which is not aggressive to concrete based on pH values between 7 to 9, chlorides 5 to 30 ppm, and sulfates 10 to 30 ppm. These values are within the NUREG 1801 criteria (chlorides less than 500 ppm, sulfates less than 1500 ppm and pH greater than 5.5). The applicant indicated that buried carbon steel and ductile iron piping in the Fire Suppression System are externally coated with coal tar wrapping; however, there was some question regarding use of coating on other carbon steel buried piping. The applicant provided supplemental information after a detailed review of plant documents that indicates that all carbon steel buried piping at Dresden and Quad Cities was externally coated. The applicant further indicated that the installation specification required an inspection of the coating integrity prior to burial. The applicant provided operating experience from a recent plant modification that required excavation of some Fire Suppression System piping at Quad Cities. A section of 10 inch schedule 40 carbon steel piping was recently excavated. The applicant indicated that the piping was coated with coal tar wrapping and had been buried in the early 1970's. The nominal wall thickness of this piping is 0.365 inches. The measured minimum and maximum wall thicknesses were 0.320 inches and 0.400 inches respectively. The applicant concluded that there was little effect of aging on this piping after burial for approximately 30 years. The applicant also surveyed the craft personnel who performed the work to assess the condition of the external pipe coating. The applicant provided qualitative information that the coating was "generally in good condition" based on the craft personnel. The staff finds the applicant's response acceptable because the applicant provided information regarding the cause of the concrete piping degradation, provided information consistent with NUREG 1801 that indicates the environment is not aggressive to concrete, that there is reasonable assurance that the buried piping is coated and provided additional operating experience that indicates there is limited aging degradation of buried piping. Therefore, Confirmatory Item B.1.25-1 is closed.

CI.B.2.5-1: (Section 3.0.3.16 Lube Oil Monitoring Activities)

In its October 3, 2003, response to RAI B.1.23-2(a), the applicant committed to include the following additional components in the scope of this program: components in the reactor core isolation cooling (RCIC) system, additional components in the high pressure coolant injection (HPCI) system, additional components in the emergency diesel generator and auxiliaries system, and additional components in the station blackout diesel system. In addition, the applicant committed to add components exposed to EHC oil (main turbine and auxiliary

systems) and generator hydrogen seal oil (turbine oil system - Quad Cities only) to the scope of this program. The staff found that adding the above components to the scope of this program is appropriate, since maintaining oil quality is important for preventing aging effects. However, the applicant did not provide updates to the program elements to address the increased scope of the program. The applicant was requested to provide the appropriate revisions to the 10 elements and the UFSAR summary description of this program. This issue was identified as Confirmatory Item B.2.5-1.

In its draft supplemental response dated December 18, 2003, the applicant further committed to add components exposed to EHC oil (main turbine and auxiliary systems) and generator hydrogen seal oil (turbine oil system) to the scope of this program. The applicant added these components to the scope of the program by letter dated January 26, 2004. The staff found that adding the above components to the scope of this program is appropriate, since maintaining oil quality is important for preventing aging effects in these components.

In a letter dated June 22, 2004, the applicant committed to include the following additional component in the scope of this program: components in the reactor recirculation motor generation oil system. The staff found that adding the above component to the scope of this program is appropriate, since maintaining oil quality is important for preventing aging effects in these components.

[Program Scope] The applicant stated that this AMP is applicable to heat exchanger and other components exposed to a lubricating oil environment in the HPCI, emergency diesel generator and auxiliaries, (SBO) diesel and auxiliaries, reactor core isolation cooling (RCIC), generator hydrogen seal oil (HSO), main turbine and auxiliaries (electro-hydraulic control (EHC) oil subsystem), and reactor recirculation motor generator systems. The staff finds that the scope is acceptable because it includes those components that rely on the program for aging management.

[Preventive or Mitigative Actions] The applicant's program monitors and controls the oil properties and impurity levels. When the parameters exceed predefined limits, actions are taken to restore the conditions. The staff finds that maintaining the oil parameters mitigates loss of material and cracking in lubricating oil systems; therefore, the staff finds this acceptable.

[Parameters Monitored or Inspected] The applicant stated that the parameters monitored by the program include viscosity, total acid number, total base number, rotary bomb oxidation test, water demulsability, particle count, fuel and combustion byproducts, sediment, water, anti-foaming characteristics, whole particle counting, air release and emission spectrum. The applicant also stated that the parameters monitored by the program depends on oil type and type of service. The staff notes that loss of material due to general, crevice, and pitting corrosion and cracking are applicable aging effects for lubricating oil cooler components in a lubricating oil environment at locations containing water or contaminants such as chloride ions. By RAI B.2.5(a), the staff asked the applicant to clarify whether water, moisture, and chloride ions are monitored for all type of oil and service. If not, the staff requested the applicant to provide justification for not including these parameters in monitoring. In its response dated October 3, 2003, the applicant stated that water/moisture is monitored as part of the Lubricating Oil Monitoring Activities program. No monitoring for chloride ions is provided in this program. The applicant explained that EPRI 1003056, Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, Appendices C and G were reviewed in the development of

the Lubricating Oil Monitoring Activities program. These appendices address oil environments in general and lubricating oil environments for heat exchangers, respectively. Appendix C identifies damaging effects associated with chlorides in fuel oil environments, but no similar effects are identified for lubricating oil environments. Appendix G does not identify any applicable aging effects associated with chlorides for lubricating oil environments in heat exchanger components. The applicant also stated that there is no site operating experience of failure or degradation in oil environments attributed to the presence of chlorides. Therefore, the applicant concluded that monitoring for chloride ions is not required for the Lubricating Oil Monitoring Activities program. Based on the applicant's operating experience, the staff finds that the applicant's response satisfactorily addresses the staff's concerns and RAI B.2.5(a) is considered closed. The staff concludes that the applicant is monitoring the appropriate oil parameters; therefore, the staff finds this acceptable.

[Detection of Aging Effects] The applicant stated that samples of lubricating oil are taken monthly for EDGS, EHC oil, reactor recirculation motor generator oil, and HSO systems, quarterly for HPCI, SBO diesel generators, semi-annually for the RCIC pump, and every 24 months for the RCIC turbine. Sampling frequency is increased if plant and equipment operating conditions indicate a need to do so. The applicant stated that the sampling would reveal aging degradation because increased impurities and degradation of oil properties indicate degradation of material in lubricating oil systems. The staff finds this acceptable because sampling and analyses are performed periodically, and the analysis is capable of detecting aging degradation.

The staff also notes that the aging effects of the heat exchangers are also managed by the "Closed-Cycle Cooling Water System" and/or "Heat Exchanger Test and Inspection Activities," AMPs B.1.14 and B.2.6, respectively. For other components, the applicant uses the One-Time Inspection Program (B.1.23) to verify the effectiveness of the Lube Oil Monitoring Activities AMP. The inspections and performance testing under these programs provides additional assurance that loss of material and cracking will be detected before the loss of intended function; therefore, the staff finds this acceptable.

[Monitoring and Trending] The Lube Oil Monitoring program monitors the relevant parameters via samples taken monthly for EDGs, quarterly for HPCI, SBO diesel generators, EHC oil, and HSO systems, semi-annually for the RCIC pump, and every 24 months for the RCIC turbine. The oil analysis results are trended and evaluated using computer software and a database. The applicant stated that the lubricating oil analysis results are trended and evaluated using computer software and a database. The staff finds that monitoring through sample analysis is appropriate and that the frequency is consistent with industry experience; therefore, the staff finds the monitoring and trending to be acceptable.

[Acceptance Criteria] The applicant stated that normal, alert, and fault levels have been established for the various chemical and physical properties, wear metals, additives, and contaminant levels based on information from oil manufacturers, equipment manufacturers, and industry guidelines, for the specific oil type and application. The applicant also stated that the program maintains contaminant and parameter limits within the application-specific limits. By RAI B.2.5(b), the staff asked the applicant to explain the acceptance criteria of water, moisture, and contaminants. In its response dated October 3, 2003, the applicant provided the acceptable limits for water/moisture and contaminants at normal, alert, and fault levels for emergency diesel generator and SBO diesel components with MOBILGARD 450 NC oil and for HPCI turbine components with MOBIL VAPROTEC LIGHT oil. The applicant stated the acceptable limits are

based on EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Revision 3, and that any failures to meet these criteria result in a condition evaluation, an identification of root causes, and correction of the adverse condition. The staff finds that the acceptance criteria are consistent with industry guidelines and that the applicant's activities in case of failure to meet these acceptance criteria are reasonable; therefore, the staff finds the acceptance criteria acceptable.

[Operating Experience] The applicant stated that oil sampling and analysis have detected particulate or water contamination (or both) in lubricating oil systems. The operating experience has produced procedure and program changes, which have improved the effectiveness of lubricating oil testing and inspection activities. By RAI B.2.5(c), the staff asked the applicant to describe the corrective actions made and the operating experience since these corrective actions were implemented. In its response dated October 3, 2003, the applicant provided four examples of corrective actions made as a result of operating experience involving lube oil sampling and analysis. In one of the examples, the applicant stated that the 10/28/99 oil analysis of the Unit 1A (1B) SBO diesel engine crankcases indicated high percentage volume for sediment of 0.3 % (upper limit of 0.05% volume). All physical parameters other than sediment were found to be suitable for use. A recommendation was made to continue sampling/trending oil sample results on a quarterly frequency. The sampling procedure was revised to include requirements to perform sampling on a quarterly basis, and trend results. In another example, the applicant stated that a number of Quad Cities oil analysis results for RHRSW pump bearings showed high metal levels. It was determined that the high/increased wear level concentrations could have been indications of pump shaft, housing, rolling element bearing or bearing cage clearance wear. It was determined that the pump bearing oil analysis required large amounts of oil to be collected because smaller sample amounts had a tendency to show high/erratic wear levels. The sampling procedure was revised to include requirements to draw a relatively large sample. The applicant stated that no operating experience involving recurrence of heat exchanger degradations since implementation of the associated corrective actions. The staff finds that the applicant's response satisfactorily addresses the staff's concerns and RAI B.2.5(c) is considered closed. The staff finds that the applicant's operating experience supports the conclusion that the program will be effective in preventing aging of the components in the scope of this program; therefore, the staff finds this acceptable. Therefore Confirmatory Item B.2.5-1 is closed.

1.7 Summary of Proposed License Conditions

As a result of the staff's review of the DNPS/QCNPS application for license renewal, including the additional information and clarifications submitted subsequently, the staff identified three proposed license conditions. The first license condition requires the applicant to include the UFSAR Supplement in the next UFSAR update required by 10 CFR 50.71(e) following issuance of the renewed license. The second license condition requires that the future activities identified in the UFSAR Supplement and Appendix A of this SER to be completed prior to the period of extended operation. The third license condition requires the implementation of the most recent staff-approved version of the Boiling Water Reactor Vessels and Internals Project (BWRVIP) Integrated Surveillance Program (ISP) as the method to demonstrate compliance with the requirements of 10 CFR Part 50, Appendix H. Any changes to the BWRVIP ISP capsule withdrawal schedule must be submitted for NRC staff review and approval. Any changes to the BWRVIP ISP capsule withdrawal schedule which affects the time of withdrawal of any surveillance capsules must be incorporated into the licensing basis. If any surveillance

capsules are removed without the intent to test them, these capsules must be stored in manner which maintains them in a condition which would support re-insertion into the RPV, if necessary.

2. SCOPING AND SCREENING METHODOLOGY FOR IDENTIFYING STRUCTURES AND COMPONENTS SUBJECT TO AGING MANAGEMENT REVIEW, AND IMPLEMENTATION RESULTS

2.1 Scoping and Screening Methodology

2.1.1 Introduction

Title 10, Section 54.21, of the *Code of Federal Regulations* (10 CFR 54.21), “Contents of Application—Technical Information,” requires that each application for license renewal (LR) contain an integrated plant assessment (IPA). The IPA must list and identify those structures, systems and components (SSCs) that are within the scope of license renewal in accordance with 10 CFR 54.4 and subject to an aging management review (AMR).

In Section 2.1, “Scoping and Screening Methodology,” of the license renewal application (LRA) the applicant described the scoping and screening methodology used to identify the SSCs at the Dresden and Quad Cities Nuclear Power Stations that are within the scope of license renewal and subject to an AMR. The staff reviewed the applicant’s scoping and screening methodology to determine if it meets the scoping requirements stated in 10 CFR 54.4(a) and the AMR screening requirements stated in 10 CFR 54.21.

In developing the scoping and screening methodology for the Dresden and Quad Cities Nuclear Power Stations LRA, the applicant considered the requirements of 10 CFR Part 54, the statements of consideration related to the license renewal rule (the Rule), and the guidance provided in the Nuclear Energy Institute (NEI) report NEI 95-10, “Industry Guideline for Implementing the Requirements of 10 CFR Part 54—The License Renewal Rule.” In addition, the applicant also considered the U.S. Nuclear Regulatory Commission (NRC) staff’s license renewal interim staff guidance (ISG) documents and related correspondence.

2.1.2 Summary of Technical Information in the Application

In Sections 2.0 and 3.0 of the LRA, the applicant provided the technical information required by 10 CFR 54.21(a). In LRA Section 2.1, “Scoping and Screening Methodology,” the applicant described the process used to identify the SSCs that meet the license renewal scoping criteria under 10 CFR 54.4(a), as well as the process used to identify the SSCs that are subject to an AMR as required by 10 CFR 54.21(a)(1). Additionally, LRA Section 2.2 (“Plant-Level Scoping Results”), Section 2.3 (“Scoping and Screening Results: Mechanical Systems”), Section 2.4 (“Scoping and Screening Results: Structures”), and Section 2.5 (“Scoping and Screening Results: Electrical and Instrumentation and Control Systems”) provided the results of the process used to identify the structures and components (SCs) that are subject to an AMR.

2.1.2.1 Scoping Methodology

In Section 2.1 of the LRA, the applicant described the methodology used to scope mechanical, structural, and electrical and instrumentation and controls (I&C) SSCs pursuant to the requirements of the 10 CFR 54.4(a) scoping criteria. The applicant’s scoping methodology, as described in the LRA, is presented in the sections below.

2.1.2.1.1 Application of the Scoping Criteria in 10 CFR 54.4(a)

The applicant described the general approach to scoping safety-related, non-safety-related (NSR), and SSCs credited with demonstrating compliance with certain regulated events in Section 2.1.2, “Application of Scoping Criteria in 10 CFR 54.4(a),” of the LRA. The scoping approaches specific to each of the three 10 CFR 54.4(a) scoping criteria are described in the following sections.

Application of the Scoping Criteria in 10 CFR 54.4(a)(1). In LRA Sections 2.1.2.1, “Title 10 CFR 54.4(a)(1)—Safety-Related,” and 2.1.4, “Scoping Methodology” the applicant discussed the methodology used to identify SSCs meeting the 10 CFR 54.4(a)(1) safety-related license renewal scoping criteria. The applicant stated that at the Dresden and Quad Cities Nuclear Power Stations, safety-related classifications for components are documented on engineering drawings and in a controlled plant component database. The applicant relied upon the safety-related classification as reported in these source documents to identify SSCs satisfying scoping criteria of 10 CFR 54.4(a)(1).

Application of the Scoping Criteria in 10 CFR 54.4(a)(2). In LRA Sections 2.1.2.2 “Title 10 CFR 54.4(a)(2)—Non-Safety-Related Affecting Safety-Related”, 2.1.4 “Scoping Methodology”, and 2.1.6 “Additional Considerations Incorporated Into the Methodology”, the applicant discussed the methodology used to identify SSCs meeting the 10 CFR 54.4(a)(2) non-safety-related license renewal scoping criteria. The applicant performed 10 CFR 54.4(a)(2) scoping evaluations using a two-stage process that consisted of an initial scoping evaluation followed by a revised scoping evaluation. During the initial 10 CFR 54.4(a)(2) non-safety-related scoping evaluation, the applicant identified non-safety-related SSCs that explicitly supported a safety-related function. The revised non-safety-related scoping methodology considered the potential adverse effects from the failure of non-safety-related SSCs attached to safety-related equipment and spatial interactions resulting from the failure of non-safety-related SSCs on the performance of a safety-related function. The applicant described both the initial and revised 10 CFR 54.4(a)(2) scoping methodology in Section 2.1.2.2 of the LRA.

Initial Non-safety-Related Scoping

In Section 2.1.2.2 of the LRA, the applicant stated that for every non-safety-related plant system or structure, applicable sections of the Dresden and Quad Cities Updated Final Safety Analysis Reports (UFSARs) and other current licensing basis (CLB) documents were reviewed to determine whether the system or structure was credited with supporting satisfactory accomplishment of a safety-related function. Based on this review, the applicant classified non-safety-related systems or structures explicitly credited in CLB documents with supporting accomplishment of a safety-related function as satisfying criterion 10 CFR 54.4(a)(2). Because the Maintenance Rule (10 CFR 50.65) includes SSCs scoping criteria similar to 10 CFR 54.4(a)(2), the applicant stated that the Dresden and Quad Cities Maintenance Rule functional evaluation reports were also reviewed to identify any additional non-safety-related system or structure functions that supported satisfactory accomplishment of a safety-related function. Non-safety-related SSCs functions that were identified in the Maintenance Rule functional evaluation reports as supporting a safety-related function and confirmed to be part of the CLB were classified as satisfying the 10 CFR 54.4(a)(2) scoping criterion.

Revised Non-safety-Related Scoping

Following issuance of NRC guidance on the identification and treatment of SSCs which meet 10 CFR 54.4(a)(2) in a March 15, 2002, letter from Mr. C. Grimes to Mr. A. Nelson, the applicant revised the non-safety-related scoping methodology. The applicant's revised methodology included non-safety-related SSCs connected to safety-related SSCs within the scope of license renewal up to the first equivalent anchor past the safety/non-safety interface. In addition, non-safety-related SSCs that had a spatial relationship such that their failure could adversely impact the performance of a safety-related SSCs intended function were included in the scope of license renewal. The applicant stated that it considered the pipe whip, jet impingement, general flooding, spray, and displacement/falling as spatial interactions during the revised 10 CFR 54.4(a)(2) scoping process. However, the applicant did not consider pipe whip, jet impingement, general flooding, or spray of a gas to be credible spatial interactions for gas systems to adversely affect safety-related SSCs. As such, those systems containing gas were excluded from the scope of the spatial interaction review and plant walkdowns. Displacement and falling were considered credible interactions for gas systems, and, thus, all supports for gas systems were included in the scope of license renewal.

Application of the Scoping Criteria in 10 CFR 54.4(a)(3). In LRA Sections 2.1.2.3, "Title 10 CFR 54.4(a)(3)—The Five Regulated Events," 2.1.3.5, "Technical Position Papers," 2.1.4, "Scoping Methodology," and 2.1.6, "Additional Considerations Incorporated Into the Methodology," the applicant discussed the methodology used to identify SSCs credited for performing a function that demonstrates compliance with regulations for fire protection (FP), environmental qualification, pressurized thermal shock, anticipated transients without scram, and station blackout (SBO) pursuant to the 10 CFR 54.4(a)(3) license renewal scoping criteria. In Section 2.1.2.3 of the LRA, the applicant stated that, because the Dresden and Quad Cities Nuclear Power Stations are boiling water reactors (BWRs), 10 CFR 50.61, the regulation for pressurized thermal shock, was not applicable to the LRA. For each of the other four applicable regulated events, the applicant utilized technical position papers to provide input to the scoping process. The technical position papers identified (1) the systems and structures that are relied upon to demonstrate compliance with these regulations, (2) functional requirements for each system or structure, and (3) additional documentation that may be used for scoping of components credited to demonstrate compliance with each of the applicable regulated events. The applicant stated that guidance provided by the technical position papers was used to determine components credited in the regulated events. The SSCs credited in the regulated events have been classified as satisfying criterion 10 CFR 54.4(a)(3) and have been identified as within the scope of license renewal.

2.1.2.1.2 Documentation Sources Used for Scoping and Screening

In LRA Section 2.1.3, "Documentation Sources Used for Scoping and Screening," the applicant stated that information derived from the following sources was reviewed during the license renewal scoping and screening process:

- Updated Final Safety Analysis Reports
- Maintenance Rule Databases

- current licensing basis and design basis documents, including safety evaluation reports, technical specifications, licensing correspondence, and engineering evaluations and calculations
- system and structure operational description documents
- technical position papers prepared to support scoping evaluations of the regulated events identified in 10 CFR 54.4(a)(3)
- controlled plant component databases, such as the electronic work control system (EWCS) which contains integrated design and maintenance record management information at the level of detail at which distinct maintenance or modification activities typically are performed
- systems and structures lists created from system lists contained in the plant controlled database and the Maintenance Rule databases
- the license renewal database developed as a project tool to support various license renewal activities

The applicant stated that this information was used to identify the functions performed by plant systems and structures. These functions were then compared to the scoping criteria in 10 CFR 54.4(a)(1–3) to determine if the associated plant system or structure performed a license renewal intended function. These sources were also used to develop the list of structures and components subject to an AMR.

2.1.2.1.3 System, Structure, and Component Level Scoping

In LRA Section 2.1.4, “Scoping Methodology,” the applicant described the scoping methodology for systems and structures that were safety-related, non-safety-related, or relied upon to perform a function to demonstrate compliance with the regulated events described in 10 CFR 54.4(a)(3). The applicant described the approaches used to scope mechanical systems, electrical and I&C systems, and structures in accordance with 10 CFR 54.4(a). The scoping methodology for each of these component classifications is described in the sections below.

Mechanical System and Component Scoping Methodology. In LRA Section 2.1.4.1, “Mechanical System Scoping Methodology,” the applicant described the methodology for performing license renewal scoping of mechanical systems. The applicant identified six major activities associated with mechanical system scoping. These include identification of the system purpose and functions, determination of the system evaluation boundary, comparison of system functions against 10 CFR 54.4 (a)(1-3), identification of supporting systems, creation of license renewal boundary diagrams, and component-level scoping. Each of these activities is described below.

- identification of the system purpose and functions

The applicant stated that a description was prepared for each mechanical system that identified all functions (intended and nonintended) that the system was designed to

perform. The applicant used information obtained from the UFSAR system descriptions, Maintenance Rule database records, CLB documents, design-basis documents, piping and instrumentation diagrams (P&IDs), and system operating descriptions to develop the system description.

- determination of the system evaluation boundary

The applicant identified a system evaluation boundary for each system, which included all of the components needed for the system to perform all of its functions, including those functions determined not to be license renewal (LR) intended functions.

- comparison of system functions against 10 CFR 54.4(a)(1–3)

All identified system functions were compared against the criteria of 10 CFR 54.4(a)(1), (a)(2), and (a)(3). Each of the system functions satisfying scoping criteria in 10 CFR 54.4(a) was identified as a system intended function. The applicant's methodology permitted a system function to be classified as an intended function under more than one of the three scoping criteria in 10 CFR 54.4(a). Those systems for which no functions were identified as satisfying any of the three scoping criteria were classified as systems outside the scope of the Rule. When a system was determined to be outside the scope of the Rule, all of the components for that system listed in the LR database were identified as outside the scope of the Rule and were excluded from further scoping or screening evaluations. However, the applicant stated that it reviewed all components before they were excluded from further consideration to ensure that it did not inappropriately remove any safety-related or environmentally qualified components from the scope of license renewal.

- identification of supporting systems

After a mechanical system was determined to be within the scope of the Rule, the applicant stated that an evaluation was performed to identify all of the in-scope system's supporting systems. Each of the supporting systems was then reviewed to determine if its failure could prevent satisfactory accomplishment of any intended function of the in-scope system. When the applicant identified that a supporting system was needed to maintain an intended function of the in-scope system, the supporting system was determined to be in scope.

- creation of license renewal boundary diagrams

The applicant annotated plant P&IDs to create a license renewal boundary diagram for each mechanical system within the scope of license renewal. License renewal boundary diagrams included (1) the system evaluation boundary, (2) the in-scope components required to ensure success of the system intended functions, and (3) the out-of-scope components which are not required to ensure success of the system-level intended functions.

- component-level scoping

Following scoping of mechanical systems and the determination of system evaluation boundaries, the applicant performed component-level scoping. A system component list was developed in the license renewal database to support the mechanical component scoping methodology. The applicant reviewed the system functions, drawings, and other information sources to determine if failure of a system component would result in failure of a system intended function. A component was determined to be in scope if it was safety-related and met the criteria of 10 CFR 54.4(a)(1), if it was determined that the component was needed to fulfill a system intended function, if the component met the criteria of 10 CFR 54.4(a)(2), or if the component was needed to support the intended function of the system needed to meet the regulation for regulated events. The applicant stated that every safety-related component was included within the scope of the Rule. All other components in the LR database for a given system were reviewed to determine if they supported any of the intended functions for a given system.

The applicant stated that all electrical and I&C components within the evaluation boundary of in-scope mechanical systems were included within the scope of the Rule and evaluated using the spaces approach described in Section 2.1.4.2 of the LRA. The electrical and I&C components from all plant systems (mechanical/electrical and I&C) and structures were scoped collectively under one electrical and I&C component group. However, if the electrical and I&C components provided a mechanical component function, such as a pressure boundary, the components were evaluated individually for aging management along with other components in the mechanical system.

Structure and Structural Component Scoping Methodology. The applicant described the methodology used for structural scoping in Section 2.1.4.3, “Structure Scoping Methodology,” of the LRA. Structures include freestanding buildings, separately evaluated rooms that are contiguous with freestanding buildings, the primary containment shell, tank foundations, the station chimney, and commodity-like groupings of cranes and hoists. The applicant stated that the list of structures used for scoping was developed through review of site plot drawings in conjunction with a walkdown of the property at each site. The UFSARs were relied upon to identify safety classification of structures and structural components. Class I structures and structural components were considered safety-related.

The structural scoping methodology described in the LRA was similar to the mechanical system scoping described in Section 2.1.4.1 of the LRA. Structure descriptions were prepared that included all structure functions. Structure evaluation boundaries were determined, including examination of structure interfaces. All structure functions were evaluated against the criteria of 10 CFR 54.4(a)(1–3) and the results of this evaluation were documented in the LR database. In those instances in which the structure intended functions were supported by other structures or systems, the supporting systems or structures were identified and evaluated against the criteria in 10 CFR 54.4(a)(2). The applicant stated that although a structural boundary drawing was not created for structures, a single boundary diagram based on site plot or equipment layout drawings was created for each site and displays all of the structures in relation to one another.

The applicant noted that, although the controlled plant component database includes some structural components such as pipe supports, equipment anchors, ladders, and doors, it does not include most of the structural components that constitute a structure. Therefore, for structures determined to be within the scope of the Rule, more detailed structural drawings were reviewed and, where needed, walkdowns were performed to identify structural elements (such

as structural steel, foundations, floors, walls, ceilings, penetrations, stairways, or curbs). For in-scope structures, all structural components that are required to support the intended functions of the structure were entered into the LR database as generic structural components and were identified as within the scope of the Rule.

Electrical and Instrumentation and Control System and Component Scoping Methodology. The applicant described the methodology used to scope electrical and I&C systems in Section 2.1.4.2, “Electrical and Instrumentation and Control System Scoping Methodology,” of the LRA. At the system level, the scoping methodology utilized for electrical and I&C systems was identical to the mechanical system-level scoping described in Section 2.1.4.1. The UFSAR, Maintenance Rule database records, CLB and design-basis documents, and system description documents applicable to the system were reviewed to determine the system safety classification and to identify all of the system functions. All system level functions were evaluated against the criteria of 10 CFR 54.4(a)(1–3). The supporting systems needed to maintain the in-scope system intended functions were identified and evaluated against the criteria in 10 CFR 54.4(a)(2). License renewal boundary diagrams were not created for electrical systems. However, boundary diagrams showing the basic electrical distribution throughout the plant and the associated switchyards were created for each site.

The applicant stated that the spaces approach was used to scope electrical and I&C components. Therefore, the applicant identified the electrical and I&C commodity groups that were installed in the plant rather than performing a detailed review to scope specific electrical and I&C components in each in-scope system.

Commodity Group Scoping. In Section 2.1.6 of the LRA, the applicant described its use of mechanical, structural, and electrical commodity groups for certain types of generic components during the scoping process. The use of these commodity groups for each of these scoping areas is discussed below.

- In Section 2.1.6 of the LRA, the applicant stated that mechanical system piping components that were not uniquely identified in the controlled plant component databases were evaluated as part of a system-specific commodity group. When a system was determined to include in-scope commodity items, the commodity items for the system were evaluated and were entered as a representative commodity component into the LR database for the system. For systems determined to have in-scope commodity components made of more than one material. The LR database was modified to include multiple commodity component records corresponding to the different component materials.

The applicant also noted that Dresden and Quad Cities use thermal insulation and jacketing on piping and equipment for a variety of purposes. The applicant recognized that thermal insulation and jacketing on piping and equipment could not readily be scoped against the requirements of 10 CFR 54.4(a)(2) based simply on the plant system where they are used. Therefore, for each plant piping system, the applicant reviewed the insulated pipe plant specifications to determine which systems had installed insulation. For each piping system with insulation installed, the applicant identified an insulation commodity group representing all of the insulation of that type within the system and initially classified the insulation commodity group as within the scope of license renewal. During AMR of the insulation commodity group, further evaluation of the design purpose

for the insulation requirement for each system confirmed or revised the in-scope classification of the system insulation components.

- Structural elements and components were evaluated in commodity groupings that were based on similarity of materials and component functions. For example, an in-scope building comprises several wall elements and may include multiple, but similar, structural components such as equipment supports or doors. The scoping and screening evaluation did not identify and evaluate these multiple structural components on an individual basis. Rather, the evaluation grouped similar structural components as generic components for scoping and screening.
- Electrical and I&C components in electrical and I&C systems and some electrical and I&C components in mechanical systems and structures were evaluated as a consolidated electrical and I&C component group. Electrical components were identified and assigned to this consolidated electrical and I&C component group for scoping and screening evaluation. All components assigned to the consolidated electrical and I&C component group were initially identified as in scope of the Rule. After their assignment to the consolidated electrical and I&C component group, some individual components were reevaluated on the basis of their specific design function. If it were determined that the component did not perform an intended function as described in 10 CFR 54.4, the component was classified as outside the scope of the Rule.

2.1.2.2 Screening Methodology

Following the identification of SSCs within the scope of license renewal, the applicant implemented a process for determining which SSCs would be subject to an AMR in accordance with the requirements of 10 CFR 54.21(a)(1). In LRA Section 2.1.5, "Screening Methodology," the applicant discussed these screening activities as they related to the SCS that are within the scope of license renewal. These screening activities consisted of the identification of mechanical, structural, and electrical and I&C components within the scope of license renewal and subject to an AMR. The applicant's screening methodology described in the LRA for mechanical, structural, and electrical and I&C components is presented below.

2.1.2.2.1 Mechanical Component Screening

Following component-level scoping for mechanical systems, the applicant performed screening to identify those mechanical components that were subject to an AMR. As described in LRA Section 2.1.5.1, "Mechanical System Component Screening Methodology," the applicant used the following methodology.

After a mechanical system component was categorized in the LR database as within the scope of the Rule, the applicant classified the component as either active or passive based on an evaluation of the component description and type. The applicant used the active/passive component determinations documented in Appendix B of NEI 95-10, as guidance for this activity. Components that were recognized during screening as short-lived were eliminated from the AMR process, and the basis for the classification as short-lived was documented in the LR database. All other in-scope passive components were identified as long-lived. Long-lived, passive components within the scope of license renewal were identified as subject to an AMR and evaluated to determine their component-level intended function(s). During the AMR

process, if detailed review of maintenance procedures and requirements determined that a component previously categorized as long-lived was subject to replacement based on a qualified life or specified time period, the component was recategorized as short-lived and eliminated from the AMR evaluation process. The results of the component screening were recorded in the LR database.

2.1.2.2.2 Structural Component Screening

Following component-level scoping for structures, the applicant performed screening to identify those civil/structural components that were subject to an AMR. In LRA Section 2.1.5.3, "Structural Component Screening Methodology," the applicant described the methodology used to screen civil/structural components. The applicant stated that when a structure or structural component was determined to be within the scope of license renewal, the structure screening methodology classified the component as passive. An evaluation was made to determine whether in-scope structural components were subject to replacement based on a qualified time period. If the in-scope structural component were subject to replacement based on a qualified time period, the component was identified as short-lived and was excluded from an AMR. The applicant stated that, except for a very limited number of structural components that were excluded on the basis of being subject to replacement per criterion 10 CFR 54.21(a)(1)(ii), all in scope structures and structural components were subject to an AMR.

2.1.2.2.3 Electrical and I&C Component Screening

In LRA Section 2.1.5.2, "Electrical and I&C System Component Screening Methodology," the applicant described the methodology used to screen electrical and I&C components. The applicant stated that, based on the spaces approach to AMR for electrical components, all electrical and I&C components classified as within the scope of the license renewal were evaluated as a consolidated electrical and I&C component group. The applicant stated that components were categorized as "active" or "passive" based on the determinations documented in Appendix B of NEI 95-10. In-scope components determined to be passive were identified in the LR database as subject to an AMR. In Section 2.1.6 of the LRA, the applicant stated that for most passive components within the scope of license renewal, the determination of whether a component was short-lived or long-lived was made during the AMR process when procedures for maintaining and replacing plant equipment were reviewed in detail. The component-level intended function(s) were determined for each in-scope passive component and recorded in the LR database. All passive electrical and I&C commodity components, such as cables, are subject to an AMR unless they were specifically evaluated and determined not to perform an intended function as described in 10 CFR 54.4. Electrical and I&C components from mechanical systems were screened collectively using the spaces approach along with similar components from electrical and I&C systems. This also applied to any electrical and I&C components associated with structures. Any mechanical or structural components in electrical and I&C systems that were determined to be within the scope of the Rule were categorized as "active" or "passive" based on the determinations documented in NEI 95-10.

2.1.3 Staff Evaluation

The staff evaluated the LRA scoping and screening methodology in accordance with the guidance contained in Section 2.1, "Scoping and Screening Methodology," of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants."

(SRP-LR). The acceptance criteria for the scoping and screening methodology review are based on the following regulations:

- 10 CFR 54.4(a), as it relates to the identification of plant SSCs within the scope of the Rule
- 10 CFR 54.4(b), as it relates to the identification of the intended functions of plant SSCs determined to be within the scope of the Rule
- 10 CFR 54.21(a)(1) and (a)(2), as they relate to the methods utilized by the applicant to identify plant structures and components subject to an AMR

As part of the review of the applicant's scoping and screening methodology, the NRC staff reviewed the activities described in the following sections of the LRA using the guidance contained in NUREG-1800:

- Section 2.1 ("Scoping and Screening Methodology") to ensure that the applicant described a process for identifying SSCs that are within the scope of license renewal in accordance with the requirements of 10 CFR 54.4(a)(1), (a)(2), and (a)(3)
- Section 2.2 ("Plant-Level Scoping Results"), Section 2.3 ("Scoping and Screening Results: Mechanical Systems"), Section 2.4 ("Scoping and Screening Results: Structures"), and Section 2.5 ("Scoping and Screening Results: Electrical and Instrumentation and Control Systems") to ensure that the applicant described a process for determining structural, mechanical, and electrical components at the Dresden and Quad Cities Nuclear Power Stations that are subject to an AMR in accordance with the requirements of 10 CFR 54.21(a)(1) and (a)(2)

In addition, the staff conducted a scoping and screening methodology audit at Exelon corporate offices in Warrenville, Illinois, from May 20–23, 2003. The focus of the audit was to ensure that the applicant had developed and implemented adequate guidance to conduct the scoping and screening of SSCs in accordance with the methodologies described in the application and the requirements of the Rule. The audit team reviewed implementation procedures and engineering reports which describe the scoping and screening methodology implemented by the applicant. In addition, the audit team conducted detailed discussions with the applicant on the implementation and control of the license renewal program and reviewed administrative control documentation and selected design documentation used by the applicant during the scoping and screening process. The audit team further reviewed a sample of system scoping and screening results reports for the core spray (CS) system, reactor core isolation cooling (RCIC) system (Quad Cities only), isolation condenser (Dresden only), reactor building closed cooling water system, and main feedwater system to ensure that the methodology outlined in the administrative controls was appropriately implemented and the results were consistent with the CLB.

2.1.3.1 Scoping Methodology

The staff reviewed the scoping process to verify that the applicant's methodology was consistent with NUREG-1800 and other documented staff positions and that the scoping

methodology adequately identified SSCs within the scope of license renewal in accordance with the requirements of 10 CFR 54.4(a).

2.1.3.1.1 Implementation Procedures and Documentation Sources Used for Scoping and Screening

The staff reviewed the applicant's scoping and screening implementation procedures to verify that the process used to identify structures and components subject to an AMR was consistent with the LRA and NUREG-1800 and that the applicant appropriately implemented the procedural guidance. Additionally, the staff reviewed the scope of CLB documentation sources used to support the LRA development and the process used by the applicant to ensure that CLB commitments were appropriately considered during the scoping and screening process.

Review of Methodology Implementation Procedures. The staff reviewed the following scoping and screening methodology implementation procedures and engineering reports:

- GE-NE-LRTI-2000, "Scoping and Screening of Systems, Structures, and Components for License Renewal"
- LRTI-16, "Identification of Non Safety-related Structures and Components Which Spatially or Structurally Interact With Safety-related Systems"
- PP-QDC-DRE Revision 00 IN, "Treatment of Pipe/Equipment Insulation During Scoping and Screening Systems for License Renewal"
- PP-DRE&QDC Revision 02-AP, "Active/Passive Classification and Intended Function Determination of Structures and Components"
- PP-DRE-QDC Revision 01 SPACES, "Scoping and Screening Position Paper for Electrical Components Based on Electrical Spaces Approach for Aging Management Review"
- Desktop Guide, "Scoping & Screening of Systems, Structures and Components"

In reviewing these procedures, the staff focused on the consistency of the detailed procedural guidance with information in the LRA and the various NRC staff positions documented in NUREG-1800 and ISG documents. The team found that the scoping and screening methodology instructions were generally consistent with Section 2.1 of the LRA and were of sufficient detail to provide the applicant's staff with concise guidance on the scoping and screening implementation process to be followed during the LRA activities.

During the scoping and screening methodology audit, the audit team identified that some of the applicant's implementation procedures were based on a version of NEI 95-10 that was not endorsed by the NRC. Specifically, the staff noted that the applicant used guidance from Revision 2 to NEI 95-10, dated August 2000, to develop certain portions of the scoping and screening procedures. For example, procedure PP-DRE&QDC Revision 02-AP, "Active/Passive Classification and Intended Function Determination of Structures and Components," Section 3, stated that the classification of components was performed in conformance and consistent with the guidelines provided in NEI 95-10, Revision 2. In Regulatory Guide 1.188, "Standard Format and Content for Application to Renew Nuclear

Power Plant Operating Licenses,” issued July 2001, the NRC endorsed Revision 3 to NEI 95-10, dated March 2001, as providing an acceptable method for complying with the license renewal rule. Because the applicant utilized a version of NEI 95-10 that has not been endorsed by the NRC staff for LRA development, in Request for Additional Information (RAI) 2.1-5, the staff asked the applicant to identify the differences that exist between Revisions 2 and 3 of NEI 95-10 and the potential impact on the LRA.

In its October 3, 2003, response to RAI 2.1-5, the applicant stated that, based on a comparison between NEI 95-10 Revision 2 and Revision 3, the major substantive changes involved the new LRA format; some changes to Appendix B, “Typical Structure, Component and Commodity Groupings and Active/Passive Determinations for the Integrated Plant Assessment”; and additional guidance on the treatment of consumables. The applicant stated that (1) there were no changes in Revision 3 of NEI 95-10 Appendix B tables for active/passive determinations for components that impacted the conclusions or methodology implemented for the Dresden/Quad Cities component screening and (2) the Exelon evaluation process for evaluating consumables was consistent with the screening guidance provided in Table 2.1-3 of NUREG-1800. The staff reviewed the changes between Revisions 2 and 3 of NEI 95-10, the applicant’s guidance for active/passive screening determinations, and the applicant’s treatment of consumable items. Based on these reviews, the staff concluded that the applicant’s response to RAI 2.1-5 was reasonable and the use of NEI 95-10, Revision 2, for LRA development did not adversely impact the scoping and screening methodology. Therefore, RAI 2.1-5 has been resolved.

Methods Used to Review the Current Licensing Basis. The staff reviewed the scope and depth of the applicant’s CLB review to verify that the methodology was sufficiently comprehensive to identify SSCs within the scope of license renewal and structures and components requiring an AMR. As defined in 10 CFR 54.3(a), the CLB is the set of NRC requirements applicable to a specific plant and a licensee’s written commitments for ensuring compliance with and operation within applicable NRC requirements and the plant-specific design basis that are docketed and in effect. The CLB includes certain NRC regulations, orders, license conditions, exemptions, technical specifications, design-basis information documented in the most recent updated final safety analysis report (UFSAR), and licensee commitments remaining in effect that were made in docketed licensing correspondence such as licensee responses to NRC bulletins, generic letters, and enforcement actions, as well as licensee commitments documented in NRC safety evaluations or licensee event reports.

The staff determined that LRA Section 2.1.3, “Documentation Sources Used for Scoping and Screening,” provides a description of the CLB and related documents used during the scoping and screening process that is consistent with the guidance contained in NUREG-1800 and NEI 95-10. However, the applicant’s methodology implementation procedures do not describe the process used to review certain CLB and design-basis documents such as safety evaluation reports (SERs), license event reports, and responses to NRC bulletins, generic letters, and enforcement actions in a manner that ensured that all system and structure functions were identified for the purposes of license renewal scoping. Because the staff was unable to fully evaluate the process used to review CLB documents, the staff requested in RAI 2.1-8 that the applicant describe the method(s) used to review the CLB documents identified in Section 2.1.3 of the LRA for the purposes of identifying all applicable SSCs functions.

In its October 3, 2003, response to RAI 2.1-8, the applicant stated that the first level of documents reviewed included the UFSARs, the Maintenance Rule databases, the

system/structure design-basis documents, and the system/structure operational description documents. Based on references contained in the initially reviewed documents, the applicant stated that additional CLB documents such as SERs, license event reports, and responses to NRC bulletins, generic letters, and enforcement actions were identified for review. In addition, the applicant noted that electronic searches based upon key words or document numbers were also conducted. The staff concluded that the identification of CLB documents such as SERs, license event reports, and responses to NRC bulletins, generic letters, and enforcement actions using reference information from other parent CLB documents, in combination with electronic document searches, provides reasonable assurance that the applicant considered a broad scope of CLB document sources during scoping and screening. The staff determined that the applicant's response to RAI 2.1-8 was reasonable; therefore, RAI 2.1-8 is resolved.

Based on a review of information provided in Section 2.1 of the LRA, a review of the applicant's detailed scoping and screening implementation procedures, and the results from the scoping and screening audit, the staff concluded that the applicant's scoping and screening methodology considered a sufficient scope and depth of CLB information. The staff determined that the CLB documentation review methodology was capable of identifying SSCs intended functions in a manner consistent with the requirements of 10 CFR 54.4 and 10 CFR 54.21.

2.1.3.1.2 Application of the Scoping Criteria in 10 CFR 54.4(a)

The staff evaluated the applicant's methodology for scoping SSCs pursuant to the requirements of 10 CFR 54.4(a). The results of this staff evaluation are described below.

Application of the Scoping Criteria in 10 CFR 54.4(a)(1). In part, 10 CFR 54.4(a)(1) requires that the applicant consider all safety-related SSCs that are relied upon to remain functional during and following design-basis events to ensure (1) the integrity of the reactor coolant pressure boundary, (2) the ability to shut down the reactor and maintain it in a safe shutdown condition, or (3) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11, to be within the scope of the license renewal.

The applicant performed scoping of safety-related SSCs in accordance with implementation procedure GE-NE-LRTI-2000 and the Scoping and Screening Desktop Guide. Section 4.1.4 of procedure GE-NE-LRTI-2000 includes a checklist used to determine if a structure or system meets the safety-related scoping criteria of 10 CFR 54.4(a)(1). Although the applicant's safety-related checklist items were similar to the criteria contained in 10 CFR 54.4(a)(1), the staff identified some differences. Specifically, the checklist items associated with safety-related scoping did not specifically address the full scope of potential offsite exposure limits referenced in 10 CFR 54.4(a)(1)(iii) and the spectrum of design-basis events to be considered for safety-related scoping. The staff requested additional information to clarify the use of the safety-related scoping questions. The staff's evaluation of these two issues is described below:

- Scope of Potential Offsite Exposure Limits Considered for Safety-Related Scoping

Although the wording in LRA Section 2.1.2.1, "Title 10 CFR 54.4(a)(1)—Safety-Related," is consistent with the scoping requirements of 10 CFR 54.4(a)(1)(iii), the safety-related scoping checklist items contained in Section 4.1.4 of procedure GE-NE-LRTI-2000 do not include all the exposure limitations referenced in 10 CFR 54.4(a)(1)(iii). Specifically,

GE-NE-LRTI-2000 does not include a reference to offsite exposures limits comparable to those referred to in 10 CFR 50.34(a)(1) and 10 CFR 50.67(b)(2). Because the failure to consider exposure limitations contained in 10 CFR 50.34(a)(1) and 10 CFR 50.67(b)(2) could result in the omission of safety-related SSCs from the scope of license renewal, in RAI 2.1-1, the staff requested the applicant to describe how these exposure limitations, as applicable, were factored into the license renewal scoping and screening process.

In its October 3, 2003, response to RAI 2.1-1, the applicant clarified how the exposure limitations of Section 50.34(a)(1) and Section 50.67(b)(2) were factored into the scoping methodology. The applicant noted that 10 CFR 50.34 applies to applications for a construction permit and that Exelon has not applied for a construction permit for either the Dresden or Quad Cities stations. However, the applicant stated that it has submitted license amendment requests for the Dresden and Quad Cities stations to support application of an alternate source term methodology pursuant to 10 CFR 50.67(b)(2). To support the alternate source term submittal, the applicant evaluated the radiological consequence analyses of the four design-basis accidents (DBAs) that result in offsite exposure and identified proposed changes to the CLB. The applicant stated that none of the proposed CLB changes would result in changes to system or equipment license renewal intended functions. Based on this response, the staff concluded that the applicant adequately considered the exposure limitations associated with 10 CFR 50.34 and 10 CFR 50.67 in performing safety-related scoping. Therefore, RAI 2.1-1 is resolved.

- Spectrum of Design-Basis Events Considered for Safety-Related Scoping

In part, 10 CFR 54.4(a)(1) states that SSCs within the scope of license renewal include safety-related SSCs that are relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49(b)(1)). As defined in 10 CFR 50.49, design-basis events are conditions of normal operation, including anticipated operational occurrences, design-basis accidents, external events, and natural phenomena for which the plant must be designed. In regard to identification of design-basis events, Section 2.1.3, "Review Procedures," of NUREG-1800 states the following:

The set of design basis events as defined in the rule is not limited to Chapter 15 (or equivalent) of the UFSAR. Examples of design basis events that may not be described in this chapter include external events, such as floods, storms, earthquakes, tornadoes, or hurricanes, and internal events, such as a high-energy-line break.

During the scoping and screening methodology audit, the NRC staff questioned how nonaccident design-basis events, particularly design-basis events that may not be described in the UFSAR, were considered during scoping. The staff noted that, although GE-NE-LRTI-2000, Section 4.1.4, includes safety-related scoping criteria similar to 10 CFR 54.4(a)(1), the procedure did not appear to clearly define the scope of design-basis events that were to be considered during scoping. During the scoping and screening methodology audit, the applicant was unable to provide sufficient information to demonstrate that design-basis events not included in the UFSAR Chapter 15 accident analyses were adequately considered during scoping. The staff determined that limiting the review of design-basis events to design-basis accidents described in Chapter 15 of the UFSAR could result in omission of safety-related functions described elsewhere in the CLB. For example, the Dresden UFSAR, Section 3.4.1.1, "External Flood Protection Measures," indicates that the isolation condenser has a safety-related function during a design-basis flooding event to

provide core cooling. However, during the methodology audit, the team noted that the isolation condenser system-level intended functions did not include a safety-related function for providing capability to shut down the reactor and maintain it in a safe shutdown condition. Therefore, in RAI 2.1-7, the staff requested the applicant to explain the basis for the determination that the safety-related intended functions of the isolation condenser system did not include shutting down the reactor and maintaining it in a safe shutdown condition. Additionally, in RAI 2.1-7, the staff requested the applicant to describe the methodology used to ensure that all design-basis events (including conditions of normal operation, anticipated operational occurrences, design-basis accidents, external events, and natural phenomena) were addressed during license renewal scoping.

In its October 3, 2003, response to RAI 2.1-7, the applicant stated that the Dresden and Quad Cities site safety classifications were based on a definition of "safety-related" that did not incorporate the 10 CFR 50.49(b)(1) definition of design-basis events. Consequently, the applicant indicated that the CLB definition of "safety-related" for the Dresden and Quad Cities sites is not the same as that given in 10 CFR 54.4(a)(1). Specifically, the applicant noted that its CLB definition of "safety-related" does not include SSCs used to mitigate nonaccident design-basis events (e.g., such as tornados, external flooding, internal flooding, high-energy line breaks, dam failures, and earthquakes).

In preparation for responding to RAI 2.1-7, the applicant reviewed the SSCs credited for safe shutdown during nonaccident events to ensure that the intent of 10 CFR 54.4(a) was met. As a result of this review, the applicant identified additional components associated with high-energy line break nonaccident events that were within the scope of license renewal but had not been previously identified. The specific components added to the LR scope were associated with the applicant's scoping of non-safety-related high-energy systems and are described in "Application of the Scoping Criteria in 10 CFR 54.4(a)(2)," below. The applicant noted that the additional components included within the scope of license renewal as a result of nonaccident events were not classified as "safety-related" as defined in the licensing basis for each site. To remain consistent with the existing licensing basis for each site, these SSCs were included within the scope of license renewal under the criteria of 10 CFR 54.4(a)(2). Therefore, for the Dresden and Quad Cities sites, SSCs meeting the scoping criteria of 10 CFR 54.4(a)(1) were identified during the applicant's Section 54.4(a)(1) and Section 54.4(a)(2) scoping efforts.

With regard to the scoping of the safety-related function of the isolation condenser during a flooding event, the applicant stated that the CLB search for intended functions for the isolation condenser inadvertently missed the statement in Section 3.4.1.1 of the UFSAR crediting the core cooling function of the isolation condenser. Although inadvertently omitting SSCs intended functions described in the CLB could result in the failure to include appropriate equipment within the scope of license renewal, the staff determined that the additional reviews conducted by the applicant in response to RAI 2.1-7 provide additional assurance that intended functions have been identified. The staff concluded that the applicant's scoping efforts conducted pursuant to 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2), in addition to the scoping evaluations performed for RAI 2.1-7, ensured that SSCs meeting the scoping criteria of 10 CFR 54.4(1) were included within the scope of the rule and evaluated for aging management. Therefore, RAI 2.1-7 has been resolved.

Following scoping of structures and systems, the applicant performed safety-related component scoping. During the scoping and screening methodology audit, the applicant stated that the EWCS database included safety classification data for certain SSCs. The applicant stated that the safety classification obtained from the EWCS database was initially used to scope safety-related components. During the methodology audit, the staff identified that the EWCS safety classification field for several components was blank in the license renewal database. The applicant stated that a blank safety classification field indicated that a safety classification review of the component had not been performed, and therefore, the EWCS database did not have safety classification data for the component. The applicant stated that GE License Renewal Instruction Letter GE LR 002, Revision 3, related to GE-NE-LRTI-2000, provided guidance for handling EWCS component data deficiencies, including blank safety classification fields. The guidance stated that, if the component with a blank safety-related classification field was a daughter component to a safety-related parent component, then the daughter component should be classified as safety-related. If the component was not a daughter to a safety-related component, the guidance specified that further evaluation was needed. During the audit, the applicant stated that P&IDs and other controlled documents would be used in these cases to determine the proper safety classification. The staff determined that the applicant's utilization of EWCS safety classification data, including the resolution of data deficiencies, was reasonable.

The audit team reviewed a sample of the license renewal database 10 CFR 54.4(a)(1) scoping results and discussed the methodology and results with the applicant's license renewal project personnel. The team verified that the applicant had identified and used pertinent engineering and licensing information in order to determine the SSCs required to be in scope in accordance with the 10 CFR 54.4(a)(1) criteria. On the basis of this sample review, discussions with the applicant, and review of the applicant's scoping process, the staff determined that the applicant's methodology for identifying systems and structures meeting the scoping criteria of 10 CFR 54.4(a)(1) was adequate.

Application of the Scoping Criteria in 10 CFR 54.4(a)(2). As required by 10 CFR 54.4(a)(2) all non-safety-related SSCs whose failure could prevent satisfactory accomplishment of any of the functions identified in 10 CFR 54.4(a)(1) must be within the scope of the license renewal. Guidance for the staff review of non-safety-related scoping is provided in NUREG-1800, Section 2.1.3.1.2, "Non-safety-Related." The staff provided further expectations for determining what SSCs met the 10 CFR 54.4(a)(2) criterion in letters dated December 3, 2001, and March 15, 2002. In the December 3rd letter (ADAMS Accession No. ML013380013) the staff described the expectation that both seismic II/I piping segments and their supports should be included within the scope of license renewal under the 10 CFR 54.4(a)(2) criterion. Additionally, the letter provided specific examples of operating experience which identified pipe failure events (summarized in Information Notice (IN) 2001-09, "Main Feedwater System Degradation in Safety-Related ASME Code Class 2 Piping Inside the Containment of a Pressurized Water Reactor") and the approaches the NRC considers acceptable to determine which piping systems should be included in scope based on the 54.4(a)(2) criterion. The March 15th letter (ADAMS Accession No. ML020770026) further described the staff's expectations for the evaluation used to determine which non-safety-related SSCs are in scope due to the potential to adversely impact safety-related intended functions. The position states that applicants should not consider hypothetical failures, but rather should base their evaluation on the plant's current licensing basis, engineering judgement and analyses, and relevant operating experience. The paper further describes operating experience as all documented plant-specific and industry wide experience which can be used to determine the plausibility of a failure. Documentation would

include NRC generic communications and event reports, plant-specific condition reports, industry reports such as significant operating event reports (SOERs), and engineering evaluations.

The applicant's methodology for performing 10 CFR 54.4(a)(2) scoping of non-safety-related SSCs was documented in implementation procedure GE-NE-LRTI-2000, the Scoping and Screening Desktop Guide, and license renewal technical instruction (LRTI)-16, "Identification of Non Safety-related Structures and Components Which Spatially or Structurally Interact With Safety-related Systems." The applicant performed the initial scoping of non-safety-related structures and systems using a checklist item contained in Section 4.1.4 of procedure GE-NE-LRTI-2000 to identify if a structure or system met the non-safety-related scoping criteria of 10 CFR 54.4(a)(2). During the scoping and screening methodology audit, the applicant stated that the checklist item applicable to 10 CFR 54.4(a)(2) was initially interpreted to apply only to non-safety-related structures and components that provided support functions to safety-related equipment. Following issuance of the staff's March 15, 2002, letter on scoping SSCs per 10 CFR 54.4(a)(2), the applicant revised the non-safety-related scoping methodology to consider non-safety-related SSCs seismic and spatial interactions that could adversely impact safety-related intended functions. Consequently, the applicant added Attachment 2, "Guidance for Identification and Documentation of Structures, Systems, and Components (SSCs) which Meet 10 CFR 54.4(a)(2)," to GE-NE-LRTI-2000 to provide guidance for the revised scoping of non-safety-related SSCs. Technical instruction LRTI-16 provided the detailed methodology for identifying non-safety-related SSCs that could spatially interact with safety-related SSCs. The LRTI-16 scoping process included the following steps:

- An inventory was taken to identify all systems that contain equipment located in each plant area that contained at least one safety-related component.
- The applicant completed a spatial interaction checklist to identify non-safety-related systems that could spatially interact with safety-related equipment. The checklist was completed based on the results of walkdowns and spatial interaction screening criteria contained in LRTI-16. The LRTI-16 screening criteria identified specific seismic and spatial interactions that the applicant considered to be credible means for non-safety-related SSCs to adversely interact with safety-related equipment.
- In situations where non-safety-related piping physically connected to a safety-related system, the portion of the non-safety-related system providing structural support to the safety-related system was included within the scope of the rule up to the point where the non-safety-related system was anchored in three dimensions.

The staff reviewed the applicant's scoping methodology, as described in the LRA and associated implementation procedures, to verify that it was consistent with the guidance provided in NUREG-1800 and related staff positions. Additionally, during the scoping methodology audit, the staff reviewed a sampling of scoping results to determine if the methodology adequately identified non-safety-related SSCs meeting the scoping criteria of 10 CFR 54.4(a)(2). Based on a review of the LRA, the applicant's scoping and screening implementation procedures, and discussions with the applicant, the staff determined that additional information was required to assess certain aspects of the applicant's scoping methodology for the 10 CFR 54.4(a)(2) criteria. In RAI 2.1-2, the staff requested the applicant to address the following five issues:

- (a) In LRA Section 2.1.2.2, "Title 10 CFR 54.4(a)(2) - Non-safety-related affecting safety-related," the applicant stated that plant walkdowns were performed to identify those areas containing safety-related SSCs. The applicant further stated in LRA Section 2.1.2.2 that, in those instances where a plant walkdown could not be performed, plant drawings were used to identify those areas containing safety-related SSCs and to identify component interactions. For areas where walkdowns could not be performed to identify non-safety-related SSCs that could affect safety-related SSCs, the staff requested the applicant to describe the methodology and documentation sources used to perform scoping pursuant to 10 CFR 54.4(a)(2).

In its October 3, 2003, response to RAI 2.1-2.a, the applicant provided a listing of plant areas where plant drawings were used to identify spatial interactions rather than a physical area walkdown. Controlled plant piping layout drawings for the various elevations of the plant were used to identify those areas containing safety-related SSCs and to identify component interactions. Controlled electrical/instrumentation physical layout drawings were also used to aid in the identification of safety-related components in the areas. The applicant stated that this review of controlled plant drawings was only performed for high-radiation areas where personnel entry at power operation would have resulted in an unnecessary accumulation of dose. The staff determined that the applicant provided a reasonable basis for not performing physical walkdowns for the identified areas of the plant. Further, the use of controlled plant piping layout and electrical/instrumentation plant drawings was a reasonable method for identifying potential spatial interactions for these areas. On this basis, the staff concluded that RAI 2.1-2.a is resolved.

- (b) Instruction LRTI-16, "Identification of Non Safety-related Structures and Components Which Spatially or Structurally Interact With Safety-related Systems," describes the process used to identify non-safety-related systems and components which meet the scoping criteria specified in 10 CFR 54.4(a)(2) due to spatial or structural interaction with safety-related systems. Section 4.3 of LRTI-16 states that non-safety-related systems were evaluated using the screening criteria provided in LRTI-16, Table 2, "Spatial Interaction Screening Criteria." The staff requested the applicant to describe the basis and/or provide justification for the use of the following spatial interaction screening criteria contained in LRTI-16, Table 2:

- Pipe whip and jet impingement apply only to high-energy systems containing fluids with temperatures greater than or equal to 200 °F and a pressure greater than or equal to 275 psig (LRTI-16, Table 2, Item 5). The staff noted that this definition of high-energy systems appeared to be inconsistent with the CLB definition of a high-energy system as described in the Dresden UFSAR, Section 3.6.1.1.1.1, which indicated that a fluid was high energy when the temperature exceeds 200 °F or the pressure exceeds 275 psig.
- Spray from high-energy systems can affect equipment up to 25 feet (LRTI-16, Table 2, Item 10).
- Cables in conduit or trays are not affected by water spray as long as the spray does not target a cable termination area (LRTI-16, Table 2, Item 4).

- Spray from medium-/low-energy systems can affect equipment up to 20 feet (LRTI-16, Table 2, Item 11). The applicant defined medium-/low-energy systems as any system that did not meet the definition of a high-energy system.
- Early detection of leaks (sumps and floor drain systems) is given credit in the scope of the rule for preventing long-term degradation of passive equipment and flooding beyond the lowest elevation of the building (LRTI-16, Table 2, Item 8).
- Fluid spray can affect only active components (LRTI-16, Table 2, Item 6).

In its October 3, 2003, response to RAI 2.1-2.b, the applicant provided additional information relating to each of the above spatial interaction screening criteria.

High-Energy System Definition and Scoping

The applicant stated that the definition of a high-energy system used during scoping and screening evaluations was consistent with the specific licensing basis at each site. Consequently, Quad Cities defined a high-energy system as a system where the temperature and pressure conditions of fluid exceed 200 °F and 275 psig, respectively, while Dresden defined a high-energy system as one where the temperature or pressure conditions of fluid exceed 200 °F and 275 psig, respectively. The applicant indicated that all systems meeting the plant-specific licensing basis definition of a high-energy system at each site were evaluated for spatial interactions.

In its response to the RAI, the applicant did not justify the use of the 25-foot separation criterion but instead revised the scoping methodology to consider potential spatial interactions between high-energy systems and safety-related SSCs separated by more than 25 feet. The applicant stated that all high energy piping located inside the primary containment was safety-related and included within the scope of license renewal under 10 CFR 54.4(a)(1) scoping criteria. For high energy piping located outside the primary containment, the applicant re-evaluated the scoping boundaries for the following high-energy systems to account for potential spatial interactions:

- main steam
- feedwater
- high pressure coolant injection
- reactor water cleanup
- reactor core isolation cooling (Quad Cities only)
- isolation condenser (Dresden only)
- extraction steam to heaters A, B, C, or D
- heater drain from heater C or D
- condensate booster lines
- moisture separator drain
- control rod drive hydraulic system

As a result of this re-evaluation, the applicant expanded the scoping boundaries of the main steam, feedwater, reactor water cleanup (RWCU), and control rod drive (CRD) systems. The applicant stated that the expanded boundaries are now consistent with the scope of high-energy line breaks analyzed in the CLB and described in Appendix 3A of the UFSAR

for both sites. The staff evaluation mechanical system scoping results and aging management programs (AMPs) associated with these expanded boundaries are described in Sections 2.3.1 and 3.1 of this report. The staff concluded that the applicant's scoping methodology for high-energy systems was consistent with the plant-specific licensing bases for the Dresden and Quad Cities sites and considered an adequate scope of potential spatial interactions.

Fluid Spray Interactions with Cables

In its October 3, 2003, response to RAI 2.1-2.b, the applicant stated that the technical justification for the assumption that cables in conduit or trays are not affected by water spray is that the cables are protected by the cable insulation and jacketing. The applicant also noted that cable pan covers and conduit provide additional protection of cable from water spray. The staff concluded that the applicant provided a reasonable basis for its approach to the scoping of cables in conduit or trays.

Fluid Spray Interactions and Flooding

In its October 3, 2003, response to RAI 2.1-2.b, the applicant stated that the only spatial interactions attributed to moderate-/low-energy systems were water spray, flooding, and falling of piping components onto safety-related components. Furthermore, the applicant stated that portions of low-/moderate-energy pipe located directly over a safety-related component (active or passive) were included within the scope of license renewal regardless of the distance separating the two systems. However, the applicant used a separation criterion of 20 feet when evaluating the potential effects of spray. Therefore, spatial interactions were considered only for those portions of low- or moderate-energy non-safety-related systems separated by less than 20 feet from an active safety-related component. In reviewing the RAI response, the staff determined that the applicant's primary basis for this position was the assumption that fluid sprays dissipate over distance, and degradation of low- or moderate-energy systems would occur gradually over time. The applicant stated that any early leakage would be detected and corrected by plant personnel through rounds, inspections, and monitoring of sumps before the aging mechanisms such as corrosion can have an adverse effect. The applicant used a similar basis for the assumption that early detection of leakage would prevent long-term degradation of passive components. Consequently, the applicant assumed that fluid sprays could affect only active components.

The staff concluded that the applicant's basis relied on the assumption that the exposure duration of a non-safety SSC failure would be limited by early detection of leakage through operator actions. However, as discussed in a March 21, 2003, letter to NEI regarding staff comments to proposed industry guidance on 10 CFR 54.4(a)(2) scoping, neither the license renewal rule nor the associated statements of consideration examine duration of the failure as a factor in determining whether a non-safety-related SSC should be in scope. Therefore, the staff determined that the applicant did not provide a sufficient basis for limiting consideration of fluid spray interactions to only those non-safety-related SSCs located within 20 feet of an active safety-related SSC. In particular, the staff requires additional clarification regarding the capability of active and passive safety-related SSCs located greater than 20 feet from a potential spray source to tolerate wetting, the specific operating experience that was relied upon to determine that it was not credible for fluid sprays to affect equipment greater than 20 feet from a failure location, specific methods to detect leakage in

normally accessible and inaccessible areas, and justification for use of exposure duration in limiting the scope of potential failure mechanisms considered during scoping. This issue was identified as Open Item 2.1-1.

The applicant responded to Open Item 2.1-1 by letters dated April 9, 2004 and May 18, 2004 (ADAMS Accession Nos. ML041070456, and ML041480178). In addressing this open item, the applicant revised the scoping methodology for non-safety-related moderate energy piping systems that have the potential to interact spatially with safety-related systems. Specifically, the applicant eliminated the 20 foot separation criterion and credit for the early detection of leakage that was previously used to exclude certain moderate energy non-safety-related piping and components from the scope of license renewal. The revised methodology assumes that all safety-related components, active as well as passive, could be adversely affected by spray or wetting from a non-safety moderate energy system located in the same general area of the plant. Therefore, the applicant stated that all components from moderate energy non-safety-related systems located in the same general area as a safety-related component (active or passive) would be included within the scope of license renewal. The applicant defined "General area" as the same floor (elevation) of a major building with no barrier walls between the fluid source and the safety-related component. Barrier walls were defined as barriers that form the boundary of a room on the same elevation of a major building separating the safety-related components from a spray or leak generated by a non-safety-related component located on the other side of the barrier wall. The applicant stated that all barrier walls credited for protection of safety-related components were previously included within the scope of license renewal during structural scoping and subject to aging management review.

In accordance with the revised methodology, the applicant expanded the license renewal boundaries of 17 systems previously determined to be within the scope of license renewal and identified an additional intended function for the main condenser at Quad Cities. Additionally, the applicant added the following five non-safety-related systems to the scope of license renewal that were previously excluded from the scope of license renewal: circulating water (Dresden and Quad Cities), laundry (Dresden), zinc addition (Dresden and Quad Cities), extraction steam (Quad Cities), and feedwater heater vents and drains (Quad Cities). In its May 18, 2004 response to Open Item 2.1-1, the applicant identified LRA revisions, scoping results changes, and aging management program changes required as a result of the scoping methodology revision. The staff review of these revised scoping results and associated aging management programs are described in Sections 2.3 and 3.1 of this report.

On the basis of the above, the staff concludes that the applicant adequately resolved the issues identified in Open Item 2.1-1. Specifically, the elimination of the 20-foot limitation on spray interactions, consideration of potential adverse effects for both active and passive safety-related equipment, and elimination of credit for early detection of leakage adequately addressed the staff's methodology concerns. Furthermore, the staff determined that the applicant's revised methodology considered a reasonable spectrum of potential non-safety-related spatial interactions with safety-related equipment. Therefore, the staff concludes that the revised methodology for scoping non-safety-related equipment provides reasonable assurance that the applicant considered non-safety-related SSCs whose failure could prevent satisfactory accomplishment of a safety-related intended function within the scope of license renewal. On this basis, Open Item 2.1-1 is resolved. Furthermore, the applicant

adequately resolved the staff concerns raised in RAI 2.1-2.b; therefore, RAI 2.1-2.b is resolved.

- (c) Section 2.1.2.2 of the LRA states that pipe whip, jet impingement, general flooding, or spray of a gas were not considered credible interactions for gas systems to adversely affect safety-related SSCs. In LRTI-16, Table 2, Item 3 states, “while falling equipment from gas systems can spatially impact safety-related components located below them, the only credible manner in which equipment can fall is through failure of the attached supports.” The staff position described in the letter dated March 15, 2003 is that applicant should not consider hypothetical failures, but rather should base their evaluation on the plant’s CLB, engineering judgment and analyses, and relevant operating experience. The staff requested that the applicant describe the scoping methodology implemented for the evaluation of the 10 CFR 54.4(a)(2) criteria, including a description of the site and industry operating experience used, as it relates to the non-fluid-filled SSCs of interest and its consistency with the staff position documented in the staff’s letter dated March 15, 2003.

In its October 3, 2003, response to RAI 2.1-2.c, the applicant stated that pipe whip, jet impingement, general flooding, or spray of a gas were not considered credible interactions for non-safety-related gas systems to adversely affect safety-related SSCs. The applicant’s basis for this assumption was that gas systems contain no fluids that could spray or leak onto safety-related systems causing shorts or other malfunctions and gas systems do not contain sufficient energy to cause pipe whip or jet impingement. Additionally, the applicant considered that the falling of gas-filled pipe components onto safety-related equipment was not a credible spatial interaction unless the attached piping supports were to fail. This latter assumption was based on an operating experience review that included a review of NRC information notices, NRC Office of Inspection and Enforcement (IE) bulletins, generic letters, and plant-specific condition reports, work order history, and self assessments. The applicant stated that no instances of gas-filled piping or component degradation resulting in the falling of components were identified. For this reason, the applicant stated that the pipe supports for gas systems were included within the scope of license renewal, but the gas system piping and valves were not included in the scope of license renewal. The staff determined that the applicant performed a sufficient operating experience review to determine credible spatial effects between non-safety-related gas-filled systems and safety-related SSCs. Therefore, the staff concluded that the applicant’s scoping approach for gas-filled systems was reasonable and RAI 2.1-2.c is resolved.

- (d) As described in the staff’s letter dated March 15, 2003, if an applicant uses a mitigative option when performing the scoping of non-safety-related SSCs under 10 CFR 54.4(a)(2), the applicant should demonstrate that plant mitigative features are adequate to protect safety-related SSCs from non-safety-related SSC failures, regardless of failure location. If an applicant cannot demonstrate that the mitigative features are adequate to protect safety-related SSCs from the consequences of non-safety-related SSC failures, then the entire non-safety-related SSCs is required to be brought into the scope of license renewal.

In reviewing the LRA, the NRC staff was unable to determine if the 10 CFR 54.4(a)(2) scoping methodology considered failures at all piping locations where age-related degradation is possible. The staff requested the applicant to clarify how the scoping methodology of non-safety-related piping was performed relative to the guidance contained in the staff’s letter dated March 15, 2003.

In its October 3, 2003, response to RAI 2.1-2.d, the applicant stated that plant mitigative features were not credited with protecting safety-related SSCs from failures of non-safety-related SSCs. Those portions of non-safety-related SSCs that could spatially or structurally interact with a safety-related SSCs in such a manner that would prevent the accomplishment of a safety-related SSCs intended function were included within the scope of license renewal. Based on this response, the staff concluded that the applicant considered an adequate scope of non-safety-related SSC failure locations during license renewal scoping and RAI 2.1-2.d is resolved.

- (e) In discussions with the applicant's license renewal project team, the NRC staff noted some cases where non-safety-related plant equipment was credited with providing anchorage for non-safety-related piping that was attached to safety-related piping. In these cases, the non-safety-related piping was placed within the scope of license renewal, but the plant equipment providing structural support was not considered to be within scope. For cases in which an entire pipe run including both safety- and non-safety-related piping was analyzed as part of the CLB to establish that it could withstand design-basis event loads, NUREG-1800, Section 2.1.3.1.2, indicates that the scoping methodology includes (1) the non-safety-related piping up to its anchors and (2) the associated piping anchors as being within the scope of license renewal under 10 CFR 54.4(a)(2). Because the plant equipment credited with providing support to non-safety-related piping within the scope of license renewal appears to be equivalent to an associated piping anchor as described in NUREG-1800, the staff requested the applicant to provide justification for not including this plant equipment within the scope of license renewal in RAI 2.1-2.e.

In its October 3, 2003, response to RAI 2.1-2.e, the applicant stated that it conservatively included those portions of non-safety-related pipe up to the point where the pipe was restrained in three orthogonal directions. The scoping boundary was determined through a review of isometric pipe drawings. In those instances where isometric drawings of non-safety-related pipe did not exist (typically small bore pipe less than 2.5 in. in diameter), the applicant either included the entire line up to the end of the pipe run (e.g., no more pipe existed) or ended the boundary where the line attached to a larger piping header or a major component (i.e., pump or heat exchanger). The larger piping header or major component was treated as an anchor. However, the applicant stated that the major component was excluded from the scope of license renewal because all pipe supports installed in the plant were included within the scope of license renewal.

The staff determined that the applicant did not provide a sufficient basis for excluding major components credited with providing a pipe support function from the scope of license renewal. The staff concluded that major components that ensure satisfactory accomplishment of a safety-related function by providing support to non-safety-related piping attached to safety-related systems should be included within the scope of license renewal. The staff noted that the intended function performed by these major components is similar to that performed by pipe supports. In a supplement to their RAI 2.1-2.e response dated December 22, 2003, the applicant stated that, as a result of further review, these major components have been added into the scope of license renewal as non-structural components that provide non-safety-related anchorage. In this supplemental RAI response, the applicant also provided a listing of specific components added to the scope of license renewal and identified a new component group for non-structural components providing non-safety-related anchorage. The staff evaluations of the mechanical system scoping

results and aging management programs associated with the component scoping additions are described in Sections 2.3.1 and 3.1, of this report. Based on inclusion of non-safety-related components credited with providing support to non-safety-related piping attached to safety-related systems within the scope of license renewal, RAI 2.1-2.e is resolved.

A related non-safety-related piping anchorage issue was identified during the Regional scoping and screening inspection documented in NRC Inspection Report Nos. 50-237/03-04(DRS), 50-249/03-04(DRS), 50-254/03-04(DRS), 50-265/03-04 (DRS), dated September 15, 2003. During that inspection, the inspectors questioned the applicant's definition of an equivalent anchor as used to determine the extent of non-safety-related piping attached to safety-related systems that were included within the scope of the license renewal. Specifically, the applicant included non-safety-related piping attached to safety-related pipe up to the point where the non-safety-related piping was restrained in three orthogonal directions. In a letter dated October 20, 2003, the staff requested the applicant to clarify whether this methodology was consistent with the applicable plant's CLB. Additionally, the staff requested justification that would demonstrate that failure of the non-safety-related piping that was potentially excluded from the scope of license renewal would not adversely impact the safety-related portion of the piping system in accordance with 10 CFR 54.4(a)(2). This issue is identified as Open Item (50-237/03-04-01; 50-249/03-04-01; 50-254/03-04-01; 50-265/03-04-01).

By a letter dated March 25, 2004 (ADAMS Accession No. ML040900466), the applicant responded to Open Item 50-237/03-04(DRS); 50-249/03-04(DRS); 50-254/03-04(DRS); 50-265/03-04 (DRS). In its response, the applicant stated that piping at Dresden and Quad Cities was designed in accordance with United States of American Standard (USAS) B31.1 Code, 1967 Edition. The applicant noted that the CLB for Dresden and Quad Cities states that the boundaries of the piping system model used in the original seismic analysis extended well beyond the stress analysis boundaries set by the first normally closed valves. However, the CLB does not provide any detail concerning how much of the non-safety-related piping beyond the first normally closed valve was included in the analysis. The applicant stated that it performed an additional review of CLB documents to determine the criteria used for these piping analyses. During this review, the applicant identified several isometric drawings used in response to IE Bulletin No. 79-14, "Seismic Analyses for As-Built Safety-Related Piping Systems," which indicated the extent to which the piping analyses included non-safety-related piping. The applicant determined that the isometric drawings imply that the piping analyses most likely included two levels of support in each orthogonal direction on the non-safety-related portion of the piping.

Based on the CLB information supporting the Bulletin 79-14 evaluations, the applicant indicated that the scoping boundary for non-safety-related piping attached to safety-related equipment should have been extended up to and including two levels of support in each of the three orthogonal directions. Therefore, the applicant reviewed license renewal system boundary diagrams and piping isometrics to determine which non-safety-related piping license renewal boundaries needed to be expanded to encompass this degree of restraint. For non-safety-related piping attached to large bore (10 in. or larger) safety-related pipe, the applicant license renewal boundary expanded for several systems, including: condensate and condensate storage (Dresden), high pressure coolant injection (Dresden and Quad Cities), reactor building closed water cooling (Quad Cities), residual heat removal (Quad Cities), service water (Quad Cities), and reactor recirculation (Quad Cities). For small bore

pipe, the applicant stated that the original scoping of piping less than 10 inches in diameter typically included the entire line. However, the applicant identified some additional non-safety-related small bore piping which needed to be added to the scope of license renewal as a result of this effort, including piping in the following systems: reactor building closed cooling water (Dresden), isolation condenser (Dresden), nuclear boiler instrumentation (Dresden), control rod drive hydraulic (Dresden and Quad Cities), high pressure coolant injection (Dresden), containment isolation (Dresden and Quad), condensate and condensate storage (Quad Cities), diesel generator cooling (Quad Cities), reactor recirculation (Quad Cities), residual heat removal (Quad Cities), and standby liquid control (Quad Cities). The applicant determined that the components added to the scope of license renewal as a result of these additional reviews were comprised of the same material and environmental combinations as other components previously assessed for aging management. Consequently, the applicant concluded that no new aging management programs were required. However, because the applicant identified certain component types that had not been previously identified in the scoping results described in the LRA, the applicant revised certain LRA Chapter 2 aging management review tables. In their response, the applicant provided a summary of the necessary revisions to the affected tables. The staff review of the additional equipment added to the scope of license renewal and the associated aging management programs are discussed in Sections 2.1 and 3.1 of this report.

On the basis of its review, the staff finds that the applicant's method as described above is reasonable and acceptable because the applicant's response to IE Bulletin 79-14 verified that the actual configuration of the piping systems meets the design requirements, and the staff has previously reviewed the response and found it acceptable. As documented in NRC Inspection Report 50-237/83-23; 50-249/83-20; 50-254/83-22; 50-265/83-21, dated September 9, 1983 (ADAMS Accession No. 8309210296), the NRC staff previously concluded that all pertinent issues and findings relative to IE Bulletin 79-14 had been resolved. Therefore, the staff concludes that the extension of the license renewal scoping boundary to two levels of support in each orthogonal direction beyond the safety-non-safety interface provides reasonable assurance that the safety-related portion of piping could withstand design basis event loads. As such, the staff concludes that the applicant's revised scoping methodology for non-safety-related piping attached to safety-related systems is consistent with NUREG-1800 and the staff expectations of the December 3rd and March 15th letters. Therefore, Open Item (50-237/03-04-01; 50-249/03-04-01; 50-254/03-04-01; 50-265/03-04-01) is resolved.

In reviewing the LRA description of non-safety-related scoping, the staff noted that the subsection entitled "Hypothetical Failures and Cascading," located within LRA Section 2.1.6, indicates that only hypothetical failures described in the CLB were considered during SSCs scoping. With regard to failures that should be considered during 10 CFR 54.4(a)(2) scoping, NUREG-1800, Section 2.1.3.1.2, "Non-safety-Related," states the following:

The applicant must identify those non-safety-related SSCs (including certain second-, third-, or fourth-level support systems) whose failures are considered in the CLB and could prevent the satisfactory accomplishment of the safety-related function identified under 10 CFR 54.4(a)(1). In order to identify such systems, the applicant should consider those failures identified in (1) the documentation that makes up its CLB, (2) plant-specific operating experience, and (3) industry wide operating experience that is specifically applicable to its facility.

The NRC staff noted that consideration of only hypothetical failures described in the CLB may result in the failure to consider failures identified in plant-specific and industry wide operating experience. Therefore, in RAI 2.1-11, the staff requested the applicant to describe the intent of this statement in the LRA and to discuss how the scoping process considered failures identified in the CLB and plant-specific and industry wide operating experience that is applicable to the Dresden and Quad Cities facilities in a manner consistent with the guidance contained in NUREG-1800.

In its October 3, 2003, response to RAI 2.1-11, the applicant provided additional information regarding its treatment of hypothetical failures during scoping. The applicant stated that instruction GE-NE-LRTI-2000 requires the person performing the scoping review for each system or structure to identify information found in CLB documents and to list this information on the system or structure scoping form. The applicant stated that this process provides reasonable assurance that any CLB requirements dealing with the scoping criteria in 10 CFR 54.4(a)(2) are identified in the scoping process. With respect to credible failures identified in plant-specific and industry wide operating experience, the applicant stated that plant-specific and industry wide operating experience was not specifically reviewed during the scoping process in preparation of the Dresden and Quad Cities LRA. The applicant based this position on the existence of routine Exelon practices for review of operating experience which include an assessment to determine if non-safety-related equipment failures prevented a safety-related function from occurring. The applicant stated these practices would identify appropriate corrective actions to prevent recurrence of any failure of non-safety-related SSCs identified through the routine operating experience reviews. Although the staff agrees that the applicant's scoping methodology would reasonably identify failures considered in the CLB, the staff lacked sufficient information to conclude that the applicant adequately considered operating experience in identifying credible failures. In particular, the staff determined that corrective actions arising from routine operating experience reviews would not necessarily be effective in preventing recurrence of failures identified in site-specific or industry-wide operating experience. Further, the corrective actions arising from these reviews may not address the aging management aspects of the previously experienced failures.

In a supplement to the RAI 2.1-11 response dated December 17, 2003, the applicant clarified their use of operating experience during the scoping of non-safety-related SSCs. The applicant stated that an explicit review of operating experience was not conducted during the initial phase of non-safety-related scoping. However, during the revised non-safety-related scoping phase conducted following the issuance of additional NRC guidance pertaining to the identification and the treatment of SSCs which meet 10 CFR 54.4(a)(2), the applicant stated that operating experience was considered. Specifically, the applicant stated that operating experience items such as NRC documents (information notices, generic letters, violations, and bulletins), 10 CFR Part 21 reports, vendor bulletins, and site operating experience reports were considered during the scoping of non-safety-related SSCs. Based on this supplemental response, the staff concluded that the applicant considered an adequate scope of operating experience when identifying failures that could prevent the satisfactory accomplishment of the safety-related intended functions. Based on the above, RAI 2.1-11 is resolved.

Based on a review of the LRA and related scoping implementation procedures, discussions with the applicant, and a sampling of scoping results, the staff determined that the applicant's methodology for scoping non-safety-related equipment under 10 CFR 54.4(a)(2) adequately identified those non-safety-related SSCs whose failures could prevent the satisfactory

accomplishment of the safety-related functions identified under 10 CFR 54.4(a)(1). Therefore, the staff determined that the applicant's methodology for identifying systems and structures meeting the scoping criteria of 10 CFR 54.4(a)(2) was adequate.

Application of the Scoping Criteria in 10 CFR 54.4(a)(3). In part, 10 CFR 54.4(a)(3) requires that the applicant consider all SSCs relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection (10 CFR 50.48), environmental qualification (10 CFR 50.49), pressurized thermal shock (10 CFR 50.61), anticipated transients without scram (10 CFR 50.62), and station blackout (10 CFR 50.63) to be within the scope of the license renewal. Because the pressurized thermal shock requirements of 10 CFR 50.61 apply only to pressurized water reactors, the 10 CFR 54.4(a)(3) scoping criteria related to 10 CFR 50.61 are not applicable to the Quad Cities and Dresden Nuclear Power Stations, which are boiling water reactors.

The applicant's methodology for performing the scoping of SSCs in accordance with 10 CFR 54.4(a)(3) was documented in implementation procedures GE-NE-LRTI-2000 and the Scoping and Screening Desktop Guide. Additionally, the applicant prepared technical position papers for each regulated event applicable to the Dresden and Quad Cities Nuclear Power Stations to support the scoping process.

The applicant performed the initial scoping for regulated events using general screening checklist questions in Section 4.1.4 of procedure GE-NE-LRTI-2000 to identify if the structure or system met the scoping criteria of 10 CFR 54.4(a)(3). Section 3 of the Scoping and Screening Desktop Guide indicated that the GE-NE-LRTI-2000 checklist questions could be answered by reviewing the technical position papers to determine if a system or structure was relied on to demonstrate compliance with any of the regulated events listed in 10 CFR 54.4(a)(3). During the scoping and screening methodology audit, the applicant stated that use of the position papers ensured consistent scoping results and eliminated the need to review CLB documents when evaluating each plant structure or system against the 10 CFR 54.4(a)(3) scoping criteria. The staff noted that Section 2.1.3.5 of the LRA identified technical position papers as a documentation source for license renewal scoping under 10 CFR 54.4(a)(3). However, in reviewing the LRA and scoping and screening implementation procedures, the NRC staff was unable to determine the extent that the CLB was reviewed during position paper development. NUREG-1800, Section 2.1.3.1.3, "Regulated Events," states that all SSCs that are relied upon in the plant's CLB, plant-specific experience, industry wide experience (as appropriate), and safety analyses or plant evaluations to perform a function that demonstrates compliance with NRC regulations identified under 10 CFR 54.4(a)(3), are required to be included within the scope of the rule. Therefore, in RAI 2.1-6, the staff requested the applicant to provide a description of the methodology used to develop technical position papers and clarification regarding the process used to identify the SSCs intended functions related to the mitigation of regulated events.

In its October 3, 2003, response, the applicant stated that the regulated event position papers were prepared by engineers who had previous experience with BWR systems and operations. The preparer reviewed applicable CLB documents to identify systems required in each regulated event. The applicant noted that position papers also identified system functions explicitly credited for regulated events. A reviewer, who had not been directly involved in the preparation of the paper, checked the position paper for accuracy and completeness. After preparation and review, the position papers were approved by license renewal project

management and issued for use. Position papers were revised using a similar preparation-review-approval process. In its RAI response, the applicant identified supporting CLB documentation and described an electronic document database used in the development of the position papers. The staff determined that the scope of documentation reviewed for the development of the position papers and the control of the position paper development process were adequate to provide reasonable assurance that the applicant identified SSCs and associated intended functions for regulated events. Therefore, based on the above, the staff resolved RAI 2.1-6.

In Section 2.1.6 of the LRA, the applicant stated that when a supporting system or structure was identified for an intended function that satisfies only criterion 10 CFR 54.4(a)(3), the scoping process did not require that the supporting function be classified as an intended function unless a requirement in a CLB document explicitly identifies a requirement for the supporting function. Per 10 CFR 54.4(a)(3), all SSCs relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with specific regulated events must be within the scope of license renewal. In reviewing the LRA and supporting implementation procedures, the staff was unable to determine how the applicant's guidance for scoping support systems to equipment credited for demonstrating compliance with the Section 54.4(a)(3) regulated events was implemented. In particular, the staff questioned if support functions that were not explicitly identified by a CLB requirement but still required to demonstrate compliance with a regulated event were considered within the scope of license renewal. Therefore, in RAI 2.1-9, the staff asked the applicant to describe the intent and basis for the support function scoping guidance in Section 2.1.6 of the LRA and the extent of CLB reviews conducted to identify support functions to structures and systems meeting the scoping criteria of 10 CFR 54.4(a)(3).

In its October 3, 2003, response, the applicant stated that the discussion in LRA Section 2.1.6 should have been written as follows:

When a supporting system or structure was identified for an intended function that satisfies only criterion 10 CFR 54.4(a)(3), the scoping process did not require that the supporting function be classified as an intended function unless (1) failure of the supporting system or structure is expected to cause failure of the intended function satisfying criterion 10 CFR 54.4(a)(3), or (2) a requirement in a current licensing basis documented explicitly identifies a requirement for the supporting function.

The applicant also noted that the scoping process for systems and structures satisfying 10 CFR 54.4(a)(1) through (3) required that any supporting system function be identified as a license renewal "intended function" if its failure would prevent the supported system from performing any of its intended functions. The review to identify support functions of SSCs within the scope of license renewal consisted of reviewing the UFSARs, system design-basis documents, system operating description documents (operator lesson plans and procedures), and, where necessary, engineering drawings related to the system to identify interfaces with other systems and any required support provided by the interfacing system. Based on this review, the applicant stated that critical supporting functions, such as those provided by power supplies or required cooling water subsystems, were identified. The supporting functions were classified as license renewal intended functions if their failure was expected to cause failure of a supported intended function. The staff determined that the applicant's approach to scoping of support systems adequately ensured that all SSCs relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with regulated events would be included within the scope of license renewal. Therefore, the staff resolved RAI 2.1-9.

In an April 1, 2002, letter from Mr. D. Matthews to Mr. A. Nelson and Mr. D. Lochbaum, the staff provided guidance on the scoping of equipment relied on to meet the requirements off the station blackout (SBO) rule, 10 CFR 50.63. In this letter, the staff noted that, consistent with the requirements specified in 10 CFR 54.4(a)(3) and 10 CFR 50.63(a)(1), the plant system portion of the offsite power system that is used to connect the plant to the offsite power source should be included within the scope of the rule. In Section 2.1.3.5 of the LRA, the applicant stated that the SBO technical position papers include structures and components of the offsite power system for each plant required to restore power from the onsite switchyard down to the safety-related busses in the plant. Furthermore, the applicant stated that the plant offsite power system and these structures and components were classified as satisfying criteria 10 CFR 54.4(a)(3) and were included within the scope of license renewal. The staff determined that the applicant's approach to scoping SSCs relied on to demonstrate compliance with the SBO rule (10 CFR 50.63) was consistent with the staff's April 1, 2002, interim guidance.

As part of the evaluation of the applicant's scoping methodology, the audit team reviewed a sample of the LR database 10 CFR 54.4(a)(3) scoping results to assess the adequacy of the applicant's scoping methodology. The staff verified that the applicant's scoping methodology identified and used pertinent engineering and licensing information in order to determine the SSCs required to be in scope in accordance with the 10 CFR 54.4(a)(3) criteria. Therefore, the staff determined that the applicant's methodology for identifying systems and structures meeting the scoping criteria of 10 CFR 54.4(a)(3) was adequate.

2.1.3.1.3 Plant-Level Scoping of Systems and Structures

The applicant performed the scoping of systems and structures in accordance with implementation procedures GE-NE-LRTI-2000 and the Scoping and Screening Desktop Guide. Procedure GE-NE-LRTI-2000 specified that the personnel performing scoping use CLB documents and list all functions that the system or structure is required to accomplish. System or structure functions were then compared to a list of scoping screening questions contained in Section 4.1.4 of GE-NE-LRTI-2000 to determine whether the functions met the scoping criteria of 10 CFR 54.4(a). Systems or structures with functions meeting one or more of the screening criteria were considered to be within the scope of license renewal. The staff reviewed the screening questions and concluded that the screening questions were consistent with the requirements of 10 CFR 54.4(a).

The applicant documented the results of the plant-level scoping process in accordance with GE-NE-LRTI-2000, Exhibit A, "License Renewal System and Structure Scoping Form." The scoping form included a description of the structure or system, a listing of functions performed by the system or structure, information pertaining to system realignment (as applicable), identification of intended functions, the 10 CFR 54.4(a) scoping criteria met by the system or structure, references, and identification of support systems. During the scoping methodology audit, the staff reviewed a sampling of scoping reports and concluded that the applicant's scoping forms contained an appropriate level of detail to document the scoping process.

Based on a review of the LRA, the scoping and screening implementation procedures, and a sampling review of system and structure scoping results during the methodology audit, the staff concluded that the applicant's scoping methodology for systems and structures was adequate. In particular, the staff determined that the applicant's methodology reasonably identified systems and structures within the scope of license renewal and their associated intended

functions. Additionally, the applicant's approach to system and structure scoping was consistent with the methodology described in Section 2.1.4 of the LRA.

2.1.3.1.4 Component-Level Scoping

After the applicant identified systems and structures within the scope of licensee renewal and their associated intended functions, a review was performed to identify the components of each in-scope system and structure that supported an intended function. As described in Section 2.1.4.1 of the LRA, a component was determined to be in scope if it was safety-related, meeting the criteria of 10 CFR 54.4(a)(1); if it was determined that the component was needed to fulfill a system intended function; if the component met the criteria of 10 CFR 54.4(a)(2); or if the component was needed to demonstrate compliance with a regulated event.

To facilitate the scoping and screening process and AMRs, the applicant realigned certain components from their actual parent system to a different LR system. Attachment 1 of GE-NE-LRTI-2000 described the process used by the applicant to realign components from one system to another for the purposes of LR scoping. This guidance allowed alignment of components to a system more closely associated with their intended functions when all but a few components in the parent system were outside the scope of license renewal. Component realignment was intended to allow components to be evaluated as a coherent functional group within an appropriate system or commodity group. The implementation procedure included documentation requirements to permit traceability of components that were realigned from one parent system to a different LR system. During the scoping and screening methodology audit, the staff reviewed the implementation of this component realignment guidance and determined that the realignment process did not adversely impact component-level scoping and screening.

Mechanical Component Scoping. Section 4.3, "Scoping and Screening of System Components," of GE-NE-LRTI-2000 provided the applicant's proceduralized guidance for scoping mechanical system components. The applicant initially generated a listing of mechanical system components based on information contained in the EWCS database. This information was augmented by a review of the system LR boundary diagram to identify system components not included in the EWCS database or generic components such as piping and tubing that were applicable to the system. Following identification of all system components, the applicant used the LR boundary diagrams as an aid to evaluate each component against the scoping criteria of 10 CFR 54.4(a). System components meeting the criteria of 10 CFR 54.4(a) were classified as within the scope of license renewal.

The applicant provided guidance for the scoping of equipment insulation in Section 9.7 of the Scoping and Screening Desktop Guide and position paper PP-QDC-DRE- Revision 00 IN. Based on information contained in the insulated line list specification for each plant site, the applicant determined which piping system had insulation installed. For each pipe system with installed insulation, the applicant created a generic insulation component in the system component list. The generic insulation component was then realigned to the generic insulation system, which is described in LRA Section 2.4.16, "Insulation Commodity Group." The applicant stated that all insulation was initially considered within the scope of license renewal but that the scoping classification could be revised based on further evaluation of its design function during an aging management review.

During the scoping and screening methodology audit, the staff reviewed a sampling of scoping results to verify that the applicant's proceduralized methodology was adequately implemented. In performing this review, the staff noted a potential inconsistency in the scoping results for the refueling equipment system and the applicant's mechanical system scoping methodology. LRA Section 2.3.3.1, "Refueling Equipment," identified two system-level intended functions for the refueling equipment system—(1) maintain structural integrity to prevent collapse of the platform onto the spent fuel storage racks or the reactor core and (2) provide interlocks to preclude inadvertent criticality. LRA Table 2.3.3-1, "Component Groups Requiring Aging Management Review—Refueling Equipment System," identified the spent fuel gates as requiring aging management to maintain a "pressure boundary" component-level intended function. Based on a review of LRA Section 2.3.3.1, the NRC staff was unable to determine how the pressure boundary component-level function for the spent fuel pool gates supported either of the refueling equipment system-level intended functions in a manner consistent with the component scoping methodology described in Section 2.1.4.1 of the LRA. In RAI 2.1-10, the staff requested that the applicant describe how the scoping methodology was implemented to identify the need for spent fuel gate pressure boundary integrity to support the specified refueling equipment system intended functions. The staff did not identify additional inconsistencies during the mechanical scoping results review.

In its October 3, 2003, response to RAI 2.1-10, the applicant stated that component intended function for the spent fuel pool gates was properly classified as pressure boundary and properly evaluated for aging management. The gates were included in the refueling equipment system because the original equipment supplier included them in the list of refueling equipment provided to the station. After further review, the applicant has stated that it would have been more appropriate to place the fuel pool gates, with pressure boundary intended function, into the Reactor Building system, along with the fuel pool structure. However, the staff concluded that the appropriate intended function of the spent fuel pool gates was identified by the applicant's scoping process, and evaluation of the spent fuel pool gate with the refueling equipment system rather than the reactor building system was an isolated example and did not indicate a significant deficiency in the implementation of the scoping methodology. Consequently, the staff resolved RAI 2.1-10.

The staff determined that the applicant's proceduralized methodology was consistent with the description provided in Section 2.1.4.1 of the LRA and the guidance contained in NUREG-1800, Section 2.1, and was adequately implemented. After reviewing the applicant's detailed scoping implementation procedures and a sample of the mechanical components scoping results, the staff concluded the applicant's methodology for identifying mechanical components within the scope of license renewal met the requirements of 10 CFR 54.4(a).

Structural Component Scoping. Section 4.2, "Scoping and Screening of Structural Components," of GE-NE-LRTI-2000 provided the applicant's proceduralized guidance for scoping structural components. For all structures within the scope of license renewal, the applicant stated that an initial listing of structural components was generated based on information derived from the EWCS database. Because the EWCS does not identify all components within a given structure, the applicant augmented the component list with generic component types applicable to the structure. In Section 2.1.4.3 of the LRA, the applicant stated that detailed structural drawings and, where needed, walkdowns were performed to identify structural elements. Generic structural component types were selected from Table 5, "Generic Structural and Mechanical System Components," of GE-NE-LRTI-2000. The staff compared the

applicant's generic structural component listing to the typical structural commodity groups identified in Table 2.1-5 of NUREG-1800 and concluded that the applicant's general structural component list was reasonable. Following identification of all system components, the applicant evaluated each component against the scoping criteria of 10 CFR 54.4(a). Structural components meeting the criteria of 10 CFR 54.4(a) were classified as within the scope of license renewal.

The staff determined that the applicant's proceduralized methodology was consistent with the description provided in Section 2.1.4.3 of the LRA and the guidance contained in NUREG-1800, Section 2.1. Based on review of information contained in the LRA, the applicant's detailed scoping implementation procedures, and a sample of the structural component scoping results, the staff concluded that the applicant's methodology for identifying structural components within the scope of license renewal met the requirements of 10 CFR 54.4(a).

Electrical and I&C Component Scoping. The applicant's methodology for scoping electrical and I&C components was described in technical position paper PP-DRE-QDC Revision 01 SPACES, "Scoping and Screening Position Paper for Electrical Components based on Electrical Spaces Approach for Aging Management Review." The electrical scoping methodology initially identified every electrical component as within the scope of license renewal. However, Section 3.0.3 of PP-DRE-QDC Revision 01 SPACES allowed exclusion of electrical components "which are clearly in systems which are not in the license renewal scope, or which are determined by other means to be outside license renewal scope" from the scope of license renewal. During the scoping and screening methodology audit, the applicant's LR project team indicated that electrical components located within certain plant spaces were excluded from LR scope, in addition to some electrical components that did not perform an intended function. Based on a review of the LRA and scoping implementation procedure PP-DRE-QDC Revision 01 SPACES, the NRC staff was unable to determine the applicant's basis for generically excluding electrical and I&C components in certain plant spaces from the scope of license renewal or the specific methods used to determine that an electrical or I&C component was otherwise not within the scope of license renewal.

Section 2.5.3.1, "Components Within the Scope of License Renewal," of NUREG-1800 states that an applicant may use the plant spaces approach in scoping electrical and I&C components. In the plant spaces approach, an applicant may indicate that all electrical and I&C components located within a particular area are either within or not within the scope of license renewal. In NUREG-1800, Table 2.5-1, "Examples of 'Plant Spaces' Approach for Electrical and I&C Scoping and Corresponding Review Procedures," provides guidance for the review of scoping performed in accordance with the plant spaces approach. In particular, if the applicant limits the scope of electrical and I&C components considered within the scope of license renewal by excluding components in certain plant spaces, Table 2.5-1 indicates that this approach should not result in failing to place electrical and I&C components that perform intended functions within the scope of license renewal. Because the staff was unable to determine the applicant's specific basis for excluding certain electrical and I&C components from the scope of license renewal, the staff was unable to evaluate the applicant's electrical spaces approach against the guidance in NUREG-1800. Therefore, to support the staff review of the implementation of the electrical spaces approach, in RAI 2.1-13, the staff requested the applicant to describe the methodology used to exclude electrical equipment located within certain plant spaces from the scope of license renewal.

In its October 3, 2003, response, the applicant stated that all electrical cables and components were considered in the scope of license renewal. The radwaste building, which did not contain any electrical components within the scope of license renewal, was the only space where the electrical components were generically excluded based on location. All electrical systems were evaluated to determine if the system intended functions met the requirements of 10 CFR 54.4(a)(1) through (a)(3). Electrical components, except for cables, that were clearly in systems not in the scope of 10 CFR 54.4(a)(1) through (a)(3) were flagged as not in the scope of license renewal. The remaining electrical components and all of the cables were flagged as being in the scope of license renewal and assigned component intended functions. During the AMR process, the applicant determined that certain cables and components were not safety-related; that failure of these cables or components would not prevent satisfactory accomplishment of any of the intended functions identified in 10 CFR 54.4(a)(1)(i), (ii), or (iii); and that these cables and components performed no functions that demonstrates compliance with fire protection, environmental qualification, anticipated transients without scram, or SBO. Therefore, these cables and components were removed from the scope of license renewal. In reviewing the response to RAI 2.1-13, the staff concluded that the applicant identified an appropriate basis for excluding certain electrical and I&C components from the scope of license renewal. In particular, the staff concluded that the applicant's implementation of the electrical spaces approach provided reasonable assurance that electrical and I&C components that perform intended functions were within the scope of license renewal. Therefore, the staff resolved RAI 2.1-13.

The staff determined that the implementation of the electrical spaces method for scoping of electrical and I&C components was consistent with the guidance contained in NUREG-1800. Because the applicant's use of the electrical spaces approach integrated the scoping and screening phases of the methodology, additional conclusions regarding the use of this method are discussed in Section 2.1.3.2.3 of this report.

2.1.3.2 Screening Methodology

The staff reviewed the screening methodology used by the applicant to determine if mechanical, structural, and electrical components within the scope of license renewal would be subject to further aging management evaluation. The applicant described its screening process in Section 2.1.5 of the LRA. In general, the applicant's screening approach consisted of evaluations to determine which in-scope structures and components were passive and long-lived. Passive, long-lived structures and components were then subject to an AMR.

The staff evaluated the applicant's screening methodology against the criteria contained in 10 CFR 54.21(a)(1) and (a)(2) using the review guidance contained in NUREG-1800, Section 2.1.3.2, "Screening." According to 10 CFR 54.21(a)(1), the applicant's integrated plant assessment must identify and list those structures and components subject to an AMR. Further, 10 CFR 54.21(a)(1) requires that structures and components subject to an AMR shall encompass those structures and components that (1) perform an intended function, as described in Section 54.4, without moving parts or a change in configuration or properties and (2) are not subject to replacement based on a qualified life or specified time period. Per 10 CFR 54.21(a)(2), the applicant must describe and justify the methods used to meet the requirements of 10 CFR 54.21(a)(1). In the LRA, the applicant described screening methodologies that were unique to the mechanical, structural, and electrical disciplines. The

staff evaluation of the applicant's screening approach for each of these disciplines is described below.

2.1.3.2.1 Mechanical Component Screening

The applicant provided procedural guidance for the conduct of mechanical component screening in Section 4.3 of procedure GE-NE-LRTI-2000, position paper PP-DRE-QDC Revision 02-AP, and the Scoping and Screening Desktop Guide. For each mechanical system component determined to be within the scope of license renewal, the applicant identified if the component was active or passive. The classification of a component as either active or passive was based on an active/passive classification component table provided in position paper PP-DRE-QDC Revision 02-AP. In discussions with the applicant during the scoping and screening methodology audit, the staff determined that the component types and active/passive classifications provided in PP-DRE-QDC Revision 02-AP were based on Revision 2 to NEI 95-10, rather than the NRC-endorsed Revision 3. As discussed in Section 2.1.3.1.1 of this SER, the staff evaluated the applicant's use of Revision 2 to NEI 95-10 and determined that the use of the earlier revision did not adversely impact the screening process. After a component was classified as passive, the applicant identified the associated passive component intended functions. The applicant selected component passive intended functions from Table 6, "Passive Component Intended Functions," of GE-NE-LRTI-2000. The staff reviewed the passive intended functions described in Table 6 and determined that the functions were consistent with those described in NUREG-1800, Table 2.1-3, "Typical 'Passive' Structure and Component Intended Functions."

Following classification of an in-scope mechanical system component as passive and identification of the component intended functions, the applicant determined if the component was long-lived. Scoping and screening procedure GE-NE-LRTI-2000, Section 4.3.8, and Table 7, "Short Lived Components Not Requiring Aging Management," provided guidance for determining if a component was long-lived. Specifically, GE-NE-LRTI-2000 Table 7 listed general component types, including consumable items, that did not require an AMR because they were considered to be short-lived. Section 4.3.9 of GE-NE-LRTI-2000 required that all passive, long-lived mechanical system components within the scope of license renewal be subject to an AMR.

In reviewing the LRA and GE-NE-LRTI-2000, the staff was unable to determine the basis for considering some of the components listed in Table 7 to be short-lived and therefore not subject to an AMR. As discussed in NUREG-1800, Table 2.1-3, "Specific Staff Guidance on Screening," states that the applicant should identify the standards that are relied on for replacement of consumables that are not subject to an AMR as part of the methodology description. For consumables such as packing, gaskets, component seals, and O-rings, Table 2.1-3 of NUREG-1800 states that these components may be excluded from an AMR using a clear basis. For consumables such as system filters, fire extinguishers, fire hoses, and air packs, the applicant should identify the standards relied on for replacement as part of the methodology description. Therefore, in RAI 2.1-12, the staff asked the applicant to justify its determination that the component is not subject to an AMR for each of the component types listed in Table 7.

In its October 3, 2003, response to RAI 2.1-12, the applicant provided a justification for each component type listed in Table 7 of GE-NE-LRTI-2000 that is not subject to an AMR.

Additionally, the applicant noted that flexible hoses should not have been listed in Table 7. Flexible hoses may be either short-lived or long-lived, depending on whether they are periodically replaced as part of preventative maintenance. The applicant stated that it had recognized the need to revise Table 7 during the transition from the scoping and screening phase to the AMR phase of the integrated plant evaluation. At that time, any in-scope flexible hoses that had been categorized as “short-lived” were re-screened as “long-lived” and were carried forward for AMR. During AMR, flexible hoses screened as “long-lived” could be re-categorized as “short-lived” and excluded from further evaluation provided that a basis for re-categorizing them as “short-lived” was identified and documented in the component comment field of the LR database. In its response, the applicant also identified the AMPs credited with managing the effects of aging for long-lived flexible hoses. The staff determined that the applicant provided a sufficient justification for excluding the component types listed in Table 7 of GE-NE-LRTI-2000, other than flexible hoses, from an AMR. Additionally, the applicant described a reasonable process for the classification of flexible hoses as either short-lived and subject to periodic replacement or long-lived and subject to an AMP. Therefore, on this basis, the staff resolved RAI 2.1-12.

In a May 1, 2002, letter from Dr. P.T. Kuo to Mr. A. Nelson and Mr. D. Lochbaum, the staff provided guidance on the identification and treatment of housings for active components for LR scoping and screening. As discussed in this letter, the staff expects applicants for license renewal to identify active component housings (e.g., housings for fans, dampers, and heating and cooling coils) which require an AMR. This determination should consider whether failure of the housing would result in a failure of the associated active component to perform its function, and whether the housing meets the long-lived and passive criteria as defined in the Rule. During the scoping and screening methodology audit, the applicant stated that this guidance was incorporated into the AMR process. Additionally, the applicant provided several examples where housings of active components were identified as requiring an AMR. These include housings located in the standby gas treatment system (SBGTS); emergency diesel generator (EDG) and auxiliaries; and heating, ventilation, and air conditioning (HVAC)—reactor building. Based on this information, the staff concluded that the applicant appropriately considered the housings of active components in its scoping and screening methodology.

Based on the preceding, the staff determined that the applicant’s screening methodology was consistent with the guidance contained in NUREG-1800 and was capable of identifying passive, long-lived components within the scope of license renewal that are subject to an AMR.

2.1.3.2.2 Structural Component Screening

The applicant provided procedural guidance for the conduct of structural component screening in Section 4.2 of procedure GE-NE-LRTI-2000, position paper PP-DRE-QDC Revision 02-AP, and the Scoping and Screening Desktop Guide. For each structural component determined to be within the scope of license renewal, the applicant identified if the component was active or passive. The classification of a component as either active or passive was based on an active/passive classification component table provided in position paper PP-DRE-QDC Revision 02-AP. In addition to the use of the active/passive classification table, Section 4.2.5 of GE-NE-LRTI-2000 stated that the distinct structural features (components) that constitute a structure were considered passive. After a structural component was classified as passive, the applicant identified the related passive structure intended functions. The applicant selected component passive intended functions from Table 6, “Passive Component Intended

Functions,” of GE-NE-LRTI-2000. The staff reviewed the passive intended functions described in Table 6 and determined that the functions were consistent with those described in NUREG-1800, Table 2.1-3, “Typical ‘Passive’ Structure and Component Intended Functions.”

Following classification of an in-scope structural component as passive and identification of the component intended functions, the applicant determined if the component was long-lived. Scoping and screening procedure GE-NE-LRTI-2000, Section 4.2.7 and Table 7, provided guidance for determining if a structural component was long-lived. Specifically, GE-NE-LRTI-2000 Table 7 listed general component types, including consumable items, that did not require an AMR because they were considered to be short-lived. As discussed in Section 2.1.3.2.1 above, the staff evaluated the applicant’s classification of certain generic component types in GE-NE-LRTI-2000 and concluded that the applicant’s approach was adequate. Section 4.2.8 of GE-NE-LRTI-2000 required that all passive, long-lived structural components within the scope of license renewal be subject to an AMR.

The staff determined that the applicant’s structural component screening methodology was consistent with the guidance contained in NUREG-1800 and was capable of identifying those passive, long-lived components within the scope of license renewal that are subject to an AMR.

2.1.3.2.3 Electrical and I&C Component Screening

As described in Section 2.1.3.1.3 of this SER, the applicant used a plant spaces approach for electrical and I&C scoping and screening. Therefore, the applicant screened electrical and I&C components on a plant-wide basis rather than on a system basis. The applicant described the electrical and I&C screening methodology in Section 2.1.4.2 of the LRA and position paper PP-DRE-QDC Revision 01-SPACES. Although the applicant initially considered all electrical components to be within the scope of license renewal, the scoping and screening methodology allowed electrical and I&C components to be removed from scope. As described in Section 2.1.3.1.3 of this report, the staff requested the applicant to provide additional information regarding the application of the electrical spaces approach with regard to removing electrical equipment from scope. For each electrical component within the scope of license renewal, the applicant determined if the component was active or passive based on component classifications listed in Attachment 1 to position paper PP-DRE-QDC Revision 01-SPACES. In discussions with the applicant during the scoping and screening methodology audit, the staff determined that the component types and active/passive classifications provided in PP-DRE-QDC Revision 01-SPACES were based on Revision 2 to NEI 95-10, rather than on the NRC-endorsed Revision 3. As discussed in SER Section 2.1.3.1.1 above, the staff evaluated the applicant’s use of Revision 2 to NEI 95-10 and determined that the use of the earlier revision did not adversely impact the screening process. Following identification of passive electrical and I&C electrical components, for each component the applicant identified if the component was long-lived. Passive, long-lived electrical and I&C components within the scope of license renewal were then subject to an AMR. In Section 2.5 of the LRA, the applicant identified electrical and I&C commodity groups subject to an AMR, including (1) cables and connections (splices, connectors, fuse blocks, and terminal blocks), (2) bus ducts, (3) high-voltage transmission conductors and insulators, and (4) electrical penetrations. The staff determined that the applicant’s selection of electrical and I&C commodity groupings was consistent with NUREG-1800.

The staff also reviewed the applicant's approach to scoping and screening of electrical fuse holders. In license renewal ISG-5, "Identification and Treatment of Electrical Fuse Holders for License Renewal," dated March 10, 2003, the staff stated that, consistent with the requirements specified in 10 CFR 54.4(a), fuse holders (including fuse clips and fuse blocks) are considered to be passive electrical components. Fuse holders would be scoped, screened, and included in the AMR in the same manner as terminal blocks and other types of electrical connections that are currently being treated in the process. This staff position applies only to fuse holders that are not part of a larger assembly, but support safety-related and non-safety-related functions in which the failure of a fuse holder precludes an intended function from being accomplished. As described in LRA Section 2.5.1.1, "Cables and Connections," all electrical insulated cables and connections, including fuse blocks, were evaluated for aging management using the "spaces" approach. The staff noted that technical position paper PP-DRE-QDC Revision 02-AP identified fuse holders and fuse blocks as passive components supporting the intended function of providing electrical connections to specified sections of an electrical circuit to deliver system voltage and current. However, the inspectors found that the applicant's electrical spaces position paper, PP-DRE-QDC-Revision 01-SPACES, was inconsistent with the active/passive position paper in that it identified fuse holders and fuse blocks as active components. During the scoping methodology audit, the applicant stated that the active classification for fuse holders and blocks in the PP-DRE-QDC Revision 01-SPACES was incorrect and would be revised to match the passive classification in PP-DRE-QDC-Revision 02-AP. Despite the discrepancy in procedure PP-DRE-QDC Rev 01-SPACES, the applicant appropriately classified fuse holders and blocks as passive components. The staff concluded that the applicant's scoping and screening methodology addressed the treatment of fuse holders in a manner consistent with the staff's guidance contained in ISG-5.

The staff determined that the applicant's electrical and I&C screening methodology was consistent with the guidance contained in NUREG-1800 and was capable of identifying passive, long-lived components within the scope of license renewal that are subject to an AMR.

2.1.4 Conclusions

The staff review of the information presented in Section 2.1 of the LRA, the supporting information in the scoping and screening implementation procedures and reports, the information presented during the scoping and screening methodology audit, and the applicant's responses to the staff's RAIs formed the basis of the staff's safety determination. The staff verified that the applicant's scoping and screening methodology, including its supplemental 10 CFR 54.4(a)(2) review which brought additional non-safety-related piping segments and associated components into the scope of license renewal, was consistent with the requirements of the Rule and the staff's position on the treatment of non-safety-related SSCs. On the basis of this review, the staff concluded that, there is reasonable assurance that the applicant's methodology for identifying the SSCs within the scope of license renewal and the SCs requiring an AMR is consistent with the requirements of 10 CFR 54.4 and 10 CFR 54.21(a)(1).

2.1.5 References

1. NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," April 2001

2. NEI 95-10, Revision 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54—The License Renewal Rule," August 2001
3. Letter from the NRC to Exelon Generation Company, LLC, "Request For Additional Information for the Review of the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2, License Renewal Application," July 21, 2003 (ADAMS Accession No. ML0320200800)
4. Letter from Exelon Generation Company, LLC, to the NRC, "Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3," RS-03-178, October 3, 2003
5. Desktop Guide, Revision 2, "Scoping & Screening of Systems, Structures and Components"
6. GE-NE-LRTI-2000, Revision 6, "Technical Instruction for Exelon Dresden/Quad Cities License Renewal Project—Scoping and Screening of Systems, Structures and Components for License Renewal"
7. PP-QDC-DRE Revision 00 IN, "Treatment of Pipe/Equipment Insulation During Scoping and Screening Systems for License Renewal"
8. PP-DRE Revision 03 SBO, "Systems and Structures Relied Upon to Demonstrate Compliance with 10 CFR 50.63 (Station Blackout) Dresden Station—Units 2 and 3"
9. PP-QDC Revision 03 SBO, "Systems and Structures Relied Upon to Demonstrate Compliance with 10 CFR 50.63 (Station Blackout) Quad Cities Station—Units 1 and 2"
10. PP-DRE-QDC Revision 02-AP, "Active/Passive Classification and Intended Function Determination of Structures and Components"
11. PP-DRE-QDC Revision 01 SPACES, "Scoping and Screening Position Paper for Electrical Components Based on Electrical Spaces Approach for Aging Management Review"
12. LRTI-16, Revision 0, "Identification of Non Safety-related Structures and Components Which Spatially or Structurally Interact With Safety-related Systems"
13. NRC Inspection Report 50-237/03-04(DRS), 50-249/03-04(DRS), 50-254/03-04(DRS), 50-265/03-04(DRS), "Dresden Nuclear Power Station, Quad Cities Nuclear Power Station, NRC License Renewal Scoping/Screening Inspection," September 15, 2003
14. Letter from the NRC to Exelon Generation Company, LLC, "Follow-Up of an Inspection Open Item Related to the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 And 2, License Renewal Application," October 20, 2003 (ADAMS Accession No. ML032940056)
15. Letter from Exelon Generation Company, LLC, to the NRC, "Additional Information for the Review of the License Renewal Applications for Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2," RS-03-328, December 22, 2003

16. Letter from Exelon Generation Company, LLC, to the NRC, "Additional Information for the Review of the License Renewal Applications for Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2," RS-03-325, December 17, 2003
17. Letter from Exelon Generation Company, LLC, to the NRC, "Additional Information for the Review of the License Renewal Applications for Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2," RS 04-046, March 25, 2004
18. Letter from Exelon Generation Company, LLC, to the NRC, "Response to License Renewal Safety Evaluation Report for the Dresden and Quad Cities Nuclear Power Stations," RS 04-057, April 9, 2004
19. Letter from Exelon Generation Company, LLC, to NRC, "Follow-up Response to License Renewal Safety Evaluation Report for the Dresden and Quad Cities Nuclear Power Stations," RS 04-073, May 18, 2004

2.2 Plant-Level Scoping Results

2.2.1 Summary of Technical Information in the Application

This section addresses the plant-level scoping results for license renewal. Per 10 CFR 54.21(a)(1), the applicant must identify and list SCs subject to an AMR. These are passive and long-lived SCs that are within the scope of license renewal.

In LRA Tables 2.2-1 and 2.2-2, the applicant provided a list of the plant systems and structures, respectively, identifying those that are within the scope of license renewal and those that are not within the scope of license renewal. Systems and structures that exist only at one station are marked in the tables as "Dresden only" or "Quad Cities only," as appropriate. The Rule does not require the identification of all plant systems and structures. However, providing such lists allows for a more efficient staff review. Based on the design-basis events considered in the plant's CLB and other CLB information relating to non-safety-related systems and structures and certain regulated events, the applicant identified those plant-level systems and structures within the scope of license renewal, as defined in 10 CFR 54.4. To verify that the applicant has properly implemented its methodology, the staff focuses its review on the implementation results to confirm that there is no omission of plant-level systems and structures within the scope of license renewal.

The staff performed the following two-step evaluation:

- (1) The staff determined whether the applicant properly identified the SSCs within the scope of license renewal, in accordance with 10 CFR 54.4. The staff reviewed selected SSCs identified by the applicant as not falling within the scope of license renewal to determine whether they have any intended functions that do fall within the scope of license renewal.
- (2) The staff then determined, in accordance with 10 CFR 54.21(a)(1), whether the applicant properly identified the SCs that are subject to an AMR from among the SSCs that were identified as being within the scope of license renewal in accordance with 10 CFR 54.4. The staff reviewed selected SCs that the applicant identified as being within the scope of license

renewal to verify whether they perform their intended functions, as described in 10 CFR 54.4, without moving parts or without a change in configuration or properties and are not subject to replacement based on qualified life or specified time period.

In LRA Section 2.3, “Scoping and Screening Results: Mechanical Systems,” Section 2.4, “Scoping and Screening Results: Structures,” and Section 2.5, “Scoping and Screening Results: Electrical and Instrumentation and Controls Systems,” the applicant describes the SSCs that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively. The staff evaluated components and commodities associated with all systems and structures within LRA Sections 2.3 through 2.5. In LRA Sections 2.3.1 (“Reactor Coolant System”), 2.3.2 (“Engineered Safety Features Systems”), 2.3.3 (“Auxiliary Systems”), and 2.3.4 (“Steam and Power Conversion Systems”), the applicant described the mechanical systems and components within the scope of LR and subject to an AMR based on the applicant’s license renewal scoping and screening methodology as described in Section 2.1 of this SER.

Structures that support or provide shelter and protection for the operation of other systems are presented in LRA Section 2.4. Some structural components were treated as bulk commodity items common to various systems and structures. These commodity items are described in LRA Section 2.4.15, “Component Supports Commodity Group,” and LRA Section 2.4.16, “Insulation Commodity Group.”

Electrical systems and I&C systems that support the operation of both safety and non-safety-related systems are presented in LRA Section 2.5. Electrical and I&C components are all treated using a bulk commodity approach.

2.2.2 Staff Evaluation

In LRA Section 2.1, the applicant describes its methodology for identifying the SCs that are within the scope of license renewal and subject to an AMR. This methodology typically consists of a review of all plant SSCs to identify those that are within the scope of license renewal in accordance with the requirements of 10 CFR 54.4. From those SSCs that are within the scope of license renewal, an applicant will identify and list those SCs that are passive (i.e., that perform their intended function(s) without moving parts, or without a change in configuration or properties) and are long-lived (i.e., that are not replaced based on a qualified life or specified time period). The staff reviewed the scoping and screening methodology and provided its evaluation in Section 2.1 of this SER. The applicant documented the implementation of the methodology in LRA Sections 2.3 through 2.5. The staff’s review of the applicant’s implementation was conducted in accordance with Section 2.3 of the SRP-LR and is described in Sections 2.3 through 2.5 of this SER.

To ensure that the scoping and screening methodology described in LRA Section 2.1 was properly implemented, and that the SCs that are subject to an AMR were properly identified, the staff performed an additional review. The staff sampled the contents of the UFSAR based on the listing of systems and structures in LRA Tables 2.2-1 and 2.2-2 to determine whether there were systems or structures that may have intended functions as defined by 10 CFR 54.4 but were not included within the scope of license renewal. The staff did not identify any omissions.

In LRA Section 1.4, the applicant stated that Dresden Unit 1 has been placed in a safe storage condition until Units 2 and 3 are ready for decommissioning. Although Dresden Unit 1 has been left intact, the fuel has been removed from the reactor vessel, and radioactive liquids have been drained from the systems and components and have been processed. However, the diesel-driven fire pump and the crib house in Dresden Unit 1 provide support for operation of Units 2 and 3 that satisfy the criteria of 10 CFR 54.4(a). The staff's evaluation of this Unit 1 diesel-driven fire pump and the crib house SCs is provided in Section 2.3.3.5 of this SER.

In the Dresden and Quad Cities LRA, Sections 2.3 through 2.5, the applicant identified and listed the SCs that are subject to an AMR in accordance with 10 CFR 54.21(a)(1). The applicant identified the mechanical systems components and structural components that are subject to an AMR in LRA Sections 2.3 and Section 2.4, respectively. The staff documents the findings from its review and evaluation of the applicant's mechanical systems and plant structural components screening results in Sections 2.3 and 2.4 of this SER, respectively.

2.2.3 Conclusions

The staff reviewed LRA Section 2.2 and the supporting information in the Dresden and Quad Cities UFSARs to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. As a result of this review, the staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the SSCs that are within the scope of license renewal in accordance with 10 CFR 54.4. The NRC staff's detailed review of the SSCs that are subject to an AMR is provided in Sections 2.3 through 2.5 of this SER.

2.3 Scoping and Screening Results: Mechanical Systems

This section addresses the scoping and screening results of the following mechanical systems for the license renewal.

Reactor Systems

- C reactor vessel
- C reactor internals
- C reactor coolant system
- C reactor recirculation system
- C reactor vessel head vent system
- C nuclear boiler instrumentation system
- C head spray system
- C RC pressure boundary components in other systems

Engineered Safety Feature Systems

- C high-pressure coolant injection system
- C core spray system
- C containment isolation components and primary containment piping system
- C reactor core isolation cooling system (Quad Cities only)
- C isolation condenser (Dresden Only)
- C residual heat removal system (Quad Cities only)

- C low-pressure coolant injection system (Dresden only)
- C standby liquid control system
- C standby gas treatment system
- C automatic depressurization system
- C anticipated transient without scram system

Auxiliary Systems

- C refueling equipment
- C shutdown cooling system (Dresden only)
- C control rod drive hydraulic system
- C reactor water cleanup system
- C fire protection system
- C emergency diesel generator and auxiliaries
- C HVAC—main control room
- C HVAC—reactor building
- C ECCS corner room HVAC
- C station blackout building HVAC
- C station blackout system (diesel and auxiliaries)
- C diesel generator cooling water system
- C diesel fuel oil system
- C process sampling system
- C carbon dioxide system
- C service water system
- C reactor building closed cooling water system
- C turbine building closed cooling water system
- C demineralizer water makeup system
- C residual heat removal service water system (Quad Cities only)
- C containment cooling service water (Dresden only)
- C ultimate heat sink
- C fuel pool cooling system and filter demineralizer system
- C plant heating system
- C containment atmosphere monitoring system
- C nitrogen containment atmosphere dilution system
- C drywell nitrogen inerting system
- C safe shutdown makeup pump system (Quad Cities only)

Steam and Power Conversion Systems

- C main steam system
- C feedwater
- C condensate and condensate storage system
- C main condenser
- C main turbine and auxiliaries
- C turbine oil system (Quad Cities only)
- C main generator and auxiliaries (Quad Cities only)

As a result of the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the applicant added the following non-safety-related systems previously excluded from the scope of license renewal to the scope for the first time at one or both sites.

- C circulating water
- C laundry treatment system (Dresden only)
- C zinc injection system
- C extraction steam system (Quad Cities only)
- C feedwater heater drains and vents (Quad Cities only)

According to 10 CFR 54.21(a)(1), an applicant must identify and list SCs subject to an AMR. These are passive, long-lived SCs that are within the scope of license renewal. To verify that the applicant has properly implemented its methodology, the staff focuses its review on the implementation results. Such a focus allows the staff to confirm that there is no omission of mechanical system components that are subject to an AMR. If the review identifies no omission, the staff has the basis to find that there is reasonable assurance that the applicant has identified the mechanical system components that are subject to an AMR.

2.3.1 Reactor Vessel, Internals, and Reactor Coolant System

2.3.1.1 Reactor Vessel

2.3.1.1.1 Summary of Technical Information in the Application

The applicant described the reactor vessel in License Renewal Application (LRA) Section 2.3.1.1 and provided a list of components subject to an aging management review (AMR) in LRA Table 2.3.1-1.

The reactor vessel contains the reactor core, the reactor internals, and the reactor core coolant-moderator. It serves as a high-intensity barrier against leakage of radioactive materials to the drywell.

The reactor vessel is a vertical, cylindrical pressure vessel with hemispherical heads. The cylindrical shell and bottom hemispherical head of the reactor vessel are of welded construction and are fabricated of low alloy steel plate. The removable top head is attached to the cylindrical shell flange by bolting. The major safety function for the reactor vessel is to provide a radioactive material barrier. The vessel also provides a floodable core volume, contains the moderator, and provides support for the reactor vessel internals.

Intended Functions within the Scope of License Renewal include the following:

Pressure Boundary—Maintains the integrity of the reactor coolant pressure boundary

Containment—Provides a fission product containment barrier

Physical Support—Provides vertical and horizontal support for the core and other reactor vessel internals

Core Cooling—The reactor vessel and the reactor vessel internals provide a means to distribute coolant to the fuel assemblies located in the core and provides a floodable volume to at least two-thirds core height following design basis accidents

Table 2.3.1-1 of the LRA identified the component groups requiring AMR. The component groups which were identified for the reactor vessel include:

- Closure Bolting
- Nozzle Safe Ends
- Nozzles
- Penetrations
- Bottom Head Drain
 - Control Rod Drive Stub Tubes
 - Incore Instrument Housings
 - Instrumentation and Jet Pump Instrumentation
 - Standby Liquid Control
- Penetrations (Control Rod Drive Stub Tubes)
- Support Skirts and Attachment Welds
- Top Head Enclosure (Closure Studs and Nuts)
- Top Head Enclosure (Head Flanges)
- Top Head Enclosure (Top Heads and Nozzles)
- Vessel Bottom Heads
- Vessel Shell Attachment Welds
- Vessel Shells
 - Beltline Welds
 - Flange
 - Intermediate Beltline Shell
 - Intermediate Nozzle Shell
 - Lower Shell
 - Upper Shell

2.3.1.1.2 Staff Evaluation

The staff reviewed LRA Section 2.3.1.1, Dresden UFSAR Section 5.3, and Quad Cities UFSAR Section 5.3 to determine whether there is reasonable assurance that the reactor vessel components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP-LR and is described as below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the systems, structures, and components (SSCs) within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the structures and components that were identified as not being within the scope of license renewal to verify the following:

- these structures and components do not have any of the intended functions delineated under 10 CFR 54.4(a)
- for those structures and components that have applicable intended function(s), verify that they either perform these function(s) with moving parts or a change in configuration or properties, or they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any function(s) delineated under 10 CFR 54.4(a) that were not identified as intended function(s) in the LRA, to verify that the SSCs with such function(s) will be adequately managed so that the function(s) will be maintained consistent with the CLB for the extended period of operation.

After completing the initial review, the staff requested the applicant to provide additional information on the reactor vessel. By letter dated October 3, 2003 (Ref. 1), the applicant responded to the staff's request for additional information (RAI) as discussed below.

In RAI 2.3.1.1-1, the staff requested the applicant to verify whether the plant is equipped with a thermal shield, whose intended function is to provide shielding for the safety-related SSCs, such as the reactor vessel and the internals, from gamma and neutron radiation, and thereby, it may be relied upon to minimize irradiation induced embrittlement of the vessel and/or the internals. If the component exists at Quad Cities and/or Dresden, the staff requested the applicant to justify its exclusion from aging management; otherwise, to submit an AMR for the subject component. In response, the applicant stated that the reactor vessels at Dresden and Quad Cities do not contain any thermal shield to protect safety-related SSCs such as the reactor vessel and the vessel internals from radiation. Further, no boiling water reactors manufactured by General Electric contain such a design feature. Therefore, there is no need to identify such a component in the LRA. Based on the above discussion, the staff finds the applicant's assessment acceptable.

In RAI 2.3.1.1-2, the staff requested the applicant to clarify whether the vessel head spray nozzle is included in LRA Table 2.3.1-1 as part of the component group "Nozzles." If the component was not included in LRA Table 2.3.1-1, the staff requested the applicant to justify its exclusion from aging management; otherwise, to submit an AMR for the subject component. In response, the applicant stated that the vessel head spray nozzles for Dresden are included in LRA Table 2.3.1-1 as part of the component group "Top Head Enclosure (Top Head Nozzles)" and are subject to aging management. Based on the above discussion, the staff finds the applicant's assessment acceptable.

In RAI 2.3.1.1-3, the staff requested the applicant to indicate whether (1) thermal sleeves for core spray and recirculation inlet nozzles, (2) standby liquid control and core differential pressure line, and (3) low-pressure coolant injection (LPCI) coupling are considered part of the reactor pressure vessel nozzles, safe ends, attachments and instrument penetrations requiring an AMR. If so, the staff requested the applicant to provide an AMR for the subject components and include them in LRA Table 2.3.1-1. Also, the staff requested that the applicant indicate whether the nozzles connecting the reactor recirculation system to the connecting piping should be identified as reactor recirculation system components requiring AMR. In response, the applicant stated the following:

- The thermal sleeves for core spray are considered to be part of the core spray lines and spargers. They are addressed in LRA Section 2.3.1.2.1, Table 2.3.1-2, Component Group,

– Core Spray Lines and Spargers. The recirculation inlet nozzles thermal sleeves are considered an integral part of the recirculation nozzles. They are addressed in LRA Section 2.3.1.1, Table 2.3.1-2, Component Group - Nozzle Safe Ends.

- LRA Section 2.3.2.8 Standby Liquid Control, Table 2.3.2-8, Component Group - Piping and Fittings, addresses the standby liquid control line (not including the vessel nozzle).
- LRA Section 2.3.1.1 Reactor Vessel, Table 2.3.1-1, Component Group - Nozzle Safe Ends, addresses the standby liquid control nozzle.
- LRA Section 2.3.1.3.3 Nuclear Boiler Instrumentation, Table 2.3.1-7, Component Group - Piping and Fittings (small bore) addresses the core differential pressure line. These system evaluation breaks are depicted on Boundary Diagrams LR-DRE-M-26-1 (E/6), LR-DRE-M-357-1 (B/5), LR-QDC-M-35-1 (G/4), and LR-QDC-M-77-1 (G/4).

Those portions of the standby liquid control and core differential pressure piping located inside the reactor vessel were determined to be not in the scope of the Rule. They do not perform a safety-related function and their failure would not prevent a safety-related SSC from performing a safety-related function. This evaluation is supported by BWRVIP-27, BWR Standby Liquid Control System/Core Plate) P Inspection and Flaw Evaluation Guidelines. BWRVIP-27 has been evaluated and accepted by the NRC staff. Paragraph 2.2.1 of BWRVIP-27 provides a safety assessment stating that the standby liquid control and core differential pressure internals are not essential and therefore concluded in paragraph 3.1.1 of BWRVIP-27 that no inspections are recommended.

- As stated in LRA Table 3.1-1, Ref. No. 3.1.1.17 low-pressure coolant injection (LPCI) couplings are not used at Dresden or Quad Cities. The low-pressure coolant injection (LPCI) coupling identified in BWRVIP-06, Safety Assessment of BWR Reactor Internals, applies to BWR/4, BWR/5 and BWR/6 reactors (Ref. Section 2.7, BWRVIP-06). The Dresden and Quad Cities reactors are a BWR/3 design. Neither site has a LPCI coupling as described in BWRVIP-06.
- LRA Section 2.3.1.1 Reactor Vessel, Table 2.3.1-1, Component Group – Nozzle Safe Ends, includes the nozzles connecting the reactor recirculation system to the connecting piping. They are considered to be part of the reactor vessel and should not be identified as reactor recirculation system components.

Based on the above discussion, the staff finds the applicant's assessment acceptable. There is no need to identify those portions of the standby liquid control and core differential pressure piping located inside the reactor vessel in LRA Table 2.3.1-1. As stated in LRA Table 3.1-1, Reference 3.1.1.17, LPCI couplings are not used at Dresden or Quad Cities, and therefore, there is no need to identify the LPCI couplings in LRA Table 2.3.1-1.

The staff did not identify any omissions.

2.3.1.1.3 Conclusions

The staff reviewed the LRA and the accompanying scoping boundary drawings to determine whether any SSCs that should be within the scope of license renewal were not identified by the applicant. No omissions were found. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not

identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes there is reasonable assurance that the applicant has adequately identified the reactor vessel components that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the reactor vessel components that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.1.2 Reactor Vessel Internals

2.3.1.2.1 Summary of Technical Information in the Application

The applicant describes the reactor vessel internals in LRA Section 2.3.1.2 and provides a list of components subject to an AMR in LRA Table 2.3.1-2.

The reactor internals are installed to properly distribute the flow of coolant delivered to the vessel, to locate and support the fuel assemblies and control blades, and to provide an inner volume containing the core that can be flooded following a break in the nuclear system process barrier external to the reactor vessel.

The shroud is a stainless steel cylinder which surrounds the reactor core and provides a barrier to separate the upward flow of the coolant through the reactor core from the downward recirculation flow. Bolted on top of the shroud is the steam separator assembly which forms the top of the core discharge plenum. This provides a mixing chamber before the steam-water mixture enters the steam separator. The recirculation outlet and inlet plenum are separated by the baffle plate (part of the shroud support structure) joining the bottom of the shroud to the vessel wall. The jet pump diffuser sits on and is welded to the baffle plate, making the jet pump diffuser section an integral part of the baffle plate. The baffle plate supports all of the vertical weight of the shroud, steam separator and dryer assembly, top guide and bottom core plate (core grids), peripheral fuel assemblies, and jet pump components carried on the shroud. The control rod guide tubes extend up from the control rod drive housing through holes in the core plate. Each tube is designed as a lateral guide for the control rod and as the vertical support for the fuel support piece which holds the four assemblies surrounding the control rod.

Intended Functions within the Scope of License Renewal:

Reactivity Control - The control rod drive mechanisms insert negative reactivity for normal shutdown and for mitigation of operational transients and accidents. Reactor vessel internals, not directly involved with reactivity insertion, support reactivity insertion by maintaining appropriate geometry to permit proper functioning of the control rod drive mechanism. Standby liquid control system flow supports an alternate method for reactivity control.

Core Cooling - Distributes emergency cooling system flow to the core and maintains coolable core geometry.

Support Safety-Related Function(s) - Reactor vessel internals which do not perform a safety-related function are required not to fail in a way that would cause a safety-related function to fail.

Physical Support - Provides vertical and horizontal support for the core and other reactor vessel internals.

Table 2.3.1-2 of the LRA identified the component groups requiring AMR. The component groups which were identified for the reactor internals include:

- Access Hole Covers (Mechanical)
- Access Hole Covers (Welded) (Dresden only)
- Control Rod Drive Housings [Pressure Boundary]
- Control Rod Drive Housings [Structural Support]
- Control Rod Guide Tubes
- Core Plates
- Core Plates and Bolts
- Core Shrouds (Upper, Central, Lower)
- Core Spray Lines and Spargers [pressure boundary]
- Core Spray Lines and Spargers [Spray]
- Core Spray Lines and Spargers [Structural Support]
- Incore Instrumentation Dry Tubes and Guide Tubes
- Jet Pump Assemblies (Does not include Sensing Lines) [pressure boundary]
- Jet pump Assemblies (Does not include Sensing Lines) [structural support]
- Orificed Fuel Support Pieces
- Orificed Fuel Supports
- Reactor Internals Modification/Repair Hardware
 - Core Spray Clamp
 - Jet Pump Riser Clamp (Quad Cities only)
 - Jet Pump Riser Brace Clamp (Quad Cities only)
 - Shroud Repair
- Shroud Support Structures
- Top Guides

2.3.1.2.2 Staff Evaluation

The staff reviewed LRA Section 2.3.1.2, Dresden UFSAR Section 3.9.5, and Quad Cities UFSAR Section 3.9.5 to determine whether there is reasonable assurance that the reactor vessel internals components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described as below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel internals and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the structures and components that were identified as not being within the scope of license renewal to verify that:

1. these structures and components do not have any of the intended functions delineated under 10 CFR 54.4(a), and
2. for those structures and components that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or

properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any function(s) delineated under 10 CFR 54.4(a) that were not identified as intended function(s) in the LRA, to verify that the SSCs with such function(s) will be adequately managed so that the function(s) will be maintained consistent with the CLB for the extended period of operation.

After completing the initial review, the staff requested the applicant to provide additional information on reactor internals. By letter dated October 3, 2003 (Ref. 1), the applicant responded to the staff's request for additional information (RAI) as discussed below:

In Drawing LR-QDC-FSAR-3.9 of the LRA, the steam separator and standpipe assembly are both in scope at Quad Cities. In RAI 2.3.1.2-1, the staff requested the applicant to explain why, per LR-DRE-FSAR-3.9, the steam separator assembly, including the steam separator, steam separator standpipe and steam plenum head, are not also in scope at Dresden. In response, the applicant stated that LR-QDC-FSAR-3.9 incorrectly shows the steam separator and standpipe assembly as in scope at Quad Cities. The steam separator and standpipe assemblies are not safety-related, nor would their failure cause another safety-related SSC from performing its safety-related function, as discussed in BWRVIP-06, BWR Vessel and Internals Project, Section 3.2.2. Therefore, the steam separator and standpipe assemblies at both Dresden and Quad Cities are not in the scope of the rule and not subject to AMR. The steam plenum head depicted on LR-DRE-FSAR-3.9 is the area between the core shroud head and the bottom of the steam separator standpipe. It is not a component. Based on the above discussion, the staff finds the applicant's assessment acceptable.

In drawing LR-DRE-FSAR-3.9, steam dryer lifting lugs are in scope at Dresden. In RAI 2.3.1.2-2, the staff requested the applicant to identify if Quad Cities has steam dryer lifting lugs and if so, to explain why the steam dryer lifting lugs are in scope at Dresden but not Quad Cities. In response, the applicant stated the steam dryer lifting lugs are not identified on LR-DRE-FSAR-3.9, however, these lugs are out of scope at both Dresden and Quad Cities. This is consistent with boundary diagram LR-QDC-FSAR-3.9 which does show the steam dryer lifting lugs as out of scope. Based on the above discussion, the staff finds the applicant's assessment acceptable.

As noted in NRC Information Notice 2002-26, "Failure of Steam Dryer Cover Plate After a Recent Power Uprate," dated September 11, 2002, Quad Cities Unit 2 experienced a failure of the steam dryer cover plate in March 2002 following implementation of the 17.8% power uprate of the unit. One piece of the dryer cover plate had fallen onto the separator; another piece was found in the dryer; a third piece had lodged in the A main steam line flow venturi (upstream of the main steam isolation valves); and several other pieces had been swept down the A main steam line downstream of the MSIVs into a turbine stop valve strainer. It was reported by the applicant however, that there was no apparent damage other than minor scratches and gouges to the main steam nozzle and piping.

On June 12, 2003, inspections of the steam dryer at Quad Cities Unit 2 identified the following: (1) through-wall cracking (about 90 inches in length) in the vertical and horizontal outer hood plate, (2) one vertical and two diagonal internal braces detached on the outer hood, (3) one severed vertical internal brace on the outer hood, and (4) three cracked tie bars on top of the dryer.

Following up on this recent issue, the staff issued RAI 4.3.0. In RAI 4.3.0(a), the staff is concerned that while components such as the steam dryer and steam separator are non-safety-related, the failure of these components (as experienced at Quad Cities Unit 2) could potentially impact other safety-related components. This issue was also discussed during the Advisory Committee on Reactor Safeguards (ACRS) subcommittee meeting on April 14, 2004, and then during the full committee meeting on September 9, 2004. In a letter dated September 16, 2004, the ACRS recommended that for Dresden Units 2 and 3 and Quad Cities Units 1 and 2, the steam dryers should be included in the scope of license renewal. By letter dated October 8, 2004, Exelon has committed to include the steam dryers within the scope of license renewal for Dresden and Quad Cities for 10 CFR 54.4(a)(2). The aging effect that needs to be managed is cracking. The aging management program will be the NRC approved Boiling Water Reactor Vessel Internals Program (BWRVIP) Steam Dryer Inspection and Evaluation Guideline. If the BWRVIP Steam Dryer Inspection and Evaluation Guideline is not approved by the NRC then a plant specific aging management program will be submitted to the NRC for review and approval by December 22, 2007, which is two years before the first Dresden unit enters the period of extended operation. This is part of Commitment #9 in Appendix A of this SER.

Also in response, the applicant stated additional information regarding the steam dryer failure was provided to the NRC in report GENE-0000-0018-3359-P, "Technical Assessment, Quad Cities Unit 2 Steam Dryer Failure - Determination of Root Cause and Extent of Condition," Revision 1, dated August 2003, which was transmitted by letter from Mr. P.R. Simpson (Exelon Generation Company) to the NRC, "Transmittal of General Electric Technical Assessment Regarding Quad Cities Nuclear Power Station Unit 2 Steam Dryer Failure," dated August 11, 2003. The failure of the steam dryer as described in the above technical assessment was attributed to high cycle fatigue resulting from low frequency pressure loading on the outer hoods during normal operation. The failure did not prevent satisfactory accomplishment of any of the functions identified in 10 CFR 54.4(a)(1)(i), (ii) or (iii). Those portions of non-safety-related SSCs that could spatially or structurally interact with a safety-related SSC in a manner that would prevent the accomplishment of a safety-related SSC intended function were included within the scope of License Renewal as described in LRA Section 2.1.2.2 and in response to RAI 2.1-2: CFR 54.4(a)(2), Scoping Criteria for non-safety-related SSCs. Based on the above discussion and the applicant's commitment, the staff finds the applicant's assessment acceptable.

In RAI 4.3.0(b), the staff requested the applicant to explain how they have considered or examined the potential synergistic effects of large power uprates and plant aging (for those SSCs within scope of license renewal). In response, the applicant stated the Dresden/Quad Cities extended power uprate (EPU) evaluations that explicitly included an assumption of 60 years operation (54 effective full power years [EFPY]) were the Reactor Fracture Toughness Evaluation and the Reactor Internals Flow Induced Vibration Evaluation. The Reactor Fracture Toughness Evaluation determined that there is an increase in the ART (adjusted reference temperature) of the limiting beltline material, and a corresponding increase in the beltline portion of the pressure-temperature (P-T) curves is required to include the increase in fluence and licensed EFPY for the P-T curves for 54 EFPY. Exelon will submit revised Dresden P-T curves to the NRC for 54 EFPY. The Reactor Internals Flow Induced Vibration Evaluation concluded that, except for the Dresden Unit 2 jet pump riser braces, the Dresden and Quad Cities units can operate at the increased flow associated with EPU conditions for a 60-year plant life without exciting the safety-related reactor internal components above their established vibration criteria limits during balanced (dual loop) recirculation flow operation and without developing resonance problems due to vane passing frequency excitation. Additionally, the EPU analyses considered single recirculation loop operation and concluded that with the existing flow restrictions that

apply for single recirculation loop operation, there is no resonance problem due to vane passing frequency excitation at EPU conditions. The exception involving the Dresden Unit 2 jet pump riser braces occurs because these riser braces are designed differently from the Dresden Unit 3 and the Quad Cities Units 1 and 2 jet pump riser braces. LRA Section 4.3.2.2 includes a commitment to repair or replace the Dresden Unit 2 jet pump riser braces prior to the period of extended operation. The Dresden/Quad Cities license renewal evaluations were based upon the plant environmental conditions associated with EPU implementation. Prior to the period of extended operation, the Environmental Qualification (EQ) Binders for components within the scope of 10 CFR 50.49 will be updated to include environmental conditions associated with EPU implementation together with an extended operating period of 60 years. No other synergistic effects of large power uprates and plant aging were considered for those SSCs within the scope of license renewal. Based on this discussion, the staff finds the applicant's assessment acceptable.

In RAI 2.3.1.2-3, the staff requested the applicant to explain why feedwater spargers are not in scope. In response, the applicant stated the feedwater spargers are not in scope because their failure would not prevent the injection of coolant makeup and they are not required to safely shutdown the reactor. They were therefore classified as non-safety-related. Also, the sparging function is not credited in delivery of Emergency Core Cooling System (EECS) flow to the vessel and no failure that could result in consequential failure of safety-related components has been identified. Therefore, there is no need to identify such a component in the LRA. Based on the above discussion, the staff finds the applicant's assessment acceptable.

In accordance with 10 CFR 54.4(a) criteria, sump screens and vortex suppressors/breakers are in scope of license renewal requiring AMR. In RAI 2.3.1.2-4, the staff requests the applicant to identify if sump screens and vortex suppressors/breakers are in scope at Dresden and Quad Cities. If they are in scope, the applicant was asked to submit the AMR results to the staff. If they are not within scope, the applicant was asked to explain the reason for their exclusion. In response, the applicant stated that Sump (ECCS) screens and vortex suppressors/breakers are installed in pressurized-water reactors (PWR). The equivalent boiling-water reactor equipment is the suppression chamber ECCS suction strainers. At Dresden and Quad Cities, these ECCS suction strainers are in the scope of license renewal and are managed for aging. The suppression chamber ECCS suction strainers are included in LRA Section 2.3.2.7, Table 2.3.2-7 under the Component Group "filters/strainers (Dresden only)" with "filter" as the component intended function, and in LRA Section 2.3.2.6, Table 2.3.2-6, under the Component Group "Filters/Strainers (Quad Cities only)" with "Filter" as the component intended function. The aging management results of the strainer (stainless steel) components that are exposed to 25 - 288 °C demineralized water environment are provided in Aging Management Reference 3.2.1.13, LRA Table 3.2-1. The aging mechanism of blockage, as it applies to strainers, is managed by the "Protective Coating Monitoring and Maintenance" aging management program, B.1.32, which provides for aging management of service level I coatings inside the primary containment. Based on the above discussion, the staff finds the applicant's assessment acceptable.

The applicant has identified most of the reactor internals requiring AMR. However, there are a few items that normally would be considered part of reactor pressure vessel internals requiring AMR that have not been included in the submitted LRA. In RAI 2.3.1.2-5, the staff requested the applicant to justify the following exclusions from aging management; otherwise, submit an AMR for the subject component:

- Thermal sleeves for core spray and recirculation inlet nozzles. These sleeves represent pressure boundary and direct flow to core spray spargers and jet pumps, respectively
- Standby liquid control and core differential pressure line (SLC/core delta P line, pressure boundary PB)
- Please identify all the components that are included in Component Group “Jet pump assemblies,” and also explaining why sensing lines are not included in jet pump assemblies
- Low pressure coolant injection coupling

In response to RAI 2.3.1.2-5, the applicant provides the following clarification of either where to find the components in the LRA or the justification for excluding the component from AMR.

- The thermal sleeves for core spray are considered to be part of the core spray lines and spargers. They are addressed in LRA Section 2.3.1.2.1, Table 2.3.1-2, Component Group - Core Spray Lines and Spargers. The recirculation inlet nozzle thermal sleeves are considered an integral part of the recirculation nozzles. They are addressed in LRA 2.3.1.1, Table 2.3.1-2, Component Group - Nozzle Safe Ends.
- The portions of the standby liquid control and core differential pressure piping located inside the reactor vessel were determined to be not in the scope of license renewal. They do not perform a safety-related function and their failure would not prevent a safety-related SSC from performing a safety-related function. This evaluation is supported by BWRVIP-27, BWR Standby Liquid Control System/Core Plate) P Inspection and Flaw Evaluation Guidelines. BWRVIP-27 has been evaluated and accepted by the NRC staff. Paragraph 2.2.1 of BWRVIP-27 provides a safety assessment stating that the standby liquid control and core differential pressure internals are not essential, and therefore concluded in paragraph 3.1.1 of BWRVIP-27 that no inspections are recommended.
- The Jet Pump Assemblies group is comprised of the following components:
 - a. Thermal Sleeve
 - b. Inlet Header
 - c. Riser Brace Arm
 - d. Hold Down Beams
 - e. Inlet Elbow
 - f. Mixing Assembly
 - g. Diffuser

BWRVIP-41, BWR Jet Assembly Inspection and Flaw Evaluation Guidelines (Section 2.3.12.7) concludes that inspection of sensing lines is essentially occurring continuously by plant operations. If a sensing line were to fail, the ability to monitor jet pump integrity would be lost. Plant Technical Specifications would require either a plant shutdown or safety assessment to justify continued operation if a failure were to occur. Therefore, sensing line failure has no adverse safety consequences and no inspection is required.

- As stated in LRA Table 3.1-1, Ref No. 3.1.1.17 LPCI couplings are not used at Dresden or Quad Cities. The LPCI coupling identified in BWRVIP-06, Safety Assessment of BWR Reactor Internals, applies to BWR/4, BWR/5, and BWR/6 reactors (see Section 2.7 of BWRVIP-06). The Dresden and Quad Cities reactors are a BWR/3 design. Neither site has a LPCI coupling as described in BWRVIP-06.

Based on the above discussion, the staff finds the applicant's assessment acceptable. The staff did not identify any omissions.

2.3.1.2.3 Conclusions

The staff reviewed the LRA and the accompanying scoping boundary drawings to determine whether any systems, structures, or components that should be within the scope of license renewal were not identified by the applicant. The staff did not identify any omissions. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that there is reasonable assurance that the applicant has adequately identified the reactor vessel internals components that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the reactor vessel internals components that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.1.3 Reactor Coolant System

2.3.1.3.1 Summary of Technical Information in the Application

The applicant described the reactor coolant system in LRA Section 2.3.1.3 and provided a list of components subject to an AMR in LRA Tables 2.3.1-5 through 2.3.1-9.

The reactor coolant system for BWRs as described in NUREG-1800 includes the reactor coolant recirculation system and portions of other systems connected to the pressure vessel extending to the first isolation valve outside of containment or to the first anchor point. For Dresden and Quad Cities, the reactor coolant system comprises the following plant systems:

- Reactor recirculation system, recirculation flow control, and M/G sets
- Reactor vessel head vent system
- Nuclear boiler instrumentation system
- Head spray system (Dresden only)
- Reactor coolant pressure boundary components in other systems
 - High-pressure coolant injection system
 - Core spray system
 - Reactor core isolation cooling system (Quad Cities only)
 - Isolation condenser (Dresden only)
 - Residual heat removal system (Quad Cities only)
 - Low-pressure coolant injection system (Dresden only)
 - Standby liquid control system
 - Shutdown cooling system (Dresden only)
 - Control rod drive hydraulic system
 - Reactor water cleanup system
 - Main steam system
 - Feedwater system

In RAI 2.1-2, the staff stated that by letters dated December 3, 2001, and March 15, 2002, the NRC issued a staff position to the Nuclear Energy Institute (NEI) which described areas to be considered and options it expects licensees to use to determine what SSCs meet the 10 CFR 54.4(a)(2) criterion (i.e., all non-safety-related SSCs whose failure could prevent satisfactory

accomplishment of any safety-related functions identified in paragraphs (a)(1)(i),(ii),(iii) of this section.)

The December 3rd letter provided specific examples of operating experience which identified pipe failure events (summarized in Information Notice 2001-09, "Main Feedwater System Degradation in Safety-Related ASME Code Class 2 Piping Inside the Containment of a Pressurized Water Reactor") and the approaches that the NRC considers acceptable to determine which piping systems should be included in the scope based on 10 CFR 54.4(a)(2).

The March 15th letter further described the staff's expectations for the evaluation of non-piping SSCs to determine which additional non-safety-related SSCs are within scope. The position states that applicants should not consider hypothetical failures, but rather should base their evaluation on the plant's current licensing basis (CLB), engineering judgement and analyses, and relevant operating experience. The letter further describes operating experience as all documented plant-specific and industry-wide experience which can be used to determine the plausibility of a failure. Operating experience documentation sources would include NRC generic communications and event reports, plant-specific condition reports, industry reports such as SOERs, and engineering evaluations.

Based on a review of the LRA, the applicant's scoping and screening implementation procedures, and discussions with the applicant, the staff determined that additional information is required with respect to certain aspects of the applicant's evaluation of the 10 CFR 54.4(a)(2) criteria. The staff asked the applicant to address the following issues:

- C LRA Section 2.1.2.2, "Title 10 CFR 54.4(a)(2) - Non-safety-related affecting safety-related," stated that the applicant performed plant walkdowns to identify those areas containing safety-related SSCs. The applicant further stated in LRA Section 2.1.2.2 that, in those instances where a plant walkdown could not be performed, it used plant drawings to identify those areas containing safety-related SSCs and identify component interactions. For areas where walkdowns could not be performed to identify non-safety-related SSCs that could affect safety-related SSCs, the staff asked the applicant to describe the methodology and documentation sources used to perform scoping pursuant to 10 CFR 54.4(a)(2). In its response, the NRC asked the applicant to list the areas where walkdowns were not performed and the basis for not performing the walkdowns.
- C Instruction LRTI-16, "Identification of Non Safety-related Structures and Components Which Spatially or Structurally Interact With Safety-related Systems," describes the process used to identify non-safety-related systems and components which meet the scoping criteria specified in 10 CFR 54.4(a)(2) due to spatial or structural interaction with safety-related systems. Section 4.3 of LRTI-16 states that non-safety-related systems are evaluated using the criteria provided in LRTI-16, Table 2, "Spatial Interaction Screening Criteria." The staff asked the applicant to describe the basis and/or justification for the use of the following spatial interaction screening criteria contained in LRTI-16, Table 2:
 - Cables in conduit or trays are not affected by water sprays as long as the spray does not target a cable termination area. Nor is it credible that water would be channeled to a termination area (LRTI-16, Table 2, Item 4).
 - Pipe whip and jet impingement only apply to high energy systems containing fluids with temperatures greater than or equal to 200 °F and a pressure greater than or

equal to 275 psig (LRTI-16, Table 2, Item 5). The staff noted that this definition of high energy systems appeared to be inconsistent with the current licensing basis definition of a high energy system (for example, see Dresden UFSAR, Section 3.6.1.1.1.1).

- Fluid sprays can only affect active components (LRTI-16, Table 2, Item 6).
 - Early detection of leaks (sumps and floor drain systems) is taken credit in the scope of the rule to prevent long term degradation of passive equipment and flooding beyond the lowest elevation of the building (LRTI-16, Table 2, Item 8).
 - Spray from high energy systems can affect equipment up to 25 feet (LRTI-16, Table 2, Item 10).
 - Spray from medium/low energy systems can affect equipment up to 20 feet (LRTI-16, Table 2, Item 11).
- C Section 2.1.2.2 of the LRA states that pipe whip, jet impingement, general flooding, or spray of a gas were not considered credible interactions for gas systems to adversely affect safety-related SSCs. LRTI-16, Table 2, Item 3, states, "while falling equipment from gas systems can spatially impact safety-related components located below them, the only credible manner in which equipment can fall is through failure of the attached supports." Consistent with the staff position described in the March 15th letter, please describe your scoping methodology implemented for the evaluation of the 10 CFR 54.4(a)(2) criteria as it relates to the non-fluid-filled SSCs of interest. As part of your response please indicate the non-fluid-filled SSCs evaluated and describe the site and industry operating experience relied on to determine the potential for failures of such non-fluid-filled SSCs which could impact safety-related SSCs within scope.
- C As described in the letter dated March 15, 2003, if an applicant uses a mitigative option when performing the scoping of non-safety-related SSCs under 10 CFR 54.4(a)(2), the applicant should demonstrate that plant mitigative features are adequate to protect safety-related SSCs from non-safety-related SSC failures, regardless of failure location. If an applicant cannot demonstrate that the mitigative features are adequate to protect safety-related SSCs from the consequences of non-safety-related SSC failures, then the entire non-safety-related SSC is required to be brought into scope of license renewal. In reviewing the LRA, the NRC staff was unable to determine if the 10 CFR 54.4(a)(2) scoping methodology considered failures at all piping locations where age-related degradation is possible. Please clarify how the scoping methodology of non-safety-related piping was performed relative to the guidance contained in the staff's March 15, 2003 letter.
- C In discussions with the Exelon license renewal project team, the NRC staff noted some cases where non-safety-related plant equipment was credited with providing anchorage for non-safety-related piping that was attached to safety-related piping. In these cases, the non-safety-related piping was placed within the scope of license renewal, but the plant equipment (such as a heat exchanger) was not considered to be within scope. For cases where an entire pipe run including both safety and non-safety-related piping was analyzed as part of the current licensing basis to establish that it could withstand design basis event loads, NUREG-1800, Section 2.1.3.1.2 indicates that the scoping methodology includes: (1) the non-safety-related piping up to its anchors and (2) the

associated piping anchors as being within the scope of license renewal under 10 CFR 54.4(a)(2). Because the plant equipment credited with providing support to non-safety-related piping within the scope of license renewal appears to be equivalent to an associated piping anchor as described in NUREG-1800, provide justification for not including this plant equipment within the scope of license renewal.

In addressing each of the above issues, if your review indicates that use of the scoping methodology screened out potential non-safety-related SSCs that could spatially interact with safety-related SSCs, describe any additional scoping evaluations performed to address the 10 CFR 54.4(a)(2) criteria. As part of your response, list any additional SSCs included within scope as a result of your efforts, and list those SCs for which aging management reviews were conducted, and for each SC describe the aging management programs, as applicable, to be credited for managing the identified aging effects.

Based on the applicant's response to RAI 2.1-2 in Reference 2, the staff determined that the applicant did not provide a sufficient basis for limiting consideration of fluid spray interactions to only those non-safety-related SSCs located within 20 feet of an active safety-related SSC. This issue is now identified as Open Item 2.1-1. The staff required additional clarification regarding the capability of active and passive safety-related SSCs located greater than 20 feet from a potential spray source to tolerate wetting, the specific operating experience that was relied upon to determine that it was not credible for fluid sprays to affect equipment greater than 20 feet from a failure location, specific methods to detect leakage in normally accessible and inaccessible areas, and justification for use of exposure duration in limiting the scope of potential failure mechanisms considered during scoping.

In response to Open Item 2.1-1 (Ref. 3), Exelon has revised the methodology utilized in the scoping of non-safety-related moderate energy piping systems that have the potential to spatially interact with safety-related systems. Specifically, Exelon has eliminated the 20 foot separation criterion previously utilized to exclude moderate energy systems from the scope of License Renewal. The revised methodology assumes that all safety-related components, active as well as passive, could be adversely affected by spray or wetting from a non-safety moderate energy system located in the same general area of the plant. As such, early detection of leakage was also eliminated from the revised scoping methodology.

Under the revised scoping methodology, all components from moderate energy non-safety-related systems located in the same general area as a safety-related component (active or passive) will be included within the scope of license renewal. "General area" is defined as the same floor (elevation) of a major building with no barrier walls between the fluid source and the safety-related component. Barrier walls were defined as barriers that form the boundary of a room on the same elevation of a major building separating the safety-related components from a spray or leak generated by a non-safety-related component located on the other side of the barrier wall. All barrier walls credited for protection of safety-related components were previously included within the scope of license renewal during the scoping of structures and are included in the structures monitoring aging management program described in section B.1.30 of the license renewal application and the masonry wall aging management program described in section B.1.29 of the license renewal application.

While both sites contain similar systems and equipment, the location of specific systems and equipment varies between sites. For example, the safety-related standby gas treatment system at Dresden Station is located in the Turbine Building while the same system is located in the Reactor Building at Quad Cities. Because this system resides in two different physical locations

at each site, it will spatially interact with different non-safety-related piping systems. This explains why the scoping boundaries for the same non-safety-related system can vary between sites.

Following the revised methodology described above, the boundaries of several non-safety-related systems previously included within scope of license renewal were expanded. Likewise, several non-safety-related systems previously excluded from the scope of license renewal were added to the scope for the first time at one or both sites.

Because of the revised methodology, additional piping and components from the reactor recirculation system were added to the scope of license renewal at Quad Cities due to the potential for spatial interaction with safety-related components. Specifically, the recirculation motor generator oil subsystem was added to the scope of license renewal at Quad Cities. All of the components shown on revised boundary diagrams LR-QDC-M-35-4 and LR-QDC-M-77-4 have been included within the scope of license renewal. The system did not require a boundary expansion at Dresden because the physical plant layout is different than Quad Cities at this location. The resulting changes to LRA Table 2.3.1-5 include the following:

Component	Component Intended Function	LRA Aging Management Reference
Pumps (spatial interaction) (Quad Cities only)	Leakage Boundary (spatial)	3.1.2.66, 3.1.2.67
Tanks (spatial interaction) (Quad Cities only)	Leakage Boundary (spatial)	3.1.2.3, 3.1.2.68

Based on the above discussion, the staff finds the applicant's response and revised methodology changes for the reactor recirculation system acceptable.

Intended Functions within the Scope of License Renewal:

The following intended functions are for the reactor coolant system as a whole as comprised above by the licensee in LRA Sections 2.3.1.3.1 through 2.3.1.3.5.

Pressure Boundary - Maintains integrity for the reactor coolant pressure boundary.

Flow Path - Provides an integral flow path for low pressure core injection (LPCI) flow into the reactor vessel. It also provides a flow path for establishing the shutdown cooling mode of operation.

Support ESF Function(s) - Provides signals and performs actions during a design basis loss of coolant accident for correct selection of the unbroken recirculation loop and closure of the recirculation system valves.

Credited in Regulated Event(s) - Required to enable hot shutdown and cold shutdown during an Appendix R fire event and to provide trips of recirculation pumps to mitigate the ATWS event. The system also contains components that are relied upon for compliance with 10 CFR 50.49 (EQ).

Credited in Regulated Event(s) - Provides trip and initiation signals and process

information and indications credited in mitigation of the Appendix R fire, ATWS, and SBO events. The system also contains components that are relied upon for compliance with 10 CFR 50.49, (EQ).

Preclude Adverse Effects on Safety-Related SSCs - Non-safety-related components that could be a hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

Primary Containment Isolation - Provides containment isolation for those portions of the system that interface with the primary containment.

Table 2.3.1-5 of the LRA identified the component groups requiring AMR. The component groups which were identified for reactor recirculation system, recirculation flow control and M/G sets include:

- Closure Bolting (includes flanges)
- Dampeners (Quad Cities only)
- Dampeners (spatial interaction) (Quad Cities only)
- Filters/Strainers (spatial interaction) (Quad Cities only)
- Flow Elements
- NSR Vents or Drains, Piping and Valves (attached support) (Dresden only)
- Piping and Fittings
- Piping and Fittings (spatial interaction)
- Piping and Fittings (attached support)
- Piping and Fittings (small bore)
- Pumps
- Pumps (spatial interaction) (Quad Cities only)¹
- Restricting Orifices (spatial interaction) (Quad Cities only)
- Sight Glasses (attached support)
- Sight Glasses (spatial interaction) (Quad Cities only)
- Tanks (spatial interaction) Quad Cities only¹
- Thermowells
- Tubing
- Tubing (spatial interaction) (Quad Cities only)
- Valves
- Valves (attached support)
- Valves (spatial interaction) (Quad Cities only)

Table 2.3.1-6 of the LRA identified the component groups requiring AMR. The component groups identified for the reactor vessel head vent system include the following:

- closure bolting (includes flanges)
- NSR vents or drains, piping, and valves (attached support)
- piping and fittings
- piping and fittings (small bore)

¹This component has been added to LRA Table 2.3.1-5 because of the applicant's revised methodology in response to Open Item 2.1-1. Additional piping and components from the reactor recirculation system were added to the scope of license renewal at Quad Cities due to the potential for spatial interaction with safety-related components. This component is physically located in another location at Dresden, therefore, it is not in scope of license renewal at the Dresden Station.

- sight glasses (attached support, Dresden only)
- tubing
- valves

Table 2.3.1-7 of the LRA identified the component groups requiring AMR. The component groups which were identified for nuclear boiler instrumentation system include:

- Closure Bolting (includes flanges)
- Dampeners (Quad Cities only)
- Filters/Strainers (spatial interaction) (Dresden only)
- NSR Vents or Drains, Piping and Valves (attached support) (Dresden only)
- Pipes
- Piping and Fittings (attached support)
- Piping and Fittings (spatial interaction) (Dresden only)
- Piping and Fittings (Quad Cities only)
- Piping and Fittings (small bore)
- Tanks
- Thermowells
- Tubing
- Tubing (spatial interaction) (Quad Cities only)
- Tubing (attached support) (Quad Cities only)
- Valves
- Valves (spatial interaction)
- Valves (attached support)

Table 2.3.1-8 of the LRA identified the component groups requiring AMR. The component groups which were identified for head spray system (Dresden only) include:

- Closure Bolting (includes flanges) (Dresden only)
- Flow Elements (attached support) (Dresden only)
- NSR Vents or Drains, Piping and Valves (attached support) (Dresden only)
- Piping and Fittings (Dresden only)
- Piping and Fittings (attached support) (Dresden only)
- Piping and Fittings (small bore) (Dresden only)
- Valves (Dresden only)
- Valves (attached support) (Dresden only)

Table 2.3.1-9 of the LRA identified the application sections where the additional reactor coolant pressure boundary components were evaluated. The reactor coolant boundary components evaluated in separate sections of the LRA include:

System Name	Other Application Section That Contain Reactor Coolant Pressure Boundary Components
High Pressure Coolant Injection System	2.3.2.1
Core Spray System	2.3.2.2
Reactor Core Isolation Cooling System (Quad Cities only)	2.3.2.4
Isolation Condenser (Dresden only)	2.3.2.5
Residual Heat Removal System (Quad Cities only)	2.3.2.6
Low Pressure Coolant Injection System (Dresden only)	2.3.2.7
Standby Liquid Control System	2.3.2.8
Shutdown Cooling System (Dresden only)	2.3.3.2
Control Rod Drive Hydraulic System	2.3.3.3
Reactor Water Cleanup System	2.3.3.4
Main Steam System	2.3.4.1
Feedwater System	2.3.4.2

2.3.1.3.1.2 Staff Evaluation

The staff reviewed LRA Section 2.3.1.3, Dresden UFSAR Sections 5.4.1, 7.6.2, and 5.4.15, and Quad Cities UFSAR Sections 5.4.1 and 7.6.2 to determine whether there is reasonable assurance that the reactor coolant system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described as below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel internals and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the structures and components that were identified as not being within the scope of license renewal to verify that:

1. these structures and components do not have any of the intended functions delineated under 10 CFR 54.4(a), and
2. for those structures and components that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any function(s) delineated under 10 CFR 54.4(a) that were not identified as intended function(s) in the LRA, to verify that the SSCs with such function(s) will be adequately managed so that the function(s) will be maintained consistent with the CLB for the extended period of operation.

After completing the initial review, the staff requested the applicant to provide additional information on the reactor coolant system. By letter dated October 3, 2003 (Ref. 1), the applicant responded to the staff's request for additional information (RAI) as discussed below:

In RAI 2.3.1.3-1, the staff requested the applicant to verify whether the pumps at Quad Cities and/or Dresden, such as the recirculation pumps, are designed with lube motor-oil collection systems, as required under 10 CFR 50, App. R, III O. If they are, please justify its exclusion from aging management; otherwise, submit an AMR for the subject component. In response, the applicant stated the reactor recirculation pumps at Quad Cities and Dresden are not equipped with oil collection systems and do not need such systems to comply with 10 CFR 50, App. R, III O. 10 CFR 50, App. R, III O requires that the reactor coolant pump (reactor recirculation pump at Quad Cities and Dresden) be equipped with an oil collection system if the containment is not inerted during normal operation. The reactor recirculation pumps at Quad Cities and Dresden are located in the drywell portions of the primary containment, which are inerted during normal operation. The Quad Cities and Dresden Fire Hazards Analysis Reports sections for Fire Zones 1.2.1 and 1.2.2 state that there is no design-basis fire postulated for the drywell since the drywell atmosphere is inerted during normal reactor operation. Therefore, there is no need to identify such a component in the LRA. Based on the above discussion, the staff finds the applicant's assessment acceptable.

Updated Final Safety Analysis Reports (UFSARs) for Dresden and Quad Cities do identify the reactor vessel nozzles, safe ends, vessel shell attachments, and instrumentation penetrations at these plants, but it is not clear whether all of these components are included in Table 2.3.1-1 of the LRA. In RAI 2.3.1.3-2, the staff requested the applicant to explicitly identify all of the nozzles, safe ends, vessel shell attachments and instrumentation penetrations included in Component Groups "Nozzles," "Nozzle Safe Ends" (including core delta P/SLC nozzle safe end), "Vessel Shell attachment welds," and "Penetrations" (bottom head drain, CRD stub tubes, incore instrument housings, jet pump instrumentation, other instrumentation, standby liquid control), respectively. In response, the applicant identifies the individual components included in the LRA Table 2.3.1-1. The following list Industry Component Type line items are as shown in bolded and underlined text. In some cases generic components were created to represent a population of components, as for example the CRD stub tubes. Also, there are nozzles included in the component group, "Top Head Enclosure (Top Head Nozzles)." Therefore, although not requested, the individual components for this group are also provided.

All the nozzles identified on page 3 of Quad Cities UFSAR Section 5, Appendix 5A, "Reactor Vessel Report," and on page 11 of Dresden UFSAR Section 5, Appendix 5A, "Dresden 2 Reactor Vessel," are included in LRA Table 2.3.1-1 in the Component Groups of "Nozzles" and "Penetrations."

Nozzles (Component Intended Function of Pressure Boundary)

<u>Unit</u>	<u>Equip No.</u>	<u>Equipment Name</u>
Q1	1-0201-N1	Recirculation Outlet Nozzles
Q1	1-0201-N2	Recirculation Discharge Nozzles
Q1	1-0201-N3	Main Steam Nozzles

Q1	1-0201-N4	Feedwater Nozzles
Q1	1-0201-N5	Core Spray Nozzles
Q1	1-0201-N9	CRD Return Line Nozzles
Q2	2-0201-N1	Recirculation Nozzles
Q2	2-0201-N2	Recirculation Discharge Nozzles
Q2	2-0201-N3	Main Steam Nozzles
Q2	2-0201-N4	Feedwater Nozzles
Q2	2-0201-N5	Core Spray Nozzles
Q2	2-0201-N9	CRD Return Line Nozzles
D2	2-0201-N1	Recirculation Nozzles
D2	2-0201-N2	Recirculation Discharge Nozzles
D2	2-0201-N3	Main Steam Nozzles
D2	2-0201-N4	Feedwater Nozzles
D2	2-0201-N5	Core Spray Nozzles
D2	2-0201-N9	CRD Return Line Nozzles
D2	2-0201-N17	Isolation Condenser Nozzles
D3	3-0201-N1	Recirculation Suction Nozzles
D3	3-0201-N2	Recirculation Discharge Nozzles
D3	3-0201-N3	Main Steam Nozzles
D3	3-0201-N4	Feedwater Nozzles
D3	3-0201-N5	Core Spray Nozzles
D3	3-0201-N9	CRD Return Line Nozzles
D3	3-0201-N17	Isolation Condenser Nozzles

Nozzle Safe Ends (Component Intended Function of Pressure Boundary)

<u>Unit</u>	<u>Equip No.</u>	<u>Equipment Name</u>
Q1	1-0201-N1-SE	Recirculation Suction Nozzle Safe Ends
Q1	1-0201-N2-SE	Recirculation Discharge Nozzle Safe Ends
Q1	1-0201-N3-SE	Main Steam Nozzle Safe Ends
Q1	1-0201-N4-SE	Feedwater Nozzle Safe Ends
Q1	1-0201-N5-SE	Core Spray Nozzle Safe Ends
Q1	1-0201-N5-SEEXT	Core Spray Nozzle Safe End Extension
Q1	1-0201-N6B-SE	Vessel Head Instrumentation Nozzle Safe End
Q1	1-0201-N7-SE	Vent Nozzle N7 Safe End
Q1	2-0201-N8-SE	Jet Pump Instrumentation Nozzle Safe Ends
Q1	1-0201-N9-SE	CRD Return Line Nozzle Safe End
Q1	1-0201-N10-SE	Core Delta P & SLC Nozzle Safe Ends
Q1	1-0201-N11/12-SE	Instrumentation Nozzle Safe Ends
Q2	2-0201-N1-SE	Recirculation Suction Nozzle Safe Ends
Q2	2-0201-N2-SE	Recirculation Discharge Nozzle Safe Ends
Q2	2-0201-N3-SE	Main Steam Nozzle Safe Ends
Q2	2-0201-N4-SE	Feedwater Nozzle Safe Ends
Q2	2-0201-N5-SE	Core Spray Nozzle Safe Ends
Q2	2-0201-N5-SEEXT	Core Spray Nozzle Safe End Extension
Q2	2-0201-N6B-SE	Vessel Head Instrumentation Nozzle Safe End
Q2	2-0201-N7-SE	Vent Nozzle N7 Safe End
Q2	2-0201-N8-SE	Jet Pump Instrumentation Nozzle Safe Ends
Q2	2-0201-N9-SE	CRD Return Line Nozzle Safe End
Q2	2-0201-N10-SE	Core Delta P & SLC Nozzle Safe Ends
Q2	2-0201-N11/12-SE	Instrumentation Nozzle Safe Ends

D2	2-0201-N1-SE	Recirculation Suction Nozzle Safe Ends
D2	2-0201-N2-SE	Recirculation Discharge Nozzle Safe Ends
D2	2-0201-N3-SE	Main Steam Nozzle Safe Ends
D2	2-0201-N4-SE	Feedwater Nozzle Safe Ends
D2	2-0201-N5-SE	Core Spray Nozzle Safe Ends
D2	2-0201-N5-SEEXT	Core Spray Nozzle Safe End Extension
D2	2-0201-N6B-SE	Vessel Head Instrumentation Nozzle Safe End
D2	2-0201-N7-SE	Vent Nozzle Safe End
D2	2-0201-N8-SE	Jet Pump Instrumentation Nozzle Safe Ends
D2	2-0201-N9-SE	CRD Return Line Nozzle Safe End
D2	2-0201-N10-SE	Core Delta P & SLC Nozzle Safe End
D2	2-0201-N11/12-SE	Instrumentation Nozzle Safe Ends
D2	2-0201-N17-SE	Isolation Condenser Nozzle Safe End
D3	3-0201-N1-SE	Recirculation Suction Nozzle Safe Ends
D3	3-0201-N2-SE	Recirculation Discharge Nozzle Safe Ends
D3	3-0201-N3-SE	Main Steam Nozzle Safe Ends
D3	3-0201-N4-SE	Feedwater Nozzle Safe Ends
D3	3-0201-N5-SE	Core Spray Nozzle Safe Ends
D3	3-0201-N5-SEEXT	Core Spray Nozzle Safe End Extension
D3	3-0201-N6B-SE	Vessel Head Instrumentation Nozzle Safe End
D3	3-0201-N7-SE	Vent Nozzle Safe End
D3	3-0201-N8-SE	Jet Pump Instrumentation Nozzle Safe Ends
D3	3-0201-N9-SE	CRD Return Line Nozzle Safe End
D3	3-0201-N10-SE	Core Delta P & SLC Nozzle Safe End
D3	3-0201-N11/12-SE	Instrumentation Nozzle Safe Ends
D3	3-0201-N17-SE	Isolation Condenser Nozzle Safe End

Vessel Shell Attachment Welds (Component Intended Function of Structural Support)

Generic Components were created for the attachment welds on each unit at each site:

Unit	Equip No.	Equipment Name
Q1	1-0201-LR037	Attachment Welds
Q2	2-0201-LR037	Attachment Welds
D2	2-0201-LR037	Attachment Welds
D3	3-0201-LR037	Attachment Welds

Penetrations (Component Intended Function of Pressure Boundary)

Unit	Equip No.	Equipment Name
Q1	1-0201-12	Housing In-Core Penetrations
Q1	1-0201-LR038	CRD Stub Tube Penetrations
Q1	1-0201-N8	Jet Pump Instrumentation Nozzle Penetrations
Q1	1-0201-N10	Core Delta P & SLC Nozzle Penetrations
Q1	1-0201-N11/12	Instrumentation Nozzle Penetrations
Q1	1-0201-N15	Bottom Head Drain Nozzle Penetrations
Q2	2-0201-12	Housing In-Core Penetrations
Q2	2-0201-LR038	CRD Stub Tube Penetrations
Q2	2-0201-N8	Jet Pump Instrumentation Nozzles Penetrations
Q2	2-0201-N10	Core Delta P & SLC Nozzle Penetrations
Q2	2-0201-N11/12	Instrumentation Nozzle Penetrations
Q2	2-0201-N15	Bottom Head Drain Nozzle Penetrations

D2	2-0201-12	Housing In-Core Penetrations
D2	2-0201-LR038	CRD Stub Tube Penetrations
D2	2-0201-N8	Jet Pump Instrumentation Nozzle Penetrations
D2	2-0201-N10	Core Delta P & SLC Nozzle Penetrations
D2	2-0201-N11/12	Instrumentation Nozzle Penetrations
D2	2-0201-N15	Bottom Head Drain Nozzle Penetrations
D3	3-0201-12	Housing In-Core Penetrations
D3	3-0201-LR038	CRD stub tube Penetrations
D3	3-0201-N8	Jet Pump Instrumentation Nozzle Penetrations
D3	3-0201-N10	Core Delta P & SLC Nozzle Penetrations
D3	3-0201-N11/12	Instrumentation Nozzle Penetrations
D3	3-0201-N15	Bottom Head Drain Nozzle Penetrations

Penetrations (Control Rod Drive Stub Tubes) (Component Intended Function of Structural Support)

Generic Components were created for the CRD stub tubes on each unit at each site:

<u>Unit</u>	<u>Equip No.</u>	<u>Equipment Name</u>
Q1	1-0201-LR038	CRD Stub Tube Penetrations
Q2	2-0201-LR038	CRD Stub Tube Penetrations
D2	2-0201-LR038	CRD Stub Tube Penetrations
D3	3-0201-LR038	CRD Stub Tube Penetrations

Top Head Enclosure (Top Head Nozzles) (Component Intended Function of Pressure Boundary)

<u>Unit</u>	<u>Equip No.</u>	<u>Equipment Name</u>
Q1	1-0201-N6B	Vessel Head Instrumentation Nozzle
Q1	1-0201-N7	Vent Nozzle N7
Q2	2-0201-N6B	Vessel Head Instrumentation Nozzle
Q2	2-0201-N7	Vent Nozzle N7
D2	2-0201-N6B	Vessel Head Instrumentation Nozzle
D2	2-0201-N7	Vent Nozzle
D3	3-0201-N6B	Vessel Head Instrumentation Nozzle
D3	3-0201-N7	Vent Nozzle

Based on the above discussion, the staff finds the applicant's assessment acceptable.

One of the intended functions of the main steam line flow restrictors is to limit steam line flow during a steam line rupture outside of primary containment until the MSIVs [main steam isolation valves] can close, thereby limiting potential radioactive release. Over the extended life of the plant, it is therefore essential to maintain the flow area of the flow restrictors used in the CLB [current licensing basis] to calculate the amount of steam released. The staff believes that erosion/corrosion due to high energy steam flow can eventually increase this flow area beyond the value used in the CLB. In RAI 2.3.1.3-3, the staff requested the applicant to provide the following information:

- a) Are the main steam line flow restrictors, and their flow restriction function, within scope? If not, please explain why not.

- b) If in scope, how will the applicant determine that the flow area does not exceed more than the value used in the CLB, so that the intended functions will be maintained consistent with the CLB for the period of extended operation?

The applicant provided the following response:

- a) The main steam line flow restrictors are within the scope of license renewal. They are listed as components in two line items in LRA Table 2.3.4-1 because they have two intended functions. They are included in the component group "Flow Elements," with a component intended function of "Pressure Boundary." They are also included in the component group "Flow Elements," with a component intended function of "Throttle."
- b) The main steam line flow restrictors are constructed of an external carbon steel pipe segment, with an internal venturi-type flow element welded into it. The venturi flow element is comprised of stainless steel.

The entry in the LRA Table 2.3.4-1 Component Group "Flow Elements," with a component intended function of "Pressure Boundary" is for the carbon steel pipe segment that comprises the pressure boundary. The LRA Chapter 3 Aging Management References are 3.1.1.11 and 3.4.2.6. The internal aging effect/aging mechanism is wall thinning due to flow-accelerated corrosion, and is managed by the flow-accelerated corrosion program, as described in LRA Appendix B, Section B.1.11. The external environment for the pipe segment is "containment nitrogen," and there are no identified aging effects/aging mechanisms for this environment.

The entry in the Component Group "Flow Elements," with a component intended function of "Throttle" is for the internal stainless steel venturi-type flow element. The LRA Chapter 3 Aging Management Reference is 3.1.1.15. The aging effect/aging mechanism is crack initiation and growth due to SSCS, IGSCC. It is managed by the BWR stress corrosion cracking program as described in LRA Appendix B, Section B.1.7, and by the water chemistry program as described in LRA Appendix B, Section B.1.2. EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Appendix A - Treated Water, Section 3.1.6, states that stainless steels used in treated water environments are resistant to FAC.

Based on this discussion, the staff finds the above applicant's assessment acceptable.

The staff did not identify any omissions.

2.3.1.3.3 Conclusions

The staff reviewed the LRA and the accompanying scoping boundary drawings to determine whether any structures, systems, or components that should be within the scope of license renewal were not identified by the applicant. The staff did not identify any omissions. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that there is reasonable assurance that the applicant has adequately identified the reactor coolant system components that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the reactor coolant system components that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.1.4 Evaluation Findings

On the basis of its review, the staff concludes that there is reasonable assurance that the applicant has adequately identified the reactor coolant systems and components that are within the scope of license renewal, in accordance with the requirements of 10 CFR 54.4(a), and that the applicant has adequately identified the reactor coolant system components that are subject to an AMR, in accordance with the requirements of 10 CFR 54.21(a)(1).

2.3.1.5 References

1. Letter from Patrick R. Simpson (Exelon) to the NRC, "Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3," October 3, 2003 (Accession No. ML032810692).
2. Letter from Patrick R. Simpson (Exelon) to the NRC, "Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3," October 3, 2003 (Accession No. ML032810563).
3. Letter from Patrick R. Simpson (Exelon) to the NRC, "Follow-up Response to License Renewal Safety Evaluation Report for the Dresden and Quad Cities Nuclear Power Stations," June 6, 2004 (Accession No. ML041820207).

2.3.2 Engineered Safety Features Systems

2.3.2.1 High-Pressure Coolant Injection System

2.3.2.1.1 Summary of Technical Information in the Application

The applicant described the high-pressure coolant injection (HPCI) system in LRA Section 2.3.2.1 and provided a list of components subject to an AMR in LRA Table 2.3.2-1.

The HPCI system ensures that adequate core cooling takes place for all break sizes less than those sizes for which the low-pressure coolant injection or core spray subsystems can adequately protect the core. Operation of the HPCI system in the emergency mode is completely independent of alternating current (ac) power.

The HPCI system consists of a steam turbine driving a multi-stage high-pressure main pump and a gear driven single-stage booster pump, piping, auxiliary support systems, and instrumentation. The turbine is driven by nuclear steam and exhausts to the suppression chamber (evaluated with the primary containment structure). The preferred water source to the HPCI booster pump suction is supplied from the condensate storage system (evaluated with the condensate and condensate storage system), with a backup source from the suppression chamber. Water from the HPCI main pump is delivered to the reactor vessel (evaluated with the reactor vessel) through the “B” feedwater line (evaluated with the feedwater system) and distributed within the reactor vessel through the feedwater sparger (evaluated with reactor internals). The system is equipped with a test line to the condensate storage system to permit functional testing and a minimum flow bypass line to the suppression chamber for pump protection.

Intended functions within the scope of license renewal include the following:

- core cooling—provides cooling water to the reactor vessel during loss of coolant (LOCA) conditions that do not result in rapid depressurization of the reactor pressure vessel and provides coolant inventory makeup in non-LOCA events
- pressure control—provides pressure control in events where the main steam isolation valves are closed
- pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- credited in regulated event(s)—provides core makeup, cooling, and pressure control credited in mitigation of the Appendix R fire, ATWS, and SBO events; also contains components that are relied upon for compliance with 10 CFR 50.49 (EQ)
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

Table 2.3.2-1 of the LRA identified the component groups requiring AMR. The component groups identified for HPCI include:

- closure bolting
- dampeners (Quad Cities only)
- diffusers
- filters/strainers (includes separators, pressure boundary)
- filters/strainers (includes separators, filter)
- flexible hoses
- flow orifices
- heat exchangers (includes condensers, pressure boundary)
- heat exchangers (includes condensers, heat transfer)
- NSR vents or drains, piping, and valves (attached support)
- piping and fittings (includes thermowells)
- piping and fittings (attached support)
- piping and fittings (small bore)

- pumps
- restricting orifices (pressure boundary)
- restricting orifices (throttle)
- restricting orifices (attached support)
- rupture discs
- sight glasses (attached support)
- sight glasses (Quad Cities only)
- tanks
- thermowells
- traps
- tubing
- tubing (attached support)
- turbine casings
- valves
- valves (attached support)

2.3.2.1.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.1, Dresden UFSAR Sections 6.3.1 and 6.3.2, and Quad Cities UFSAR Sections 6.3.1 and 6.3.2 to determine whether there is reasonable assurance that the HPCI system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In performing the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the SCs that were identified as not being within the scope of license renewal to verify that (1) these structures and components do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those structures and components that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4(a) that were not identified as intended functions in the LRA, to verify that the SSCs with such functions will be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

2.3.2.1.3 Conclusions

The staff reviewed LRA Section 2.3.2.1 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the

applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the HPCI system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the HPCI system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.2 Core Spray System

2.3.2.2.1 Summary of Technical Information in the Application

The applicant described the core spray (CS) system components in LRA Section 2.3.2.2 and provides a list of components subject to an AMR in LRA Table 2.3.2-2.

The CS system provided core cooling for intermediate and large line break sizes. Two independent CS loops are provided to ensure adequate core cooling. Each CS loop is designed to operate in conjunction with LPCI and either the automatic depressurization system or high-pressure coolant injection system to provide adequate core cooling over the entire spectrum of liquid or steam break sizes.

The CS system consists of two independent loops, each with a motor-driven pump, associated piping, valves, and instrumentation. The normal water source is supplied from the suppression chamber (evaluated with the primary containment structure). An alternate water source is the condensate storage system (evaluated with the condensate and condensate storage system). The CS system delivers water directly to the reactor vessel (evaluated with the reactor vessel) onto the top of the fuel assemblies through the CS spargers (evaluated with reactor internals). Each CS loop is equipped with a test return line to the suppression chamber to permit functional testing and a minimum flow bypass line to the suppression chamber for pump protection.

Intended functions within the scope of license renewal include the following:

- pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- core cooling—in conjunction with LPCI and either automatic depressurization or high-pressure coolant injection, provides emergency core cooling for the entire spectrum of postulated design-basis LOCAs
- primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- supports ESF function(s)—provides an ECCS keep fill subsystem which maintains core spray and LPCI piping full of water to support a condition of standby readiness
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected
- credited in regulated event(s)—contains components that are relied upon for compliance with 10 CFR 50.49 (EQ)

Table 2.3.2-2 of the LRA identified the component groups requiring AMR. The component groups identified for CS include the following:

- closure bolting
- flow elements (pressure boundary)
- flow elements (throttle)
- NSR vents or drains, piping, and valves (attached support)
- piping and fittings
- piping and fittings (attached support)
- pumps
- restricting orifices (pressure boundary)
- restricting orifices (throttle)
- sight glasses (attached support)
- thermowells
- tubing
- tubing (attached support, Quad Cities only)
- valves
- valves (attached support)

2.3.2.2.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.2, Dresden UFSAR Sections 6.3.1 and 6.3.2, and Quad Cities UFSAR Sections 6.3.1 and 6.3.2 to determine whether there is reasonable assurance that the components of the CS system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the structures and components that were identified as not being within the scope of license renewal to verify that (1) these structures and components do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those structures and components that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4(a) that were not identified as intended functions in the LRA, to verify that the SSCs with such functions will be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

After completing the initial review, the staff requested the applicant to provide additional information on the CS system. By letter dated October 3, 2003 (Ref. 1), the applicant responded to the staff's RAI as discussed below.

High-radiation sampling system piping and liquid sampling flow diagram LR-QDC-M-1061-1 does not include check valve 2-1402-71 within the scope of license renewal. This valve prevents the backflow of water from the ESS fill pump discharge line back to the condensate transfer pump supply line. Failure of this valve could prevent the ESS fill pump system from supporting its intended ESF function. In RAI 2.3.2.2-1, the staff requested the applicant to explain why this component is not within the scope of the license renewal program. In response, the applicant stated that valve 2-1402-71 is included within the scope of license renewal and is subject to AMR. Boundary diagram LR-QDC-M-78 (coordinate E-7) includes valve 2-1402-71 as within the scope of license renewal requiring AMR. Check valve 2-1402-70 (not shown on LR-QDC-M-1061-1) serves as the safety-related pressure boundary that prevents the backflow of water from the ECCS keep fill pump discharge line from entering the condensate transfer system. Valve 2-1402-71 is addressed in Table 2.3.2-2 under the component group "valves (attached support)."

Valve 2-1402-70 is addressed in Table 2.3.2-2, under the component group "valves". High-radiation sampling system piping and liquid sampling boundary diagram, LR-QDC-1061-1, is a continuation boundary diagram where valve 2-1402-71 is shown as a dotted line for information only. The ECCS keep fill pump system intended function is therefore not jeopardized. Boundary diagram LR-QDC-1061-1 should have highlighted check valve 2-1402-70 indicating that it falls within the scope of license renewal. Based on this discussion, the staff finds the applicant's assessment acceptable.

Demineralized water system flow diagram LR-DRE-M-366 does not include the suction line, 3-3329-A-B-L, and suction isolation valve, 3-3329-A-500, for condensate makeup pump 3-3318-B within the scope of license renewal. Failure of these system boundary components could prevent the demineralized water system from performing its ESF function. In RAI 2.3.2.2-2, the staff requested the applicant to explain why these components are not within the scope of the license renewal program. In response, the applicant stated that Exelon has reviewed the demineralized water system boundary diagram LR-DRE-M-366 for Dresden and the following clarification is provided:

Demineralized water system boundary diagram LR-DRE-M-366 should have highlighted suction line, 3-3329-A-8-L, and suction isolation valve, 3-3329-A-500, for condensate make-up pump 3-3318-A and included those components within the scope of license renewal. The suction line and the suction isolation valve are included in the scope of license renewal and are subject to AMR. The suction piping and isolation valve are addressed in LRA Section 2.3.4.3, Table 2.3.4-3 under the Component Groups "Piping and Fittings" and "Valves". Aging Management Reference 3.4.1.3 discusses the aging management of the suction piping and isolation valve external surfaces as a carbon steel component. Aging Management References 3.4.1.2 and 3.4.1.4 discuss the aging management of the suction piping and isolation valve internal surfaces.

Based on this discussion, the staff finds the applicant's assessment acceptable.

2.3.2.2.3 Conclusions

The staff reviewed Section 2.3.2.2 of the LRA and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to

determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the CS system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the CS system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.3 *Containment Isolation Components and Primary Containment Piping System*

2.3.2.3.1 Summary of Technical Information in the Application

The applicant described the containment isolation components and primary containment piping system in LRA Section 2.3.2.3 and provided a list of components subject to an AMR in LRA Table 2.3.2-3.

The containment isolation components and primary containment piping system is a composite support system for the primary containment structure. The containment isolation components and primary containment piping system comprises primary containment isolation valves, penetrations, and piping from non-safety-related systems that perform no intended function except primary containment isolation. It also includes safety-related piping, components, and instrumentation that directly support intended functions of the primary containment structure and that are not assigned to other systems in the scope of license renewal. The containment isolation components and primary containment piping system ensures that the primary containment structure can perform its intended functions.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following intended functions of the containment isolation components and primary containment piping system:

- primary containment isolation—provides functions that support isolation
- pressure suppression—provides functions that support absorption of energy by containment air and water volumes
- containment integrity—provides vacuum relief between drywell, suppression chamber, and reactor building
- preclude adverse effects on safety-related SSCs
- credited in regulated events—components relied upon for compliance with 10 CFR 50.49 (EQ)

In the event of a nuclear steam supply system piping failure within the drywell (evaluated with the primary containment structure), reactor water and/or steam would be released into the drywell. The resulting increased drywell pressure would force a mixture of radioactive materials, noncondensable gases, steam, and water through the connecting vent lines into the chamber of water in the suppression chamber, which is also called the torus (evaluated with the primary containment structure). The steam would condense rapidly and completely in the suppression chamber resulting in suppression of the pressure increase in the drywell. During this period, the primary containment and suppression chamber piping isolation valves are relied upon to ensure the containment of these gases and liquids.

The containment isolation components and primary containment piping system consists of: primary containment pressure instruments; suppression chamber to reactor building vacuum breaker lines; purge supply and exhaust penetrations (HVAC—primary containment); suppression chamber level instrumentation penetrations; local leak-rate test (LLRT) penetrations; and containment isolation barriers from the traversing in-core probe, drywell equipment and floor drain sumps, atmospheric containment air dilution (ACAD), service air, and instrument air systems. All associated piping, components, and instrumentation contained within the flow paths and systems described above are included in the primary containment and suppression chamber piping system evaluation boundary.

In LRA Section 2.3.2.3, the applicant described the evaluation boundary of the containment isolation components and primary containment piping system. In addition, the applicant highlighted those portions of the system and its structures and components that are within the scope of the Rule in the P&IDs listed as references in LRA Section 2.3.2.3. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the containment isolation components and primary containment piping system in LRA Table 2.3.2.3 as being within the scope of license renewal and subject to an AMR:

- closure bolting (pressure boundary)
- flexible hoses and flow elements (pressure boundary, Quad Cities only)
- isolation barriers including piping, tubing, valves, and vacuum breakers (pressure boundary)
- isolation barriers—attached support including piping and valves (structural integrity)
- NSR vents or drains, piping, and valves (structure integrity/attached support)
- piping and fittings (structure integrity/attached support)
- piping and fittings (pressure boundary)
- restricted orifices (pressure boundary, Dresden only)
- tanks including drain pot (pressure boundary)
- thermowells (pressure boundary, Dresden only)
- tubing (pressure boundary)

2.3.2.3.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.3, Dresden UFSAR Section 6.2.1, and Quad Cities UFSAR Section 6.2.1 to determine whether there is reasonable assurance that the components of the containment isolation components and primary containment piping system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the containment isolation components and primary containment piping system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the containment isolation components and primary containment piping system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&IDs to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&IDs were representative of the containment isolation components and primary containment piping system. The staff then reviewed the referenced P&IDs to verify that those portions of the containment isolation components and primary containment piping system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.2.3, and that the applicant identified all system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.2.3 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by letter on August 4, 2003, the staff issued RAIs to the applicant concerning specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses, dated October 3, 2003, are described below.

RAI 2.3.2.3-1. On instrument air piping diagram LR-QDC-M-24-12, line 1-47209-1" is shown within the scope of the containment isolation components (primary containment (PC)) system that requires an AMR because it provides a safety-related pressure-retaining function. Lines 1-47692-1 and 1-4315A which are connected to line 1-470209-1 are not shown in the PC system to require an AMR. Similarly for Unit 2, lines 2-47692, 2-4315A, and 2-47209A which are connected to line 2-470209 on diagram LR-QDC-M-71-7 are not shown in the PC system to require an AMR. The staff asked the applicant to provide an AMR for these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.3-1 stated that those portions of instrument air lines 1-47209-1"-T and 2-47209-1"-T shaded in red on boundary diagrams LR-QDC-M-24-12 and LR-QDC-M-71-7 are non-safety-related. These lines are attached to safety-related portions of lines 1-47209-1"-T and 2-47209-1"-T, as shown on boundary diagrams LR-QDC-M-24-13 and LR-QDC-M-71-8. Those portions of the lines colored in red provide structural support to the safety-related portions of piping colored in green. The non-safety-related piping and components and components on lines 1-47209-1"-T and 2-47209-1"-T extend up to the first support in each of the three orthogonal directions. A failure in lines 1-47692-1 1/4", 1-4315A-1/4"-L, 2-47692-1 1/4", or 2-4315A-1/4"-L would not have any impact on the structural integrity of the safety-related piping and components. Additionally, failure of these lines would not impact the intended function of any safety-related systems. Safety-related valves that rely upon instrument air fail in the safe position. Therefore, these lines are not within the scope of license renewal and do not require an AMR.

Based on its review, the staff concurs with the applicant's clarification that a failure in the above-cited instrument air lines would not have any impact on the structural integrity of the safety-related piping and components and the intended function of any safety-related systems. In accordance with criteria set forth in 10 CFR 54.4, these lines are not within the scope of license renewal and do not require an AMR. Therefore, the staff finds the applicant's response to RAI 2.3.2.3-1 acceptable and considers its concern described in RAI 2.3.2.3-1 resolved.

RAI 2.3.2.3-2. Instrument air piping diagram LR-QDC-M-24-13 does not show boundary breaks between PC system components that may require an AMR and instrument air (IA) components. The staff asked the applicant to identify the PC system component boundary breaks and to identify where the LRA addresses the AMR for these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.3-2 stated that all of the piping and piping components colored in red and green on boundary diagram LR-QDC-M-24-13 have been included within the scope of license renewal and require an AMR. These components were evaluated within the PC system boundary. All components highlighted in green are safety-related. All components highlighted in red are non-safety-related components attached to safety-related components providing structural support. The non-safety-related components providing structural support include all components up to the first support in each of the three orthogonal directions. Therefore, portions of piping highlighted in red end abruptly at some locations. Piping and piping components that are colored in black are IA system components that are not included within the scope of license renewal and do not require an AMR. Instrument air boundary diagram LR-QDC-M-24-13 should have been corrected to include the boundary flags designating breaks between PC system components and IA system components. Those components that are highlighted in green and red are included in LRA Table 2.3.2-3 as being within the scope of license renewal and subject to an AMR.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.2.3-2 acceptable because the applicant clearly identified the PC system component boundary breaks, and the piping and components that are within the scope of license renewal are included in LRA Table 2.3.2-3 as subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.2.3-2 resolved.

RAI 2.3.2.3-3. On diagram LR-QDC-M-71-8, line 2-47209-1" (E-7) and line 2-4700-2" (D-10) are shown within the scope of PC system components that require an AMR because they provide a safety-related pressure-retaining function. Lines 2-47775 and 2-47498 which are connected to lines 2-47209 and 2-4700 are not in the PC system requiring an AMR. The staff asked the applicant to identify where the LRA addresses the AMR for these components or to provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.3-3 stated that those portions of lines 2-47209-1" and 2-4700-2" shown on boundary diagram LR-QDC-M-71-8 that are highlighted in green are safety-related and provide a pressure-retaining function. The safety-related boundary pressure-retaining boundary ends at valves 2-4721 and 2-4799-156. Those portions of lines 2-47209-1" and 2-4700-2" highlighted in red are not safety-related and provide structural support for the safety-related portions of pipe. All components highlighted in green and red are included within the scope of license renewal and require aging management. The non-safety-related portions of piping falling within the scope of license renewal extended up to the first support in each of the three orthogonal directions. Therefore, the red highlighted lines appear to end abruptly. Field walkdowns performed by Exelon identified those structural interactions with the safety-related components that can affect the ability of SSCs to perform their intended functions. Failure of lines 2-47775-1/2" and 2-47498-3/4" would not have any impact on the structural integrity (interaction or attached) of the safety-related piping and components. Additionally,

failure of these lines would not impact the intended function of any safety-related systems. Safety-related valves reliant upon instrument air fail in the safe position. Thus, these lines were not included within the scope of license renewal and do not require an AMR.

Based on its review, the staff concurs with the applicant's clarification that failure of lines 2-47775-1/2" and 2-47498-3/4" would not have any impact on the structural integrity of the safety-related piping and components and the intended function of any safety-related systems. In accordance with criteria set forth in 10 CFR 54.4, these lines are not within the scope of license renewal and do not require an AMR. Therefore, the staff finds the applicant's response to RAI 2.3.2.3-3 acceptable and considers its concern described in RAI 2.3.2.3-3 resolved.

RAI 2.3.2.3-4. On liquid sampling system diagrams LR-QDC-M-1056-1 and LR-QDC-M-1061-1, boundary breaks between PC system components that require an AMR and other system components are not shown. The staff asked the applicant to identify the PC system component boundary breaks and identify where the LRA addresses the AMR for these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.3-4 stated that piping and piping components shown on boundary diagram LR-QDC-M-1056-1 highlighted in red or green fall within the scope of license renewal and require aging management. Those portions of pipe highlighted in red and green have been evaluated under various systems. For example, those portions of piping shown at locations B-7 and C-6 (includes valves 1-2099-417 and 1-2099-500) were evaluated with the PC system. These two stretches of pipe are bounded by high-radiation sampling system piping that falls outside the scope of license renewal. Those portions of pipe highlighted in red at location G-9 on boundary diagram LR-QDC-M-1056-1 (includes valve 1-8941-701) were evaluated with the reactor recirculation system. Those components highlighted in red are not safety-related but provide structural support to safety-related reactor recirculation system piping. Finally, those portions of pipe highlighted in green and red at location D-9 on boundary diagram LR-QDC-M-1056-1 (includes valve 1-1402-69) fall within the scope of license renewal and require aging management. Those components were evaluated with the core spray system and are bounded by high-radiation sampling system piping that falls outside the scope of license renewal. The piping highlighted in green is safety-related, and the piping highlighted in red is not safety-related but provides structural support to the safety-related pipe that is attached.

Piping and piping components shown on boundary diagram LR-QDC-M-1061-1 highlighted in red or green fall within the scope of license renewal and require aging management. Those portions of pipe highlighted in red and green have been evaluated under various systems. For example, those portions of piping shown at locations B-7 and C-6 (includes valves 2-2099-649 and 2-2099-394) were evaluated with the PC system. These two stretches of pipe are bounded by high-radiation sampling system piping that falls outside the scope of license renewal. Those portions of pipe highlighted in red at location G-9 on boundary diagram LR-QDC-M-1061-1 (includes valve 2-8941-721) were evaluated with the reactor recirculation system. Those components highlighted in red are not safety-related but provide structural support to safety-related reactor recirculation system piping. Finally, those portions of pipe highlighted in green and red at location D-9 on boundary diagram LR-QDC-M-1061-1 (includes valve 2-1402-69) fall within the scope of license renewal and require aging management. Those components were evaluated with the core spray system. These components are bounded by high-radiation sampling system piping that falls outside the scope of license renewal. The core spray system

pipng highlighted in green is safety-related, and the piping highlighted in red is not safety-related but provides structural support to the safety-related pipe that is attached.

Table 2.3.2-3 includes those components evaluated within the PC system boundary. Table 2.3.1.3-5 includes those components evaluated within the reactor recirculation system boundary. Table 2.3.2-2 includes those components evaluated within the core spray system boundary. Boundary diagrams LR-QDC-M-1056-1 and LR-QDC-M-1061-1 should have included the appropriate system boundary flags.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.2.3-4 acceptable because the applicant clearly identified the PC system component boundary breaks; the piping and components that are within the scope of license renewal and are evaluated within the PC system boundary are included in LRA Table 2.3.2-3 subject to an AMR; and the piping and components that are evaluated within the reactor recirculation system boundary are included in LRA Table 2.3.1.3-5. Therefore, the staff considers its concern described in RAI 2.3.2.3-4 resolved.

RAI 2.3.2.3-5. On radwaste ventilation diagram LR-DRE-M-272, boundary breaks between PC and RW system components are shown at location A-10, but no component in the PC system is shown to require an AMR. The staff asked the applicant to identify the PC system components on the above drawing and to identify where the LRA addresses the AMR for these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.3-5 stated that the components shown on boundary diagram LR-DRE-M-272 at coordinate A-9 were evaluated with the PC system and are connected to piping that is continued on the same diagram at coordinate F-3. This portion of non-safety-related piping is a continuation of piping from drawings LR-DRE-M-356 (coordinate A-1) and LR-DRE-M-25 (coordinate B-1). As shown on boundary diagrams LR-DRE-M-25 (B-1) and LR-DRE-M-356 (A-1), the PC system piping highlighted in green is safety-related and provides a pressure-retaining function. Those portions of lines 2-1656-10" and 3-1656-10" highlighted in red on boundary diagrams LR-DRE-M-25 (B-1) and LR-DRE-M-356 (A-1) are not safety-related and provide structural support for the safety-related portions of pipe colored in green. The non-safety-related pipe colored in red falls within the scope of license renewal and extends up to the first support in each of the three orthogonal directions. The piping continues beyond the first seismic anchor on diagrams LR-DRE-M-25 and LR-DRE-M-356 and continues on to boundary diagram LR-DRE-M-272. The purpose of the boundary flags on boundary diagram LR-DRE-M-272 is to identify the extent of the PC system boundary. Failure of piping and piping components shown on boundary diagram LR-DRE-M-272 would not have any impact on the structural integrity or intended function of the safety-related piping and components in the PC system. As such, the PC system components on boundary diagram LR DRE-M-272 were not included within the scope of license renewal and do not require an AMR.

Based on its review, the staff concurs with the applicant's clarification that failure of PC system piping and piping components shown on boundary diagram LR-DRE-M-272 would not have any impact on the structural integrity of the safety-related piping and components and the intended function of any safety-related systems. In accordance with criteria set forth in 10 CFR 54.4, PC system piping and piping components shown on boundary diagram LR-DRE-M-272 are not within the scope of license renewal and do not require an AMR. Therefore, the staff finds the

applicant's response to RAI 2.3.2.3-5 acceptable and considers its concern described in RAI 2.3.2.3-5 resolved.

2.3.2.3.3 Conclusions

The staff reviewed LRA Section 2.3.2.3, the accompanying scoping boundary drawings and the applicant's response to RAIs dated October 3, 2003, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the containment isolation components and primary containment piping systems that are within the scope of license renewal, as required by 10 CFR 54.4, and that the applicant has adequately identified the components of the containment isolation components and primary containment piping systems that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.4 Reactor Core Isolation Cooling System—Quad Cities Only

2.3.2.4.1 Summary of Technical Information in the Application

The applicant described the reactor core isolation cooling (RCIC) system components in LRA Section 2.3.2.4 and provided a list of components subject to an AMR in LRA Table 2.3.2-4.

The RCIC system at Quad Cities provides cooling water to the reactor core in the event of a postulated isolation of the reactor from the main condenser with a loss of reactor feedwater.

The RCIC system consists of a steam turbine-pump unit, piping, associated valves, auxiliary support systems, and instrumentation. The turbine is driven by nuclear steam supplied from the "A" main steam line on Unit 1 and from the "D" main steam line on Unit 2 (evaluated with main steam) and exhausts to the suppression chamber (evaluated with the primary containment structure), below the water line. All steam leakage from valve packing and the turbine shaft seals is routed to and condensed in the barometric condenser. The preferred water source to the RCIC pump suction is supplied from the condensate storage tank (evaluated under the condensate and condensate storage system), with a backup source from the suppression chamber (evaluated with the primary containment structure). The pump discharge is delivered into the reactor vessel through a connection to the "A" feedwater line (evaluated with the feedwater system) and is distributed within the vessel through the feedwater spargers (evaluated with reactor internals). A minimum flow bypass line from the pump discharge line to the suppression chamber is provided for pump protection. The RCIC system is equipped with a test line used for functional testing that returns condensate to the condensate storage tank. The RCIC test return line is tied to the HPCI system test return line (evaluated under the HPCI system). The RCIC auxiliaries include the drain pot subsystem, the barometric condenser and vacuum subsystem, and the turbine oil subsystem. The RCIC turbine and pump are located in a room with a CS pump, and the area is cooled by the CS room cooler (evaluated with ECCS corner room HVAC).

Intended functions within the scope of license renewal include the following:

- pressure boundary—maintains the integrity of the reactor coolant pressure boundary

- primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- core cooling—provides cooling water to the core and provides capability for level and pressure control during normal reactor isolation conditions
- credited in regulated event(s)—provides core cooling, including capability for level and pressure control, credited in mitigation of the Appendix R fire, ATWS, and SBO events; also contains components relied upon for compliance with 10 CFR 50.49 (EQ)
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

Table 2.3.2-4 of the LRA identified the component groups requiring AMR. The component groups identified for RCIC include the following:

- closure bolting (Quad Cities only)
- dampeners (Quad Cities only)
- filters/strainers (pressure boundary, Quad Cities only)
- filters/strainers (filter, Quad Cities only)
- flexible hoses (Quad Cities only)
- NSR vents or drains, piping, and valves (attached support, Quad Cities only)
- piping and fittings (includes rupture discs, Quad Cities only)
- piping and fittings (small bore, Quad Cities only)
- pumps (Quad Cities only)
- restricting orifices (pressure boundary, Quad Cities only)
- restricting orifices (throttle, Quad Cities only)
- sight glasses (Quad Cities only)
- tanks (includes drain pots, actuators, and condensers, Quad Cities only)
- traps (Quad Cities only)
- tubing (Quad Cities only)
- turbine casings (Quad Cities only)
- valves (Quad Cities only)
- valves (small bore, Quad Cities only)

2.3.2.4.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.4 and Quad Cities UFSAR Section 5.4.6 to determine whether there is reasonable assurance that the components of the RCIC system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel

and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the structures and components that were identified as not being within the scope of license renewal to verify that (1) these structures and components do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those structures and components that have applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4(a) that were not identified as intended functions in the LRA to verify that the SSCs with such functions will be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

2.3.2.4.3 Conclusions

The staff reviewed LRA Section 2.3.2.4 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concluded that there is reasonable assurance that the applicant has adequately identified the components of the RCIC system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the RCIC system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.5 *Isolation Condenser—Dresden Only*

2.3.2.5.1 Summary of Technical Information in the Application

The applicant described the isolation condenser system components in LRA Section 2.3.2.5 and provided a list of components subject to an AMR in LRA Table 2.3.2-5.

The isolation condenser system at Dresden provides reactor core cooling in the event that the reactor becomes isolated from the turbine and main condenser by closure of the main steam isolation valves.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following intended isolation condenser system functions:

- C pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- C primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- C credited in regulated event(s)—provides reactor pressure control and core cooling functions (in vessel isolation conditions) credited in mitigation of the Appendix R fire, ATWS, and SBO events; also contains components that are relied upon for compliance with 10 CFR 50.49 (EQ)

- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The isolation condenser is a heat exchanger, which consists of two tube bundles immersed in a large water storage tank. The isolation condenser system operates by natural circulation without the need for power other than direct current (dc) power to open the condensate return valve to initiate system operation. During isolation condenser system operation, steam flows through the isolation condenser steam supply line directly from the reactor vessel (evaluated with the reactor vessel), condenses in the tubes of the heat exchanger, and returns by gravity through the isolation condenser return line to the reactor via the “A” recirculation loop (evaluated with the reactor recirculation, recirculation flow control, and M/G sets system). Isolation valves are provided on the lines that penetrate the primary containment. The differential water head, created when the steam is condensed, serves as the driving force. The water on the shell side of the condenser boils and vents to the atmosphere. The tube side of the isolation condenser system is equipped with a high point vent which is used during normal operation to prevent the long-term buildup of noncondensable gases. These gases are vented to the “A” main steam line, downstream of the main steam line flow restrictor (venturi) (evaluated with the main steam system). The differential pressure across the venturi provides the driving force for the flow of steam and noncondensable gases from the tube side of the isolation condenser system to the main steam line. The preferred makeup water source is the clean demineralized water storage tank via two diesel-driven isolation condenser makeup water pumps. Alternate makeup water sources are the fire protection system (evaluated separately) and the condensate storage system (evaluated with the condensate and condensate storage system). Two radiation monitors (evaluated with the process radiation monitoring system) are provided on the shell vent. In the event of excessive radiation levels, the tube side of the heat exchanger can be isolated from the reactor.

In LRA Section 2.3.2.5, the applicant described the evaluation boundary of the isolation condenser system. In addition, the applicant highlighted those portions of the system and its structures and components that are within the scope of the Rule in the P&IDs listed as references in LRA Section 2.3.2.5. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the isolation condenser system in LRA Table 2.3.2.5 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary, Dresden only)
- C isolation condensers (pressure boundary, Dresden only)
- C isolation condensers (heat transfer)
- C NSR vents or drains, piping, and valves (structure integrity/attached support, Dresden only)
- C piping and fittings (structure integrity/attached support, Dresden only)
- C piping and fittings (pressure boundary, Dresden only)
- C piping and fittings small bore (pressure boundary, Dresden only)
- C pumps (pressure boundary, Dresden only)
- C flow elements (pressure boundary, Dresden only)
- C sight glasses (pressure boundary, Dresden only)
- C tanks (pressure boundary, Dresden only)
- C thermowells (pressure boundary, Dresden only)
- C tubing (pressure boundary, Dresden only)

- C valves (pressure boundary, Dresden only)
- C valves (structure integrity/attached support, Dresden only)

2.3.2.5.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.5 and Dresden USAR Section 5.4.6 to determine whether there is reasonable assurance that the components of the isolation condenser system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the isolation condenser system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the isolation condenser system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&IDs to the system drawings and system descriptions in the UFSAR to ensure that the referenced P&IDs were representative of the isolation condenser system. The staff then reviewed the referenced P&IDs to verify that those portions of the isolation condenser system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.2.5, and that the applicant identified all isolation condenser system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.2.5 identified areas in which additional information was necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by letter on August 4, 2003, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses, dated October 3, 2003, are described below.

RAI 2.3.2.5-1 (Dresden Units Only). For Unit 3, the system boundary between the isolation condenser and demineralized water makeup piping system for AMR is shown on flow diagram LR-DRE-M-359 (B-1) for line 3-4399-72. For Unit 2, the similar isolation boundary between the isolation condenser and demineralized water makeup piping system for AMR is not shown on flow diagram LR-DRE-M-28 (B-1) or on flow diagram M-35-1 (A-8) for line 2-4399-72. The staff asked the applicant to indicate the LR boundary for Unit 2 piping between the isolation condenser and demineralized water makeup system and to indicate where the LRA addresses the AMR of these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.5-1 stated that for Unit 3, the system boundary break between the isolation condenser and demineralized water makeup for AMR shown on boundary diagram LR-DRE-M-359 (B-1) for line 3-4388-4"-L (valve 3-4399-72) is correct and represents the boundary evaluated. For Unit 2, the same boundary break between the isolation condenser and demineralized water makeup system should have been shown on boundary diagram LR-DRE-M-28 (B-1) for line 2-4388-4"-L (Valve 2-4399-72). These components fall within the scope of license renewal. The components within the isolation condenser system boundary are included in LRA Table 2.3.2-5 under the component groups "piping and fittings (Dresden only)" and "valves (Dresden only)." The piping upstream of valve (2)3-4399-72 is evaluated in the demineralized water makeup system boundary and is included in LRA Table 2.3.3-19 under the component group "piping and fittings."

Based on its review, the staff concurs with the applicant's clarification that the above-cited segment of piping and its associated components in Unit 2 are within the scope of the Rule and subject to an AMR; they were inadvertently not highlighted in the LR boundary diagram; and their associated components are included in the appropriate LRA tables subject to an AMR. Therefore, the staff finds the applicant's response to RAI 2.3.2.5-1 acceptable and considers its concern described in RAI 2.3.2.5-1 resolved.

RAI 2.3.2.5-2 (Dresden Units Only). The LR boundary for the clean demineralized water storage tank (2/3-4300) shown on flow diagram LR-DRE-M-35-1 for AMR is not clearly indicated, and, therefore, it is unclear whether the boundary is covered in the isolation condenser system or demineralized water system. The LR boundaries for line 2/3-43220-4"-H and for line to LI and LT indicate that it is covered in the isolation condenser system. The LR boundaries for line 2/3-43206-6"-H and for line 2/3 4301-3"-L indicate that it is covered in the demineralized water system. These safety-related components are relied upon to remain functional during and following the design-basis events to provide makeup water to the isolation condenser for cooling. The staff asked the applicant to indicate the LR boundary for the tank and connecting piping and identify where the LRA addresses the AMR for these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.5-2 stated that the clean demineralized water storage tank T-105B (2/3-4300) shown on boundary diagram LR-DRE-M-35-1 was evaluated with the isolation condenser system as stated in LRA Sections 2.3.2.5 and 2.3.3.19.

Piping and components associated with the clean demineralized water storage tank (T-105B) that provide flow path to the isolation condenser makeup pumps and receive recirculation flow return from the isolation condenser makeup pumps are evaluated in the isolation condenser system boundary. Piping and components from the tank connection for the level instruments (LI and LT) and the suction piping for the clean demineralizer water pumps (2/3-4301B-3"-L) from the tank were evaluated in the clean demineralizer system boundary. Line 2/3-4301B-3"-L has the same boundary breaks as those of the piping for the LI and LT, in that the boundary break is at the piping connection to the tank.

The LR boundary break for line 2/3-43206-6"-H (LR-DRE-M-35-1, E-9) shows that the piping connecting the tank to the isolation condenser makeup pumps (through lines 2/3-43216A-8"-H and 2/3-43216A-8"-H) was evaluated within the isolation condenser evaluation boundary. The

portion of piping for line 2/3-43206-6"-H at coordinate E-9 that has been colored black should have been highlighted green to be in scope. This piping connects to valves 2/3-4399-329A/B on the suction side of dilution pumps. The piping up to and including the valves is evaluated with the makeup demineralizer system boundary for AMR.

The AMRs for those components evaluated with the isolation condenser system are included in LRA Table 2.3.2-5. They are included under the component groups of "tanks (Dresden only)," "valves (Dresden only)," and "piping and fittings (Dresden only)." The AMRs for those components evaluated with the makeup demineralizer system are included in LRA Table 2.3.3-19. They are included under the component groups of "valves," and "piping and fittings."

The components discussed above are not safety-related and are not credited in any design-basis event. The tank and the associated piping and components are within the scope of license renewal for compliance with the fire protection, ATWS, and SBO 10 CFR 54.4(a)(3) regulated events.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.2.5-2 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.5-2 resolved.

RAI 2.3.2.5-3 (Dresden Units Only). Table 2.3.2-5, "Component Groups Requiring Aging Management Review—Isolation Condenser (Dresden only)," does not list the vacuum breaker 2/3-4399-803 shown on isolation condenser makeup system flow diagram LR-DRE-M-4203 as the component requiring AMR. This safety-related component is relied upon to remain functional during and following the design-basis events to maintain the pressure boundary for the essential components. The staff asked the applicant to identify where the LRA addresses the AMR of this component or provide a justification for excluding this component from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.5-3 stated that vacuum breaker 2/3-4399-803, shown on isolation condenser makeup system boundary diagram LR-DRE-M-4203, falls within the scope of license renewal and is evaluated in LRA Table 2.3.2-5 under the component group "valves (Dresden only)."

The staff finds the applicant's clarification discussed above acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.5-3 resolved.

RAI 2.3.2.5-4 (Dresden Units Only). (a) Drawing LR-DRE-M-359, Isolation Condenser Piping, identifies two diaphragm seal components within the boundaries of license renewal; however, these components are not listed in the LRA tables described above. The staff asked the applicant to identify where the LRA addresses the AMR for these diaphragm seal components or provide a justification for excluding these components from an AMR.

(b) The Dresden isolation condenser system description mentions the presence of a loop seal and manway hatch as components in the isolation condenser system. Neither of these components is mentioned in Tables 2.3.2-5, 3.2-1, or 3.2-2 of the LRA. The staff asked the applicant to identify where the LRA addresses the AMR for these components or provide a justification for excluding these components from an AMR.

(c) Condensate piping diagram LR-QDC-M-16-5 does not include level switch isolation valves 0-33107A and 0-33108A and connecting piping to level switch 0-3341-71A within the scope of license renewal. The staff asked the applicant to identify where the LRA addresses the AMR for these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

(a) The applicant's response to RAI 2.3.2.5-4(a) stated that the diaphragm seals indicated on LR-DRE-M-28 and LR-DRE-M-359 are part of level transmitters LT-2-1341 and LT-3-1341, which are a filled-capillary type of differential pressure transmitter. This type of transmitter is used in applications where a constant reference leg level cannot be assured by process conditions (for example, condensation from a two-phase fluid). The transmitters are shipped with the diaphragm seals attached to the transmitter by coils of flexible tubing, with the fill fluid already installed. These transmitters are in the scope of license renewal but do not require aging management because they are active components.

(b) The applicant's response to RAI 2.3.2.5-4(b) stated that the loop seals are shown on LR-DRE-M-39 (A-9) and LR-DRE-M-369 (A-9). They are needed to provide a secondary containment boundary between the isolation condenser vent header, which discharges to the reactor building exterior, and the loop seal discharge to the reactor building. The loop seals are constructed of 1.5 in carbon steel piping and are included in LRA Table 2.3.2-5, with the component group of "piping and fittings (Dresden only)" and with a component intended function of "Pressure Boundary." The loop seals are not depicted correctly on the boundary diagrams. The boundary drawings should have highlighted the loop seals in green, with an "RBD/ISO" flag positioned after the highlighted portion.

The isolation condenser manways are part of the isolation condenser itself and are included in LRA Table 2.3.2-5, with the component group of "isolation condensers (Dresden only)" and with a component intended function of "pressure boundary." The manway bolting is included in LRA Table 2.3.2-5 with the component group of "closure bolting (Dresden only)" and with a component intended function of "pressure boundary."

(c) The applicant's response to RAI 2.3.2.5-4 (c) stated that the isolation valves for LS-0-3341-71A and the connecting piping are in scope, and should have been highlighted on LR-QDC-M-16-5. The valve equipment piece numbers on LR-QDC-M-16-5 are 0-3399-227A and 0-3399-228A. The connecting piping is identified on the drawing as 0-33107A-1" and 0-33108A-1." The valves are included in LRA Table 2.3.4-3 with the component group of "valves," and a component intended function of "pressure boundary." The connecting piping is included in Table 2.3.4-3 with the component group of "piping and fittings," and a component intended function of "pressure boundary."

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.2.5-4 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.5-4 resolved.

2.3.2.5.3 Conclusions

The staff reviewed LRA Section 2.3.2.5, the accompanying scoping boundary drawings and the applicant's response to RAIs dated October 3, 2003, to determine whether any SSCs within the

scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the isolation condenser system that are within the scope of license renewal, as required by 10 CFR 54.4, and that the applicant has adequately identified the components of the isolation condenser system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.6 Residual Heat Removal System—Quad Cities Only

2.3.2.6.1 Summary of Technical Information in the Application

The applicant described the residual heat removal (RHR) system components in LRA Section 2.3.2.6 and provided a list of components subject to an AMR in LRA Table 2.3.2-6.

The RHR system at Quad Cities has three modes of operation. The LPCI mode of RHR is the only ESF function of the system and operates to restore water level in the reactor vessel. The containment cooling mode furnishes spray to the drywell and suppression chamber to aid in reducing containment pressure following a LOCA. This mode also provides suppression chamber cooling to reduce water temperatures during operations that add heat to the suppression chamber and minimizes the amount of heat that the containment will need to accommodate during a LOCA. The shutdown cooling mode removes reactor residual and decay heat for shutdown, refueling, and servicing operations.

The RHR system consists of two loops, each loop containing two RHR pumps, one RHR heat exchanger (evaluated with the RHR service water system), and the necessary valves and piping to connect these components to the reactor vessel via the recirculation system piping, the suppression chamber for spray/cooling and the drywell for spray. The RHR system piping is maintained full by the ECCS keep fill system (evaluated with the CS system). Each loop of the system is equipped with a minimum flow bypass line to the suppression chamber for RHR pump protection. During normal plant operation, the RHR system is maintained in a lineup to be ready to inject water into either recirculation loop with all RHR pumps. Process lines that penetrate the primary containment structure contain isolation valves. The RHR room coolers are evaluated with the ECCS corner room HVAC system.

For the LPCI mode of operation, the primary source of water to the RHR system is supplied from the suppression chamber (evaluated with the primary containment structure). The backup source of water is the condensate storage tank (evaluated with the condensate and condensate storage system). For each loop, water is pumped from the suppression chamber, through the pumps to the heat exchanger (HX) and the HX bypass valve. Upon automatic initiation of the RHR system, the LPCI loop select logic will select the recirculation loop (evaluated with recirculation, recirculation flow control, and M/G sets system) that appears most likely intact and, provided reactor pressure is sufficiently low, will inject to the intact recirculation loop.

For the containment cooling mode of operation, there are three different uses.

- (1) Drywell spray takes suction from the suppression chamber and pumps water to two spray nozzle headers in the drywell. These spray headers may be used during a LOCA to reduce drywell pressure.

- (2) Suppression chamber spray takes suction from the suppression chamber and pumps water to spray nozzles in the suppression chamber. This reduces suppression chamber pressure following a LOCA.
- (3) Suppression chamber cooling takes suction from the suppression chamber and pumps through an RHR heat exchanger (which rejects heat to the RHR service water system) and pumps the water back to the suppression chamber. This mode provides a heat sink, external to the containment, which will limit suppression chamber water temperature during conditions such as RCIC operation and minimize the amount of heat that the suppression chamber will need to accommodate during a LOCA (for pressure suppression and ECCS pump required suction head).

For the shutdown cooling mode of operation, the RHR pumps take suction from the “B” reactor recirculation system suction piping, pump water through an RHR heat exchanger (for heat removal via RHR service water system), and return the water to the reactor vessel via the recirculation system pump discharge line.

Intended functions within the scope of license renewal include the following:

- pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- core cooling—provides emergency core cooling for various postulated LOCAs for a range of failure sizes from those for which the core is adequately cooled by HPCI up to and including the design-basis accident; in addition provides heat removal sufficient to achieve and maintain cold shutdown conditions during normal operation
- containment cooling—provides emergency containment cooling by recirculating suppression chamber water through the system heat exchangers and by spraying water into the drywell and the suppression chamber
- primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- credited in regulated event(s)—provides containment cooling and decay heat removal credited in mitigation of the Appendix R fire and ATWS events; also contains components that are relied upon for compliance with 10 CFR 50.49 (EQ)
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

Table 2.3.2-6 of the LRA identified the component groups requiring AMR. The component groups identified for RHR include the following:

- closure bolting (Quad Cities only)
- dampeners (Quad Cities only)
- dampeners (attached support, Quad Cities only)
- ECCS suction headers (Quad Cities only)
- filters/strainers (pressure boundary, Quad Cities only)
- filters/strainers (Filter, Quad Cities only)
- flow elements (Pressure Boundary, Quad Cities only)

- flow elements (Throttle, Quad Cities only)
- NSR vents or drains, piping, and valves (attached support, includes flow glasses, Quad Cities only)
- piping and fittings (Quad Cities only)
- piping and fittings (attached support, Quad Cities only)
- pumps (Quad Cities only)
- restricting orifices (includes dampeners, Quad Cities only)
- restricting orifices (Quad Cities only)
- sight glasses (attached support, Quad Cities only)
- spray Nozzles (Pressure Boundary, Quad Cities only)
- spray Nozzles (Spray, Quad Cities only)
- thermowells (Quad Cities only)
- tubing (Quad Cities only)
- tubing (attached support, Quad Cities only)
- valves (Quad Cities only)
- valves (attached support, Quad Cities only)

2.3.2.6.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.6 and Quad Cities UFSAR Sections 5.4.7, 6.3.1, and 6.3.2 to determine whether there is reasonable assurance that the components of the RHR system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the SCs that were identified as not being within the scope of license renewal to verify that (1) these SCs do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those SCs that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4 (a) that were not identified as intended functions in the LRA, to verify that the SSCs with such functions will be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

2.3.2.6.3 Conclusions

The staff reviewed LRA Section 2.3.2.6 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether

any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the RHR system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the RHR system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.7 *Low-Pressure Coolant Injection System—Dresden Only*

2.3.2.7.1 Summary of Technical Information in the Application

The applicant described the LPCI system components in LRA Section 2.3.2.7 and provided a list of components subject to an AMR in LRA Table 2.3.2-7.

The LPCI system comprises two independent loops, each with two pumps and a heat exchanger that supply water to the reactor core via the reactor recirculation system. The LPCI system provides core cooling during a LOCA for break sizes ranging from those for which the core is adequately cooled by the HPCI system alone, up to and including a design-basis accident (DBA). The LPCI is capable of injecting large quantities of water into the reactor pressure vessel and provides core cooling by submerging the core in water. The LPCI system is also designed to supply cooling/spray water to the primary containment (drywell and suppression chamber) during accident conditions to maintain containment temperature and pressure below design limits. The LPCI system is also the normal means of removing water from the suppression chamber to maintain the water level in the normal band.

The LPCI system consists of two independent loops, each with two motor-driven pumps, an LPCI heat exchanger (evaluated with the containment cooling service water system (CCSW), associated piping, valves, and instrumentation. The normal water source is supplied from the suppression chamber via an ECCS suction header (evaluated with the primary containment structure). An alternate source of water to the LPCI pumps is supplied from the condensate storage tank (evaluated with the condensate and condensate storage system). The LPCI pumps can route water to several discharge paths. The LPCI system supplies water to the reactor vessel through the LPCI heat exchanger and into the reactor recirculation system (evaluated with the recirculation, recirculation flow control and MG set system) downstream of the reactor recirculation pumps. A motor-operated valve allows LPCI flow to bypass the heat exchanger. Each loop can deliver water to the reactor vessel through its own injection line or through the other LPCI loop injection line via a cross-tie line. Each LPCI loop is equipped with a test return line to the suppression chamber to permit functional testing and a minimum flow bypass line to the suppression chamber for pump protection.

Each LPCI loop also has the capability to deliver cooling/spray water to the primary containment during accident conditions. The containment cooling mode of operation consists of (1) drywell spray where LPCI pumps are aligned to pump water from the suppression chamber to headers equipped with spray nozzles in the drywell (evaluated with the primary containment structure) to reduce containment pressure following a LOCA, (2) suppression chamber spray where LPCI pumps are aligned to pump water from the suppression chamber to a header equipped with spray nozzles (evaluated with the primary containment structure) in the suppression chamber to reduce containment pressure following a LOCA, and (3) suppression chamber cooling where LPCI pumps are aligned to recirculate water from the suppression chamber, through the LPCI heat exchangers and back to the suppression chamber.

The LPCI system is also the normal means of removing water from the suppression chamber to maintain normal operational level band. Taking suction from the suppression chamber, the LPCI pumps can transfer water from the suppression chamber to the suppression chamber of the other unit, to the main condenser (evaluated separately) of either unit, or to the floor drain collector tank (evaluated with radwaste and equipment drains).

Intended functions within the scope of license renewal include the following:

- pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- core cooling—provides emergency core cooling for various postulated LOCAs for a range of failure sizes from those for which the core is adequately cooled by HPCI up to and including the DBA
- containment cooling—provides emergency containment cooling by recirculating suppression chamber water through the system heat exchangers and by spraying water into the drywell and the suppression chamber
- primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- credited in regulated event(s)—provides containment cooling functions credited in mitigation of the Appendix R fire protection and ATWS events; also contains components that are relied upon for compliance with 10 CFR 50.49, (EQ)
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

Table 2.3.2-7 of the LRA identified the component groups requiring AMR. The component groups identified for LPCI include the following:

- closure bolting (Dresden only)
- ECCS suction headers (Dresden only)
- filters/drainers (Dresden only)
- flow elements (pressure boundary, Dresden only)
- flow elements (throttle, Dresden only)
- NSR vents or drains, piping, and valves (attached support, includes flow glasses, Dresden only)
- piping and fittings (Dresden only)
- piping and fittings (attached support, Dresden only)
- pumps (Dresden only)
- restricting orifices (pressure boundary, Dresden only)
- restricting Orifices (throttle, Dresden only)
- sight glasses (attached support, Dresden only)
- spray nozzles (pressure boundary, Dresden only)
- spray nozzles (spray, Dresden only)
- thermowells (Dresden only)
- tubing (Dresden only)
- tubing (attached support, Dresden only)
- valves (Dresden only)valves (attached support, Dresden only)

2.3.2.7.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.7 and Dresden UFSAR Sections 6.2.2, 6.3.1.2, and 6.3.2.2 to determine whether there is reasonable assurance that the components of the LPCI system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the SCs that were identified as not being within the scope of license renewal to verify that (1) these SCs do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those SCs that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4(a) that were not identified as intended functions in the LRA, to verify that the SSCs with such functions will be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

After completing the initial review, the staff requested the applicant to provide additional information on the LPCI system. By letter dated October 3, 2003, the applicant responded to the staff's RAI as discussed below.

The LPCI coupling was identified in the BWRVIP-06 report as a safety-related component. It appears, however, that the component was not identified in the LRA as requiring an AMR. In RAI 2.3.2.7-1, the staff asked the applicant if the component exists at Dresden and/or Quad Cities. If so, the applicant was requested to justify its exclusion from aging management; otherwise, the applicant must submit an AMR for the subject component. In response, the applicant stated that the LPCI coupling identified in BWRVIP-06, BWR Vessel and Internals Project, applies to BWR/4, BWR/5, and BWR/6 reactors (Section 2.7, BWRVIP-06). The Dresden and Quad Cities reactors are BWR/3. The LPCI coupling identified in Section 2.7 of BWRVIP-06 does not exist at Dresden or at Quad Cities. Based on this discussion, the staff finds the applicant's assessment acceptable.

2.3.2.7.3 Conclusions

The staff reviewed LRA Section 2.3.2.7 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The

staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the LPCI system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the LPCI system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.8 Standby Liquid Control System

2.3.2.8.1 Summary of Technical Information in the Application

The applicant described the standby liquid control (SBLC) system components in LRA Section 2.3.2.8 and provided a list of components subject to an AMR in LRA Table 2.3.2-8.

The SBLC system is able to bring the reactor from full power to a cold, xenon-free subcritical condition, assuming that none of the withdrawn control rods can be inserted, by injecting sodium pentaborate solution into the reactor core.

The SBLC system consists of a tank for sodium pentaborate solution storage, two parallel suction lines from the tank with normally opened suction valves feeding a common pump suction header; two positive displacement pumps with normally opened suction valves that discharge into a common header; two explosion-actuated shear plug valves arranged in parallel discharge lines from the common discharge header; and other piping, valves, and instrumentation. The explosive valves are actuated to provide a flow path, and the sodium pentaborate solution is delivered to the reactor vessel (evaluated separately) by one or both of the positive displacement pumps. The pumps and piping are protected from overpressure by two relief valves which discharge back to the SBLC tank. Heaters are installed in the SBLC storage tank to ensure that the solution is maintained at sufficient temperature to keep the sodium pentaborate in solution. System piping normally filled with the sodium pentaborate solution is heat traced to ensure that the sodium pentaborate does not precipitate in the piping. The system also includes a test tank and associated piping used to measure pump performance.

Intended functions within the scope of license renewal include the following:

- reactivity control—provides the capability for bringing the reactor from full power to a cold, xenon-free shutdown assuming that none of the withdrawn control rods can be inserted
- pressure boundary—maintains the integrity of the reactor coolant pressure boundary.
- containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- credited in regulated event(s)—provides reactivity control credited in mitigation of the ATWS event
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

Table 2.3.2-8 of the LRA identified the component groups requiring AMR. The component groups identified for SBLC include the following:

- accumulators
- closure bolting
- dampeners (Quad Cities only)
- NSR vents or drains, piping, and valves (attached support)
- piping and fittings
- piping and fittings (attached support)
- pumps
- sight glasses
- tanks
- thermowells
- tubing
- tubing (attached support)
- valves
- valves (attached support)

2.3.2.8.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.8, Dresden UFSAR Section 9.3.5, and Quad Cities UFSAR Sections 9.3.5 to determine whether there is reasonable assurance that the components of the SBLC system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the structures and components that were identified as not being within the scope of license renewal to verify that (1) these SCs do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those SCs that have applicable intended function(s), they either perform this function(s) with moving parts or a change in configuration or properties, or they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4(a) that were not identified as intended functions in the LRA, to verify that the SSCs with such functions will be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

2.3.2.8.3 Conclusions

The staff reviewed LRA Section 2.3.2.8 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The

staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the SBLC system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the SBLC system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.9 Standby Gas Treatment System

2.3.2.9.1 Summary of Technical Information in the Application

The applicant described the standby gas treatment system (SBGTS) in LRA Section 2.3.2.9 and provided a list of components subject to an AMR in LRA Table 2.3.2-9.

The SBGTS, which is designed to maintain a small negative pressure in the reactor building relative to the atmosphere outside of the building, has the functions of processing and controlling the effluent releases from the primary containment (drywell and suppression chambers) during vent and purge operation when necessary; processing radioactive effluent from the HPCI gland seal exhaust subsystem (Dresden only) during HPCI operation; and processing and controlling the intentional exhaust of radioactive material from the reactor building spaces to the environment during a DBA. These ensure that the requirements of 10 CFR 100 are met.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following SBGTS intended functions:

- filtration—filters and removes radioactive gases and particulates that are present in the secondary containment prior to discharging to the environment after a DBA
- containment—maintains a small negative pressure in the reactor building under isolation conditions
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity for non-safety-related components that could be a hazard to safety-related SSCs, so that the intended function of safety-related SSCs is not adversely affected
- credited in regulated events—contains components that are relied upon for compliance with 10 CFR 50.49 (EQ)

The SBGTS consists of two 100 percent capacity treatment trains. During normal operation, one train is selected as the primary and the other is placed in standby. The SBGTS receives effluent from three sources—the reactor building, primary containment, and an HPCI gland exhaust. Each train (which consists of piping that routes effluent flow to a demister, an electrical heater, roughing pre-filter, high-efficiency filters, charcoal absorbers, high-efficiency after filter, fan, associated valves, and instrumentation) filters and removes radioactive particles and adsorbs radioactive halogens (noble gases not included). Each SBGTS train is capable of maintaining a small negative pressure in the reactor building under isolation conditions to prevent ground-level escape of airborne activity. Exhaust from each SBGTS train is routed through piping to the reactor building ventilation chimney. Process moisture removed by the demister is drained to the reactor building equipment drain tank. Both SBGTS trains are connected by a cross-tie line containing a restricting orifice and isolation damper. During

operation, the primary train provides cooling flow to the standby train through the cross-tie line with air from the reactor building atmosphere at Dresden and from the turbine building at Quad Cities. The primary SBGTS train fan provides the motive force for both the treated flow through the primary train and the cooling flow through the standby train.

In LRA Section 2.3.2.9, the applicant described the evaluation boundary of the SBGTS. In addition, the applicant highlighted those portions of the SBGTS and its structures and components that are within the scope of the Rule in the P&IDs listed as references in LRA Section 2.3.2.9. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the SBGTS system in LRA Table 2.3.2-9 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C ducts—including piping and fittings (pressure boundary)
- C doors, closure, closure bolts, equipment frames—including inlet bells, restricting orifices, and tubing (pressure boundary)
- C doors, closure, closure bolts, equipment frames—including restricting orifices and exhaust header (throttle)
- C fan housings (pressure boundary)
- C filters/strainers—including demisters (Dresden only, pressure boundary)
- C flex collars, doors, and damper seals (pressure boundary)
- C housings and supports including filters (pressure boundary)
- C manifolds (pressure boundary)
- C NSR vents or drains, piping, and valves—including tubing (structural integrity/attached support)
- C seals (pressure boundary)
- C tubing (structural integrity/attached)
- C tubing (pressure boundary)
- C valves (pressure boundary)
- C valves (structural integrity/attached)

2.3.2.9.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.9, Dresden UFSAR Section 6.5.3, and Quad Cities UFSAR Section 6.5.3 to determine whether there is reasonable assurance that the SBGTS components within the scope of license renewal and subject to an AMR have been identified in

accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the SBGTS in the LRA. The staff did not identify any omissions. Also, the staff selected system functions described in the UFSARs that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the SBGTS that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&IDs to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&IDs were representative of the SBGTS. The staff then reviewed the referenced P&IDs to verify that those portions of the SBGTS that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.2.9 and that the applicant identified all SBGTS components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.2.9 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the letter of August 4, 2003, the staff issued RAIs to the applicant concerning the specific items needed to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter dated October 3, 2003, are described below.

RAI 2.3.2.9-1. Ventilation damper housings are highlighted on the ventilation flow diagrams identified in the LRA as within the scope of license renewal. While ventilation damper housings are highlighted as within the scope of license renewal, ventilation damper housings are not identified in the application tables that identify component groups requiring AMR. Examples of ventilation damper housings not identified in the component groups requiring AMR application tables include the following:

- standby gas treatment system, Table 2.3.2-9
- standby blackout building HVAC, Table 2.3.3-10
- reactor building HVAC, Table 2.3.3-8 (Quad Cities HVAC butterfly isolation valve housings)

The staff asked the applicant to state whether these components are within the scope of license renewal and subject to an AMR. If they are, the staff asked the applicant to provide the relevant information about the components so that the staff can complete the component groups requiring AMR tables of the LRA. If the components are not in scope or subject to an AMR, the applicant must provide justification for their exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.9-1 stated that the ventilation damper housings highlighted on boundary diagrams LR-DRE-M-49 and LR-QDC-M-44 for the SBGTS are within the scope of license renewal and subject to an AMR. These ventilation dampers are included under the component group "valves" found in LRA Table 2.3.2-9.

The ventilation damper housings highlighted on boundary diagrams LR-DRE-M-4356-1, 2, 3, 4, and 5, and LR-QDC-M-3033-1, and 2 for the station blackout building HVAC system are within the scope of license renewal and subject to an AMR. These ventilation dampers were evaluated with the component group “doors, closure bolts, equip frames” found in LRA Table 2.3.3-10.

The Quad Cities HVAC butterfly isolation valves highlighted on boundary diagrams LR-QDC-371 and LR-QDC-M-371-1 for the reactor building HVAC system are within the scope of license renewal and subject to an AMR. These ventilation dampers were evaluated with the component group “doors, closure bolts, equip frames” in LRA Table 2.3.3-8.

Based on its review of the applicant’s clarification discussed above, the staff finds the applicant’s response to RAI 2.3.2.9-1 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.9-1 resolved.

RAI 2.3.2.9-2. The following passive components associated with ventilation system ductwork are not identified as within the scope of license renewal or subject to an AMP:

- ductwork turning vanes
- ventilation system elastomer seals
- ventilation equipment vibration isolator flexible connections
- ductwork test connections
- ductwork access doors

The staff asked the applicant to state whether it agrees that these components are within the scope of license renewal and subject to an AMR. If they are, the applicant must provide the information necessary to complete the AMR result tables. If these components are not in scope and subject to an AMR, the applicant must provide justification for their exclusion.

Applicant’s Response and Staff’s Evaluation

The applicant’s response to RAI 2.3.2.9-2 stated that ductwork turning vanes and the ductwork access doors were evaluated as part of the ductwork. The ductwork is included within the scope of license renewal and is subject to an AMR. The ductwork is included on LRA Tables 2.3.3.7, 2.3.3.8, and 2.3.3.10 and is evaluated under the component group “Doors, closure bolts, equip frames.”

Ventilation system elastomer seals and ventilation equipment vibration isolator flexible connections are included within the scope of license renewal and are subject to an AMR. The seals and flexible connections are included on LRA Tables 2.3.3.7, 2.3.3.8, and 2.3.3.10 and are evaluated under the component group, “flex collars, doors, duct and damper Seals.”

Ductwork test connections are within the scope of license renewal and are subject to an AMR. The test connections are included on LRA Tables 2.3.3.7, 2.3.3.8, and 2.3.3.10 under the component group, “duct fittings, hinges, latches.”

Based on its review of the applicant’s clarification discussed above, the staff finds the applicant’s response to RAI 2.3.2.9-2 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.9-2 resolved.

RAI 2.3.2.9-3. The staff asked the applicant to clarify whether structural sealants used to maintain the power block building pressure boundary envelope (i.e., main control room, auxiliary building, fuel handling building, reactor building) at design pressure with respect to the adjacent areas are included in the scope of license renewal and subject to an AMR. The staff asked for information relating to structural sealant use as referenced in Table 2.1-3 on page 2.1-15 of NUREG-1800. According to NUREG-1800, an applicant's structural AMP is expected to address structural sealants with respect to an AMR program. If structural sealants are not in the scope of license renewal and subject to an AMR, the applicant must provide justification for their exclusion.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.2.9-3, the applicant stated that structural sealants used to maintain the power block building pressure boundary envelope are included in the scope of license renewal and subject to an AMR.

The following structures have caulking and sealant within the scope of license renewal and are subject to an AMR:

- C Reactor buildings roof joints and blowout panel seals are included in LRA Table 2.4-2 under the component group, "caulking/sealants."
- C Contaminated condensate storage tanks foundations tank seals are included in LRA Table 2.4-10 under the component group "caulking/sealants."
- C Exhaust duct penetration sealant located in the station blackout battery room (Dresden only) and the station blackout day tank rooms (Quad Cities only) is included in LRA Table 2.4-6 under the component group "caulking/sealants."
- C Station chimney sealant at manhole elevation 561' at Dresden and sealant at manhole elevation 638'-6" at Quad Cities are included in LRA Table 2.4-13 under the component group "caulking/sealants."
- C 2/3 isolation condenser pump house (Dresden only) roof flashing to reactor building interface is included in LRA Table 2.4-7 under the component group "caulking/sealants."
- C Turbine building caulking/sealant is included in LRA Table 2.4-4 under the component group, "caulking/sealants."
- C Control room (both stations) and auxiliary electrical equipment room (Dresden only) penetration seal caulking/sealant is included in LRA Table 2.4-3 under the component group "penetration seals."

A new component group "caulking/sealants," should have been included in LRA Table 2.4-3 with a component intended function of structural pressure barrier.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.2.9-3 acceptable because the applicant identified structures' caulking and sealant as within the scope of license renewal and subject to an AMR in accordance with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.9-3 resolved.

RAI 2.3.2.9-4. The applicant did not describe its process of evaluating consumables in the LRA. The staff asked the applicant to state whether its evaluation process for consumables is subject to screening guidance in accordance with Table 2.1-3 of NUREG-1800. If consumables are not considered subject to NUREG-1800 scoping and screening guidance, the applicant should provide a justification for their exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.2.9-4 states that Exelon concurs that the process of evaluating consumables was not described in the LRA. However, the Exelon process for evaluating consumables was consistent with the screening guidance provided in Table 2.1-3 of NUREG-1800 and the NRC memo to NEI, Mr. C.I. Grimes to Mr. D.J. Walters, License Renewal Issue No. 98-12, "Consumables," dated March 10, 2000. The following describes Exelon's process for evaluating consumables.

Group (a) subcomponents (packing, gaskets, component seals, and O-rings) of pressure boundary components were not listed explicitly in scoping and screening. The pressure boundary components that include packing, gaskets, seals, and O-rings as subcomponents have been designed to industry codes and standards, such as ANSI B31.1 or ASME Code, Section III, and do not rely on such subcomponents to maintain the structural integrity of the pressure boundary. The Dresden and Quad Cities specifications that implement the codes and standards applicable to piping and piping components do not list these as pressure boundary components, and these components are not credited with maintaining the pressure boundary function.

Group (b) subcomponents (structural sealants) were not called out explicitly in scoping and screening. The AMRs for structures determined whether structural sealants were credited with an intended function and, where applicable, included them in an appropriate AMP.

Group (c) consumables (oil, grease, and component filters) were not listed in scoping and screening and are not subject to AMR because they are periodically replaced.

Group (d) consumables (system filters, fire extinguishers, fire hoses and air packs) were not listed in scoping and screening because these items are replaced on condition. System filters are replaced based on manufacturers' requirements. Fire extinguishers, fire hoses and air packs are periodically inspected or tested consistent with instructions that implement applicable National Fire Protection Association (NFPA) guidelines as documented in the fire hazards analysis for each station.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.2.9-4 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.2.9-4 resolved.

2.3.2.9.3 Conclusions

The staff reviewed LRA Section 2.3.2.9, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis

of this review, the staff concludes that the applicant has appropriately identified the components of the SBGTS that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the SBGTS that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.10 Automatic Depressurization System

2.3.2.10.1 Summary of Technical Information in the Application

The applicant described the automatic depressurization system (ADS) in LRA Section 2.3.2.10. The applicant did not provide a list of components subject to AMR. However, under the title, “Table 2.3.2-10,” in LRA Section 2.3.2.10, the applicant stated that Dresden and Quad Cities design-basis documents treat the ADS relief valves and associated piping, solenoids, pressure controllers, and position switches as components of the main steam system. These mechanical components of the ADS subject to an AMR are included as components of the main steam system in this LRA.

The ADS, which is a safety-related system, has the function of providing backup for the HPCI system and performing vessel depressurization for all “small breaks” inside the primary containment or “small unisolable breaks” outside the containment. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following ADS intended functions:

- C core cooling—provides core cooling by receiving process signal inputs and providing, through appropriate relay logic, actuation signal outputs to relieve valves assigned to the main steam system (opening of the relief valves actuated by the ADS depressurizes the reactor vessel to support LPCI and low-pressure core spray operation)
- C credited in regulated event(s)—provides emergency core cooling credited in mitigation of the Appendix R fire protection and SBO events

The ADS is one of the ECCSs designed to operate with the LPCI and CS to protect reactor vessel/fuel in situations where the vessel is losing coolant. At Quad Cities, LPCI is an operational mode of the RHR system. For small breaks, the vessel is depressurized in sufficient time to allow the CS or LPCI to provide adequate core cooling. For large breaks, the vessel depressurizes through the break without assistance. The ADS evaluation boundary comprises the logic relays, timers, and instrumentation that receives process signal input and provides actuation signals to the relief valves actuated by the ADS. The ADS uses five safety/relief valves, which are part of the main steam system, to carry out its function. The safety/relieve valves and their tail pipes, and vacuum breaker valves, related solenoids, pressure controllers, position switches, and pneumatic air components associated with the safety/relief valves are evaluated with the main steam system in LRA Section 2.3.4.1. The suppression chamber and T-quenchers, through which steam is discharged into the suppression pool during ADS operation, are both evaluated with the primary containment structure in LRA Section 2.4.1.

2.3.2.10.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.10, Dresden UFSAR Sections 6.3.1 and 6.3.2, and Quad Cities UFSAR Sections 6.3.1 and 6.3.2 to determine whether there is reasonable assurance that the components of the ADS within the scope of license renewal and subject to an AMR have

been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified as an ADS intended function in the LRA. The staff did not identify any omissions

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that the components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

As discussed above under the title "Table 2.3.2-10" in LRA Section 2.3.2.10, the applicant stated that the mechanical components of the ADS subject to an AMR are included as components of the main steam system in the LRA. The staff reviewed LRA Section 2.3.4.1 to verify that the scoping and screening section for the main steam system included all the mechanical components that support the ADS operation. The staff found all the mechanical components that support the ADS operation included with the main steam system with the exception of the T-quenchers, which the licensee stated in LRA Section 2.3.2.10 were evaluated with the primary containment. The staff's evaluation of the primary containment is provided in Section 2.4.1 of this SER.

2.3.2.10.3 Conclusions

The staff reviewed LRA Section 2.3.2.10 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. No omissions were found. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the ADS that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the ADS that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.11 *Anticipated Transient Without Scram System*

The applicant noted that the ATWS system is not classified in the Dresden or Quad Cities UFSAR as an ESF. However, the ATWS system is evaluated in this section because of similarities with other systems that are characterized as ESF systems.

2.3.2.11.1 Summary of Technical Information in the Application

The applicant described the ATWS system components in LRA Section 2.3.2.11 and provided a list of components subject to an AMR in LRA Table 2.3.2-11.

The ATWS system provides the instrumentation and logic necessary for control rod insertion and recirculation pump trips to mitigate the effects of an ATWS situation.

ATWS events are beyond design-basis accidents. They are low-probability events in which an anticipated transient occurs and is not followed by an automatic reactor shutdown (scram) when required. The failure of the reactor to scram quickly during these transients can lead to unacceptable reactor coolant system pressures and to fuel damage. The

ATWS system logic, when energized, will reposition alternate rod insertion (ARI) solenoid valves to depressurize the scram air header for control rod insertion and, in the event of an automatic initiation, trip the recirculation pump motor generator field breakers. The ATWS system is divided into two separate systems. The trip logic circuitry of each ATWS system division is capable of performing the required mitigating action (tripping both recirculation pump motor generator field breakers and actuating three of the six ARI valves). The ATWS system will automatically initiate upon signals of high reactor pressure or low-low reactor water level. The ATWS system can also be initiated manually.

Intended functions within the scope of license renewal include the following:

- C reactivity control—provides an alternate means of control rod insertion and trips reactor recirculation pump M-G set field breakers
- C credited in regulated event(s)—provides reactivity control credited in mitigation of ATWS events

Table 2.3.2-11 of the LRA identified the component groups requiring AMR. The component groups identified for ATWS include:

- C closure bolting
- C piping and fittings
- C valves

2.3.2.11.2 Staff Evaluation

The staff reviewed LRA Section 2.3.2.11, Dresden UFSAR Section 7.8 and Quad Cities UFSAR Section 7.8 to determine whether there is reasonable assurance that the components of the ATWS system within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the SRP for License Renewal (NUREG-1800) and is described below.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted. As part of the evaluation, the staff determined whether the applicant had properly identified the SSCs within the scope of license renewal and subject to an AMR, pursuant to 10 CFR 54.4(a) and 10 CFR 54.21(a)(1). The staff reviewed the relevant portions of the UFSAR for the reactor vessel and associated components and compared the information in the UFSAR with the information in the LRA to identify those portions that the LRA did not identify as being within the scope of license renewal and subject to an AMR. The staff then reviewed the SCs that were identified as not being within the scope of license renewal to verify that (1) these SCs do not have any of the intended functions delineated under 10 CFR 54.4(a), and (2) for those SCs that have an applicable intended function(s), verify that they either perform this function(s) with moving parts or a change in configuration or properties, or that they are subject to replacement based on a qualified life or specified time period, as described in 10 CFR 54.21(a)(1).

The staff also reviewed the UFSAR for any functions delineated under 10 CFR 54.4(a) that were not identified as intended functions in the LRA, to verify that the SSCs with such functions will

be adequately managed so that the functions will be maintained consistent with the CLB for the extended period of operation.

2.3.2.11.3 Conclusions

The staff reviewed LRA Section 2.3.2.11 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes the applicant has adequately identified the components of the ATWS system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the ATWS system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.2.12 Evaluation Findings

On the basis of its review, the staff concludes that there is reasonable assurance that the applicant has adequately identified the engineered safety features systems and components that are within the scope of license renewal, in accordance with the requirements of 10 CFR 54.4(a), and that the applicant has adequately identified the engineered safety features that are subject to an AMR, in accordance with the requirements of 10 CFR 54.21 (a)(1).

2.3.2.13 References

1. Letter from Patrick R. Simpson (Exelon) to the NRC, "Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3," October 3, 2003.

2.3.3 Auxiliary Systems

2.3.3.1 Refueling Equipment

2.3.3.1.1 Summary of Technical Information in the Application

The applicant described the refueling equipment system in LRA Section 2.3.3.1 and provided a list of components subject to an AMR in LRA Table 2.3.3-1.

The purpose of the fuel handling system is to receive and transfer nuclear fuel in a manner that precludes the occurrence of inadvertent criticality and to provide equipment for handling both new and irradiated fuel. To achieve this purpose the fuel handling equipment is designed to handle fuel assemblies and other reactor components. Using the methodology described in LRA Section 2.1.4.1 for identifying mechanical components within the scope of license renewal, the applicant identified the following intended refueling equipment functions:

- Maintain structural integrity to prevent collapse of the platform onto the spent fuel storage racks or the reactor core.
- Preclude occurring of inadvertent criticality by providing interlocks for the movement of cranes.

In LRA Section 2.3.3.1, the applicant described the evaluation boundary of the refueling equipment system. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the refueling equipment system in LRA Table 2.3.3-1 as being within the scope of license renewal and subject to an AMR at Dresden:

- C cranes (structural support)
- C fuel grapples (structural support)
- C fuel pool gates (pressure boundary)
- C fuel preparation machines (structural support)

2.3.3.1.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.1, Dresden UFSAR Section 9.1.4, and Quad Cities UFSAR Section 9.1.4 to determine whether there is reasonable assurance that the refueling equipment system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the refueling equipment system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

The staff's review of LRA Section 2.3.3.1 identified areas in which additional information was necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003 letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's scoping RAI and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.1-1. The applicant included the reactor building overhead crane in the component group "cranes" requiring an AMR as listed in LRA Table 2.3.3-1. LRA Table 3.3.1 lists the component group cranes as cranes including bridge and trolleys and rail system in load handling system that require an AMR for loss of material due to general corrosion and wear (AMR Ref. No. 3.3.1.14). The staff was unable to identify the components consisting of the group cranes in order to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to identify the specific components of cranes, which are within the scope of license renewal and subject to an AMR.

Applicant's Response and Staff's Evaluation

In response to RAI 2.3.3.1-1, the applicant stated under its response to RAI 2.4-9 that while the type of components comprising crane subsystems can vary, the following cranes component types require aging management—load carrying flanges; support structures; bolts, nuts, or rivets; load blocks; suspension housings; hand chain wheels; chain attachments; clevis; yokes;

suspension bolts; shafts; gears; bearings; pins; rollers; lock and clamping devices; hook retaining nuts; hook retaining collars/pins; retaining member welds; load sprockets; drums; sheaves; hydraulic subsystems; cable; cable clamps; brakes; and bridge/beam structures.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.1-1 acceptable because it provided a list of the components subject to an AMR in accordance with the criteria set forth in 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.1-1 resolved.

RAI 2.3.3.1-2. The LRA Section 2.3.3.1 states that the major component of the refueling equipment system includes the refueling platform assembly which consists of refueling platform, fuel grapple, and associated equipment. The staff was unable to identify the components the applicant referred to as "associated equipment in order to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to list components referred to as the "associated equipment," and specify which components (if any) are within the scope of license renewal and subject to an AMR.

Applicant's Response and Staff's Evaluation

In response to RAI 2.3.3.1-2, the applicant identified the following components as "associated equipment":

The refueling platform bridge includes a walkway, railings and a trolley mounted control cab, a main grapple hoist, the adjacent frame mounted auxiliary hoist, a reverse mounted monorail auxiliary hoist, a hinged jib arm power winch, and the reels, drives, pulleys, and sheaves required for the hoist cables and the service air lines from the self contained, refueling platform mounted air compressor. The bridge air system includes the compressor, air receiver, shutoff valves, solenoid valves, air hose retrieval assist drives, and quick disconnect fittings.

The applicant also stated that all of the above-listed components are in the scope of license renewal and subject to an AMR.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.1-2 acceptable because it provided a list of the components subject to an AMR in accordance with the criteria set forth in 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.1-2 resolved.

RAI 2.3.3.1-3. The LRA Section 2.3.3.1 states that the inboard main steamline plugs, vents, and regulators associated with the reactor vessel system are evaluated with the refueling equipment system. The applicant did not provide the results of this evaluation and the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to clarify whether any of the above components are within the scope of license renewal and subject to an AMR.

Applicant's Response and Staff's Evaluation

In response to RAI 2.3.3.1-3, the applicant stated that the inboard main steamline plugs, vents, and regulators referenced in LRA Section 2.3.3.1 are temporary pieces of equipment (line plugs) installed to facilitate refueling operations. This equipment is not within the scope of license renewal and, therefore, not subject to an AMR.

Because the applicant stated that the subject components are temporary pieces of equipment installed to facilitate refueling operations, the staff agrees that they are not subject to an AMR since they are periodically replaced. Therefore, the staff finds the applicant's response to RAI 2.3.3.1-3 acceptable and considers its concern described in RAI 2.3.3.1-3 resolved.

2.3.3.1.3 Conclusions

The staff reviewed LRA Section 2.3.3.1, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the refueling equipment system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the refueling equipment system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.2 Shutdown Cooling System (*Dresden only*)

2.3.3.2.1 Summary of Technical Information in the Application

The applicant described the shutdown cooling system (SDCS) in LRA Section 2.3.3.2 and provided a list of components subject to an AMR in LRA Table 2.3.3-2.

The function of SDCS at Dresden Station is to provide cooling of the reactor water when the temperature and pressure in the reactor fall below the point at which the main condenser can no longer be used as a heat sink following reactor shutdown. The system can also be used to help cool the fuel pool during refueling outages and to heat reactor water with steam from the plant heating system during startup from cold shutdown.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following SDCS intended functions:

- C pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- C provides containment isolation—for those portions of the system that interface with the primary containment
- C core cooling—provides heat removal sufficient to achieve and maintain cold shutdown conditions during normal operation
- C credited in regulated events—provides heat removal sufficient to achieve and maintain cold shutdown conditions during normal operation (This core cooling function is credited in mitigation of the Appendix R fire event. The system contains components that are relied upon for compliance with 10 CFR 50.49 (Equipment Qualification)).
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The SDCS consists of three partial capacity cooling loops, each containing a pump, a heat exchanger, and associated piping, valves and instrumentation. The system takes suction from either reactor recirculation loop, delivers the flow through each of the three separate cooling loops, and then directs it to the LPCI injection lines. Capability also exists to permit flow from both reactor recirculation loops to both LPCI injection lines simultaneously. When used to augment fuel pool cooling, only one of the cooling loops is required. Each cooling loop is provided with a minimum flow valve to return pump discharge flow to the pump suction. The system heat exchangers are cooled by water from the reactor building closed cooling water (RBCCW) system in the cooling mode and heated by steam from the plant heating system in the heating mode. Provision is also made for chemical sampling, cleanup via the reactor water cleanup system, and system drainage to the reactor building equipment drain system. The SDCS is also used to help cool the fuel pool during refueling outages and to heat reactor water with steam from the heating boiler during startup from cold shutdown.

In LRA Section 2.3.3.2, the applicant described the evaluation boundary of the SDCS. In addition, the applicant highlighted those portions of the SDCS and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.2. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the SDCS in LRA Table 2.3.3-2 as being within the scope of license renewal and subject to an AMR at Dresden:

- C closure bolting (pressure boundary)
- C dampeners (pressure boundary)
- C filters/strainers (pressure boundary)
- C filters/strainers (filter)
- C heat exchangers (pressure boundary)
- C heat exchangers (heat transfer)
- C NSR vents or drains, piping, and valves (structural integrity/attached support)
- C piping and fittings (pressure boundary)
- C pumps (pressure boundary)
- C restricting orifices (pressure boundary)
- C restricting orifices (throttle)
- C sight glasses (pressure boundary)
- C sight glasses (structural integrity/attached support)
- C thermowells (pressure boundary)
- C valves (pressure boundary)

2.3.3.2.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.2 and Dresden UFSAR Section 5.4.7, as well as other UFSAR Sections that discussed the SDCS, which included Sections 1.2.2, 1.9.2, 3.1.2, 3.2.9, 3.3.2, 3.6.2, 3.8.5, 3.9.2, 5.1, 5.2.2, 5.4.1, 5.4.7, 6.2, 6.3.1, 7.1.3, 7.3.2, 7.4.2, 9.1.2, 9.1.3, 9.2.3, 9.3.2, 12.3.2, 12A.2, 12A.4, 14.2.4, and 15.6.4, to determine whether there is reasonable assurance that the SDCS components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with the Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the SDCS system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the SDCS that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the SDCS. The staff then reviewed the referenced P&I drawings to verify that those portions of the SDCS that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.2; and that the applicant identified all SDCS components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.2 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.2-1. License renewal boundary drawing LR-DRE-M-32, "Shutdown Reactor Cooling Piping," (at A-7) shows a 0.5 in. pipe that is in scope (colored green) that goes from the SDCS pump 2-1002A seal cooler, to drawing LR-DRE-M-39, "Reactor Building Equipment Drains" (at A-8), where it ties into a pipe that goes from valve 2-1001-213A to the same SDCS pump shown on drawing LR-DRE-M-39. However, on drawing LR-DRE-M-39 the pipe is not shown in scope (not color coded). The staff believes that the run of pipe shown on drawing LR-DRE-M-39 that comes from drawing LR-DRE-M-32, and the pipe it tees into, up to and including valve 2-1001-213A and the SDCS pump, should be in scope for the same reason the portion of that pipe on drawing LR-DRE-M-32 is in scope. This also applies to pumps 2-1002B and C on drawings LR-DRE-M-32 and -39, as well as to pumps 3-1002A, B and C on drawings LR-DRE-M-363 and 369. Please provide a justification for the exclusion of the portion of the piping shown on drawings LR-DRE-M-39 and LR-DRE-M-369.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.2-1 is that boundary diagrams LR-DRE-M-32, LR-DRE-M-39, LR-DRE-M-363, and LR-DRE-M-369 should have highlighted the piping from the seal coolers to the shutdown cooling pumps, up to and including pumps 2(3)-1002A, B, and C and valves 2(3)-1001-213A, B, and C. Valves 2(3)-1001-213A, B, and C are included in LRA Table 2.3.3-2, under component group "valves (Dresden only)." The Aging Management Reference for the internal environment is 3.3.1.8. The Aging Management Reference for the external environment is 3.3.2.27. Pumps 2(3)-1002A, B, and C are included in Table 2.3.3-2, under component group "pumps (Dresden only)." The Aging Management Reference for the internal environment is 3.3.1.8. The Aging Management Reference for the external environment is 3.3.1.5.

Based on its review of the applicant's clarification discussed above, the staff concurs with the applicant's clarification that the above-cited segments of piping and their associated

components are within the scope of the Rule, and they were inadvertently not highlighted in the LR boundary diagrams. Also, because the components associated with the cited segments of piping are included in LRA Table 2.3.3-2 subject to an AMR, the staff finds the applicant's response to RAI 2.3.3.2-1 acceptable. Therefore, the staff considers its concern described in RAI 2.3.3.2-1 resolved.

RAI 2.3.3.2-2. License renewal boundary drawing LR-DRE-M-32, "Shutdown Reactor Cooling Piping," (at C-9) shows relief valve RV 2-1099-29, and the associated piping to the header, in scope (colored Green). However, the equivalent relief valve, RV 3-1099-29, on LR-DRE-M-363, "Shutdown Reactor Cooling Piping," (at C-9) is shown not in scope (not color coded). The staff believes that RV 3-1099-29 on LR-DRE-M-363 should be in scope for the same reason that RV 2-1099-29 on LR-DRE-M-32 is in scope. The relief valve provides a passive intended function. Please provide a justification for the exclusion of RV 3-1099-29 on LR-DRE-M-363 and the associated piping to the main header.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.2-2 is that boundary diagram LR-DRE-M-363 should have highlighted valve 3-1099-29 and the associated piping to the main header. However, Dresden Station has plans to remove these valves from the plant design. Since the LRA was prepared, a modification was completed under engineering change (EC) 338910 that removed relief valve 3-1099-29 and replaced it with a blind flange. EC 340263, to remove relief valve 2-1099-29 from Dresden Unit 2, has not yet been implemented.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.2-2 acceptable because the subject valve will be removed and replaced with a blind flange. Therefore, the staff considers its concern described in RAI 2.3.3.2-2 resolved.

2.3.3.2.3 Conclusions

The staff reviewed LRA Section 2.3.3.2, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the SDCS that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the SDCS that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.3 Control Rod Drive Hydraulic System

2.3.3.3.1 Summary of Technical Information in the Application

The applicant described the control rod drive hydraulic (CRDH) system in LRA Section 2.3.3.3 and provided a list of components subject to an AMR in LRA Table 2.3.3-3.

The purpose of the CRDH system is to (1) control changes in reactivity by incrementally positioning the control rods in response to signals from the reactor manual control system, and (2) shut down the reactor quickly by rapidly inserting control rods into the core in response to

manual or automatic signal. The CRDH system is made up of supply pumps, filters, strainers, control valves, and associated instrumentation and controllers. The CRDH system provides water at the required pressures to the hydraulic control units for cooling and all types of required control rod motion. The CRDH system allows control rod withdrawal or insertion at a limited rate, one rod at a time, for power level control and flux shaping during reactor operation. Using the methodology described in LRA Section 2.1.4.1 for identifying mechanical components within the scope of license renewal, the applicant identified the following intended CRDH system functions:

- Provide reactivity control to rapidly shut down (scram) the reactor under appropriate conditions.
- Provide pressure boundary to support integrity of the reactor coolant pressure boundary and to support in-scope pressure boundaries at interfaces with other in-scope systems.
- Provide (1) scram discharge volume vent and drain isolation valves which are credited to remain closed in the 10 CFR 50, Appendix R fire event, and (2) alternate rod insertion capability which is credited in the ATWS event. At Dresden only, CRDH system water supply to the vessel is credited in the 10 CFR 50, Appendix R fire event. Also at Dresden only, CRDH system contains components that are relied upon for compliance with 10 CFR 50.49, environmental qualification of electric equipment important to safety for nuclear power plants.
- Preclude occurring of adverse effects on safety-related SSCs by maintaining sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected.

In LRA Section 2.3.3.3, the applicant described the evaluation boundary of the CRDH system. In addition, the applicant highlighted those portions of the CRDH system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.3. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified component groups and their intended functions within the CRDH system in LRA Table 2.3.3-3 as being within the scope of license renewal and subject to an AMR.

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1 and clarified in a letter, dated June 22, 2004, the applicant expanded the system boundaries for the CRDH system at both Dresden and Quad Cities due to the potential for spatial interaction with safety-related components. The applicant added all of the CRDH components shown on revised boundary diagrams LR-DRE-M-34-1, LR-DRE-M-365-1, LR-DRE-M-419-4, LR-QDC-M-41-4, and LR-QDC-M-83-4 to the scope of license renewal. The applicant excluded the isolated vent and drain piping the CRDH system from the scope of license renewal because the piping does not contain any fluid that could spatially interact with safety-related equipment in the general area. These changes resulted in adding four component groups to LRA Table 2.3.3-3.

The following is the component groups and their intended functions within the CRDH system in the revised LRA Table 2.3.3-3 as being within the scope of license renewal and subject to an AMR:

- accumulators (pressure boundary)

- closure bolting (pressure boundary)
- dampeners (pressure boundary, Quad Cities only)
- dampeners (spatial interaction, Quad Cities only)
- filters/strainers (pressure boundary)
- filters/strainers (filter)
- filters/strainers (spatial interaction) (leakage boundary (spatial), Quad Cities only)
- flow elements (spatial interaction)
- flow elements (pressure boundary, Dresden only)
- NSR vents or drains, piping, and valves (attached support)
- piping and fittings, including dampeners and tubing (pressure boundary)
- piping and fittings (spatial interaction)
- piping and fittings (attached support)
- pumps (pressure boundary) (Dresden only)
- pumps (spatial interaction) (leakage boundary (spatial), Quad Cities only)
- restricting orifices (pressure boundary, Dresden only)
- restricting orifices (spatial interaction) (leakage boundary (spatial), Quad Cities only)
- rupture discs (pressure boundary)
- tanks, including accumulators (pressure boundary)
- tubing (pressure boundary)
- tubing (spatial interaction) (leakage boundary (spatial), Quad Cities only)
- valves (pressure boundary)
- valves (spatial interaction)
- valves (attached support)

2.3.3.3.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.3, Dresden UFSAR Section 4.6.3, and Quad Cities UFSAR Section 4.6.3 to determine whether there is reasonable assurance that the CRDH system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the CRDH system in the LRA.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the CRDH that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the CRDH. The staff then reviewed the referenced P&I drawings to verify that those portions of the CRDH that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.3; and that the applicant identified all CRDH components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.3 identified areas in which additional information was necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the letter dated August 4, 2003, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, and supplemented by letter, dated December 17, 2003, are described below.

RAI 2.3.3.3-1. License renewal boundary diagram LR-QDC-M-41-1 for Quad Cities Unit 1 excludes the following sections of piping from the scope of license renewal, while piping at both ends of these sections is identified as in scope:

- 1-0314A-1/2"-A (section from locations A-7 to E-9)
- 1-0314B-1/2"-A (section from locations A-4 to E-2)
- 1-0314-2"-A (section from locations A-5 to A-6)
- 1-0313-1"-C (section from locations B-5 to B-6)
- 1-0315-1"-A (section from locations B-5 to B-6)

License renewal boundary diagram LR-QDC-M-83-1 excludes the corresponding sections of Quad Cities Unit 2 from the scope of license renewal. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to justify the exclusion of the above sections from the scope of license renewal and an AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-1, the applicant stated that it performed a plant walkdown on non-safety-related control rod drive (CRD) hydraulic piping at Quad Cities to identify those portions that could interact with safety-related SSCs. Portions of the non-safety-related piping were included in the scope of license renewal for either spatial considerations or because the piping is attached to safety-related SSCs. Because of the proximity of the CRDH headers to safety-related components, some situations exist where portions of piping in the center of a pipe run cannot spatially interact with any safety-related SSCs. For this reason, they were excluded from the scope of license renewal.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.3-1 acceptable because the excluded portions are non-safety-related and not in the proximity of any safety-related SSCs. Therefore, the staff considers its concern described in RAI 2.3.3.3-1 resolved.

RAI 2.3.3.3-2. License renewal boundary diagram LR-QDC-M-41-2 for Quad Cities Unit 1 excludes the piping from the exhaust water header and fittings and the pressure indicator 1-0302-77 from the scope of license renewal. However, the corresponding components for Quad Cities Unit 2 are identified as in the scope of license renewal per 10 CFR 54.4(a)(2) (license renewal boundary diagram LR-QDC-M-83-2). As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to justify exclusion of the above components of Quad Cities Unit 1 from the scope of license renewal and an AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-2, the applicant stated that it performed a plant walkdown on non-safety-related CRD hydraulic piping at Quad Cities to identify those portions that could interact with safety-related SSCs. Those portions of the non-safety-related piping on LR-QDC-M-41-2 and LR-QDC-M-83-2 were included in the scope of license renewal for spatial interaction with safety-related SSCs. The piping from the exhaust water header and fittings and the pressure indicator 1(2)-0302-77 cannot spatially interact with safety-related SSCs and were not included in the scope of license renewal. The applicant noted that it color-coded these components incorrectly as in the scope of license renewal on LR-QDC-M-83-2 for Quad Cities Unit 2. The applicant also noted that boundary diagram LR-QDC-M-41-2 correctly identifies those portions falling within the scope of license renewal.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.3-2 acceptable because the excluded portions are non-safety-related and not in the proximity of any safety-related SSCs. Therefore, the staff considers its concern described in RAI 2.3.3.3-2 resolved.

RAI 2.3.3.3-3. Several solenoid valves shown in license renewal boundary diagram LR-QDC-M-41-2 for Quad Cities Unit 1 (e.g., SO 1-0302-19A at location F-1) are identified as within the scope of license renewal. However, the piping connections to these valves are excluded from the scope of license renewal. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to justify exclusion of the above components from the scope of license renewal and an AMR.

Applicant's Response and Staff's Evaluation

In response to RAI 2.3.3.3-3, the applicant stated that the piping in question is non-safety-related instrument air system. The failure of this non-safety-related instrument air support system piping will not affect any of the CRDH system's intended functions. Loss of instrument air will cause the CRD scram valves to fail open, inserting the control rods into the core and causing other air-operated CRDH system valves to fail in their fail-safe positions. There are small segments of safety-related instrument air piping (such as that connecting solenoid valves SO 1-0305-117 and SO 1-0305-118) for each CRD hydraulic control unit that are included in the scope of license renewal.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.3-3 acceptable because the applicant stated that the piping in question is non-safety-related instrument air system; the failure of this non-safety-related instrument air support system piping will not affect any of the CRDH system's intended functions; and the small segments of safety-related instrument air piping for each CRD hydraulic control unit are included in the scope of license renewal. Therefore, the staff considers its concern described in RAI 2.3.3.3-3 resolved.

RAI 2.3.3.3-4. License renewal boundary diagram LR-QDC-M-41-2 for Quad Cities Unit 1 shows the pressure indicator, component PI 1-032-80, as within the scope of license renewal. However, a similar component at the same location, pressure switch, component PS 1-032-81 is excluded from the scope of license renewal. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff

requested the applicant to justify exclusion of component PI 1-032-80 from the scope of license renewal and an AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-4, the applicant stated that pressure indicator PI 1-0302-80, manual instrument shutoff valve 1-0302-80, and the connecting tubing to the non-safety-related instrument air system should not have been highlighted on boundary diagram LR-QDC-M-41-2. As stated in the response to RAI 2.3.3.3-3, the failure of this non-safety-related instrument air support system piping will not affect any of the CRDH system's intended functions. Therefore, both PI-0302-80 and PS 1-0302-81 are outside the scope of license renewal.

Based on its review of the applicant's clarification discussed above, the staff finds that the applicant's response to RAI 2.3.3.3-4 is in accordance with the criteria set forth in 10 CFR 54.4(a) and acceptable. Therefore, the staff considers its concern described in RAI 2.3.3.3-4 resolved.

RAI 2.3.3.3-5. License renewal boundary diagram LR-QDC-M-41-2 identified CRDs as within the scope of license renewal. However, LRA Table 2.3.3-3 does not list CRDs as within the scope of license renewal. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to justify the exclusion of CRDs from LRA Table 2.3.3-3.

Applicant's Response and Staff's Evaluation

In response to RAI 2.3.3.3-5, the applicant stated that component groups listed in LRA Table 2.3.3-3 only include those components requiring an AMR. Although CRDs are in the scope of license renewal, they were screened as "active" components. As such, they do not require an AMR and were not included in LRA Table 2.3.3-3.

Based on its review, the staff concurs with the applicant's clarification that CRDs are in the scope of license renewal, however, they are active components and not subject to an AMR. Therefore, the staff finds that the applicant's response to RAI 2.3.3.3-5 is in accordance with the criteria set forth in 10 CFR 54.4(a) and acceptable. The staff considers its concern described in RAI 2.3.3.3-5 resolved.

RAI 2.3.3.3-6. License renewal boundary diagram LR-QDC-M-41-2 for Quad Cities Unit 1 shows that the license renewal boundary for 2.5 in. piping section at location B-10 ends at an undistinguishable location. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to explain why (1) the piping section up to and including valve 1-0301-7, and (2) the corresponding piping section of Quad Cities Unit 2 (license renewal boundary diagram LR-QDC-M-83-2) up to and including valve 2-0301-7, were excluded from the scope of license renewal.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-6, the applicant stated that it performed a plant walkdown on non-safety-related CRDH. Portions of non-safety-related CRD hydraulic components depicted on boundary diagrams LR-QDC-M-41-2 and LR-QDC-M-83-2 are included in the scope of license renewal because the components could spatially interact with safety-related SSCs

located in the same area. The CRD pump discharge line, 1(2)-8302C-2-1/2", is included in the scope of license renewal from the point that the line enters the reactor building (A-10) to where that line and others downstream of it no longer can spatially interact with safety-related SSCs.

Based on its review of the applicant's clarification discussed above, the staff finds that the applicant's response to RAI 2.3.3.3-6 is in accordance with the criteria set forth in 10 CFR 54.4(a) and acceptable. Therefore, the staff considers its concern described in RAI 2.3.3.3-6 resolved.

RAI 2.3.3.3-7. License renewal boundary diagram LR-QDC-M-83-1 for Quad Cities Unit 2 excludes the following 0.75 in.-diameter sections of piping between the reducer and the quick disconnect from the scope of license renewal:

- line containing valve 2-0301-139A at location A-7
- line containing valve 2-0301-138A at location A-7
- line containing valve 2-0301-137A at location B-7
- line containing valve 2-0301-136A at location C-7
- line containing valve 2-0301-136B at location C-4

However, license renewal boundary diagram LR-QDC-M-41-1 shows that the corresponding sections of Quad Cities Unit 1 are included in the scope of license renewal. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested (in RAI 2.3.3.3-7) the applicant to justify the exclusions of the above sections of Quad Cities Unit 2 from the scope of license renewal and an AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-7, the applicant stated that lines and valves 2-0301-136A, 2-0301-136B, 2-0301-137A, 2-0301-138A, and 2-0301-139A are included in the scope of license renewal. Boundary diagram LR-QDC-M-83-1 should have highlighted the components. They are included in LRA Table 2.3.3-3, under component group "NSR vents or drains, piping and valves (attached support)."

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.3-7 acceptable because it is in accordance with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers the concern described in RAI 2.3.3.3-7 resolved.

RAI 2.3.3.3-8. License renewal boundary diagram LR-DRE-M-34-1 for Dresden Unit 2 shows that the license renewal boundary for 1.5 in. piping section at location B-5 (cooling water pressure control station) ends at normally open valve 2-0301-72. The staff was not certain whether the license renewal boundary should continue beyond this valve. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to explain why (1) the piping section beyond this valve, and (2) the corresponding piping section of Dresden Unit 3 (license renewal boundary diagram LR-DRE-M-365-1) beyond valve 3-0301-72 were excluded from the scope of license renewal.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-8, the applicant stated that it expanded the in-scope portion of the Dresden CRDH system as shown on license renewal boundary diagrams LR-DRE-M-34-1 and LR-DRE-M-365-1 to include all downstream pipe lines that would be isolated by closing valve 2(3)-0301-72. The applicant made this change in its responses to RAI 2.1-02 and to Supplement RAI 2.1-02b. The expanded boundary includes all of the piping, fittings, valves, and piping components downstream of valve 2(3)-0301-72, up to and including points of termination at blank flanges, at normally closed vent or drain valves, at instrumentation, or at points of interface with portions of the piping system already designated as in-scope for license renewal. The additional piping, fittings, valves, and piping components the applicant included in-scope are constructed of the same materials, are in the same environments, and perform the same intended functions as components listed in LRA Table 2.3.3-3. Therefore, LRA Table 2.3.3-3, which lists components groups of CRDH system requiring aging management review, needed no change to encompass the expanded in-scope boundary.

Based on its review of the applicant's expanded in-scope boundary discussed above, the staff finds the applicant's response to RAI 2.3.3.3-8 acceptable because it is in accordance with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers the concern described in RAI 2.3.3.3-8 resolved.

RAI 2.3.3.3-9. License renewal boundary diagram LR-DRE-M-365-1 for Dresden Unit 3 excludes the following sections of piping from the scope of license renewal:

- from valve 3-0301-60 to and including valve 3-0301-61 at location B-4
- from valve 3-0301-53 to and including valve 3-0301-54 at location B-2

However, the corresponding sections of Dresden Unit 2 are included in the scope of license renewal (license renewal boundary diagram LR-DRE-M-34-1). As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to justify the exclusions of the above sections of Dresden Unit 3 from the scope of license renewal and an AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-9, the applicant stated that it expanded the in-scope portion of the Dresden CRDH system to include sections of piping (1) from valve 3-0301-60 to and including valve 3-0301-61 and (2) from valve 3-0301-53 to and including valve 3-0301-54 as shown on License Renewal Boundary Diagram LR-DRE-M-365-1. This boundary expansion added active instruments dPT3-302-61 and dPT3-302-88 and their associated vent and equalizing valves. The additional piping/tubing and valves (passive components) the applicant included in-scope are constructed of the same materials, are in the same environments, and perform the same intended functions as components listed in LRA Table 2.3.3-3. Therefore, LRA Table 2.3.3-3, which lists components groups of CRDH system requiring aging management review, needed no change to encompass the expanded in-scope boundary.

Based on its review of the applicant's expanded in-scope boundary discussed above, the staff finds the applicant's response to RAI 2.3.3.3-9 acceptable because it is in accordance with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers the concern described in RAI 2.3.3.3-9 resolved.

RAI 2.3.3.3-10. License renewal boundary diagram LR-DRE-M-34-1 for Dresden Unit 2 shows that the license renewal boundary ends at valves 2-0301-67A and 2-0301-67B at locations C-5

and B-5 (stabilizing valves). The staff was not certain whether the license renewal boundary should continue beyond these valves. As such, the staff was unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, the staff requested the applicant to explain why (1) the piping section beyond these valves, and (2) the corresponding piping sections of Dresden Unit 3 (license renewal boundary diagram LR-DRE-M-365-1) beyond valves 3-0301-67A and 3-0301-67B, were excluded from the scope of license renewal.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.3-10, the applicant stated that it expanded the in-scope portion of the Dresden CRDH system as shown on License Renewal Boundary Diagrams LR-DRE-M-34-1 and LR-DRE-M-365-1 to include all downstream pipe lines that would be isolated by closing valves 2(3)-0301-67A and 2(3)-0301-67B. The applicant made this change in its responses to RAI 2.1-02 and to Supplement RAI 2.1-02b. The expanded boundary includes all of the piping, fittings, valves, and piping components downstream of valves 2(3)-0301-67A and 2(3)-0301-67B, up to and including points of termination at blank flanges, at normally closed vent or drain valves, at instrumentation, or at points of interface with portions of the piping system already designated as in-scope for license renewal. The additional piping, fittings, valves, and piping components the applicant included in-scope are constructed of the same materials, are in the same environments, and perform the same intended functions as components listed in LRA Table 2.3.3-3. Therefore, LRA Table 2.3.3-3, which lists components groups of CRDH system requiring aging management review, needed no change to encompass the expanded in-scope boundary.

Based on its review of the applicant's expanded in-scope boundary discussed above, the staff finds the applicant's response to RAI 2.3.3.3-10 acceptable because it is in accordance with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers the concern described in RAI 2.3.3.3-10 resolved.

2.3.3.3.3 Conclusions

The staff reviewed LRA Section 2.3.3.3, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the CRDH system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the CRDH system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.4 Reactor Water Cleanup System

2.3.3.4.1 Summary of Technical Information in the Application

The applicant described the reactor water cleanup (RWCU) system in LRA Section 2.3.3.4 and provided a list of components subject to an AMR in LRA Table 2.3.3-4.

The RWCU system has the functions to remove insoluble, waterborne activation products from reactor coolant; prevent soluble inorganic impurities (i.e., chlorides) from concentrating in the reactor coolant and exceeding specified water quality limits; reduce beta and gamma radiation

sources in the reactor coolant resulting from the presence of corrosion and fission products; and remove water from the reactor coolant system at reduced activity levels during startup and shutdown.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following RWCU system intended functions:

- C pressure boundary—maintains the integrity of the reactor coolant pressure boundary
- C primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- C supports ESF function(s)—supports the ESF function of the standby liquid control system by shutdown of RWCU pumps and closure of RWCU valves to prevent dilution or removal of the injected boron
- C credited in regulated event(s)—credited in evaluation of the Appendix R fire and in the ATWS events (The system also contains components relied upon for compliance with 10 CFR 50.49 (EQ))
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The RWCU system consists of pumps, regenerative and nonregenerative heat exchangers, demineralizers, filters (Quad Cities only), containment isolation valves, and associated piping, valves, and instrumentation and controls. The system provides continuous purification of a portion of the reactor coolant recirculation flow with a minimum of heat loss and water loss from the cycle. It can be operated during startup, shutdown, refueling operations, and during normal operation. The system takes suction from the reactor recirculation system at the shutdown cooling system connection at Dresden and the reactor recirculation pump suction connection at Quad Cities, and the reactor vessel bottom drain connection. From these two suction sources, reactor water impurities are removed by directing the flow through the system's major components, piping, and supporting components, and then back to the reactor vessel via the feedwater system at Dresden and via the RCIC system at Quad Cities. The regenerative heat exchangers transfer heat from the water leaving the reactor to the water returning to the reactor. The nonregenerative heat exchangers are cooled by water from the reactor building close cooling water system.

Containment isolation capability is provided by four motor-operated containment isolation valves. The RWCU system maintains the integrity of the reactor coolant pressure boundary and the RWCU system can be isolated from the reactor coolant system by closure of the containment isolation valves.

During refueling at Quad Cities, the RWCU system, in conjunction with the fuel pool filter demineralizers, maintains fuel pool water clarity and reduced activity levels.

In LRA Section 2.3.3.4, the applicant described the evaluation boundary of the RWCU system. In addition, the applicant highlighted those portions of the RWCU system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in

LRA Section 2.3.3.4. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the RWCU system in LRA Table 2.3.3-4 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C NSR vents or drains, piping, and valves (structural integrity/attached support)
- C piping and fittings (pressure boundary)
- C piping and fittings (structural integrity/attached support)
- C piping and fittings (spatial interaction, Quad Cities only)
- C small bore piping and fittings (pressure boundary)
- C sight glasses (structural integrity/attached support, Dresden Only)
- C valves (pressure boundary)
- C valves (structural integrity/attached support)
- C valves (spatial interaction, Quad Cities only)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1 and clarified in a letter, dated June 22, 2004, the applicant expanded the system boundaries for the RWCU system at Dresden Station due to the potential for spatial interaction with safety-related components. Specifically, the applicant added associated piping components lines 2-3324-1"-H, 2/3-1223-8-LX, and 2-3318-1-L of the RWCU system shown on revised boundary diagram LR-DRE-M-30 and lines 2/3-1223-8"-H, 3-5503-4"-H, and 2-5508-4"-H of the RWCU system shown on new boundary diagram LR-DRE-M-45-1 to the scope of license renewal. This boundary expansion includes more of the same type of components already represented on Table 2.3.3-4 of the LRA. As such, no changes to Table 2.3.3-4 were required.

2.3.3.4.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.4, Dresden UFSAR Section 5.4.8 and Quad Cities UFSAR Section 5.4.8. Additionally, the staff reviewed other UFSAR sections that discussed the RWCU system to determine whether there is reasonable assurance that the RWCU system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). At Dresden these sections included 3.2.9, 3.6.1, 3.6.2, 3.11.1, 5.0, 5.1, 5.2.3, 7.1.3, 7.3.2, 7.5.2, 9.1.4, 9.2.6, 9.3.2, 9.3.5, 11.5.2.6, 12.2, 12.3.2, 123A.3, 14.2.4, 15.6.4, and 15.8.6. At Quad Cities these sections included 3.6.1, 3.11.1, 5.1.3, 5.2.3, 5.4.3, 5.4.7, 5.4.8, 7.1.3, 7.3.1, 9.1.3, 9.2.3, 9.2.6, 9.3.1, 9.3.2, 9.3.5, 10.4.6, 11.2.2, 11.5.2, 12.2, and 12.3.2. The staff's review was conducted in accordance with Section 2.3 of the SRP-LR.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the RWCU system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the RWCU system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR

54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the RWCU system. The staff then reviewed the referenced P&I drawings to verify that those portions of the RWCU system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.4 and that the applicant identified all RWCU system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the RWCU system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.4 and that the RWCU system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-4. The staff did not identify any omissions.

2.3.3.4.3 Conclusions

The staff reviewed LRA Section 2.3.3.4 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the RWCU system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the RWCU system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.5 *Fire Protection System*

2.3.3.5.1 Summary of Technical Information in the Application

The applicant described the fire protection (FP) systems in LRA Section 2.3.3.5 and provided a list of component groups subject to an AMR in LRA Table 2.3.3.5.

The FP systems provide the means for detecting, alarming, isolating, and suppressing fires at Dresden Units 2 and 3 and Quad Cities Units 1 and 2. These systems include the following subsystems and attributes:

- The fire detection and alarm system, referred to as the fire computer system, is an instrumentation system that alerts control room operators of a fire and indicates its location.
- The fire suppression system includes fire-fighting equipment such as automatic sprinklers, Halon 1301 systems, carbon dioxide (CO₂) systems, standpipe hose stations, and outside fire hydrants.
- Fire-rated assemblies are features of plant design and construction (e.g., fire barriers) which contribute to the separation of fire hazards into zones and fire areas and are addressed as part of the structure. Fire doors, fire dampers, and penetration seals provide the necessary closures associated with openings in the fire rated barriers.

The FP systems are relied upon to meet the requirements of 10 CFR 50.48, "Fire Protection Rule," and Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." The plants are divided into unique fire areas as required by Appendix A of Branch Technical Position (BTP) Auxiliary and Power Conversion System Branch (APCSB) 9.5-1, "FP for Nuclear Power Plants." The SSCs satisfying the safe-shutdown requirements of Appendix R are contained in the safe-shutdown equipment list (SSEL) and captured by the review conducted for 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2). The applicant provided technical position papers which summarize the results of the review performed on the fire protection program (FPP) documents and summarize the systems and structures necessary to demonstrate compliance with 10 CFR 50.48.

2.3.3.5.2 Staff Evaluation

The staff reviewed LRA Sections 2.1.3.5 and 2.3.3.5, UFSAR Section 9.5.1, and FP technical position papers to determine whether there is reasonable assurance that the FP system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively.

In the performance of the review, the staff selected system functions described in the UFSAR that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

The staff also reviewed SERs referenced for the FP program which summarize the FPP and commitments made to meet 10 CFR 50.48 using the guidelines of Appendix A to BTP APCS 9.5-1 and Appendix R. The staff sampled portions of these SERs to verify that the functions of the FP components relied upon to satisfy the provisions of Appendix A to BTP APCS 9.5-1 and Appendix R were included within the scope of license renewal as intended functions in the LRA.

After the staff's initial review of the LRA, the staff identified several concerns regarding the scoping and screening of FP SSCs required for compliance with 10 CFR 50.48. Section 2.1.3.5 of the LRA states that technical position papers were developed for FP which summarize the results of a detailed review of the FPP documents demonstrating compliance with 10 CFR 50.48 and 10 CFR 50 Appendix R, Sections III.G, III.J, III. L, and III.O. It is unclear that these position papers also included the licensing commitments contained in the applicant's response to Appendix A to the BTP APCS 9.5-1 and the SERs resulting from the review of those responses. In a letter dated August 4, 2003, the staff requested that the applicant clarify that plant commitments contained in FP SERs, and other plant documentation which may also reflect the plant FP CLB, were included in the development of the technical position papers to ensure that all FP SSCs relied upon for compliance with 10 CFR 50.48 were included within the scope of license renewal (RAI 2.3.3.5-1a). In a letter dated October 3, 2003, the applicant responded that the Dresden and Quad Cities FP position papers identify those SSCs relied upon to demonstrate compliance with 10 CFR 50.48. These include SSCs credited with satisfying the commitments contained in the responses to Appendix A to BTP APCS 9.5-1, and the SERs resulting from the review of those responses, and SSCs credited with satisfying any FP SERs issued before BTP APCS 9.5-1 was published. The staff reviewed the applicant's response and agreed that the applicant included these bases in the scoping process.

LRA Section 2.3.3.5 lists “detects fires” as a system purpose and references the fire computer system, which includes initiation devices. This fire detection/alarm computer system is not referenced elsewhere in the LRA, for example, as part of the scoping and screening of the electrical and instrumentation systems. By letter dated August 4, 2003, the staff requested that the applicant clarify where the fire detection and alarm systems and components are addressed in the LRA (RAI 2.3.3.5-1b). In a letter dated October 3, 2003, the applicant responded that although the fire computer system, including smoke detectors, heat sensors, pressure/flow sensors, and actuation devices for preaction systems, is within the scope of license renewal, all of the components in the system were categorized as “active” based on the determinations documented in NEI 95-10, Appendix B, and are not subject to an AMR. Therefore, they are not discussed in LRA Section 2.5, “Scoping and Screening Results: Electrical and Instrumentation and Control Systems.” The staff reviewed the applicant’s response and agreed that the components are categorized as active.

The staff reviewed the LRA boundary drawings included with the LRA to assess what portions of the FP system were in scope. In a letter dated August 4, 2003, the staff asked the applicant to clarify information contained in the LRA boundary drawings for Dresden (RAI 2.3.3.5-1c through f). In the response dated October 3, 2003, the applicant provided the following clarifications.

LR-DRE-M-23-1: LRA boundary drawing LR-DRE-M-23-1 should have highlighted valves PIV 1-4199-187, PIV 1-4199-188, PIV 1-4199-189, PIV 1-4199-190, PIV 1-4199-194, fire hydrants FH-30, FH-31 at drawing coordinates C-10 and the piping segments associated with these valves and hydrants. The piping segment up to and including these valves and hydrants are included in the scope of license renewal. The FP piping, and components down stream of these valves are not included as part of the plant FP plan and do not perform functions that demonstrate compliance with 10 CFR 50.48. Fire hydrants FH-8, FH-9 and FH-10 at drawing coordinate A-4 on LRA boundary drawing LR-DRE-M-23-1 and fire hydrant FH-33 at drawing coordinate E-7 on LRA boundary drawing LR-DRE-M-23-1 are within the scope of license renewal. LRA boundary drawing LR-DRE-M-23-1 should have included those components within the scope of license renewal.

LR-DRE-M-23-4: The portions of Unit 1 FP piping shown on LRA boundary drawing LR-DRE-M-23-4 that perform functions necessary to demonstrate compliance with 10 CFR 50.48 are the fire hose stations F21 (drawing coordinate C-8), F22 (drawing coordinate C-5), F23 (drawing coordinate C-6), F27 (drawing coordinate A-5), F29 (drawing coordinate C-8), and F47 (drawing coordinate C-2), the West Aux Bay North and South sprinkler systems, and the piping connected to Unit 2 and 3 FP piping up to and including the isolation valves that connect to the Unit 1 piping. The Unit 1 fire hose stations are in scope because they are included as part of the Dresden Unit 2 and 3 FP plan. The West Aux Bay North system and South sprinkler system are in scope because of the cable concentrations in the Unit 1 West Auxiliary Bay, located below the Unit 2 control room. All remaining piping, valves, fire hose station, service water drops, and sprinkler systems pertaining to Unit 1 are not included as part of the Dresden Unit 2 and 3 FP plan and do not perform functions that demonstrate compliance with 10 CFR 50.48.

LRA boundary drawing LR-DRE-M-23-4 contains some boundary interfaces that do not end at an isolation valve. At location A-8, the piping down stream of valve 1-4199-134 up to and including valve 1-4199-264 should not have been highlighted and does not belong within the scope of license renewal. A small portion of piping down stream of valves 1-4199-314 (drawing coordinate E-6), 1-4199-315 (drawing coordinate E-6) and 1-4199-131 (drawing coordinate D-8) should not have been highlighted. These portions of pipe do not belong within the scope of license renewal. LRA boundary drawing LR-DRE-M23-4 should have excluded these components from the scope of license renewal.

LR-DRE-M-23-5: Those portions of Unit 1 FP piping shown on LRA boundary drawing LR-DRE-M-23-5 that perform functions necessary to demonstrate compliance with 10 CFR 50.48 are fire hose stations F11 (drawing coordinate F-3) and F37 (drawing coordinate B-10), the Unit 1 emergency diesel driven fire pump (drawing coordinate D-2) and sprinkler system (drawing coordinate F-5), and the piping connected to the Unit 2 and 3 FP piping up to and including the isolation valves that connect to the Unit 1 piping. Fire hose stations F11 and F37 are in scope because they are included as part of the Dresden

Unit 2 and 3 FP plan. The emergency diesel driven fire pump and sprinkler system are in scope to facilitate protection of the Unit 1 emergency diesel driven fire pump.

All remaining piping, valves, fire hose stations, service water drops, and sprinkler systems pertaining to Unit 1 are not included in the Dresden Unit 2 and 3 FP plan and do not perform functions necessary to demonstrate compliance with 10 CFR 50.48. Those FP components falling within the scope of license renewal can be isolated from those sections outside the scope of license renewal by manually closing isolation valves that are within the scope of license renewal. Degradation of any pressure retaining components located in the out-of-scope portions of the FP system would be identified through a drop in fire header pressure and isolated.

A review of LRA boundary drawing LR-DRE-M-23-5 identified a boundary interface at drawing coordinate A-9 that does not end at an isolation valve. A field walk down determined that this pipe has been cut and capped. Valve 1-4199-502-DV at drawing coordinate F-6 should have been highlighted, is within the scope of license renewal and was evaluated for aging management.

LR-DRE-M-4204: The fire sprinkler systems shown in the ISCO makeup pump building rooms A&B on LRA boundary drawing LR-DRE-M-4204 are within the scope of license renewal and subject to an AMR. LRA boundary drawing LR-DRE-M-4204 should have included these components within the scope of license renewal. This sprinkler system was evaluated for aging along with the other sprinkler systems shown on the boundary diagram.

The staff reviewed the response provided by the applicant and concurs with the changes to the LRA boundary drawings proposed by the applicant on the basis that these portions of the FP system are in the scope of license renewal.

In a letter dated August 4, 2003, the staff asked the applicant to clarify information contained in LRA drawing LR-QDC-M-27-1 for Quad Cities (RAI 2.3.3.5-1g). By letter dated October 3, 2003, the applicant supplied the following clarifications. The fire hydrants on LRA boundary drawing LR-QDC-M-27-1 at drawing coordinates D-1, D-2, and E-4 are within the scope of license renewal and are subject to an AMR. These fire hydrants should have been highlighted. The fire hydrants at drawing coordinates F-7, G-6, and G-7 are located downstream of isolation valve 1/2-4199-278 (drawing location F-6), are not included as part of the plant FP plan, and do not perform functions that demonstrate compliance with 10 CFR 50.48. For these reasons, they were not included within the scope of license renewal. The fire hydrants at drawing coordinates G-2 and G-3 are incorrectly shown as being located upstream of isolation valve 1/2-4199-288. A field walkdown verified that these hydrants are located downstream of isolation valve 1/2-4199-288 (drawing coordinate G-4). These hydrants are not included as part of the plant FP plan and do not perform functions that demonstrate compliance with 10 CFR 50.48.

The staff reviewed the response provided by the applicant and concurs with the clarifications on the basis of those portions of the FP system that are included in the plant FP plan. The staff also agrees that the portions of the FP water system located downstream of isolation valve 1/2-4-199-228 are not in the scope of license renewal, since they are not part of the licensing basis.

Section 5.4.6.3 of the Dresden UFSAR states that the Unit 2 and 3 diesel-driven fire pump, or the Unit 1 diesel-driven fire pump, automatically provide a backup supply of river water to the FP system on low system pressure. LRA Sections 2.3.3.5 and 2.3.3.13 state that the fire pump diesels for Dresden are evaluated with the FP system. While the fire pump diesels are considered active components, and therefore may be excluded from the scope of license renewal, supporting components and subsystems of the fire pump diesels should appear in Table 2.3.3.5 of the LRA. In a letter dated August 4, 2003, the staff requested that the applicant identify the portions of the diesel fire pump that were intended to be included within the scope of

license renewal and clarify how they may be included in LRA Table 2.3.3.5 (RAI 2.3.3.5-1i). In a letter dated October 3, 2003, the applicant submitted the table below to identify those portions of the diesel fire pump addressed by LRA Table 2.3.3-5.

Long-lived, passive components for the fire pump diesels and diesel fire pump subsystem are included in LRA Table 2.3.3-5.

Equipment Description	LRA Table 2.3.3-5 Component Group
diesel fire pump suction screens	filters/strainers
strainer diesel fire pump deluge system	filters/strainers
fire pump diesel cooling water strainer	filters/strainers
diesel fire pump room supply air damper	fire dampers
fire pump diesel silencer	mufflers
diesel fire pump headers	pipng and fittings
sprinkler system fire pump diesel day tank	pipng and fittings
fire diesel sprinkler	pipng and fittings
diesel fire pump	pumps
sprinkler system fire pump diesel day tank	sprinklers
fire pump diesel oil day tank	tanks
diesel fire pump deluge system valves	valves
diesel fire pump cross-tie valves	valves
fire pump diesel cooling water valves	valves
diesel fire pump discharge valves	valves
fire pump diesel engine lubrication oil valves	valves
diesel fire pump supply valves	valves
fire pump diesel day tank valves	valves
fire pump diesel instrumentation valves	valves

The staff finds the applicant's response acceptable on the basis that the components of the diesel fire pump identified are within the scope of the license renewal and subject to an AMR.

Since no LRA boundary drawings were provided for the Halon 1301 fire suppression systems, the staff requested in a letter dated August 4, 2003, that the applicant clarify which systems and components are within scope and are covered in the AMR (RAI 2.3.3.5-1j). In a letter dated October 3, 2003, the applicant stated that a P&ID for the Halon 1301 system at Dresden does not exist. As such, an LRA boundary drawing was not created for that portion of the FP system. There are three Halon subsystems at Dresden that are completely independent of one another. These subsystems protect the record retention vault, the process computer room, and the auxiliary electric equipment room/primary computer room. The Halon 1301 subsystems for the record retention vault and the process computer room are not included within the scope of license renewal because they are not included in the plant FP plan and do not perform functions that demonstrate compliance with 10 CFR 50.48. However, the entire subsystem supporting the auxiliary electric equipment room/primary computer room is within the scope of license renewal. LRA Table 2.3.3-5 evaluates these components in component groups—pipng and fittings (including flex hoses, hose reels, hoses, nozzles, tubing, sprinklers, and gaskets of

buried components), aging management reference 3.3.1.5 and 3.3.2.138; and valves (including nozzles), aging management reference 3.3.2.23 and 3.3.2.260.

The applicant further indicated that the Halon bottles/cylinders are considered consumable FP equipment, are replaced based on condition, and, therefore, are not considered long-lived components.

At Quad Cities, Halon is only used in areas that do not house any safe shutdown equipment (training building, records storage building, and new computer room). Therefore, the Halon system at Quad Cities is not within the scope of license renewal because it is not included in the plant FP plan and does not perform functions that demonstrate compliance with 10 CFR 50.48.

The staff finds the applicant's response acceptable on the basis that the applicant has included the Halon system in the Dresden plant auxiliary electric equipment room/primary computer room in the scope of license renewal as it is included in the Dresden FPP, and excluded the Halon system at Quad Cities that does not perform an intended function.

The staff identified the use of water shields or baffles referenced in the Quad Cities response to BTP APCS 9.5-1 and requested that the applicant confirm that these components were included within the scope of license renewal and subject to an AMR, or justify their exclusion (RAI 2.3.3.5-1k). The applicant responded in a letter dated October 3, 2003, that the water shields referenced in Amendment 2 to the Quad Cities response to BTP APCS 9.5-1 were never installed. This configuration was clarified in the Quad Cities Fire Protection Report, Volume 1, Section 4.3-3889, Revision 13, issued August 2001. Because these shields were never installed, they are not included within the scope of license renewal.

The staff reviewed the applicant's response and concurs, on the basis that these shields were never installed, that they are not included within the scope of license renewal and subject to an AMR.

Portable equipment, such as fire extinguishers, self-contained breathing air packs, fire hoses, and portable ductwork, are not included in the LRA. The staff believes that these components should be within the scope of the license renewal, but exempt from an AMR, because portable equipment is typically replaced on condition. These standards require the replacement of portable equipment based on their condition or performance during testing and inspection. These portable components are not long-lived and are maintained per the NFPA standards; therefore an AMR is not required. In a letter dated August 4, 2003, the staff requested that the applicant identify where in the LRA these components are identified as being within the scope of license renewal, or provide a technical justification for their exclusion (RAI 2.3.3.5.1-l). In a letter dated October 3, 2003, the applicant responded that portable FP equipment is included within the scope of license renewal but is not discussed in the LRA. Section 2.1.5.4 of the LRA should have been written as in the following section to be consistent with the NRC letter from Mr. C. I. Grimes to Mr. D. J. Walters of NEI, dated March 10, 2000, regarding License Renewal Issue No. 98-12, "Consumables."

2.3.3.5.3 Consumable Fire Protection Equipment

Fire extinguishers, self-contained breathing air packs, fire hoses, and portable ductwork (smoke ejectors) are within the scope of license renewal, but are not subject to aging management because they are replaced on condition. These components are periodically inspected in accordance with National Fire Protection Association (NFPA) standards. These standards

require replacement of equipment based on their condition or performance during testing and inspection. These components are not long-lived and therefore, aging management is not required.

2.3.3.5.4 Conclusions

The staff reviewed LRA Section 2.3.3.5, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the FP system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the FP system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.6 *Emergency Diesel Generator and Auxiliaries*

2.3.3.6.1 Summary of Technical Information in the Application

The applicant described the emergency diesel generator (EDG) and auxiliary systems in LRA Section 2.3.3.6 and provided a list of components subject to an AMR in LRA Table 2.3.3-6.

The function of the EDG and auxiliary systems is to provide an emergency source of AC power to the emergency core cooling system or safe shutdown equipment for each unit following a design basis accident and/or in the event of loss of offsite power (LOOP). Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following EDG and auxiliary systems intended functions:

- C provide emergency AC power—provides independent power source to assure safe reactor shutdown under emergency conditions on a total loss of offsite power concurrent with a design basis accident.
- C credited in regulated event(s)—credited in support of fire protection (10 CFR 50.48) (The system contains components that are relied upon for compliance with 10 CFR 50.49 (EQ)).
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected.

The EDG and auxiliary systems consist of three EDGs per site—one EDG per reactor and a shared EDG. Each EDG, located in a separate diesel generator room, is an assembly containing a diesel engine and a generator. Section 54.21(a)(1) of Title 10 of the *Code of Federal Regulations* recognizes that EDGs are active and excludes them from the group of equipment subject to AMR. However, the auxiliary systems for each EDG are within the scope of the Rule and subject to an AMR. These auxiliary systems include the following:

- C EDG room ventilation system
- C EDG jacket water system
- C EDG air start system

- C EDG lubrication system
- C EDG combustion air intake and exhaust system
- C EDG cooling water system
- C EDG fuel oil storage and transfer system

EDG Room Ventilation System

The staff's evaluation of the EDG room ventilation system is provided in Section 2.3.3.6A of this SER.

EDG Jacket Water System

The EDG jacket water system provides cooling to the lube oil cooler and other diesel engine subcomponents, and maintains the diesel engine at an acceptable starting temperature during standby. The system is a closed loop system that starts with the EDG jacket water heat exchangers, passes through the diesel engine and lube oil cooler, and returns to the heat exchanger. It includes engine-driven pumps, an immersion heater, expansion tank, piping, valves, and controls and instrumentation. Cooling water for the EDG jacket water heat exchangers is provided by the EDG cooling water system.

EDG Air Start System

The EDG air start system stores and delivers sufficient air to start the diesel engine in the event of a LOOP. Each EDG has an independent air starting system which primarily consists of a set of two starting air compressors, four air receivers, two moisture separators, two air-driven starting motors and piping, valves, and controls and instrumentation. The system starts with the EDG starting air compressors, then passes through the air receivers, and moisture separators, to the EDG start motors. Because the air receivers are designed to store and provide sufficient air, as required to start the EDG, those portions of the system used for charging the air receivers have no safety function and are noncritical quality elements. Therefore, the air compressors and associated equipment are not included in the license renewal scope.

EDG Lubrication System

The EDG lubrication system provides lubrication to the EDG and subcomponents, and maintains the diesel engine at an acceptable starting temperature during standby. The system includes five pumping circuits for each EDG. The lubrication system evaluation boundary for each EDG starts from the engine sump, then passes through strainers, pumps, filters, and coolers, to the supplied service for each of the five circuits. It includes piping, valves, and controls and instrumentation. Also included is the oil pumping circuit for the governor drive assembly.

EDG Combustion Air Intake and Exhaust System

The EDG combustion air intake and exhaust system provides filtered air for engine combustion and removes exhaust gases to the outside. The system evaluation boundary starts from the air intake hood, then passes through intake filters, the engine, the exhaust manifold, the exhaust silencer, and the outlet screen.

EDG Cooling Water System

The EDG cooling water system is described in LRA Section 2.3.3.12. The staff's evaluation of the EDG cooling water system is provided in Section 2.3.3.12 of this SER.

EDG Fuel Oil Storage and Transfer System

The EDG fuel oil storage and transfer system is described in LRA Section 2.3.3.13. The staff's evaluation of the fuel oil storage and transfer system is provided in Section 2.3.3.13 of this SER.

In LRA Section 2.3.3.6, the applicant described the evaluation boundary of each EDG auxiliary system. In addition, the applicant highlighted those portions of the EDG auxiliary systems and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.6. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the EDG auxiliary systems in LRA Table 2.3.3-6 as being within the scope of license renewal and subject to an AMR:

- C air accumulator vessels, including tanks (pressure boundary)
- C closure bolting (pressure boundary)
- C debris screens (filter, Quad Cities only)
- C doors, closure bolts, and equip frames, including dampers, duct, and housings (pressure boundary)
- C duct fittings, hinges, and latches, including anchors, bolts, and fasteners (pressure boundary)
- C filters/strainers (pressure boundary)
- C filters/strainers (filter)
- C flex collars, doors, and damper seals (pressure boundary)
- C flexible hoses (pressure boundary)
- C heat exchangers, including coolers (pressure boundary)
- C heat exchangers, including coolers (heat transfer)
- C lubricators (pressure boundary)
- C NSR vents or drains, piping, and valves (structural integrity/attached support, Quad Cities only)
- C piping and fittings, including dryers, heaters, and tubing (pressure boundary)
- C piping and fittings (structural integrity/attached support)
- C pumps (includes governors)

- C restricting orifices (pressure boundary)
- C restricting orifices (throttle)
- C sight glasses (pressure boundary)
- C tanks (pressure boundary)
- C thermowells (pressure boundary)
- C tubes, including heat exchangers (heat transfer, Quad Cities only)
- C tubing (pressure boundary)
- C tubing (structural integrity/attached support, Quad Cities only)
- C turbochargers (pressure boundary)
- C valves (pressure boundary)
- C valves (structural integrity/attached support, Quad Cities only)

2.3.3.6.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.6, Dresden UFSAR Sections 8.3.1, 9.4.7, 9.5.4, 9.5.5, 9.5.6, 9.5.7, and 9.5.8, and Quad Cities UFSAR Sections 8.3.1, 9.4.5, 9.5.4, 9.5.5, 9.5.6, 9.5.7, and 9.5.8 to determine whether there is reasonable assurance that the EDG auxiliary system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with the Section 2.3 of the SRP-LR.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the EDG auxiliary systems in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the EDG auxiliary systems that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the EDG auxiliary systems. The staff then reviewed the referenced P&I drawings to verify that those portions of the EDG auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.6 and that the applicant identified all EDG auxiliary systems components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the EDG auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.6. The EDG auxiliary systems components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-6. The staff did not identify any omissions.

2.3.3.6.3 Conclusions

The staff reviewed LRA Section 2.3.3.6 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the EDG and auxiliary systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the EDG and auxiliary systems that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.6A Diesel Generator Room Ventilation

2.3.3.6A.1 Summary of Technical Information in the Application

The applicant described the EDG room ventilation system in LRA Section 2.3.3.6 and provided a list of components subject to an AMR in LRA Table 2.3.3-6.

The design function of the EDG room ventilation system is to maintain a suitable environment for equipment operation during normal and emergency operating modes when the EDG is required. Based on 10 CFR 54.4, and using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following EDG room ventilation system intended functions:

- C credited in regulated event(s)—credited in support of fire protection (10 CFR 50.48) and contains components that are relied upon for compliance with 10 CFR 50.49 (EQ).
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected.

Each EDG room has an independent ventilation system. Each ventilation system has a supply fan which auto starts when the EDG starts. The fan draws in either outside air or turbine building air through temperature-controlled modulation dampers, isolation dampers, and fire dampers. The air exhausts the room through pneumatically operated dampers. Each ventilation system is used only when its respective EDG is operating.

In LRA Section 2.3.3.6, the applicant described the evaluation boundary of the EDG room ventilation system. In addition, the applicant highlighted those portions of the EDG room ventilation system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.6. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified and included the EDG room ventilation system component group subject

to an AMR in LRA Table 2.3.3.6, which lists all mechanical components of the EDG auxiliary systems.

2.3.3.6A.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.6, Dresden UFSAR Section 9.4.7, and Quad Cities UFSAR Section 9.4.5 to determine whether there is reasonable assurance that the system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the EDG room ventilation system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the EDG room ventilation system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the EDG room ventilation system. The staff then reviewed the referenced P&I drawings to verify that those portions of the EDG room ventilation system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.6 and that the applicant identified all EDG room ventilation system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the EDG room ventilation system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.6 and that the EDG room ventilation system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-6. The staff did not identify any omissions.

2.3.3.6A.3 Conclusions

The staff reviewed LRA Section 2.3.3.6 and the accompanying scoping boundary drawings to determine whether any SSCs that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the EDG room ventilation systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the EDG room ventilation systems that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.7 Main Control Room Heating, Ventilation, and Air Conditioning

2.3.3.7.1 Summary of Technical Information in the Application

The applicant described the main control room heating, ventilation, and air conditioning (CRV-HVAC) system in LRA Section 2.3.3.7 and provided a list of components subject to an AMR in LRA Table 2.3.3-7.

The CRV-HVAC system has the functions to—provide a suitable environment during normal operation for the control room operators and equipment; provide a habitable environment after a design basis accident in which the operators can safely shutdown and maintain the plant for the duration of the accident; provide an environment from which the operators can safely occupy and operate the plant during an onsite or offsite toxic chemical accident; provide detection and protection for control room personnel from radioactive contamination or smoke released to the atmosphere; provide detection and protection for control room personnel from toxic gas (Quad Cities); provide fire protection to the operators with fire dampers for fires outside the control room, and a smoke purge function mode for fires inside the control room; and meet the seismic Category I requirements for all safety-related system components.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following CRV-HVAC system intended functions:

- isolation and filtration—provides isolation and filtration for the control room during accident conditions
- environmental control—provides habitable environment for the control room during normal, abnormal, accident, and postaccident conditions
- credited in regulated event(s)—demonstrates compliance with NRC regulations regarding station blackout (10 CFR 50.63) and fire protection (10 CFR 50.48)
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The CRV-HVAC system consists of the train-A HVAC system (a multizone unit), the train B HVAC system (a single zone unit), the emergency air filtration unit (AFU), the toxic gas analyzer system, and the smoke detection system. Each system train includes manual and air-operated dampers, an air handling unit (AHU), and distribution air ducts to and from the control room (including the cable spreading room and the auxiliary electric equipment room for Quad Cities) and the train-B HVAC equipment room. The train-A HVAC system also included an exhaust fan and the smoke detection system. The train-B HVAC system also included the AFU, associated booster fans, a refrigeration condensing unit (RCU), the toxic gas analyzer system, and associated valves, and instrumentation and controls. A sprinkler system is also provided to the AFU from the fire protection system (evaluated with the fire protection system). The train-A AHU is the primary unit to provide the temperature control and air distribution for the control room. The train-B AHU serves as a backup to the train-A AHU and provides the source of cooling for the control room in the event the train-A AHU is lost. During normal operation, outside air is mixed with return air to maintain the control room emergency zone at a positive pressure. In the event of a design basis accident, the normal outside air intakes are isolated,

and the AFU provides filtered makeup air to maintain pressurization of the control room emergency zone. In the event smoke is detected in the intake air ducts, the train-A HVAC system outdoor air-intake is automatically isolated and the system air is recirculated. In the event smoke is detected in the return air ducts, the train-A HVAC system is automatically switched to the purge mode and the system is supplied with 100 percent outdoor air. The train-B RCU is normally cooled with SW (evaluated with the SW system). However, upon loss of SW, the RCU may be cooled by containment cooling SW (evaluated with the containment cooling SW system) at Dresden and by residual heat removal SW (evaluated with the residual heat removal SW system) at Quad Cities. The toxic gas analyzer (at Quad Cities) continuously monitors the outside air intake of the operating AHU, and automatically isolates outdoor air intakes in the event specified toxic gas limits are approached. The toxic gas analyzer at Dresden has been determined to not be needed, and has been abandoned in place. If required, the outdoor air intakes can still be manually isolated.

In LRA Section 2.3.3.7, the applicant described the CRV-HVAC system evaluation boundary. In addition, the applicant highlighted those portions of the CRV-HVAC system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.7. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the CRV-HVAC system in LRA Table 2.3.3-7 as being within the scope of license renewal and subject to an AMR:

- C air handlers heating/cooling (CRV-HVAC) (pressure boundary)
- C air handlers heating/cooling (CRV-HVAC) (heat transfer)
- C dampeners (pressure boundary, Quad Cities only)
- C debris screens (filter)
- C diffusers (pressure boundary)
- C doors, closure bolts, and equip frames, including dampers, duct, housings, and silencers (pressure boundary)
- C duct fittings, hinges, and latches (pressure boundary)
- C filters/strainers (pressure boundary)
- C filters/strainers (filter)
- C flex collars, doors, and damper seals, including duct (pressure boundary)
- C flow elements (throttle, Dresden only)
- C heat exchangers (pressure boundary)
- C heat exchangers (heat transfer)
- C housings and supports (pressure boundary)
- C NSR vents or drains, piping, and valves (structural integrity/attached support, Dresden only)
- C piping and fittings (pressure boundary)
- C piping and fittings (structural integrity/attached support, Quad Cities only)
- C seals (pressure boundary)
- C sight glasses (pressure boundary)
- C tubing (pressure boundary, Dresden only)
- C valves including dampers (pressure boundary)

2.3.3.7.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.7, Dresden UFSAR Sections 6.4 and 9.4.1, and Quad Cities UFSAR Sections 6.4 and 9.4.1 to determine whether there is reasonable assurance that the CRV-HVAC system components within the scope of license renewal and subject to an AMR

have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the CRV-HVAC system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the CRV-HVAC system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the CRV-HVAC system. The staff then reviewed the referenced P&I drawings to verify that those portions of the CRV-HVAC system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.7 and that the applicant identified all CRV-HVAC system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.7 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items needed to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.7-1. Ductwork in the main control room HVAC systems is identified on ventilation system flow diagrams referenced in the LRA as within the scope of license renewal. Ductwork performs the intended function of a pressure boundary. However, it is not included in the AMR results in Table 2.3.3-7 of the LRA. Therefore, the staff requested the applicant to clarify whether ductwork is subject to an AMR and provide the relevant information about this component to enable the staff to complete its review of Table 2.3.3-7 in the LRA (Component Groups Requiring AMR- HVAC). If ductwork is not subject to an AMR, provide justification for its exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.7-1 states that the ductwork in the main control room HVAC systems is included within the scope of license renewal and is subject to an AMR. The ductwork is included in LRA Table 2.3.3-7 and is evaluated under the component group "doors, closure bolts, equip frames (including dampers, duct, housings and silencers)."

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.7-1 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.7-1 resolved.

RAI 2.3.3.7-2. The Dresden and Quad Cities ventilation systems that support use of the safe shutdown controls have not been included as part of the scoping and screening process. The staff asked the applicant to state whether the ventilation systems used to support the safe shutdown controls are within the scope of license renewal and subject to an AMR in accordance with 10CFR54.4(a)(1) and (a)(2). If they are within scope, the applicant should provide the relevant information about the components to enable the staff to complete its review of the AMR result tables in the LRA. If the ventilation systems used to support the safe shutdown controls are not in the scope of license renewal and subject to an AMR, provide justification for their exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.7-2 states that safe shutdown of the Dresden and Quad Cities plants from outside the control room is discussed in Dresden UFSAR Section 7.4.2 and Quad Cities Section 7.4.2. Neither Dresden nor Quad Cities has a dedicated safe shutdown control panel. Consequently, there is no ventilation system that specifically supports safe shutdown controls. Each station has procedures for control room evacuation that provide operator actions to be taken at various instrument and control panels located throughout the plants. The ventilation systems that serve the areas where safe shutdown equipment is located were included in the scoping and screening evaluation process. However, the Dresden and Quad Cities current licensing bases do not require that a radiological accident be postulated concurrent with a control room fire and they do not credit ventilation systems with maintaining habitability for local operation of safe shutdown equipment during an event that requires the control room to be evacuated.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.7-2 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.7-2 resolved.

2.3.3.7.3 Conclusions

The staff reviewed LRA Section 2.3.3.4, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the CRV-HVAC system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the CRV-HVAC system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.8 HVAC—Reactor Building

2.3.3.8.1 Summary of Technical Information in the Application

The applicant described the reactor building HVAC (RBH-HVAC) system in LRA Section 2.3.3.8 and provided a list of components subject to an AMR in LRA Table 2.3.3-8.

The RBH-HVAC system has the functions to—provide conditioned air to the reactor building and primary containment structures, and remove the heat remaining from the primary process and

operating equipment; minimize the level of airborne contaminants; make the plant atmosphere adequate to support the presence of personnel; maintain the reactor building at a negative pressure to minimize the release of radioactive contaminants to the environment; maintain a differential pressure of at least 0.25 in. water between clean and potentially contaminated areas; and remove exhaust air from the drywell and suppression chamber purge system when the reactor is shutdown and/or whenever primary containment access is required.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following RBH-HVAC system intended functions:

- C support ESF function(s)—provides instrumentation to trip automatically on a secondary containment isolation signal
- C containment isolation—isolation dampers help ensure that adequate secondary containment is maintained during and after an accident by minimizing potential paths to the environment
- C credited in regulated event(s)—fire dampers provide isolation to prevent spread of a fire credited in mitigation of the Appendix R fire
- C flow path (Dresden only)—conducts effluent directly to the reactor building stack or the standby gas treatment system
- C pressure control (Dresden only)—maintains a negative pressure of at least 0.25 in. water between the reactor building and the environment
- C radioactivity control—(Dresden only) collects radioactivity released from a fuel handling accident in the openings located on the periphery of the refueling pools, and provide timely removal to the reactor building exhaust plenum providing sufficient level to isolate secondary containment

The RBH-HVAC system operation provides general building ventilation. Using supply fans, outside air is drawn into the RBH-HVAC system, and filtered, tempered, and discharged into the supply system ducts. The supply air ducts distribute air throughout the building via air registers. The system also uses two emergency isolation dampers in series in the main supply duct upstream of all branch ducts. The exhaust fans draw building air into exhaust vents located throughout the building and discharge it through the reactor building vent stack. The normal ventilation exhaust duct for the spent fuel, reactor cavity, and dryer/separator pool area is arranged to take suction through multiple inlets around the periphery of the pools above the water line. Two emergency isolation dampers are installed in series in the main exhaust duct upstream of the exhaust fan air intake and downstream of any branch connections to the exhaust duct. The reactor building ventilation system also removes exhaust air from the drywell and suppression chamber purge system when the reactor is shut down for maintenance or whenever primary containment access is required.

In LRA Section 2.3.3.8, the applicant described the RBH-HVAC system evaluation boundary. In addition, the applicant highlighted those portions of the RBH-HVAC system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.8. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following

component groups and their intended functions within the RBH-HVAC system in LRA Table 2.3.3-8 as being within the scope of license renewal and subject to an AMR:

- C debris screens (filter, Dresden only)
- C doors, closure bolts, and equip frames including dampers, duct, housings, and silencers (pressure boundary)
- C duct fittings, hinges, and latches (pressure boundary)
- C filters/strainers (pressure boundary, Dresden only)
- C flex collars, doors and damper seals (pressure boundary, Dresden only)
- C housing supports (pressure boundary, Dresden only)
- C piping and fittings (pressure boundary, Dresden only)
- C seals (pressure boundary, Dresden only)
- C tubing (pressure boundary)
- C valves, including dampers (pressure boundary, Dresden only)

2.3.3.8.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.8, Dresden UFSAR Sections 6.2.3, 9.4.2, 9.4.5, and 9.4.7, and Quad Cities UFSAR Sections 6.2.3, 9.4.2, 9.4.5, and 9.4.7 to determine whether there is reasonable assurance that the RBH-HVAC system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the RBH-HVAC system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the RBH-HVAC system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the RBH-HVAC system. The staff then reviewed the referenced P&I drawings to verify that: those portions of the RBH-HVAC system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.8 and that the applicant identified all RBH-HVAC

system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the RBH-HVAC system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.8 and that the RBH-HVAC system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-8. The staff did not identify any omissions.

2.3.3.8.3 Conclusions

The staff reviewed LRA Section 2.3.3.8 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the RBH-HVAC systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the RBH-HVAC systems that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.9 *Emergency Core Cooling System (ECCS) Corner Room HVAC*

2.3.3.9.1 Summary of Technical Information in the Application

The applicant described the ECCS corner room (ECR-HVAC) system in LRA Section 2.3.3.9 and provided a list of components subject to an AMR in LRA Table 2.3.3-9.

The purpose of the ECR-HVAC system room coolers is to maintain the compartment temperature below the qualification temperature of the components that are required for safe shutdown of the plant. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following additional intended functions of the ECR-HVAC system:

- C environmental control—provides ventilation to maintain an acceptable environment to support proper ECCS pump operation during normal plant operating conditions and following design basis events
- C credited in regulated event(s) (Dresden)—the system contains components that are relied upon to demonstrate compliance with 10 CFR 50.49 (EQ)
- C credited in regulated event(s) (Quad Cities)—provides ventilation and cooling credited in mitigation of the Appendix R fire (The system also contains components that are relied upon to demonstrate compliance with 10 CFR 50.49 (EQ))

Each of the ECCS corner rooms has an ECR-HVAC system which contains a water-cooled heat exchanger and a fan unit. At Dresden, the ECR system includes the HPCI and LPCI room coolers. The core spray pumps are located in the LPCI rooms. There are two LPCI room coolers and one HPCI room cooler per unit. During normal plant operating conditions, the cooling water for the room coolers is provided by the SW system. The CCSW system provides backup cooling water to all three room coolers. At Quad Cities, the ECR-HVAC system includes

one HPCI, two core spray pumps, and two RHR room coolers per unit. The Quad Cities Unit 1 and Unit 2 diesel generator cooling water pumps (evaluated with the diesel generator service water system) provide cooling water to the room coolers in their respective units. The SW system can also provide a non-safety-related alternate supply of cooling water to the HPCI room emergency coolers.

In LRA Section 2.3.3.9, the applicant described the ECR-HVAC system evaluation boundary. In addition, the applicant highlighted those portions of the ECR-HVAC system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.9. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the ECR-HVAC system in LRA Table 2.3.3-9 as being within the scope of license renewal and subject to an AMR:

- C air handlers heating/cooling (pressure boundary)
- C air handlers heating/cooling (heat transfer)
- C ducts, fittings, access doors, closure bolts, and equipment frames (pressure boundary)

2.3.3.9.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.9, Dresden UFSAR Sections 9.2.1, 9.2.2, and 9.4.6, and Quad Cities UFSAR Sections 6.3.2, 9.2.2, and 9.5.5 to determine whether there is reasonable assurance that the ECR system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified as an intended function of the ECR-HVAC system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the ECR-HVAC system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the ECR-HVAC system. The staff then reviewed the referenced P&I drawings to verify that: those portions of the ECR-HVAC system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.9 and that the applicant identified all ECR-HVAC system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.9 identified one area in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued an RAI to the applicant concerning a specific item needed to determine whether the applicant has properly applied the scoping and

screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAI and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.9-1. The ECR-HVAC system Table 2.3.3-9 that identifies component groups requiring AMR has not included the following in the scope of license renewal—flexible collars, damper or door gaskets, seals, or other soft parts. These types of components were included in the other HVAC systems. State whether these identified components are subject to an AMR and provide the relevant information within Table 2.3.3-9 to enable the staff to complete the license renewal review process. If these components are not subject to an AMR, provide justification for their exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.9-1 states that the ECR-HVAC system consists of room coolers that contain a cooling coil, a fan, and a housing. There is no ductwork attached to the cooler. There are no flexible collars, damper or door gaskets, seals, or other soft parts associated with the ECR-HVAC system.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.9-1 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.9-1 resolved.

2.3.3.9.3 Conclusions

The staff reviewed LRA Section 2.3.3.9, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the ECR-HVAC system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the ECR-HVAC system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.10 *Station Blackout Building HVAC*

2.3.3.10.1 Summary of Technical Information in the Application

The applicant described the station blackout building HVAC (SBO-HVAC) system in LRA Section 2.3.3.10 and provided a list of components subject to an AMR in LRA Table 2.3.3-10.

The SBO-HVAC system has the functions to—maintain the SBO diesel generator and support equipment ambient temperatures within an acceptable range for diesel readiness, provide annunciation of temperature abnormalities, react to fire alarm actuation, and remove hydrogen gas and diesel fumes from the building. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following SBO-HVAC system intended functions:

- C environmental control—supports the SBO diesel generators in providing AC power during a loss of offsite power and station blackout by supplying the necessary HVAC to required SBO diesel generators and auxiliaries
- C credited in regulated event(s)—system functions to prevent the spread of a fire credited in mitigation of the Appendix R fire (Quad Cities only)

Operation of the SBO-HVAC system provides heating and ventilation for the SBO diesel generator rooms, the electrical equipment rooms, and the battery rooms. The ventilation system for each diesel generator is capable of maintaining the design room conditions with the diesel generators running at full load and maintaining design room conditions in winter with the SBO diesel generators in the standby mode. The ventilation system for each electrical equipment room is capable of maintaining the design room conditions with the diesel generators running at full load. The heating systems for these rooms maintain room conditions in winter. The ventilation systems for the battery rooms have an air-cooled condensing unit, an air handling unit and an electric heater capable of maintaining the battery room at nominal design conditions. The exhaust fans in the battery rooms and the day tank rooms are interlocked with the fire system to shut down on fire alarm actuation.

In LRA Section 2.3.3.10, the applicant described the SBO-HVAC system evaluation boundary. In addition, the applicant highlighted those portions of the SBO-HVAC system and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.10. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the SBO-HVAC system in LRA Table 2.3.3-10 as being within the scope of license renewal and subject to an AMR:

- C diesel generator building HVAC (DGB-HVAC) air handlers heating/cooling (pressure boundary, Quad Cities)
- C DGB HVAC air handlers heating/cooling (heat transfer, Quad Cities)
- C debris screens (filter)
- C doors, closure bolts, and equip frames (pressure boundary)
- C duct fittings, hinges, and latches (pressure boundary)
- C flex collars, doors and damper seals (pressure boundary)
- C flow elements (pressure boundary, Dresden only)
- C tubing (pressure boundary)

2.3.3.10.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.10, Dresden UFSAR Section 9.5.9, and Quad Cities UFSAR Section 8.3.1.9 to determine whether there is reasonable assurance that the SBO-HVAC system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the SBO-HVAC system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were required by

10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the SBO-HVAC system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the SBO-HVAC system. The staff then reviewed the referenced P&I drawings to verify that those portions of the SBO-HVAC system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.10 and that the applicant identified all SBO-HVAC system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.10 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning specific items needed to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.10-1. The standby blackout building ventilation fan housings are highlighted on the ventilation flow diagrams identified in the LRA as within scope of license renewal. While ventilation fan housings are highlighted as within the scope of license renewal, ventilation fan housings are not identified in LRA Table 2.3.3-10 that identify component groups requiring AMR. The applicant should state whether the standby blackout building ventilation fan housings are within the scope of license renewal and subject to an AMR. If so, the applicant should provide the relevant information about the components in order to provide the staff with the ability to complete Table 2.3.3-10 of the LRA. If the standby blackout building ventilation fan housings are not in scope or subject to an AMR, provide justification for their exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.10-1 states that the SBO ventilation fan housings highlighted on boundary diagrams LR-DRE-M-4356-1, -2, -3, -4, and -5, and LR-QDC-M-3033-1 and -2 for the SBO-HVAC system are within the scope of license renewal and subject to an AMR. These ventilation fan housings were evaluated under the component group of "doors, closure bolts, equip frames" in LRA Table 2.3.3-10.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.10-1 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.10-1 resolved.

RAI 2.3.3.10-2. The Dresden and Quad Cities ventilation systems used to support fuel handling have not been included as part of the scoping and screening process. The applicant should state whether the ventilation systems used to support fuel handling are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4(a)(1) and (a)(2). If so, the applicant should provide the relevant information about the components to enable the staff to complete its review of the application. If the ventilation systems used to support fuel handling

are not in the scope of license renewal and subject to an AMR, provide justification for their exclusion.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.10-2 states that Dresden UFSAR Section 15.7.3.4.3.2, Airborne Effects Over the Drywell Head Cavity, addresses airborne effects associated with design basis fuel handling accidents and states the following:

If the noble gases are released within a couple of feet of the peripheral exhaust ducts, this activity would be removed within a short period of time to the reactor building exhaust plenum header. The radiation level in the exhaust duct would be sufficient to isolate secondary containment.

The Dresden UFSAR statement credits the radiation monitors in the reactor building ventilation system for isolating the system and preventing further release of noble gas to the environment. This requires the reactor building ventilation system to transport the noble gases released from a fuel handling accident to the radiation monitors to isolate the system. The above statement was the basis for inclusion of the entire reactor building ventilation system for Dresden in the scope of license renewal. The Quad Cities UFSAR contains a similar fuel handling accident scenario. However, the Quad Cities analysis does not credit the reactor building ventilation radiation monitors for isolating the ventilation system. Rather, the analysis credits the radiation monitors on the refueling floor for initiating the signal that isolates the reactor building ventilation. UFSAR Section 15.7.2.5.3, Chimney Release Rate, addresses chimney release rates associated with design basis fuel handling accidents and states the following:

The standby gas treatment system is actuated automatically on high area radiation in the reactor building in order to control the release of fission products to the atmosphere. Monitors are located near the fuel pool, and the SBGTS would be initiated prior to the escape of fission products through the regular ventilation system.

The refueling floor radiation monitors are relied upon for actuation of the SBGTS (and secondary containment isolation) for the Quad Cities fuel handling accident. Despite the fact that radiation monitors are contained in the Quad Cities reactor building ventilation system ductwork, no mention is made of these monitors in the UFSAR for this DBA. Consequently, a determination was made not to include system components other than the isolation dampers (and selected fire dampers) in the scope of license renewal.

However, further consideration of the ventilation ducting leads to the conclusion that exhaust dampers and fan configuration relative to the ventilation exhaust radiation monitors do provide a basis for adding parts of the Quad Cities ventilation ducting within the scope of license renewal. The function of the radiation monitors in the exhaust duct is to ensure that excessive radiation is not released. This is done by isolating the secondary containment when the radiation level in the building effluent is above the monitors' set point. Appropriate monitoring of all reactor building effluent is ensured by (1) maintaining the building at a slightly negative pressure relative to atmosphere, (2) monitoring the building ventilation effluent upstream of the exhaust dampers, and (3) tripping the fans and closing the intake and exhaust dampers if the permissible effluent radiation level is exceeded or if the negative pressure on the building is not maintained. The ducting between the reactor building-to-turbine building interface and the reactor building ventilation exhaust dampers must remain intact in order to ensure that all reactor building effluent is properly monitored and that there is no potential exhaust path that bypasses the radiation monitors. As such, this additional Quad Cities ventilation ductwork is

included within the scope of license renewal and will receive the same aging management as the other ductwork included within the scope.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.10-2 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.10-2 resolved.

2.3.3.10.3 Conclusions

The staff reviewed LRA Section 2.3.3.10, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the SBO-HVAC systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the SBO-HVAC system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.11 Station Blackout System (Diesel and Auxiliaries)

2.3.3.11.1 Summary of Technical Information in the Application

The applicant described the station blackout (SBO) system in LRA Section 2.3.3.11 and provided a list of components subject to an AMR in LRA Table 2.3.3-11.

The SBO system is a non-safety-related system which functions to provide an independent source of additional on-site AC power as a backup to the EDGs. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following SBO system intended functions:

- C credited in regulated event(s)—provides an alternate source of AC electrical power to plant equipment in the event of a station blackout (10 CFR 50.63)
- C credited in regulated event(s)—provides an alternate power source credited in mitigation of the Appendix R fire (Quad Cities only)

The system consists of two diesel generator (DG) sets. Each SBO DG set is an assembly consisting of two diesel engines and a generator arranged in tandem, and their associated support systems. Each SBO DG set is located in a separate DG room. The support systems included in the SBO system evaluation boundary are the SBO DG engine jacket water system, SBO DG engine exhaust/combustion air system, SBO DG engine air start system, SBO DG engine lube oil system, and SBO DG fuel oil system.

In LRA Section 2.3.3.11, the applicant described the evaluation boundary for the SBO system. In addition, the applicant highlighted those portions of the SBO system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.11. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions

within the SBO system in LRA Table 2.3.3-11 as being within the scope of license renewal and subject to an AMR:

- C air accumulator vessels (pressure boundary)
- C closure bolting (pressure boundary)
- C filters/strainers (pressure boundary)
- C filters/strainers, including separators (pressure boundary)
- C flexible hoses (pressure boundary)
- C flow elements (pressure boundary)
- C heat exchangers, including coolers and heat exchangers (pressure boundary)
- C heat exchangers, including coolers and heat exchangers (heat transfer)
- C lubricators (pressure boundary)
- C mufflers (pressure boundary)
- C piping and fittings, including heaters, orifices, and thermowells (pressure boundary)
- C piping and fittings, including restricting orifices (pressure boundary)
- C pumps (pressure boundary)
- C pumps (throttle, Dresden only)
- C restricting orifices (pressure boundary)
- C restricting orifices (throttle)
- C sight glasses (pressure boundary)
- C tanks (pressure boundary)
- C thermowells (pressure boundary)
- C tubing (pressure boundary)
- C turbochargers (pressure boundary)
- C valves (pressure boundary)

2.3.3.11.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.11, Dresden UFSAR Section 9.5.9, and Quad Cities UFSAR Section 8.3.1.9 to determine whether there is reasonable assurance that the SBO system components, within the scope of license renewal and subject to an AMR, have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the SBO system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the SBO system that are within the scope of license renewal and subject to an AMR, in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the SBO system. The staff then reviewed the referenced P&I drawings to verify that those portions of the SBO system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.11 and that the applicant identified all SBO system components within the

scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the SBO system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.11 and that the SBO system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-11. The staff did not identify any omissions.

2.3.3.11.3 Conclusions

The staff reviewed LRA Section 2.3.3.11 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the SBO system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the SBO system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.12 Diesel Generator Cooling Water System

2.3.3.12.1 Summary of Technical Information in the Application

The applicant described the diesel generator cooling water (DGCW) system in LRA Section 2.3.3.12 and provided a list of components subject to an AMR in LRA Table 2.3.3-12.

The primary function of the DGCW system is to provide cooling water to the EDGs. In addition, at Quad Cities, the DGCW system provides cooling water to the ECCS room coolers to ensure the proper environment for ECCS pump operation. Also, at Dresden, the DGCW system provides an alternate water supply for the CCSW keep fill system.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following DGCW system intended functions:

- C supports emergency supply of AC power—provides cooling water to emergency diesel generator heat exchangers and engine jacket cooling
- C support ESF function(s) (Quad Cities only)—provides cooling water to ECCS room coolers to ensure proper environment for ECCS pump operation
- C provides structural support—non-safety-related portions of this system provide structural support to attached safety-related piping
- C credited in regulated event(s)—provides cooling water to safe shutdown equipment credited in mitigation of the Appendix R fire

At Dresden, three motor driven submersible pumps take suction in the cribhouse and provide cooling water to the DGCW heat exchangers. The DGCW return water is then routed back to

the SW discharge pipe. A cross-tie connection piping is provided between the DGCW systems of Unit 2 and Unit 3. The DGCW pumps may also be used as the alternate safety-related water supply to the CCSW keep fill system which is normally supplied by SW system.

At Quad Cities, the DGCW pumps take suction from the RHR SW inlet header. These pumps provide cooling water to the EDG heat exchangers and to the room coolers of the HPCI room, the RHR rooms, the CS rooms, and the diesel generator cooling water pump cubicle, and ultimately discharge into the SW discharge pipe.

The applicant described the evaluation boundary for the DGCW system in LRA Section 2.3.3.12. In addition, the applicant highlighted those portions of the DGCW system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.12. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the DGCW system in LRA Table 2.3.3-12 as being within the scope of license renewal and subject to an AMR:

- C DGB-HVAC air handlers heating/cooling, including DGCW pump cubicle coolers (pressure boundary, Quad Cities only)
- C DGB-HVAC air handlers heating/cooling, including DGCW pump cubicle coolers (heat transfer, Quad Cities only)
- C closure bolting (pressure boundary)
- C doors, closure bolts, and equipment frames (pressure boundary, Quad Cities only)
- C non-safety-related (NSR) vents or drains, piping, and valves (structural integrity/attached support)
- C orifice bodies (pressure boundary)
- C orifice bodies (throttle)
- C orifice bodies (structural integrity/attached support, Quad Cities)
- C piping and fittings, including flow elements (pressure boundary)
- C piping and fittings (structural integrity/attached support)
- C pulsation dampeners (structural integrity/attached support, Quad Cities)
- C pumps (pressure boundary)
- C strainer bodies (pressure boundary, Dresden only)
- C strainer screens (filter, Dresden only)
- C thermowells (pressure boundary)
- C tubing (pressure boundary)

C valves (pressure boundary)

C valves (structural integrity/attached support)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of non-safety-related sections of the DGCW system at Quad Cities were expanded and highlighted as shown on the revised boundary diagrams and an additional new boundary diagram. Additional piping and components, including a gland seal water tank, piping, valves, and associated instrumentation, from the DGCW system at Quad Cities were added to the scope of license renewal. The applicant stated that the DGCW system did not require a boundary expansion at Dresden because of a different diesel cooling water pump design that does not require gland seal water.

The applicant identified the following additional component groups and their intended functions within the DGCW system as being within the scope of license renewal, and added them to LRA Table 2.3.3-12 being subject to an AMR:

C tanks (spatial interaction, Quad Cities only)

C valves (spatial interaction)

C piping and fittings (spatial interaction)

2.3.3.12.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.12, Dresden UFSAR Sections 7.4.2 and 9.5.5, and Quad Cities UFSAR Sections 3.4.1.2, 6.3.2, and 9.5.5 to determine whether there is reasonable assurance that the DGCW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the DGCW system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the DGCW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the DGCW system. The staff then reviewed the referenced P&I drawings to verify that those portions of the DGCW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.12 and that the applicant identified all DGCW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the DGCW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.12. The DGCW system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-12. The staff did not identify any omissions.

2.3.3.12.3 Conclusions

The staff reviewed LRA Section 2.3.3.12 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the DGCW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the DGCW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.13 Diesel Fuel Oil System

2.3.3.13.1 Summary of Technical Information in the Application

The applicant described the diesel fuel oil (DFO) system in LRA Section 2.3.3.13 and provided a list of components subject to an AMR in LRA Table 2.3.3-13.

The function of the DFO system is to store and supply DFO for the EDGs, the SBO DGs, the diesel fire pumps, and (at Dresden only) the isolation condenser makeup pump diesels. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following DFO system intended functions:

- C support ESF function(s)—stores and provides a source of clean diesel fuel oil to the emergency diesel generators which supply on-site AC power to ESF systems
- C credited in regulated events—stores and provides oil to the diesel fire pump (10 CFR 50.48) and the isolation condenser system (at Dresden only) diesel
- C preclude adverse effects on safety-related SSCs-maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

A separate fuel oil storage and transfer system, consisting of tanks, pumps, filters, strainers, and associated piping, valves, and instrumentation and controls, is provided for each EDG. Each storage and transfer system includes a fuel oil storage tank and a fuel oil day tank. Fuel is transferred from the fuel oil storage tank to the fuel oil day tank by the diesel fuel oil transfer pump. Transfer is accomplished automatically by level switches on the day tank. Fuel oil from the fuel oil day tank is drawn through the engine-driven fuel oil pump and discharged through the duplex fuel oil filter and on to the diesel engine injectors. Any excess fuel is returned to the fuel oil day tank. At Dresden, the Unit 2 EDG fuel oil transfer system also supplies fuel oil to the isolation condenser makeup pump fuel oil day tanks and the Unit 3 EDG fuel oil transfer system also supplies fuel oil to the Unit 2/3 diesel fire pump day tank. At Quad Cities, the Unit 1 and

Unit 2 EDG fuel oil transfer systems also supply fuel oil for the diesel fire pump day tanks.

The applicant described the evaluation boundary for the DFO system in LRA Section 2.3.3.13. In addition, the applicant highlighted those portions of the DFO system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.13. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the DFO system in LRA Table 2.3.3-13 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C filters/strainers (pressure boundary)
- C filters/strainers (filter)
- C flame arrestors (fire barrier)
- C piping and fittings (pressure boundary)
- C piping and fittings (structural integrity/attached support)
- C pumps (pressure boundary)
- C restricting orifices (pressure boundary, Quad Cities only)
- C tubing (pressure boundary)
- C sight glasses (pressure boundary)
- C tanks (pressure boundary)
- C valves (pressure boundary)
- C valves (structural integrity/attached support)

2.3.3.13.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.13, Dresden UFSAR Section 9.5.4, and Quad Cities UFSAR Section 9.5.4 to determine whether there is reasonable assurance that the DFO system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the DFO system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the DFO system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the DFO system. The staff then reviewed the referenced P&I drawings to verify that those portions of the DFO system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.13 and that the applicant identified all DFO system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the DFO system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.13. The DFO system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-13. The staff did not identify any omissions.

2.3.3.13.3 Conclusions

The staff reviewed LRA Section 2.3.3.13 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the DFO system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the DFO system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.14 *Process Sampling System*

2.3.3.14.1 Summary of Technical Information in the Application

The applicant described the process sampling system in LRA Section 2.3.3.14 and provided a list of components subject to an AMR in LRA Table 2.3.3-14.

The process sampling systems/subsystems are used to monitor process parameters from various systems. Samples are taken and analyzed on a continuous and/or laboratory basis. Selected parameters are recorded and/or alarmed. At Dresden, the process sampling systems include nitrogen inerting and drywell oxygen sampling, turbine building and radwaste air particulate sampling, drywell air particulate sampling, and off-gas building air particulate sampling. At Quad Cities, the process sampling systems include drywell oxygen analysis, drywell air particulate, and turbine building particulate sampling. Sample lines that penetrate the primary containment are provided with isolation valves.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following intended process sampling system function:

- C primary containment isolation—provides isolation of air sampling system piping penetrating primary containment

At Dresden, the evaluation boundary includes the process sampling systems for nitrogen inerting and drywell oxygen sampling, drywell air particulate sampling, turbine building and radwaste air particulate sampling, and off-gas building air particulate sampling. At Quad Cities, the evaluation boundary includes the process sampling systems for drywell oxygen analysis, drywell air particulate, turbine building particulate sampling, and off-gas filter building continuous air monitor.

In LRA Section 2.3.3.14, the applicant described the evaluation boundary of the process sampling system. In addition, the applicant highlighted those portions of the system and its structures and components that are within the scope of the Rule in the P&I drawings listed as

reference in LRA Section 2.3.3.14. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the process sampling system in LRA Table 2.3.3-14 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C NSR vents or drains, piping and valves (structure integrity/attached support, Quad Cities only)
- C piping and fittings (structure integrity/attached support, Quad Cities only)
- C piping and fittings (pressure boundary, Quad Cities only)
- C tubing (pressure boundary)
- C valves (pressure boundary)
- C valves (leakage boundary spatial interaction, Quad Cities only)
- C valves (structure integrity/attached support,) (Quad Cities only)

2.3.3.14.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.14, and Dresden UFSAR Sections 1.2.2.4, 5.2.5.6.1, 6.2.1, 7.3.2, and 9.3.2 and Quad Cities UFSAR Sections 1.2, 5.2, 6.2, 7.3, and 9.3.2 to determine whether there is reasonable assurance that the process sampling system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the process sampling system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the process sampling system that are within the scope of license renewal and subject to an AMR, in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the process sampling system. The staff then reviewed the referenced P&I drawings to verify that those portions of the process sampling system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.14 and that the applicant identified all process sampling system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.14 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant responses, dated October 3, 2003, are described below.

RAI 2.3.3.14-1. Line 1-1655-2"-L is shown on process sampling (PS) diagram LR-QDC-461-1 (E-5) requiring AMR and extends to drawing M-34-1 (C-6). The LR interface for AMR between PS and other systems for this line is not shown on drawing M-34-1. Similarly line 2-1655-2"-L is shown on PS diagram LR-QDC-M-463-1 (C-3) and extends to drawing M-76-1 (C-5). The LR interface for AMR between PS and other systems for this line is not shown on drawing M-76-1. The staff asked the applicant to identify the boundary for these lines between PS and other systems and where the LRA addresses the AMR of these components, or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.14-1 stated that piping and piping components shown on boundary diagram LR-QDC-M-461-1, highlighted in green, fall within the scope of license renewal and require aging management. Piping shown on boundary diagram LR-QDC-M-461-1 at coordinate E-5 (includes valves 1-8803 and 1-8804) was evaluated with the PC system. Boundary diagram LR-QDC-461-1 should have included the LR boundary flag for the PC system at valve 1-8803. Remaining portions of pipe highlighted in green on boundary diagram LR-QDC-M-461-1, were evaluated with either the process sampling or primary containment systems as shown by the LR interface boundary flag on the boundary diagram.

Piping and piping components shown on boundary diagram LR-QDC-M-463-1, highlighted in green, fall within the scope of license renewal and require aging management. Piping on boundary diagram LR-QDC-M-463-1 at coordinate C-2 (includes valves 2-8803 and 2-8804) was evaluated with the PC system. Boundary diagram LR-QDC-463-1 should have included the LR boundary flag for the PC system at valve 2-8803. Remaining portions of pipe, highlighted in green on boundary diagram LR-QDC-M-463-1, were evaluated with either the process sampling or primary containment systems as shown by the LR interface boundary flag on the drawing.

LRA Table 2.3.2-3 includes those components evaluated within the PC system boundary and provides the appropriate aging management reference for each component group. LRA Table 2.3.3-14 includes those components evaluated within the process sampling system boundary and provides the appropriate aging management reference for each component group. Boundary diagrams LR-QDC-M-461-1 and LR-QDC-463-1 should have included the appropriate system boundary flags.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.14-1 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.14-1 resolved.

RAI 2.3.3.14-2. Line 2-9224 on drawing LR-DRE-M-178 (E-6) and line 3-9224 on drawing LR-DRE-M-421 (C-6) requiring AMR shows coming from main steam tunnel but no drawing number and coordinates of main steam tunnel are given for these lines. Similarly line 2-9203 on

drawing LRE-DRE-M-178 (F-6) and line 3-9203 on drawing LRE-DRE-M-421 (C-9) requiring AMR shows coming from drawings M-25 and M-356 but no coordinates of M-25 and M-356 are given for these lines. The staff asked the applicant to identify the above drawing numbers and coordinates for lines 2-9224, 3-9224, 2-9203, and 3-9204. The staff also asked the applicant to identify the boundary break between PS and other systems for these lines and associated valves and where the LRA addresses the AMR of these components, or provide a justification for excluding these component from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.14-2 stated that as shown on boundary diagrams LR-DRE-M-178 and LR-DRE-M-421, the PS system piping and tubing highlighted in green is safety-related and provides a pressure retaining function. This piping and tubing is evaluated with the PS system and is in the scope of license renewal requiring AMR. The piping is skid mounted (rigid) and was provided by the vendor. Piping and piping components beyond the safety-related PS system boundary (colored in black) are evaluated with the PS system and are outside the scope of license renewal.

On boundary diagram LR-DRE-M-178 (E-6 and F-6), line 2-9224-1/2"-T is air sample tubing and line 2-9203-1/2"-AK is air sample piping that are not connected to the process piping and do not continue from any other boundary diagram. The arrow shown on boundary diagram LR-DRE-M-178 (that includes valves 2-8507-523, 2-8599-652, 2-8507-501, and 2-8599-630) indicates that the piping comes from the main steam tunnel and drywell. The piping is open to the atmosphere to draw air samples from the area.

LRA Section 2.3.3.14, Table 2.3.3-14, includes components evaluated within the PS system boundary and provides the appropriate aging management reference for each component group. The components within the scope of license renewal are evaluated for AMR as follows:

- C AMR for the valves is addressed in aging management references 3.3.2.23, 3.3.2.40, 3.3.2.264, and 3.3.2.295.
- C AMR for tubing is addressed in aging management references 3.3.2.42, 3.3.2.254, 3.3.2.34, and 3.3.2.244.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.14-2 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.14-2 resolved.

2.3.3.14.3 Conclusions

The staff reviewed LRA Section 2.3.3.14, accompanying scoping boundary drawings and the applicant's response to RAIs dated October 3, 2003, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the process sampling system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the process sampling system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.15 Carbon Dioxide System

2.3.3.15.1 Summary of Technical Information in the Application

The applicant described the carbon dioxide (CO₂) system in LRA Section 2.3.3.15 and provided a list of component groups subject to an AMR in LRA Table 2.3.3.15. The CO₂ system provides fire suppression for three emergency diesel generator rooms, the two alternator exciters in the main generator housings, and, at Dresden only, the auxiliary equipment room. The system also provides for generator purging.

2.3.3.15.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.15 and referenced LRA boundary drawings to determine whether there is reasonable assurance that the CO₂ system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that were required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

In a letter dated August 4, 2003, the staff requested that the applicant clarify the boundary of the in-scope portions of the system to verify that the discharge nozzles are included or to justify their exclusion (RAI 2.3.3.15-1a). In a letter dated October 3, 2003, the applicant responded that the CO₂ discharge nozzles for Dresden are included within the scope of license renewal and are subject to the same AMR as the Quad Cities CO₂ discharge nozzles. The CO₂ discharge nozzles are addressed in LRA Table 2.3.3-15 under the component group "piping and fittings." Aging management reference 3.3.1.5 addresses the aging management of the external surface of the carbon steel CO₂ discharge nozzles. Aging management reference 3.3.2.138 addresses the aging management of the internal surface of the CO₂ discharge nozzles. LRA boundary drawing, LR--DRE-M-42 should have highlighted the CO₂ fire suppression system discharge nozzles indicating that they were within the scope of license renewal. The staff finds the applicant's response acceptable as it clarifies the components within the scope of license renewal.

In a letter dated August 4, 2003, the staff also requested that the applicant clarify which components of these systems are addressed in the references in LRA Table 2.3.3.15 and Table 3.3.1 (RAI 2.3.3.15-1b). In a letter dated October 3, 2003, the applicant responded that the CO₂ storage tank, valves, and other components fall within the scope of license renewal and are subject to an AMR. They are included under component groups "piping and fittings," "tanks," "tubing," and "valves" in LRA Table 2.3.3.15. The external surface of these components is evaluated in aging management reference 3.3.1.5 and the internal surfaces are evaluated in aging management references 3.3.2.138, 3.3.2.212, 3.3.2.234, 3.3.2.260, and 3.3.2.268. The staff finds the response provided by the applicant acceptable as it clarifies which components are specifically referred to by reference 3.3.1.5.

LRA boundary drawing LR-QDC-M-30-3 does not show the 7.5 ton CO₂ tank as within the scope of license renewal. This is inconsistent with LRA boundary drawing LR-DRE-M-42. The staff believes that the CO₂ storage tank should be within the scope of license renewal and subject to an AMR. In a letter dated August 4, 2003, the applicant was asked to clarify whether

the CO₂ storage tank at Quad Cities is in scope and subject to an AMR or provide justification for its exclusion (RAI 2.3.3.15-1b). In a letter dated October 3, 2003, the applicant responded that the 7.5 ton CO₂ tank falls within the scope of license renewal. LRA boundary drawing LR-QDC-M-30-3 should have highlighted the 7.5 ton CO₂ tank as within the scope of license renewal. These tanks are addressed in LRA Table 2.3.3-15 under the component group “tanks.” Aging management reference 3.3.1.5 addresses the aging management of the external surface of the carbon steel CO₂ tanks and aging management reference 3.3.2.212 addresses the aging management of the internal surface. The staff finds the applicant’s response acceptable on the basis that it clarifies that the 7.5 ton CO₂ tank is within the scope of license renewal and subject to an AMR.

2.3.3.15.3 Conclusions

The staff reviewed LRA Section 2.3.3.15, the accompanying scoping boundary drawings, and the applicant’s response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the CO₂ fire suppression system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the CO₂ fire suppression system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.16 Service Water System

2.3.3.16.1 Summary of Technical Information in the Application

The applicant describes the service water (SW) system in LRA Section 2.3.3.16 and provides a list of components subject to an AMR in LRA Table 2.3.3-16.

The function of the SW system is to provide strained river water to cool various loads in the reactor building, turbine building, and auxiliary building during plant normal operation. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following SW system intended functions:

- C preclude adverse effects on safety-related SSCs’s—maintains sufficient integrity of non-safety-related components that could spatially interact and be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected
- C structural support—non-safety-related portions of this system provide structural support to attached safety-related piping (Quad Cities only)
- C pressure boundary—maintain pressure boundary of the CCSW keep fill line (Dresden only)
- C support ESF function(s)—provides cooling water to ECCS room coolers to ensure proper environment for ECCS pump operation (Dresden only)
- C credited in regulated event(s)—provides cooling water to safe shutdown equipment credited in mitigation of the Appendix R fire (Dresden only)

- C emergency makeup—provides an alternate supply of water for makeup to the isolation condenser (Dresden only)
- C plant component cooling—provide strained cooling water to the RBCCW (Dresden only)

The SW system has five pumps, three strainers, and a common distribution header. Two SW pumps are provided per unit, and the fifth shared pump is used as a backup. The system is cross connected between the units. The majority of the loads are heat exchangers, coolers, and condensers.

The SW system provides cooling to the heat exchangers, turbine building closed cooling water heat exchangers, traveling screen wash spray, fire protection system, turbine oil coolers, reactor recirculation pump motor generator (M-G) set oil coolers, generator hydrogen coolers, generator stator water coolers, standby coolant supply, control room air conditioning condensers, auxiliary electric equipment room air conditioning condenser (Dresden only), off-gas glycol chillers, X-area (Dresden)/MSIV room (Quad Cities) coolers (steam tunnel coolers), off-gas filter building sample system heat exchanger, and control rod drive pump coolers (Dresden only, and only as a backup to turbine building closed cooling water heat exchangers).

The applicant described the evaluation boundary of the SW system in LRA Section 2.3.3.16. In addition, the applicant highlighted those portions of the SW system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.16. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the component groups and their intended functions within the SW system in LRA Table 2.3.3-16 as being within the scope of license renewal and subject to an AMR.

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1 and clarified in a letter, dated June 22, 2004, the applicant expanded the system boundaries for the SW system at both Dresden and Quad Cities due to the potential for spatial interaction with safety-related components. The applicant included all of the SW components shown on revised boundary diagrams LR-QDC-M-22-4, LR-QDC-M-22-5, LR-QDC-M-69-4, LR-QDC-M-69-5, LR-DRE-M-22, LR-DRE-M-355 within the scope of license renewal. The applicant included in the scope additional service water piping components shown on revised boundary diagrams LR-QDC-M-69-1 and LR-QDC-M-22-1 and new boundary diagrams LR-DRE-M-1011-5 and LR-DRE-M-3496. These changes resulted in adding three component groups to LRA Table 2.3.3-16.

The applicant included non-safety-related heat exchangers (e.g., 1B-3802 at location E-5 on revised boundary diagram LR-QDC-M-22-1), oil coolers (e.g., 2-202-51C at location F-2 on revised boundary diagram LR-DRE-M-22), and generator stator water coolers (e.g., 3-7002-A at location E-10 on revised boundary diagram LR-DRE-M-355) in scope for the spatial interaction intended function and evaluated them with the component group, piping and fittings (spatial interaction), on Table 2.3.3-16 for AMR. The heat exchanger (cooler) leakage boundary is comprised of the same materials and experiences the same environment as the components evaluated under the component group, piping and fittings (spatial interaction).

The following is the component groups and their intended functions within the SW system in the revised LRA Table 2.3.3-16 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C flow orifices (structural integrity/attached support, Quad Cities only)
- C orifice bodies (pressure boundary, Dresden only)
- C orifice bodies (throttle, Dresden only)
- C piping and fittings (spatial interaction) (includes heat exchanger shells)
- C piping and fittings (pressure boundary, Dresden only)
- C piping and fittings (structural integrity/attached support, Quad Cities only)
- C pumps (pressure boundary, Dresden only)
- C strainer bodies (pressure boundary, Dresden only)
- C strainer bodies (filter)
- C strainer bodies (spatial interaction) (leakage boundary, Quad Cities only)
- C tanks (spatial interaction) (leakage boundary, Dresden only)
- C thermowells (pressure boundary, Dresden only)
- C tubing (pressure boundary, Dresden only)
- C tubing (spatial interaction) (leakage boundary)
- C valves (spatial interaction)
- C valves (structural integrity/attached support)
- C valves (pressure boundary, Dresden only)

2.3.3.16.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.16, Dresden UFSAR Section 9.2.2, and Quad Cities UFSAR Section 9.2.2. Additionally, the staff reviewed other UFSAR sections that discussed the SW system to determine whether there is reasonable assurance that the SW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). At Dresden, these sections included 1.2, 2.4, 3.3.2, 3.4.1, 3.6.1, 5.4.6, 6.0.3, 6.2, 6.3.2, 6.4.2, 7.5.3, 9.1.3, 9.2.1, 9.2.3, 9.2.5, 9.2.7, 9.2.8, 9.4.6, 9.5.5, 11.0, 11.2, 11.5, 14.2.4, and 15.6.5. At Quad Cities, these sections included 1.2, 2.2.3, 3.7.3, 6.0, 6.1.10, 6.3.2, 6.4.2, 8.3.1, 9.1.3, 9.2.3, 9.2.7, 9.2.8, 9.3.1, 9.3.5, 9.5.1, 9.5.5, 11.5.2, and 14.2.12. The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the SW system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the SW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the SW system. The staff then reviewed the referenced P&I drawings to verify that those portions of the SW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.16, and that the applicant identified all SW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.16 identified one area in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued an RAI to the applicant concerning the specific item needed to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAI and the applicant's response by letter dated October 3, 2003, are described below.

RAI-2.3.3.16-1. The staff observed that there are no references to buried piping in Table 2.3.3-16 of the LRA. RA and asked the applicant to provide the basis for not identifying any buried SW piping in Table 2.3.3-16.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.16-1 is that it reviewed LRA Section 2.3.3.16, Table 2.3.3-16, and agree with NRC staff that there is no aging management reference in Table 2.3.3-16 for the external surface of buried piping. The buried SW piping is included within the scope of license renewal. Section 2.3.3.16, Table 2.3.3-16, should have included the subject buried piping under the component group "piping and fittings (Dresden only)," with "pressure boundary" as the component intended function. Aging management reference 3.3.1.16 discusses the aging management of the buried piping external surfaces as a carbon steel component in open-cycle cooling water system (service water). Aging management reference 3.3.1.15 discusses the aging management of the piping internal surfaces as a carbon steel component in open-cycle cooling water system (service water). Aging management reference 3.3.1.16 was inadvertently omitted from LRA Section 2.3.3.16, Table 2.3.3-16. Aging management reference 3.3.1.16 should have been included in Table 2.3.3-16 as an aging management reference for buried SW piping.

Based on its review, the staff finds the applicant's response to RAI 2.3.3.16-1 acceptable because the applicant (1) agrees with the staff that there is no aging management reference in LRA Table 2.3.3-16 for the external surface of buried piping; (2) has clarified that the subject buried SW piping is included within the scope of the Rule; and (3) acknowledges that aging management reference 3.3.1.16 was inadvertently omitted from LRA Table 2.3.3-16 that should have included the subject buried piping under the component group "piping and fittings (Dresden only)," with "pressure boundary" as the component intended function. Therefore, the staff considers its concern described in RAI 2.3.3.16-1 resolved.

2.3.3.16.3 Conclusions

The staff reviewed LRA Section 2.3.3.16, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the SW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the SW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.17 Reactor Building Closed Cooling Water System

2.3.3.17.1 Summary of Technical Information in the Application

The applicant described the reactor building closed cooling water system (RBCCW) in LRA Section 2.3.3.17 and provided a list of components subject to an AMR in LRA Table 2.3.3-17.

The function of the RBCCW system is to provide cooling for equipment and systems in the reactor. For Dresden only, the system also provides cooling water to the shutdown cooling heat exchangers. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following RBCCW system intended functions:

- C primary containment isolation—provide primary containment isolation for those portions of the system that interface with the primary containment
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected
- C credited in regulated event(s) (Dresden only)— provides cooling water to the shutdown cooling heat exchangers to achieve and maintain cold shutdown during an Appendix R fire (at Dresden and Quad Cities the system also contains components that are relied upon for compliance with 10 CFR 50.49 (EQ))

The RBCCW system is a closed loop system. An expansion tank is connected to the common RBCCW pump suction header to ensure adequate net positive suction head for the pumps (two for each unit, with one additional shared spare). The pumps discharge into a common header from which cooling water is provided to loads arranged in several loops. One loop provides cooling to reactor building auxiliary loads such as the reactor water cleanup nonregenerative heat exchangers, the fuel pool heat exchangers, and the reactor building equipment drain tank heat exchanger. A loop inside the primary containment provides cooling to the primary containment coolers, primary containment equipment drain sump heat exchanger, and the reactor recirculation pump seals and motor oil coolers. For Dresden only, a loop also provides cooling to the shutdown cooling heat exchangers to achieve and maintain cold shutdown during an Appendix R fire. The loops all discharge into a common header at the inlet to the RBCCW heat exchangers (also two for each unit with one additional shared spare). The RBCCW discharge from the heat exchangers flows back into the RBCCW pump suction header. The SW system cools the RBCCW heat exchangers.

Primary containment isolation valves are provided for the RBCCW lines penetrating the primary containment.

In LRA Section 2.3.3.17, the applicant described the evaluation boundary of the RBCCW system. In addition, the applicant highlighted those portions of the RBCCW system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.17. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the component groups and their intended functions within the RBCCW system in LRA Table 2.3.3-17 as being within the scope of license renewal and subject to an AMR.

Resulting from the revised methodology described in the response to the draft SER Open Item 2.1-1 and clarified in a letter, dated June 22, 2004, the applicant expanded the system boundaries for the RBCCW system at both Dresden and Quad Cities due to the potential for spatial interaction with safety-related components. The applicant added all of the RBCCW components shown on revised boundary diagrams LR-DRE-M-20, LR-DRE-M-353, LR-QDC-M-33-1, LR-QDC-M-33-2, LR-QDC-M-75-1, and LR-QDC-M-75-2 to the scope of license renewal. These changes resulted in adding two component groups to LRA Table 2.3.3-17.

The following is component groups and their intended functions within the RBCCW system in the revised LRA Table 2.3.3-17 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C flow elements (pressure boundary, Dresden only)
- C heat exchangers (pressure boundary, Dresden only)
- C heat exchangers (heat transfer, Dresden only)
- C heat exchangers (spatial interaction) (leakage boundary (spatial))
- C manifolds (pressure boundary, Dresden only)
- C NSR vents or drains, piping and valves (attached support) (structural integrity (attached), Quad Cities only)
- C Orifice bodies (pressure boundary, Dresden only)
- C piping and fittings (pressure boundary)
- C piping and fittings, including flow elements (spatial interaction) (leakage boundary (spatial))
- C piping and fittings (structural integrity/attached support, Quad Cities only)
- C pumps (pressure boundary, Dresden only)
- C pumps (spatial interaction) (leakage boundary (spatial))
- C tanks (pressure boundary, Dresden only)
- C tanks (spatial interaction) (leakage boundary (spatial))
- C thermowells (pressure boundary, Dresden only)
- C tubings (pressure boundary, Dresden only)
- C tubings (spatial interaction) (leakage boundary (spatial))
- C valves (pressure boundary)
- C valves (spatial interaction)
- C valves (structural integrity/attached support, Quad Cities only)

2.3.3.17.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.17, Dresden UFSAR Section 9.2.3, and Quad Cities UFSAR Section 9.2.3. Additionally, the staff reviewed other UFSAR sections that discussed the RBCCW system to determine whether there is reasonable assurance that the RBCCW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). At Dresden, these sections included 1.2, 3.6.2, 3.8, 5.2.5, 5.4.7, 6.2.1, 7.4.2, 9.1.2, 9.1.3, 9.3.2, 9.4.8, 11.5, and 14.2.4. At Quad Cities, these sections included 1.2, 5.2.5, 5.4.7, 5.4.8, 6.2.1, 9.1.3, 9.3.3, 9.4.7, and 11.5. The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the RBCCW system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the RBCCW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff reviewed and compared the referenced P&I drawings to the system drawings and descriptions in the UFSARs to ensure that they were representative of the RBCCW system. The staff then reviewed the referenced P&I drawings to verify that those portions of the RBCCW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.17, and that the applicant identified all RBCCW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the RBCCW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.17. The RBCCW system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-17. The staff did not identify any omissions.

2.3.3.17.3 Conclusions

The staff reviewed LRA Section 2.3.3.17 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the RBCCW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the RBCCW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.18 Turbine Building Closed Cooling Water System

2.3.3.18.1 Summary of Technical Information in the Application

The applicant described the turbine building closed cooling water (TBCCW) system in LRA Section 2.3.3.18 and provided a list of components subject to an AMR in LRA Table 2.3.3-18.

The function of the TBCCW system is to provide the means for heat rejection from systems located in the turbine building and crib house. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following TBCCW system intended function:

- C credited in regulated event(s) (Dresden only)—provides flow path for control rod drive pump cooling during an Appendix R fire

The TBCCW system is a closed loop system consisting of pumps, heat exchangers, an expansion tank, and necessary control and support equipment. The system removes heat from

the following loads—circulating water pumps, feed pump lube oil and mechanical seal coolers, condensate and condensate booster pump seal coolers, CRD pump seal coolers, instrument air compressors, resin transfer air compressors, service air compressors, radwaste sparging air compressors, electrohydraulic control (EHC) oil coolers, bus duct coolers, and main generator alternator exciter cooler. Station SW provides the cooling medium on the tube side of the TBCCW heat exchangers.

In LRA Section 2.3.3.18, the applicant described the evaluation boundary of the TBCCW system. In addition, the applicant highlighted those portions of the TBCCW system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.18. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the component groups and their intended functions within the TBCCW system in LRA Table 2.3.3-18 as being within the scope of license renewal and subject to an AMR.

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1 and clarified in a letter, dated June 22, 2004, the applicant expanded the system boundaries for the TBCCW system at Dresden Station due to the potential for spatial interaction with safety-related components. Specifically, the applicant added all of the TBCCW pumps, heat exchangers, piping, valves, surge tank, and other passive system components to the scope of license renewal. The applicant added all of the components shown on revised boundary diagrams LR-DRE-M-21, LR-DRE-M-354-1 and LR-DRE-M-354-2 to the scope of license renewal. Additional components added to the scope along with system boundary flags are shown on revised boundary diagrams LR-DRE-M-37-7, LR-DRE-M-37-10, LR-DRE-M-177-1, LR-DRE-M-177-4, LR-DRE-M-178, LR-DRE-M-419-1, LR-DRE-M-419-4, LR-DRE-M-420, LR-DRE-M-421 and new boundary diagrams LR-DRE-M-177-3, LR-DRE-M-367-4, and LR-DRE-M-367-6.

The applicant previously excluded the TBCCW system at Quad Cities from the scope of license renewal. However, the applicant added the TBCCW system at Quad Cities to the scope of license renewal as a result of the scoping methodology change. Specifically, the applicant added all of the TBCCW pumps, heat exchangers, piping, valves, surge tank, and other passive system components to the scope due to the potential for spatial interaction with safety-related components in the same general area. The applicant added equipment highlighted on revised boundary diagram LR-QDC-M-462-3, and new boundary diagrams LR-QDC-M-21, LR-QDC-M-68, LR-QDC-M-459-1, LR-QDC-M-459-3, and LR-QDC-M-462-1 to the scope of license renewal. These changes resulted in adding three component groups to LRA Table 2.3.3-18.

The applicant included non-safety-related heat exchangers (e.g., cooling water heat exchangers, 1A-3802 at location D-3 on revised boundary diagram LR-QDC-M-21) and coolers (e.g., the alternator cooler at location E-9 on revised boundary diagram LR-QDC-M-21) in scope for the spatial interaction intended function and evaluated them with the component group, piping and fittings (spatial interaction), on Table 2.3.3-18 for AMR. The heat exchanger (cooler) leakage boundary is comprised of the same materials and experiences the same environment as the components evaluated under the component group, piping and fittings (spatial interaction).

The following is component groups and their intended functions within the TBCCW system in the revised LRA Table 2.3.3-18 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C heat exchangers (pressure boundary)
- C piping and fittings (pressure boundary)
- C piping and fittings (spatial interaction) (includes heat exchanger shells) (leakage boundary (spatial))
- C pumps (spatial interaction) (leakage boundary (spatial))
- C tanks (spatial interaction) (leakage boundary (spatial))
- C valves (pressure boundary)
- C valves (spatial interaction) (leakage boundary (spatial))

2.3.3.18.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.18 and Dresden UFSAR Sections 9.2.7, 9.3.1, and 14.2.4 to determine whether there is reasonable assurance that the TBCCW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the TBCCW system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the TBCCW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSAR to ensure that the referenced P&I drawings were representative of the TBCCW system. The staff then reviewed the referenced P&I drawings to verify that those portions of the TBCCW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.18, and that the applicant identified all TBCCW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.18 identified one area in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued an RAI to the applicant concerning the specific item to determine whether the applicant has properly applied the scoping criteria of 10 CFR 54.4 and the screening criteria of 10 CFR 54.21. The staff's RAI and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI-2.3.3.18-1. The staff observed that on the TBCCW system piping flow diagram, LR-DRE-M-21, the control rod drive system drain valve 2-3868-B-500 (for pump 2-382-3B) and associated piping from the header to the drain valve are not shown in scope. The corresponding piping and drain valve (2-3868-A-500) for the pump 2-382-3A is shown in scope on LR-DRE-M-21. Also, not shown in scope is a portion of the piping from valve 2-3837-A-500 to the drain valve 2-3867-A-500 (near pump 2-382-3A). Failure of these lines could prevent the

system from performing its intended function, which is to provide a flow path for control rod drive pump cooling during an Appendix R fire. The piping is passive, long lived, and not subject to qualified life or specified time period, and it performs an intended safety function of maintaining system integrity. The staff asked the applicant to provide the basis for exclusion of the valve and piping identified above.

Applicant's Response and Staff's Evaluation

In its response to RAI 2.3.3.18-1, the applicant stated that it believes that the staff intended to reference pumps 2-302-3A and 2-302-3B, rather than 2-382-3A and 2-382-3B.

The control rod drive system drain valve 2-3868-B-500 (for pump 2-302-3B), and the associated piping from the header to the drain valve 2-3868-B-500 (coordinate C-4) on the boundary diagram, should have been highlighted in green. Also, the portion of the piping from valve 2-3837-A-500 to the drain valve 2-3867-A-500 (near pump 2-302-3A), including the drain valve (coordinate D-4), should have been highlighted in green. The subject valves and piping are in scope of license renewal. LRA Section 2.3.3.18, Table 2.3.3-18, includes the subject piping and valve under the component groups "piping and fitting" and "valves."

Based on its review of the applicant's clarification discussed above, the staff agrees with the applicant that the staff intended to reference pumps 2-302-3A and 2-302-3B, rather than 2-382-3A and 2-382-3B. Also, the staff finds the applicant's response to RAI 2.3.3.18-1 has clarified that the subject components and piping are within the scope of the Rule and subject to an AMR, and they were inadvertently not highlighted in green (in scope components per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3)) in the LR boundary diagrams. In addition, the subject piping and valve are included in LRA Table 2.3.3-18 under component groups "piping and fitting" and "valves." Therefore, the staff finds the applicant's response to RAI 2.3.3.18-1 acceptable and considers its concern described in RAI 2.3.3.18-1 resolved.

2.3.3.18.3 Conclusions

The staff reviewed LRA Section 2.3.3.18, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. The staff did not identify any omissions. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the TBCCW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the TBCCW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.19 Demineralizer Water Makeup System

2.3.3.19.1 Summary of Technical Information in the Application

The applicant described the demineralizer water makeup (DWM) system in LRA Section 2.3.3.19 and provided a list of components subject to an AMR in LRA Table 2.3.3-19.

The function of the DWM system is to provide reactor quality water for use in power plant systems, equipment, and service drops. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the

applicant identified the following DWM system intended functions:

- C primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- C isolation condenser alternate makeup water (Dresden)—provides alternate makeup water to the isolation condenser.
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected (Dresden only)

The DWM system consists of all equipment required to transfer water from the well water storage tank, through the makeup demineralizers, and into the various water storage tanks on site. Well water flows from the well water transfer pumps (which are classified within the out-of-scope well water system for Quad Cities) through the makeup demineralizers, to either the clean or contaminated demineralized water storage tank. Dresden has permanently installed demineralizers, and both stations have portable demineralizers. The clean demineralized water transfer pumps take suction from the clean demineralized water storage tank and supply clean demineralized water through a distribution header to plant systems and equipment, such as makeup to the standby liquid control system, the plant heating system, and the reactor building and turbine building closed cooling water systems. The DWM system also supplies various system loop seals, the Unit 1 fuel building (Dresden only), sample panels, and clean demineralized water service drops inside the primary containment and throughout the plant. Containment isolation valves are provided for the clean demineralized water lines that penetrate the containment. Additionally, at Dresden, the distribution header provides makeup water to the isolation condenser and emergency makeup water to the fuel pools. Also, at Dresden, the isolation condenser makeup pumps take suction from the clean demineralized water storage tank and discharge into a common header that supplies the isolation condensers for both Units 2 and 3.

In LRA Section 2.3.3.19, the applicant described the DWM system evaluation boundary. In addition, the applicant highlighted those portions of the DWM system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.19. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the component groups and their intended functions within the DWM system in LRA Table 2.3.3-19 as being within the scope of license renewal and subject to an AMR.

Resulting from the revised methodology described in the response to the draft SER Open Item 2.1-1, the applicant expanded the system boundaries for the DWM system at both Dresden and Quad Cities due to the potential for spatial interaction with safety-related components. Specifically, the applicant added associated piping components located in the Turbine Building that could spatially interact with safety-related components in the same general area to the scope of license renewal. Added piping components are shown on revised boundary diagrams LR-DRE-M-177-1, LR-QDC-M-462-3, LR-DRE-M-419-1, LR-DRE-M-35-1, LR-DRE-M-366, LR-DRE-M-269-3, LR-DRE-M-269-3, LR-QDC-M-58-1 LR-QDC-58-3 and new boundary diagrams LR-QDC-M-31, LR-QDC-M-459-1, LR-QDC-M-459-3, LR-QDC-M-462-1, LR-DRE-M-177-3, LR-DRE-M-419-3, LR-DRE-M-35-2, and LR-DRE-M-530-1. As results of these changes one new component group was added to LRA Table 2.3.3-19 and additional aging management references were added to two component groups.

The applicant identified the following component groups and their intended functions within the DWM system in the revised LRA Table 2.3.3-19 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C flow elements (spatial interaction, Quad Cities only)
- C non-safety-related vents or drains, piping, and valves (support integrity/attached support, Quad Cities only)
- C piping and fittings (pressure boundary)
- C piping and fittings (spatial interaction)

- C piping and fittings (support integrity/attached support)
- C pumps (pressure boundary, Dresden only)
- C pumps (spatial interaction, Quad Cities only)
- C restricting orifices (pressure boundary, Dresden only)
- C restricting orifices (spatial interaction, Quad Cities only)
- C strainers (spatial interaction, Quad Cities only)
- C tubing (spatial interaction, leakage boundary (spatial))
- C valves (pressure boundary)
- C valves (spatial interaction)
- C valves (support integrity/attached support, Quad Cities only)

2.3.3.19.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.19, Dresden UFSAR Section 9.2.4, and Quad Cities UFSAR Section 9.2.4 to determine whether there is reasonable assurance that the DWM system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the DWM system in the LRA.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the DWM system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the DWM system. The staff then reviewed the referenced P&I drawings to verify that those portions of the DWM system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.19, and that the applicant identified all DWM system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.19 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping criteria of 10 CFR 54.4 and the screening criteria of 10 CFR 54.21(a)(1). The staff's scoping RAIs and the applicant's responses by letters, dated October 3, 2003, and January 26, 2004, are described below.

RAI 2.3.3.19-1. In LRA Section 2.3.3.19, the applicant stated that the demineralized water makeup system distribution header provides emergency makeup to the spent fuel pool. However, this function is not identified as an intended function in LRA Section 2.3.3.19. Without knowing the basis for the applicant's determination that emergency spent fuel pool makeup is not an intended function, the staff is unable to verify the acceptability of the applicant's system scoping and screening results. Therefore, in RAI 2.3.3.19-1, the staff requested the applicant to provide the basis for concluding that emergency spent fuel pool makeup is not an intended function of the demineralized water makeup system according to the criteria described in 10 CFR 54.4(b).

Applicant's Response and Staff's Evaluation

In its response to RAI 2.3.3.19-1, the applicant stated that the DMW system provides emergency makeup water to the spent fuel pools, but this function is not a credited function in the current licensing basis and, therefore, is not a license renewal intended function. In the event of a complete loss of fuel pool cooling, the fuel pool water temperature will begin to rise and eventually will reach the boiling temperature, and the fuel pool water will boil off. However, there will be sufficient time to establish makeup water to the fuel pool from various available systems which include the condensate transfer system, the DMW system, and the fire water systems. For these reasons, emergency spent fuel pool makeup is not an intended function of the DMW system.

Based on its review, the staff finds that the DMW system is included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). However, the capability of the DMW system to provide emergency makeup water to the spent fuel pools is not credited in the current licensing basis. The failure of the DMW system would not prevent other systems from satisfactorily providing emergency makeup water to the spent fuel pools. Therefore, the staff agrees with the applicant that providing emergency makeup water to the spent fuel pools is not an intended function of the DMW system in accordance with 10 CFR 54.4. The staff finds the applicant's response to RAI 2.3.3.19-1 acceptable and considers its concern described in RAI 2.3.3.19-1 resolved.

RAI 2.3.3.19-2. In RAI 2.3.3.19-2, the staff requested the applicant to provide information concerning three symbols used on LR boundary diagrams referenced in LRA Section 2.3.3.19, so that the staff could verify that the scoping and screening results in the LRA are consistent with 10 CFR 54.4 and 10 CFR 54.21. The staff could not locate the three symbols on the symbol legend submitted with the LRA.

Applicant's Response and Staff's Evaluation

In its response, the applicant provided interpretation of four symbols used in the P&I drawings referenced in LRA Section 2.3.3.19—one in drawing LR-DRE-M-366 (E-3), one in drawing LR-QDC-M-58-4 (C-8), one in drawing LR-DRE-M-1239-3 (F-6), and one in drawing LR-QDC-M-41-2 (E-2).

The staff finds that the interpretation of the symbols provided by the applicant clarifies the staff's concerns described in RAI 2.3.3.19-2. The staff determined that no additional component needed to be within the scope of license renewal. Therefore, the staff finds the applicant's response to RAI 2.3.3.19-2 acceptable and considers its concern described in RAI 2.3.3.19-2 resolved.

RAI 2.3.3.19-3. In RAI 2.3.3.19-3, the staff requested the applicant to provide the basis for concluding that an oil drain line for clean demineralized water pump 1/2-4303B is not within the scope of license renewal in accordance with 10 CFR 54.4(a), as similar oil drain lines for the "A" and "C" clean demineralized water pumps are considered to be within the scope of license renewal. It was not apparent to the staff whether the exclusion of the oil drain line for the "B" pump was justified or an oversight.

Applicant's Response and Staff's Evaluation

In its response to RAI 2.3.3.19-3, the applicant stated that the oil drain line for clean demineralized water pump 1/2-4303B is in the scope of license renewal similar to oil drain lines for the "A" and "C" clean demineralized water pumps. Boundary diagram LR-QDC-M-58-1 should have highlighted these components within the scope of license renewal. The subject piping and valve components are subject to an AMR and are included in LRA Table 2.3.3-19 under component group, "piping and fittings (spatial interaction)," with leakage boundary (spatial) intended function.

Based on its review of the applicant's clarification discussed above, the staff concurs with the applicant's clarification that the above-cited oil drain line and its associated components are within the scope of the Rule, and they were inadvertently not highlighted in the LR boundary diagrams. Also, because the components associated with the cited oil drain line are included in LRA Table 2.3.3-19, subject to an AMR, the staff finds the applicant's response to RAI 2.3.3.19-3 acceptable. Therefore, the staff considers its concern described in RAI 2.3.3.19-3 resolved.

RAI 2.3.3.19-4. In RAI 2.3.3.19-4, the staff requested the applicant to provide the basis for concluding that the demineralized water makeup system is capable of performing its intended functions without relying upon the integrity of numerous unisolable piping lines and connected components (the piping lines and components are listed in RAI 2.3.3.19-4), and that the failure of these unisolable lines and connected components would not prevent other systems from satisfactorily accomplishing their intended functions for license renewal. From the information available in the LRA, it is not apparent to the staff why the unisolable components listed in RAI 2.3.3.19-4 are not required to be within the scope of license renewal, in accordance with 10 CFR 54.4(a), as a result of the above criteria.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.19-4 states the preferred makeup source to the isolation condenser is the dedicated diesel driven makeup pumps that take suction from the clean demineralized water tank. The clean demineralized water system is designed to supply water to multiple sources in parallel with the isolation condenser diesel driven makeup pump. For this reason, leakage in any of the branch connections described in the RAI would not prevent this preferred path from fulfilling its function.

The demineralized water makeup system provides an alternate supply of makeup water to the Isolation Condenser shell from the clean demineralized water storage tank. Therefore the

portion of the demineralized water makeup system in the flow path to the Isolation Condenser shell, including the clean demineralized water pumps, piping, associated valves, and instrumentation are included within the scope of license renewal. When establishing the in-scope boundary of the demineralized water makeup system for license renewal, credit was allowed for operator action to close accessible, normally open, manual isolation valves.

The branch connections on the demineralized water piping system that are not included within the scope of license renewal are located within the power block (turbine building, reactor building, radwaste) where detection in the event of failure would be detected. In the event of a significant demineralized water line break, operators would receive a control room low pressure alarm for the clean demineralized water header. Site operating procedure, DAN 923-1 C-6, Clean Demon. Water Pp Trip/Press Lo, directs operators to check for excessive use of clean demineralized water and to troubleshoot as needed. Operators would also detect any abnormal increase of input to plant sumps that are monitored continuously by operators in the radwaste control room. Individual sump inputs are monitored which would assist operations personnel in locating the area of any clean demineralized water line break. Operators would respond to these indications of plant leakage and take appropriate actions to isolate the leakage.

Those portions of the clean demineralized water system that can spatially interact with safety-related equipment were included during previous system scoping efforts. A pipe break and/or leak from remaining portions of the clean demineralized piping that are not in scope can not spatially affect safety-related components.

The valves listed below were added to the scope of license renewal and will be managed for aging. Operator closure of these valves would isolate a failure in the out of scope portions of the system located downstream and re-establish the demineralized water system pressure boundary and makeup flow path to the isolation condenser. This action eliminates the need for placing the downstream components within the scope of license renewal.

2-4303-500	2-4399-792	3-4399-711
2-4308-500	3-4399-706	3-4305-500
2-4308-501	3-4399-707	2/3-5799-1113
2-4309-500	3-4399-708	2/3-5799-1115
2-4399-730	3-4399-709	2/3-4311-500
2-4399-732	3-4399-710	2/3-4399-67

In addition, the following valves will be added to the scope of license renewal: check valve 2/3-4300-852 (This valve isolates the branch connection on LR-DRE-M-35-1, grid location D-7, from drawing M-1011-2) and the unnumbered vent valve in line 2-4386-1"-L at grid location D-4 on LR-DRE-M-35-1.

Based on its review of the applicant's clarification discussed above, the staff concurs with the applicant's clarification that the operators will be able to identify system failure and close the appropriate valve before the DMW system becomes unable to perform its intended function of providing an alternate supply of makeup water to the Isolation Condenser shell. The applicant also included the above-mentioned valve within scope of License Renewal and subject to AMR. The Clean Demineralized Water Storage Tank (CDWST) has a capacity of 200,000 gallons and the DMW system was designed to supply water to multiple systems. A failure of the system sections downstream of these manual valves would be identified by several means before the CDWST inventory drops to levels that would prevent the DMW system from performing its intended function of providing an alternate supply of makeup water to the Isolation Condenser

shell. The applicant also has in place procedures that will direct the operator to check the above-mentioned system sections for possible leakage. Therefore, the staff considers its concern described in RAI 2.3.3.19-4 resolved.

2.3.3.19.3 Conclusions

The staff reviewed LRA Section 2.3.3.19, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the DMW makeup system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the DMW makeup system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.20 Residual Heat Removal Service Water System (Quad Cities Only)

2.3.3.20.1 Summary of Technical Information in the Application

The applicant described the residual heat removal service water (RHRSW) system in LRA Section 2.3.3.20 and provided a list of components subject to an AMR in LRA Table 2.3.3-20.

The function of the RHRSW system is to—remove heat from the suppression chamber, in conjunction with the containment cooling mode of the residual heat removal system; remove heat from the reactor coolant, in conjunction with the shutdown cooling mode of the residual heat removal system; provide a safety-related source of cooling water to the train “B” control room HVAC refrigerant condensing unit as a backup during a loss of offsite power; provide a cross-tie to the opposite unit to achieve safe shutdown for fire events in accordance with Appendix R to 10 CFR Part 50; and provide an auxiliary function during refueling by assisting in the removal of heat from the spent fuel pool.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following RHRSW system intended functions:

- C containment and component cooling—provides a heat sink for the RHR system via the RHR heat exchangers to support containment cooling after a LOCA
- C back-up cooling—provides safety-related back-up cooling to the “B” train of the control room HVAC refrigeration units as a backup during a loss of offsite power and LOCA
- C credited in regulated event(s)—provides a heat sink for the RHR system via the RHR heat exchangers to support ATWS actions and in the Appendix R fire safe shutdown analysis (The subsystems between the units can be connected by a normally isolated crosstie line that is credited in the plant's fire protection safe shutdown analysis. The system also contains components that are relied upon for compliance with 10 CFR Part 50.49 (EQ).)
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The RHRSW system is an open-loop cooling water system consisting of four two-stage pump sets (i.e., two pumps driven by a single motor), associated valves, piping, and instrumentation and controls, divided into two independent loops. The RHRSW system removes heat from the RHR heat exchangers, which are evaluated as part of the RHRSW system. During RHRSW system operation, the pressure on the tube side of the RHR heat exchanger is maintained above the shell side to prevent reactor water leakage into the SW and thereby into the discharge bay.

In LRA Section 2.3.3.20, the applicant described the RHRSW system evaluation boundary. In addition, the applicant highlighted those portions of the RHRSW system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.20. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the component groups and their intended functions within the RHRSW system in LRA Table 2.3.3-20 as being within the scope of license renewal and subject to an AMR.

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the applicant expanded the system boundaries for the RHRSW system at Quad Cities due to the potential for spatial interaction with safety-related components. The applicant included all of the components shown on new boundary diagrams LR-QDC-M-22-2 and LR-QDC-M-69-2 to the scope of license renewal. As results of these changes two new component groups were added to LRA Table 2.3.3-20.

The applicant identified the following component groups and their intended functions within the RHRSW system in the revised LRA Table 2.3.3-20 as being within the scope of license renewal and subject to an AMR:

- C auxiliary and RW HVAC air handlers heating/cooling (pressure boundary)
- C auxiliary and RW HVAC air handlers heating/cooling (heat transfer)
- C closure bolting (pressure boundary)
- C dampeners (pressure boundary)
- C ducts and fittings, access doors, closure bolts, and equipment frames (pressure boundary)
- C heat exchangers (pressure boundary)
- C heat exchangers (heat transfer)
- C non-safety-related vents or drains, piping, and valves (structural integrity/attached support)
- C NSR Vents or Drains, Piping and Valves (spatial interaction) (Quad Cities only)
- C orifice bodies (pressure boundary)
- C orifice bodies (throttle)
- C piping and fittings (structural integrity/attached support)
- C pulsation dampeners (pressure boundary)
- C pumps (pressure boundary)
- C pumps (spatial interaction) (Quad Cities only)
- C sight glasses
- C strainer bodies (pressure boundary)
- C strainer screens
- C thermowells (pressure boundary)
- C tubing (pressure boundary)
- C tubing (structural integrity/attached support)
- C valves (pressure boundary)
- C valves (structural integrity/attached support))

2.3.3.20.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.20 and Quad Cities USAR Sections 3.4.1.2, 5.4.7, 6.2.2, 6.3, 9.1.3.2, 9.2.1, and 9.2.5 to determine whether there is reasonable assurance that the RHRSW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the RHRSW system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the RHRSW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSAR to ensure that the referenced P&I drawings were representative of the RHRSW system. The staff then reviewed the referenced P&I drawings to verify that those portions of the RHRSW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.20, and that the applicant identified all RHRSW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.20 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items needed to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.20-1. In RAI 2.3.3.20-1, the NRC staff requested the applicant to provide the basis for concluding that the LR scoping criteria of 10 CFR 54.4(a) do not require all piping and associated components necessary to discharge the flow of RHRSW returning from the control room HVAC refrigerant condensing unit to be within the scope of license renewal. From the associated LR boundary diagrams, it appears to the staff that the applicant only considered the portion of the discharge flowpath upstream of locked-open valve 0-5799-388 to be within scope.

Applicant's Response and Staff's Evaluation

In its response to RAI 2.3.3.20-1, the applicant stated that the associated flow path cited above is required for the performance of the control room HVAC refrigeration condensing unit, and the components and piping sections are in the scope of license renewal. The subject line was inadvertently left out of scope on the boundary diagram. The boundary diagram should have included the path (up to and including valves required to maintain the path) in the scope of

license renewal. The following existing boundary diagrams should have also reflected the components in the flow path in the scope of license renewal—LR-QDC-M-22-1, Service Water Piping; LR-QDC-M-22-3, Service Water Piping—Diesel Generator Cooling Water; LR-QDC-M-22-5, Service Water Piping; and LR-QDC-M-725-3, Control Room HVAC.

The components and piping sections discussed above and their intended functions are included in LRA Table 2.3.3-20 under component groups “piping and fittings,” “valves,” and “orifice bodies,” as being within the scope of license renewal and subject to an AMR.

Based on its review, the staff finds that the applicant has clarified that the subject components and piping are within the scope of the Rule and subject to an AMR. These components and piping were inadvertently not highlighted in the LR boundary diagrams, however, they are included in LRA Table 2.3.3-20, subject to an AMR. Therefore, the staff finds the applicant’s response to RAI 2.3.3.20-1 acceptable and considers its concern described in RAI 2.3.3.20-1 resolved.

RAI 2.3.3.20-2. In RAI 2.3.3.20-2, the NRC staff requested that the applicant provide the basis for concluding that a temperature element connected to the outlet line 2-1043A-14"-L from the residual heat removal heat exchanger 2-1003A is not within the scope of license renewal according to 10 CFR 54.4(a). The applicant’s treatment of this temperature element contrasts with the treatment of similar temperature elements connected to in-scope piping on the associated LR boundary diagram (LR-QDC-M-79). Therefore, the staff requested that the applicant provide additional information to verify that the scoping criteria of 10 CFR 54.4(a) are satisfied.

Applicant’s Response and Staff’s Evaluation

In the response to RAI 2.3.3.20-2, the applicant stated that the subject instrument was inadvertently not highlighted on the boundary diagram. Boundary diagram LR-QDC-M-79 should have highlighted the temperature element and associated tap (thermowell) in the scope of the Rule. However, the temperature element, which is not part of the pressure boundary, is an active component and does not require an aging management. The tap is subject to an AMR and is included in LRA Table 2.3.3-20 under component group “piping and fittings.”

Based on its review, the staff finds the applicant’s response to RAI 2.3.3.20-2 acceptable. The staff concurs with the applicant’s clarification that the temperature element and associated tap are in scope of the scope of the Rule, the temperature element is not subject to an AMR because it is an active component, the associated tap is included in LRA Table 2.3.3-20 subject to an AMR, and the temperature element and associated tap were inadvertently not highlighted in the LR boundary diagram. Therefore, the staff considers its concern described in RAI 2.3.3.20-2 resolved.

RAI 2.3.3.20-3. In RAI 2.3.3.20-3, the NRC staff requested that the applicant explain apparent scoping inconsistencies regarding four corrosion coupon holders on two LR boundary diagrams (LR-QDC-M-37 and LR-QDC-M-79). All coupon holders except one show the connecting piping and valves to be within the scope of license renewal. Also, for only one of the coupon holders is the holder itself shown as being within the scope of license renewal. The staff requested that the applicant explain these two apparent inconsistencies so that the staff could verify whether or not the applicant’s scoping results are consistent with 10 CFR 54.4(a). The staff could also not determine whether the applicant had included the coupon holders in the AMR results listed in LRA Table 2.3.3-20.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.20-3, the applicant stated that the coupon holder (1-1005B) and associated isolation valve (1-1099-36B) located at C-8 on boundary diagram LR-QDC-M-37, and coupon holders (2-1005A and 2-1005B) located at C-3 and C-8 on boundary diagram LR-QDC-M-79 are in scope of license renewal but were inadvertently not highlighted in the boundary diagrams. The coupon holder (1-1005A) located at B-3 on LR-QDC-37 is appropriately identified on the boundary diagram as in scope of license renewal. The applicant further stated that LRA Table 2.3.3-20 includes the above-listed components under component groups "piping and fittings," and "valves."

Based on its review, the staff finds that the applicant has clarified that the four corrosion coupon holders and associated isolation valves are within the scope of license renewal and are included in LRA Table 2.3.3-20, subject to an AMR. These components were inadvertently not highlighted in the flow diagram, however, they are included in LRA Table 2.3.3-20 subject to an AMR. Therefore, the staff finds the applicant's response to RAI 2.3.3.20-3 acceptable and considers its concerns described in RAI 2.3.3.20-3 resolved.

RAI 2.3.3.20-4. In RAI 2.3.3.20-4, the NRC staff requested that the applicant provide the basis for concluding that a segment of piping (1-10111C-1"-D) that is connected to in-scope piping line 1-1003C-12"-D is not within the scope of license renewal in accordance with 10 CFR 54.4(a). The applicant's scoping classification for this segment of piping contrasts with the treatment of similar segments of piping on the associated LR boundary diagram (LR-QDC-M-37). As a result of the apparent inconsistency, it is not clear to the staff that the criteria of 10 CFR 54.4(a) are satisfied.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.20-4, the applicant stated that boundary diagram LR-QDC-M-37 should have been highlighted to include the line (and pipe cap) in the scope of license renewal. This line is in scope for license renewal but was inadvertently not highlighted in the LR boundary diagram. The applicant further stated that LRA Table 2.3.3-20 includes the above-cited line under component group "piping and fittings."

Based on its review, the staff finds that the applicant has clarified that the subject segment of piping was within the scope of license renewal and subject to an AMR. The subject segment of piping was inadvertently not highlighted in the flow diagram, however, it is included in LRA Table 2.3.3-20, subject to an AMR. Therefore, the staff finds the applicant's response to RAI 2.3.3.20-4 acceptable and considers its concerns described in RAI 2.3.3.20-4 resolved.

RAI 2.3.3.20-5. In RAI 2.3.3.20-5, the NRC staff requested that the applicant provide the basis for not including flow elements as an entry in LRA Table 2.3.3-20 (which contains the AMR results for the RHRSW system) to verify that the criteria set forth in 10 CFR 54.21(a)(1) have been satisfied. License renewal boundary diagrams associated with the RHRSW system depict flow elements within this system as being within the scope of license renewal; however, they are not included in the RHRSW AMR results table, as is done in the AMR results tables for various other systems in the LRA (e.g., DWM system and CCSW system).

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.3.20-5, the applicant stated that LRA Tables 2.3.3-20, 2.3.3-19, and

2.3.3-21 identify the component groups requiring AMR for the RHRSW, DWM, and CCSW systems, respectively. The component groups identified in these tables were derived from component types identified in each site's component maintenance database (Passport). The designation of these database component types was not uniformly provided at the two sites. Consequently, the database included component type designations corresponding to "flow elements," "restricting orifices," and "orifice bodies," interchangeably to represent orifice bodies. Similarly, the component groups "flow elements," "restricting orifices," and "orifice bodies," as identified in the cited Chapter 2 tables, describe orifice bodies serving pressure/leakage boundary or throttle functions.

The subject flow elements 2-1041-A, 2-1041-B, 1-1041-A, and 1-1041-B are depicted at the cited locations on boundary diagrams LR-QDC-M-79 and LR-QDC-M-37. LRA Table 2.3.3-20 includes entries for orifice bodies with component intended functions of "Pressure Boundary" and "Throttle" to address these flow elements.

Based on its review, the staff finds the applicant's response to RAI 2.3.3.20-5 acceptable because the applicant has explained that the components identified in RAI 2.3.3.20-5 were given different type of identification at the two sites, but are already within the scope of license renewal and are included in LRA Table 2.3.3-20, subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.3.20-5 resolved.

2.3.3.20.3 Conclusions

The staff reviewed LRA Section 2.3.3.20, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that there is reasonable assurance that the applicant has adequately identified the components of the RHRSW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the RHRSW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.21 Containment Cooling Service Water System (Dresden Only)

2.3.3.21.1 Summary of Technical Information in the Application

The applicant described the containment cooling service water (CCSW) system in LRA Section 2.3.3.21 and provided a list of components subject to an AMR in LRA Table 2.3.3-21.

The function of the CCSW system is to remove heat from the primary containment by providing cooling water to the LPCI heat exchangers. Also, the CCSW system, in conjunction with LPCI, limits the suppression chamber bulk water temperature to provide assurance that—suppression chamber hydrodynamic loads during blowdown would not adversely impact the integrity of structures and equipment; complete steam condensation occurs during a LOCA to limit long-term primary containment pressure; and adequate NPSH exists for ECCS pumps to maintain long-term primary containment pressure control. The Unit 2 CCSW loops provide a safety-related source of SW to the control room air conditioning condensers. The CCSW system also supplies a safety-related source of river water to the LPCI and HPCI room coolers (evaluated with the ECR-HVAC) as a backup to the SW system. The CCSW is credited for certain regulated events, as per the definition in 10 CFR 54.4(a)(3), which include—providing

redundancy in suppression chamber cooling during an ATWS event; operating with reliance upon external source of power for an SBO event; mitigating fire events, in accordance with Appendix R to 10 CFR Part 50; and containing system components that are relied upon for compliance with environmental qualification requirements in 10 CFR 50.49.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following CCSW system intended functions:

- C containment and component cooling—provides containment cooling function, cooling to the ECCS room coolers, and the CCSW water vault coolers to maintain room temperatures
- C back-up cooling (Dresden Unit 2 only)—CCSW provides safety-related back-up cooling to the “B” train of the control room HVAC refrigeration units
- C credited in regulated event(s)—provides redundancy in suppression chamber cooling during an ATWS event, operates without reliance upon external sources of power (SBO), is credited in the Appendix R fire safe shutdown analysis, and the system contains components that are relied upon for compliance with 10 CFR Part 50.49 (EQ)
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected.

The CCSW system is an open-loop cooling water system consisting of four pumps, associated valves, piping, and instrumentation and controls. The CCSW system removes heat from the LPCI heat exchangers, which are evaluated as part of the CCSW system. The CCSW pumps develop sufficient head to maintain the cooling water heat exchanger tube side outlet pressure greater than the LPCI subsystem pressure on the shell side. Maintaining this pressure differential prevents reactor water leakage into the SW and thereby into the river.

In LRA Section 2.3.3.21, the applicant described the CCSW system evaluation boundary. In addition, the applicant highlighted those portions of the CCSW system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.21. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the RHRSW system in LRA Table 2.3.3-21 as being within the scope of license renewal and subject to an AMR:

- C auxiliary and RW HVAC air handlers heating/cooling (pressure boundary)
- C auxiliary and RW HVAC air handlers heating/cooling (heat transfer)
- C closure bolting (pressure boundary)
- C ducts and fittings, access doors, closure bolts, and equipment frames (pressure boundary)
- C flow elements (pressure boundary)
- C heat exchangers (pressure boundary)
- C heat exchangers (heat transfer)
- C orifice bodies, including manifolds, tubes, and thermowells (pressure boundary)
- C piping and fittings (structural integrity/attached support)
- C pumps (pressure boundary)
- C strainer bodies (pressure boundary)
- C strainer screens (filter)

- C thermowells (pressure boundary)
- C tubing (pressure boundary)
- C valves (pressure boundary)
- C valves (structural integrity/attached support)

2.3.3.21.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.21 and Dresden UFSAR Sections 3.4.1.2, 6.2.2, 6.3.1.2, 6.4, and 9.2.1 to determine whether there is reasonable assurance that the CCSW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the CCSW system in the LRA.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the CCSW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the CCSW system. The staff then reviewed the referenced P&I drawings to verify that those portions of the CCSW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.21, and that the applicant identified all CCSW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items needed to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.21-1. In RAI 2.3.3.21-1, the staff requested the applicant to provide the basis for apparent scoping discrepancies on the referenced P&I drawings, LR-DRE-M-29-2 (Unit 2) and LR-DRE-M-360-2 (Unit 3). Specifically, differences in the marking of pressure indicators and flow transmitters on these boundary diagrams indicate that corresponding components at Units 2 and 3 have been brought within the scope of license renewal for different reasons. The staff requested this information to ensure that the applicant has correctly identified the system intended functions for license renewal, as defined by 10 CFR 54.4(b), and the in-scope components, in accordance with 10 CFR 54.4(a).

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.21-1 states that the subject instruments and associated upstream non-safety-related piping are in scope of license renewal because they meet the requirements of 10 CFR 54.4(a)(2) regarding non-safety-related components attached to safety-related components. Boundary diagrams LR-DRE-M-29-2 and LR-DRE-360-2 should have highlighted these components in red, which indicates in scope components in accordance with 10 CFR 54.4(a)(2) for non-safety-related components and systems.

Based on its review of the applicant's clarification discussed above, the staff finds that the subject instruments and associated upstream non-safety-related piping were in scope for license renewal. They were inadvertently not highlighted in the LR boundary diagram. However, the subject components are included in LRA Table 2.3.3-21, subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.3.21-1 resolved.

RAI 2.3.3.21-2. In RAI 2.3.3.21-2, the staff requested the applicant to provide the basis for concluding that an unisolable segment of piping (and associated components) connected to in-scope piping line 3-15112-3"-H (see boundary diagram LR-DRE-M-360-2, location A-5) is not within the scope of license renewal according to 10 CFR 54.4(a). The staff could not determine why the unisolable piping segment and associated components (up to the first isolation valve) are not necessary for the CCSW system to perform its intended functions. Therefore, the staff requested that the applicant provide additional information to verify that the scoping criteria of 10 CFR 54.4(a) are satisfied.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.21-2 states that boundary diagram LR-DRE-360-2 should have highlighted the pipe segment cited above in green to designate that the components are in the scope of license renewal. This segment and associated components are included in LRA Table 2.3.3-21 under component group "piping and fittings, including manifolds, tubes, and thermowells" subject to an AMR.

Based on its review of the applicant's clarification discussed above, the staff concurs with the applicant's clarification that the above-cited segments of piping and their associated components are within the scope of the Rule. They were inadvertently not highlighted in the LR boundary diagram. However, the components associated with the cited segments of piping are included in LRA Table 2.3.3-21, subject to an AMR. Therefore, the staff finds the applicant's response to RAI 2.3.3.21-2 acceptable and considers its concern described in RAI 2.3.3.21-2 resolved.

RAI 2.3.3.21-3. In RAI 2.3.3.21-3, the staff requested the applicant to provide the basis for concluding that the CCSW system is capable of performing its intended functions without relying upon the integrity of three unisolable piping lines and associated components (the piping lines 2/3-3936-3"-0, 2/3-3921-6"-0, and 2/3-3915-16"-0 shown in boundary diagram LR-DRE-M-22), and that the failure of these unisolable lines and associated components would not prevent other systems from satisfactorily accomplishing their intended functions for license renewal. The unisolable piping lines are connected to the CCSW return line from the control room air conditioning condensers, upstream of its termination at a standpipe, which eventually discharges to the circulating water discharge header. From the information available in the LRA, it is not apparent to the staff why the unisolable piping and associated components referenced in RAI 2.3.3.21-3 are not required to be within the scope of license renewal, in

accordance with 10 CFR 54.4(a), as a result of the above criteria.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.21-3 states that boundary diagram LR-DRE-M-22 should have highlighted the pipe segment cited above in green to designate that the components are in the scope of license renewal. This segment and associated components are included in LRA Table 2.3.3-21 under component groups "piping and fittings," "valves," and "orifice bodies," subject to an AMR.

Based on its review, the staff finds the applicant's response to RAI 2.3.3.21-3 acceptable. The applicant clarified that the subject components are within the scope of the Rule and subject to an AMR, and they were inadvertently not highlighted in the LR boundary diagram. However, the subject components are included in LRA Table 2.3.3-21, subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.3.21-3 resolved.

2.3.3.21.3 Conclusions

The staff reviewed LRA Section, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the CCSW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the CCSW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.22 *Ultimate Heat Sink System*

2.3.3.22.1 Summary of Technical Information in the Application

The applicant described the ultimate heat sink (UHS) system in LRA Section 2.3.3.22 and provided a list of components subject to an AMR in LRA Table 2.3.3-22.

The function of the UHS system is to provide sufficient cooling water to the station, when the normal heat sink is unavailable, to permit operation of the CCSW system at Dresden, the RHRSW at Quad Cities, and the DGCW pumps at both stations. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following CCSW system intended functions:

- C ultimate cooling water supply—provides sufficient cooling water to the station to permit operation of the CCSW system and the DGCW pumps when the normal heat sink (the river) is unavailable (Dresden)
- C ultimate cooling water supply—provides sufficient cooling water to the station to permit operation of the residual heat removal SW pumps and the diesel generator cooling water pumps when the normal heat sink (the river) is unavailable (Quad Cities)

At Dresden, the Kankakee River is the normal source of emergency cooling water. If the Dresden Island Lock and Dam on the Illinois River were to fail, the Kankakee River level would

fall below the high point of the Dresden intake flume. At Quad Cities, the Mississippi River is the normal source of emergency cooling water. If Lock and Dam No. 14 on the Mississippi River were to fail, the Mississippi River level would fall below the high point of the Quad Cities intake flume. For both stations, the design of the UHS would trap a limited supply of water in the intake and discharge canals in the event of the loss of the dammed water.

The applicant states that, at Dresden, the natural topography forms the UHS basin with the level stabilizing at elevation 495'-0", the high point of the intake flume. The CCSW pumps take suction from the center compartment of the crib house at elevation 498'-0", above the UHS basin level. To provide adequate suction for the CCSW pumps necessitates isolating the center compartment and raising its water level. Isolation is accomplished by replacing the normal wire mesh screens in the center compartment openings with stop logs. The dewatering valves are opened to allow water from the crib house forebay to flood the trash rake refuge pit, the refuge pumps are lined up to discharge to the center compartment, and the pumps are operated to flood the compartment above the CCSW pump suction. A CCSW pump (evaluated with the CCSW system) is placed in service, discharging to the containment cooling heat exchanger, and then to the discharge canal. The deicing valve is opened, allowing flow from the discharge canal back to the forebay. A portable, low-head, high-volume, engine-driven pump could make up the loss of the impounded river water due to evaporation.

The applicant states that, at Quad Cities, the natural topography of the intake flume, along with the weir gate located in the discharge canal, forms the UHS basin. The level in the basin stabilizes at elevation 565'-0", the high point of the intake flume. The RHRSW (evaluated with the RHRSW system and DGCW (evaluated with the DGSW system) take suction from the center compartment of the crib house at elevation 556'-6", below the UHS basin level. The pumps discharge to their assigned loads, and then to the discharge flume upstream of the weir. The gate on the ice-melt line is opened, allowing flow from the discharge flume back to the intake flume. The water impounded in the intake and discharge flumes is then used as an evaporative heat sink. With the loss of Dam No. 14 on the Mississippi River, river water would backflow through the 16-foot diameter discharge piping connecting the river to the discharge flume, to the downstream base of the weir gate. Portable diesel-driven pumps take suction from downstream of the weir and discharge into the center compartment of the crib house to make up the loss of the impounded river water due to evaporation.

In LRA Section 2.3.3.22, the applicant described the UHS system evaluation boundary. In addition, the applicant highlighted those portions of the UHS system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.22. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the UHS system in LRA Table 2.3.3-22 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary, Dresden only)
- C piping and fittings (pressure boundary)
- C pump casings (pressure boundary, Dresden only)
- C valves (pressure boundary)
- C stop logs (pressure boundary)—stop logs were initially inadvertently left out of the table.

2.3.3.22.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.22, Dresden UFSAR Sections 9.2.5 and 2.4, and Quad

Cities UFSAR Sections 9.2.5 and 2.4 to determine whether there is reasonable assurance that the UHS system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the UHS system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the UHS system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the UHS system. The staff then reviewed the referenced P&I drawings to verify that those portions of the UHS system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.22, and that the applicant identified all UHS system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.22-1. In RAI 2.3.3.22-1, the staff requested the applicant to state whether the ice-melt gates, described in LRA Section 2.3.3.22 as necessary components to support UHS system intended function for Dresden and Quad Cities, are within the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). The staff further requested the applicant to provide justification if the ice-melt gates are not considered within the scope of license renewal and subject to an AMR. The basis for the staff's RAI is that the ice-melt gates are not clearly identifiable to the staff in LRA Table 2.3.3-22, which provides the AMR results for the UHS system.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.22-1 states that the ice-melt gates are included in LRA Table 2.3.3-22, under the component group "valves." Additionally, the "Dresden only" description should have been deleted from LRA Table 2.3.3-22 as shown below.

Table 2.3.3-22: Component Groups Requiring Aging Management Review—Ultimate Heat Sink

Component Group	Component Intended Function	Aging Management Ref
Valves	Pressure Boundary	3.3.2.278, 3.3.2.300

Based on its review, the staff finds the applicant’s response to RAI 2.3.3.22-1 acceptable. The applicant acknowledges that the ice-melt gates are within the scope of the Rule and subject to an AMR, and that the ice-melt gates are included in LRA Table 2.3.3-22, subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.3.22-1 resolved.

RAI 2.3.3.22-2. In RAI 2.3.3.22-2, the staff requested the applicant to state whether stop logs are within the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1), for Dresden. In LRA Section 2.3.3.22, the applicant indicates that, for Dresden, stop logs are necessary to isolate the center compartment of the crib house to allow the suction of the CCSW pumps to be flooded. Thus, stop logs appear to perform a pressure-boundary intended function for license renewal. However, in LRA Table 2.3.3-22, which contains the AMR results for the UHS system, the staff could not definitively locate an entry for stop logs. Therefore, the staff requested the applicant to provide additional information to verify that 10 CFR 54.4(a) and 10 CFR 54.21(a)(1) are satisfied.

Applicant’s Response and Staff’s Evaluation

The applicant’s response to RAI 2.3.3.22-2 states that the stop logs are needed to support the Ultimate Heat Sink and should have been added to Table 2.3.3-22 and Table 3.3-2 as shown below.

Table 2.3.3-22 Component Groups Requiring Aging Management Review—Ultimate Heat Sink

Component Group	Component Intended Function	Aging Management Ref
Stop Logs (Dresden only)	Structural Pressure Barrier	3.3.2.304

Based on its review, the staff finds the applicant’s response to RAI 2.3.3.22-2 acceptable because the applicant stated that the stop logs should have been added to Table 2.3.3-22 and Table 3.3-2 subject to an AMR and AMP. Therefore, the staff considers its concern described in RAI 2.3.3.22-2 resolved.

2.3.3.22.3 Conclusions

The staff reviewed LRA Section 2.3.3.22, the accompanying scoping boundary drawings, and the applicant’s response to RAIs, to determine whether any structures, systems, or components that should be within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the UHS system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the UHS system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.23 Fuel Pool Cooling and Filter Demineralizer System

2.3.3.23.1 Summary of Technical Information in the Application

The applicant described the fuel pool cooling and filter demineralizer system in LRA Section 2.3.3.23 and provided a list of components subject to an AMR in LRA Table 2.3.3-23.

The purpose of the fuel pool cooling and filter demineralizer system is to remove heat from the spent fuel and to maintain fuel storage pool water clarity. During refueling operations, the fuel pool cooling and filter demineralizer system may be used to maintain the water clarity of the reactor refueling cavity also. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following fuel pool cooling and filter demineralizer system intended function:

- C preclude adverse effects on safety-related SSCs - maintain sufficient integrity of components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The spent fuel pool cooling and filter demineralizer system which is a non-safety-related closed-loop system consists of two circulating pumps, two heat exchangers, two skimmer surge tanks, a filter, a deep-bed demineralizer, and the required piping, valves, and instrumentation. Water from the fuel storage pool overflows via scuppers and an adjustable weir into two crosstie skimmer surge tanks. The skimmer surge tanks drain into a common suction header for the fuel pool cooling pumps. Two parallel flow paths exist from the header, each with a fuel pool cooling pump taking suction from the header and discharging through a fuel pool cooling heat exchanger. Cooling water to the heat exchangers is supplied from the RBCCW system. A crosstie line exists on the pump discharge piping in order to operate either pump with either heat exchanger. The heat exchangers discharge into a common header that first flows through the fuel pool filter, and then through the fuel pool demineralizer. The fuel pool demineralizer discharges back into the fuel storage pool through two lines and spargers within the pool. The return lines to the fuel storage pool enter near the top and have openings in the piping about 6 in. below the pool surface to act as anti-siphon devices, to preclude uncontrolled draining of the pool during a pipe break. During refueling operations, the system may be aligned via manual valves to discharge into the reactor refueling cavity. The shutdown cooling system may be connected in parallel with the fuel pool cooling and filter demineralizer system during periods of extremely high heat loads, such as immediately after refueling or a full core discharge into the fuel storage pool. A clean demineralized water supply passes through a safety-related primary containment isolation valve that is part of the fuel pool cooling and filter demineralized system, to supply makeup water.

In LRA Section 2.3.3.23, the applicant described the evaluation boundary for the fuel pool cooling and filter demineralizer system. In addition, the applicant highlighted those portions of the fuel pool cooling and filter demineralizer system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.23. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the fuel pool cooling and filter demineralizer system in LRA Table 2.3.3-23 as being within the scope of license renewal and subject to an AMR for Dresden only:

- C closure bolting (pressure boundary)
- C piping and fittings (pressure boundary)
- C piping and fittings (spatial interaction)
- C sight glasses (spatial interaction)
- C valves (pressure boundary)
- C valves (spatial interaction)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of the fuel pool cooling and filter demineralizer system at Dresden were expanded and highlighted as shown on the revised boundary diagrams and an additional boundary diagram. Additional piping and components from the fuel pool cooling and filter demineralizer system at Dresden were added to the scope of license renewal.

At Quad Cities, the fuel pool cooling system was initially excluded from the scope of license renewal. However, the system has been added to the scope of license renewal as a result of the scoping methodology change due to the potential for spatial interaction with safety-related components in the same general area. The applicant provided boundary diagrams in the May 18, 2004 response to the draft SER Open Item 2.1-1 and highlighted those portions of the fuel pool cooling system in these boundary diagrams as within the scope of the Rule.

Fuel pool cooling filters, demineralizer, and skimmer surge tanks are not highlighted on the boundary diagrams for both Dresden and Quad Cities as within the scope of the Rule. These components reside in their own vaulted areas, physically isolated from safety-related equipment such that they can not spatially interact.

The in LRA Table 2.3.3-23, which previously listed component groups as being within the scope of license renewal and subject to an AMR at Dresden only, has been revised to include component groups as being within the scope of license renewal and subject to an AMR at both Dresden and Quad Cities.

Since the fuel pool cooling and filter demineralizer system is a non-safety-related system, regarding to the heat exchangers only the "Spatial Interaction" function requires aging management. Also, by a letter, dated June 22, 2004, the applicant clarified that the leakage boundary of these heat exchangers is comprised of the same materials and experiences the same environment as the component group evaluated under the "piping and fittings (spatial interaction)," therefore, the piping and fitting component group with spatial interaction listed in LRA Table 2.3.3-23 was revised to include heat exchanger as following:

- C piping and fittings (spatial interaction) (includes heat exchanger shells)

In addition, the following new component group has been added to LRA Table 2.3.3-23 being subject to an AMR:

- C pumps (spatial interaction)

2.3.3.23.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.23, Dresden UFSAR Section 9.1.3, and Quad Cities UFSAR Section 9.1.3 to determine whether there is reasonable assurance that the fuel pool cooling and filter demineralizer system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the fuel pool cooling and filter demineralizer system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the fuel pool cooling and filter demineralizer system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the fuel pool cooling and filter demineralizer system. The staff then reviewed the referenced P&I drawings to verify that those portions of the fuel pool cooling and filter demineralizer system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.23, and that the applicant identified all fuel pool cooling and filter demineralizer system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.23-1. The design objectives of the spent fuel pool cooling and cleanup system for Dresden Units 2 and 3 are to handle the spent fuel pool cooling load and to maintain pool water clarity. Spent fuel pool cooling pumps take suction from the skimmer surge tanks, circulate the warm pool water to the heat exchanger, filter, and demineralizer, and discharge the cooled water back to the spent fuel pool through two parallel lines (2-1910A-6"-K and 2-1910B-6"-K). In the Dresden Units 2 and 3 P&I drawings (LR-DRE-M-31 and LR-DRE-M-362), Exelon only highlighted the following:

- C a portion of one (2-1910B-6"-K) of the two lines as within the scope of license renewal per 10 CFR 54.4(a)(2)—parallel line (2-1910A-6"-K) was not highlighted as within the scope of

license renewal

- C a portion of the drain line (from the globe valve, 3-1901-11, to the 6"x4" reducer), which collects the drains from the reactor well and the reactor well seal rupture drain, as within the scope of license renewal per 10 CFR 54.4(a)(2)

Exelon did not provide discussion to justify why only the above-cited portions of the spent fuel pool cooling and cleanup system are included in the scope of license renewal and subject to an AMR. The staff believes that the entire spent fuel pool cooling and cleanup system is within the scope of license renewal per 10 CFR 54.4(a)(2), and the passive and long-lived components of the system should be subject to an AMR. The staff asked the applicant to provide detailed discussion to clarify and justify why only the above-cited portions of the spent fuel pool cooling and cleanup system are included in the scope of license renewal and subject to an AMR.

Applicant's Response and Staff's Evaluation

The applicant stated that a plant walkdown determined the following:

- C The red-highlighted portion of line 2-1910B-6"-K shown on boundary diagram LR-DRE-M-31 is in scope of license renewal because it is physically located such that leakage or spray from this line could spatially interact with safety-related primary containment isolation valve AOV 2-1601-23. Because of this spatial relationship, the highlighted portion of the line was determined to be in scope of license renewal per 10 CFR 54.4(a)(2). The pipe line 2-1910A-6"-K, which is shown as a parallel line on boundary diagram LR-DRE-M31, does not have a similar spatial relationship to any safety-related components. Consequently, it was not identified as within the scope of license renewal per 10 CFR 54.4(a)(2).
- C The red-highlighted portion of the drain line (from globe valve 3-1901-11 to the 6"x4" reducer), as shown on boundary diagram LR-DRE-M-362, is physically located such that leakage from this line could spatially interact with safety-related primary containment isolation valve AOV 3-1601-23. Because of this spatial relationship, the highlighted portion of the line was determined to be in scope of license renewal per 10 CFR 54.4(a)(2).

The applicant further stated that Exelon does not consider the entire Dresden spent fuel pool cooling and cleanup system to be within the scope of license renewal per 10 CFR 54.4(a)(2). The fuel pool cooling and cleanup system is a non-safety-related closed-loop system that is normally in continuous operation. Except as discussed in the above paragraphs, the fuel pool cooling and cleanup system is not located near safety-related equipment that could be affected by failure of fuel pool cooling and cleanup system components. Thus, the Dresden fuel pool cooling system is not, in general, classified as a system within the scope of license renewal under the criterion of 10 CFR 54.4(a)(2).

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.23-1 acceptable because the fuel pool cooling and cleanup system is a non-safety-related closed-loop system that is normally in continuous operation, and the only intended function of the system is to preclude adverse effects from failure of segments of piping and components on safety-related SSCs. The staff agrees with the applicant that

except as discussed in the above paragraphs, the Dresden fuel pool cooling and cleanup system is not located near safety-related equipment that could be affected by failure of fuel pool cooling and cleanup system components. Thus, only the segments of piping and components discussed above need to conform with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(2). Therefore, the staff considers its concern described in RAI 2.3.3.23-1 resolved.

RAI 2.3.3.23-2. In LRA Table 2.2-1, Exelon stated that because of differences in plant equipment layout, some of the fuel pool cooling system piping at Dresden can potentially fall in a way to cause failure of nearby safety-related equipment. A similar equipment layout does not exist at the Quad Cities plant.

The design objectives of the spent fuel pool cooling and cleanup system for the Quad Cities plant are to handle the spent fuel pool cooling load and to maintain pool water clarity. The staff believes that the entire spent fuel pool cooling and cleanup system is within the scope of license renewal per 10 CFR 54.4(a)(2), and the passive and long-lived components of the system should be subject to an AMR. The staff asked the applicant to provide detailed discussion to justify why the spent fuel pool cooling and cleanup system is not within the scope of license renewal per 10 CFR 54.4(a)(2), and the justification for excluding the passive and long-lived components of the system from an AMR.

Applicant's Response and Staff's Evaluation

The applicant stated that Exelon does not consider the Quad Cities spent fuel pool cooling and cleanup system to be within the scope of license renewal per 10 CFR 54.4(a)(2). The fuel pool cooling and cleanup system is a non-safety-related closed-loop system that is normally in continuous operation. A plant walkdown during scoping and screening did not identify any safety-related components that could be spatially affected by failure of Quad Cities fuel pool cooling and cleanup system piping or components. Thus, the Quad Cities fuel pool cooling system is not classified as a system within the scope of license renewal under the criterion of 10 CFR 54.4(a)(2).

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.23-2 acceptable because the Quad Cities spent fuel pool cooling and cleanup system is a non-safety-related closed-loop system that is normally in continuous operation, and the only intended function of the system is to preclude adverse effects from failure of segments of piping and components on safety-related SSCs. However, a plant walkdown by the applicant during scoping and screening did not identify any safety-related components that could be spatially affected by failure of Quad Cities fuel pool cooling and cleanup system piping or components. The staff agrees with the applicant that the Quad Cities fuel pool cooling system is not within the scope of license renewal under the criterion of 10 CFR 54.4(a)(2). Therefore, the staff considers its concern described in RAI 2.3.3.23-2 resolved.

2.3.3.23.3 Conclusions

The staff reviewed LRA Section 2.3.3.23, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an

independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the fuel pool cooling and filter demineralizer system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the fuel pool cooling and filter demineralizer system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.24 *Plant Heating System*

2.3.3.24.1 Summary of Technical Information in the Application

The applicant described the plant heating system in LRA Section 2.3.3.24 and provided a list of components subject to an AMR in LRA Table 2.3-24.

The purpose of the plant heating system is to supply steam for plant and area heating during cold weather periods, and for miscellaneous functions such as steam cleaning and carbon dioxide or nitrogen vaporizing. Additionally, the Dresden plant heating system supplies steam to the shutdown cooling system during its operation in the reactor heating mode.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following plant heating system intended function:

- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The plant heating boiler feedwater pumps take suction from the heating system deaerating tank and discharge into the plant heating boilers. In addition, Quad Cities has a small, summer boiler with its own feedwater pumps taking suction from the deaerating tank. The boilers produce steam that flows into a common distribution header. The header discharges steam through a pressure control valve to various loops throughout the plant. Separate loops supply loads in each major building, such as the turbine buildings, reactor buildings, crib house, and radwaste building. From these loops, steam flows to loads such as ventilation heating coils, area space heaters, vaporizers, and steam drops for uses such as steam cleaning. The condensate from the loads passes through steam traps to condensate return units located in the major building areas. The condensate return units pump the condensate back to the heating system deaerating tank at Dresden, and to the condensate receiving tank at Quad Cities. At Quad Cities, the condensate receiving tank pumps then pump the condensate back to the deaerating tank. At Dresden, each reactor building heating steam supply loop also provides steam to its unit's shutdown heat exchangers (evaluated with the shutdown cooling system) for use in the reactor heating mode. As the steam supplied to the shutdown heat exchangers condenses, it drains via a steam trap to the reactor building equipment drain tank.

In LRA Section 2.3.3.24, the applicant described the plant heating system evaluation boundary. In addition, the applicant highlighted those portions of the plant heating system within the scope

of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.24. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the plant heating system in LRA Table 2.3.3-24 as being within the scope of license renewal and subject to an AMR:

- C filters/strainers (spatial interaction)
- C non-safety-related vents or drains, piping, and valves (spatial interaction, Dresden only)
- C piping and fittings (spatial interaction)
- C pumps (spatial interaction)
- C sight glasses (spatial interaction, Quad Cities)
- C tanks (spatial interaction)
- C thermowells (spatial interaction,) (Dresden only)
- C traps (spatial interaction)
- C tubing (spatial interaction)
- C valves (spatial interaction)

2.3.3.24.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.24 and various parts of the Dresden UFSAR and Quad Cities UFSAR regarding the plant heating system to determine whether there is reasonable assurance that the plant heating system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the plant heating system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the plant heating system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the plant heating system. The staff then reviewed the referenced P&I drawings to verify that those portions of the plant heating system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.24, and that the applicant identified all plant heating system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the plant heating system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.24, and that the plant heating system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-24. The staff did not identify any omissions.

2.3.3.24.3 Conclusions

The staff reviewed LRA Section 2.3.3.24 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the plant heating system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the plant heating system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.25 *Containment Atmosphere Monitoring System*

2.3.3.25.1 Summary of Technical Information in the Application

The applicant described the containment atmosphere monitoring (CAM) system in LRA Section 2.3.3.25 and provided a list of components subject to an AMR in LRA Table 2.3.3-25.

The CAM system provides the ability to monitor hydrogen, oxygen, and gross gamma radiation levels in the containment following a LOCA, and provides necessary indication and trip signals.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following intended CAM system functions:

- C provide primary containment isolation
- C support ESF function(s)
- C preclude adverse effects on safety-related systems, structures and components
- C credited in regulated events—components relied upon for compliance with 10 CFR 50.49 (EQ)

During CAM system operation, containment atmosphere is withdrawn through piping connected to primary containment penetrations for obtaining both a drywell and suppression chamber air sample. Hydrogen and oxygen concentration are measured outside the primary containment (evaluated with the primary containment structure) and the sample returned to the primary containment. The sample withdrawal lines in both cases are heat traced to prevent condensation in the sample lines which would cause measurement inaccuracies. A check valve is installed in the return discharge line for primary containment. In addition, a check valve is installed in each reagent and calibration gas line for primary containment. The containment

atmosphere monitoring system consists of oxygen and hydrogen analyzer process instrumentation and various indication and annunciation instruments, primary containment monitoring panels, and gross gamma detector channels (from detector to annunciator and computer points). The system is automatically activated upon the occurrence of a LOCA, or manually by an operator. The system initiates a primary containment group 2 isolation on high radiation.

In LRA Section 2.3.3.25, the applicant described the evaluation boundary of the CAM system. In addition, the applicant highlighted those portions of the CAM and its structures and components that are within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.25. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the CAM system in LRA Table 2.3.3.25 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C filters/strainers (filter)
- C flexible hoses (pressure boundary)
- C NSR vents or drains, piping, and valves (structure integrity/attached support)
- C piping and fittings (structure integrity/attached support)
- C piping and fittings (pressure boundary)
- C pumps (pressure boundary)
- C restricted orifices (pressure boundary)
- C sample pumps (pressure boundary)
- C tubing (pressure boundary)
- C valves (pressure boundary)
- C valves (structure integrity/attached support)

2.3.3.25.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.25, Dresden UFSAR Sections 6.2.5.3.2 and 7.3.2.2.7, and Quad Cities UFSAR Section 6.2.5.2 to determine whether there is reasonable assurance that the CAM system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the CAM system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the CAM system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the CAM system. The staff then reviewed the referenced P&I drawings to verify that those portions of the CAM system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.25, and that the applicant identified all CAM system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

2.3.3.25.3 Conclusions

The staff reviewed LRA Section 2.3.3.25 and accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the CAM system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the CAM system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.26 *Nitrogen Containment Atmosphere Dilution System*

2.3.3.26.1 Summary of Technical Information in the Application

The applicant described the nitrogen containment atmosphere dilution (NCAD) system in LRA Section 2.3.3.26 and provided a list of components subject to an AMR in LRA Table 2.3.3-26.

The NCAD system provides two redundant, single failure proof, independent flow paths for purging the primary containment with nitrogen to provide postaccident combustible gas control. The NCAD system injects gaseous nitrogen into the primary containment to purge the containment of oxygen and hydrogen to maintain the mixture below combustible levels.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following intended NCAD system functions:

- C support ESF function(s)—provides capability to maintain a nonexplosive atmosphere in the primary containment following a design basis accident (backup to nitrogen inerting system for post-LOCA operations (Quad Cities only))

The NCAD system is a manually operated system comprised of redundant flow paths. It is operated locally by opening a manual valve near the nitrogen supply equipment. The containment purge and vent valves can be aligned to inject nitrogen into the drywell or

suppression chamber (evaluated with the primary containment structure) for either flowpath. At Quad Cities, the NCAD system is made up of two independent, redundant flowpaths for each unit. Each flow path in turn can supply gaseous nitrogen to either the drywell or suppression chamber. One flow path runs from the unit's corresponding electric vaporizer and taps back into the nitrogen inerting system piping just upstream of the nitrogen purge vaporization valve, on the non-safety-related side. The other flow path runs from the opposite unit's electric vaporizer and taps back into the normal nitrogen makeup system just upstream of the nitrogen makeup valve. Either flowpath can be supplied by the nitrogen atmospheric vaporizer. At Dresden, there is a normal and emergency supply line. The normal NCAD line begins with the drywell nitrogen purge and inerting system (DNPIS) (evaluated with the drywell nitrogen inerting system) connection downstream of the pressure regulating station at the discharge side of the makeup line atmospheric vaporizer; then, from the pressure regulating stations to the nitrogen supply header. The emergency NCAD line begins with the discharge of the nitrogen auxiliary tank and taps into the emergency truck connection upstream of the makeup line atmospheric vaporizer.

The NCAD system at Dresden includes the normal and emergency supply lines. The NCAD system at Quad Cities includes the two independent, redundant flow paths. All associated piping, components, and instrumentation contained within the flow paths and systems described above are included in the NCAD system.

In LRA Section 2.3.3.26, the applicant described the evaluation boundary of the NCAD system. In addition, the applicant highlighted those portions of the NCAD system and its structures and components that are within the scope of the Rule in the P&I drawings listed as reference in LRA Section 2.3.3.26. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the NCAD system in LRA Table 2.3.3.26 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C restricted orifices (pressure boundary, Dresden only)
- C restricted orifices (throttle, Dresden only)
- C tubing (pressure boundary)
- C valves (pressure boundary)

2.3.3.26.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.26, Dresden UFSAR Section 6.2.5.3.3, and Quad Cities UFSAR Section 6.2.5.3 to determine whether there is reasonable assurance that the NCAD system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the NCAD system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the NCAD system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the NCAD system. The staff then reviewed the referenced P&I drawings to verify that those portions of the NCAD system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.26, and that the applicant identified all NCAD components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

2.3.3.26.3 Conclusions

The staff reviewed LRA Section 2.3.3.26 and accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the NCAD system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the NCAD system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.27 *Drywell Nitrogen Inerting System*

2.3.3.27.1 Summary of Technical Information in the Application

The applicant described the drywell nitrogen inerting (DNI) system in LRA Section 2.3.3.27 and provided a list of components subject to an AMR in LRA Table 2.3.3-27.

The DNI system, also known as the DNPIS, is provided to maintain the drywell in a nitrogen inerted condition as a means of inhibiting the formation of a combustible gas mixture under LOCA conditions. The system is not safety-related; however, it can be used for post-LOCA hydrogen control. The system also serves as a backup to the pump-back system to maintain the required drywell-to-suppression chamber differential pressure and provide nitrogen to the NCAD system.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following intended NCAD system functions:

- C supports ESF function(s)—reduces and maintains a low concentration of oxygen in the primary containment(can also be used, if available, for post-LOCA hydrogen concentration control)
- C credited in regulated event(s)—credited in mitigation of the Appendix R fire event by establishing the inert drywell environment in which a design basis fire cannot occur

The DNI system consists of a liquid nitrogen storage tank, nitrogen vaporizers, associated piping, isolation valves, and pressure regulators. Nitrogen is supplied to three possible types of vaporizers. Steam powered vaporizers, which use plant heating steam (evaluated with plant heating system) to ensure supply temperatures do not damage nitrogen piping during periods of large demand, exist at both Dresden and Quad Cities, although Quad Cities typically uses electrically powered vaporizers installed for the same purpose. Additionally, each site has atmospheric vaporizers for periods of low demand. Flow regulating valves are also installed to limit low nitrogen supply temperatures. Nitrogen to the drywell is supplied through the drywell purge inlet line while air is vented to the reactor building ventilation system (evaluated with RBH-HVAC) or the standby gas treatment system (evaluated with standby gas treatment system). A similar method is used for inerting the suppression chamber. The containment is deinerted by admitting air into the containment as the containment atmosphere is vented to the reactor building ventilation system or the standby gas treatment system.

In LRA Section 2.3.3.27, the applicant described the evaluation boundary of the DNI system. In addition, the applicant highlighted those portions of the DNI system and its structures and components that are within the scope of the Rule in the P&I drawings listed as reference in LRA Section 2.3.3.27. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the DNI system in LRA Table 2.3.3.27 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C filter/strainers (pressure boundary, Dresden only)
- C filter/strainers (filter, Dresden only)
- C flow elements (pressure boundary)
- C isolation barriers (pressure boundary)
- C piping and fittings (pressure boundary)
- C tanks/vaporizers (pressure boundary)
- C thermowells (pressure boundary)
- C traps (pressure boundary)
- C tubing (pressure boundary)
- C valves (pressure boundary)

2.3.3.27.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.27, and Dresden and Quad Cities UFSAR Sections 6.2.5, to determine whether there is reasonable assurance that the DNI system components within the

scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the DNI system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the DNI system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the DNI system. The staff then reviewed the referenced P&I drawings to verify that those portions of the DNI system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.27, and that the applicant identified all DNI components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of LRA Section 2.3.3.27 identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant responses, dated October 3, 2003, are described below.

RAI 2.3.3.27-1. Nitrogen auxiliary tank 2/3-8554, shown on diagram LR-DRE-M-4215 in the drywell nitrogen inerting system, requires an AMR because this tank provides a pressure-retaining function for the safety-related components. Valve 2/3-8599-761 (D-7) and associated 1-inch line which connects to above tank is shown as not requiring an AMR. Also, valves 2/3-8599-807 and -803, and connecting pipe and muffler (E-6), are shown as not requiring an AMR. The staff asked the applicant to indicate where the LRA addresses the AMR of these components or provide a justification for excluding these components from an AMR.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.27-1 stated that Exelon has reviewed boundary diagram LR-DRE-M-4215 for the DNI system and the following clarification is provided.

Valve 2/3-8599-761 (D-7) and its associated 1 in. line are in the scope of license renewal and are managed for aging. Boundary diagram LR-DRE-M-4215 should have highlighted this component within the scope of license renewal. Similarly, valves 2/3-8599-807 and 2/3-8599-

803 and the connecting piping should have been highlighted indicating that they are within the scope of license renewal. The muffler and piping beyond the safety relief valve, 2/3-8599-803, are not in the scope of license renewal since these components do not support the pressure boundary intended function.

Aging management references for these components can be found in LRA Table 2.3.3-27 under the component group “valves” and “piping and fittings,” with “pressure boundary” as the component intended function.

Based on its review of the applicant’s clarification discussed above, the staff finds the applicant’s response to RAI 2.3.3.27-1 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.27-1 resolved.

RAI 2.3.3.27-2. Nitrogen purge vaporizer 1/2-8713 is shown on diagram LR-QDC-M-34-3 (C-2) in the drywell nitrogen inerting system to require an AMR because this tank provides a pressure-retaining function for the safety-related components. Lines 1/2-57163 and 1/2-57522 which connects to the vaporizer tank, are shown as not requiring an AMR. The staff asked the applicant to indicate where the LRA addresses the AMR of these components or provide a justification for excluding these components from an AMR.

Applicant’s Response and Staff’s Evaluation

The applicant’s response to RAI 2.3.3.27-2 stated that boundary diagram LR-QDC-M-34-3 should have highlighted the piping as being within the scope of license renewal. LRA Section 2.3.3.24 addresses the aging management of lines 1/2-57522-3"-O and 1/2-57163-11/4"-O. Lines 1/2-57522-3"-O and 1/2-57163-11/4"-O to the steam vaporizer are within the scope of license renewal and have an intended function of “spatial interaction.” LRA Table 2.3.3-24 includes the piping under the component group “piping and fittings (spatial interaction).”

Based on its review of the applicant’s clarification discussed above, the staff finds the applicant’s response to RAI 2.3.3.27-2 acceptable because it conforms with the criteria set forth in 10 CFR 54.4 and 10 CFR 54.21(a)(1). Therefore, the staff considers its concern described in RAI 2.3.3.27-2 resolved.

2.3.3.27.3 Conclusions

The staff reviewed LRA Section 2.3.3.27, accompanying scoping boundary drawings, and the applicant’s response to the RAIs, dated October 3, 2003, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the DNI system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the DNI system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.28 Safe Shutdown Makeup Pump System (Quad Cities Only)

2.3.3.28.1 Summary of Technical Information in the Application

The applicant described the safe shutdown makeup pump (SSMP) system in LRA Section 2.3.3.28 and provided a list of components subject to an AMR in LRA Table 2.3.3-28.

The function of the SSMP system, which is a common system to Unit 1 or Unit 2, is to provide cooling water to the reactor core in the event that the reactor becomes isolated from the main condenser simultaneously with a loss of the feedwater system. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following SSMP system intended functions:

- C pressure boundary—maintains pressure boundary integrity at interface with HPCI system piping to support injection of cooling water to the reactor pressure vessel (RPV)
- C credited for regulated event(s)—provides cooling water injection into the reactor pressure vessel credited for the mitigation of fire events in accordance with Appendix R to 10 CFR Part 50

The SSMP system consists of a motor-driven pump, associated valves, piping, and instrumentation. The preferred water source to the pump is the contaminated condensate storage tank (evaluated with the condensate and condensate storage system). An alternate source of makeup water is available from the fire header (evaluated with the FP system). The SSMP discharge is delivered to the reactor vessel (evaluated with the reactor vessel) via the HPCI system pump discharge line (evaluated with the HPCI system).

In LRA Section 2.3.3.28, the applicant described the SSMP system evaluation boundary. In addition, the applicant highlighted those portions of the SSMP system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.3.28. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the SSMP system in LRA Table 2.3.3-28 as being within the scope of license renewal and subject to an AMR:

- C auxiliary and RW HVAC air handlers heating/cooling (pressure boundary)
- C auxiliary and RW HVAC air handlers heating/cooling (heat transfer)
- C closure bolting (pressure boundary)
- C ducts and fittings, access doors, closure bolts, and equipment frames (pressure boundary)
- C filters/strainers (pressure boundary)
- C filters/strainers (filter)
- C piping and fittings, including spectacle flanges (pressure boundary)
- C pumps (pressure boundary)
- C restricting orifices (pressure boundary)
- C restricting orifices (throttle)

C valves (pressure boundary)

2.3.3.28.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.28 and Quad Cities UFSAR Section 5.4.6.5 to determine whether there is reasonable assurance that the SSMP system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with the Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the SSMP system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the SSMP system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the SSMP system. The staff then reviewed the referenced P&I drawings to verify that those portions of the SSMP system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.28, and that the applicant identified all SSMP system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.3.28-1. In RAI 2.3.3.28-1, the staff observed that boundary drawing LR-QDC-M-70 (B-8), SSMP system, shows a 2-inch pipe that is in scope (green) that comes from the SW system (LR-QDC-M-69-1, F-8) indicating that the water supply for the SSMP room cooler is supplied from SW. LRA scoping and screening results, Section 2.3.3.28, states that the SSMP room coolers are evaluated with the SW system, and LRA Section 2.3.3.16 states that the SW loads include the SSMP room cooler for Quad Cities. However, on SW scoping drawing LR-QDC-M-69-1(F-8), that portion of the SW system is not shown in scope.

Since the SW system shown on LR-QDC-M-69-1, which can supply SW to the SSMP system at the tie-in at F-7, is shown not in scope, the staff requested the applicant to identify the in-scope

source of water for the SSMP room cooler and any resultant changes to Table 2.3.3-16 and affected AMPs.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.28-1 states that although SW is supplied to the SSMP room cooler during routine operation, the SW system is not credited for compliance with 10 CFR 50.48. When the room cooler is credited during a fire, the SW supply is isolated by closing valve 1/2-2901-25, and a fire water system source (evaluated in Section 2.3.3.5) is then provided by opening valve 1/2-2901-9 (see LR-QDC-M-70, coordinates B-8 and C-8). These valves are included in Table 2.3.3-28, under the component group "valves (Quad Cities only)."

The staff finds the applicant's response to RAI 2.3.3.28-1 acceptable because the SW system is not credited for compliance with 10 CFR 50.48. When the room cooler is credited during a fire, the SW supply is isolated and a fire water system source is then provided. The fire water system source is the within scope water source for the SSMP room cooler and is evaluated under LRA Section 2.3.3.5. Therefore, the staff finds the applicant's response acceptable and considers its concern described in RAI 2.3.3.28-1 resolved.

RAI 2.3.3.28-2. The staff observed that the license renewal boundary drawing LR-QDC-M-70 (B-8), SSMP system, shows a 2 in. pipe that is in scope (green) that goes to the SW system (LR-QDC-M-69-1, D-6) indicating that the water return from the SSMP room cooler goes to the SW system and eventually to the circulating water system (LR-QDC-M-28-1, D-5). LRA scoping and screening results, Section 2.3.3.28, states that the SSMP room coolers are evaluated with the SW system. However, on LR-QDC-M-69-1(D-6), the SW system piping from the tie-in from the SSMP system to the tie-in to the circulating water system is shown not in scope.

Service water, as shown on LR-QDC-M-69-1, from where the pipe from the SSMP ties in at D-6 to where it goes to the circulating water system (LR-QDC-M-28-1, D-5) at G-6, is not shown in scope. The staff requested the applicant to identify the in-scope water discharge path for the SSMP room cooler and any resultant changes to Table 2.3.3-16 and affected AMPs.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.28-2 states that although SW is supplied to the SSMP room cooler during routine operation, the SW system is not credited for compliance with 10 CFR 50.48. When the room cooler is credited during a fire, the SW supply is isolated, and a fire water system source is then provided. The room cooler cooling water discharge piping is not reconfigured during a fire. The discharge line (line 1/2-2908-2"-L) exits the SSMP room and connects to the SW discharge line from the 0-4709 instrument air compressor (line 0-39115-2"-O), which in turn discharges into the Unit 2 42" standpipe (line 2-4407-42"-L). The standpipe then connects to the discharge flume via the Unit 2 circulating water discharge piping. Only the SSMP room cooler discharge piping and components within the SSMP room, as highlighted on boundary diagram LR-QDC-M-70, are within the scope of license renewal. The SSMP room cooler discharge piping and components are evaluated in LRA Section 2.3.3.28, "Safe Shutdown Makeup Pump System (Quad Cities Only)," and are included in Table 2.3.3-28, under component groups "piping and fittings (Quad Cities only) (includes spectacle flanges)" and

“valves (Quad Cities only),” with component intended functions of “pressure boundary.” The loss of the component function of “pressure boundary” for cooling water discharge piping and components outside of the SSMP room would not prevent the SSMP system from performing its intended functions.

Based on its review of the applicant’s clarification discussed above, the staff finds the applicant’s response to RAI 2.3.3.28-2 acceptable because the SSMP room cooler water discharge piping is not a safety-related component and a failure of the component outside of the SSMP room would not prevent the SSMP system from performing its intended functions. A failure of the pipe inside the SSMP room could prevent the SSMP system from performing its intended functions; this section of the pipe is within the scope of license renewal and the piping and components are included in LRA Table 2.3.3-28, subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.3.28-2 resolved.

RAI 2.3.3.28-3. In RAI 2.3.3.28-3, the staff identified that the boundary diagram LR-QDC-M-70 depicts the safe shutdown makeup system. At grid location F-2, piping line 1-2905-4"-B is shown as continuing at grid location D-9 on diagram LR-QDC-M-46-1. Although the staff examined diagram LR-QDC-M-46-1, this line could not be located. In the place where the staff expected to find the SSMP system discharge line (based upon the staff’s examination of LR-QDC-M-87-1), an end-capped line is depicted on LR-QDC-M-46-1. The staff requested the applicant to clarify where the SSMP system discharge line connects to the high pressure injection system discharge line, so that the staff may verify that the LR scoping boundaries for this system comply with 10 CFR 54.4(a).

Applicant’s Response and Staff’s Evaluation

The applicant’s response to RAI 2.3.3.28-3 states that when the SSMP system was initially installed at Quad Cities, the SSMP discharged into the HPCI pump discharge line on both units. The HPCI pump discharge line connects into the “B” reactor feedwater line on both units. A recent modification on Unit 1 moved the SSMP discharge line to connect directly into the “B” reactor feedwater line and capped the stub where it used to connect to the HPCI pump discharge line.

Quad Cities UFSAR Section 5.4.6.5, “Safe Shutdown Makeup Pump System,” and LRA Section 2.3.3.28, “Safe Shutdown Makeup Pump System (Quad Cities Only),” accurately describe the different flow paths for the two units, but because of the timing of the modification installation and issuance of the “For Record” drawings, not all LR boundary diagrams associated with the SSMP system reflected the change in the Unit 1 flow path prior to issuance of the LRA to the NRC. The continuation flag for line 1-2905-4"-B on LR-QDC-M-70, coordinate F-2, should point to M-15-1 (LR-QDC-M-15-1), coordinate F-1. LR-QDC-M-15-1, coordinate F-1, should show line 1-2905-4"-B continuing from M-70 (LR-QDC-M-70) and connecting to the “B” reactor feedwater line between the discharge side of check valve 1-0220-59B and the HPCI line 1-2304-14"-C connection to the “B” reactor feedwater. LR-QDC-M-46-1 correctly depicts the capped line for the original connection to the HPCI line.

Based on its review of the applicant’s clarification discussed above, the staff finds its response to RAI 2.3.3.28-3 acceptable because the inconsistency between the drawings and the system description is caused by an outdated drawing. The current drawing is in accordance with the

system description given in the LRA. All the system components in the scope of license renewal were identified in the system description in accordance with the criteria set forth in 10 CFR 54.4(a). Therefore, the staff considers its concern described in RAI 2.3.3.28-3 resolved.

RAI 2.3.3.28-4. The LRA includes flow elements as an individual entry in the AMR results tables for many of the systems in which they are depicted as being within the scope of license renewal on the associated LR boundary diagrams (e.g., DWM system and CCSW system). However, for the SSMP system, the AMR results in LRA Table 2.3.3-28 do not include an entry for flow elements, despite the fact that they are depicted as being within scope on boundary diagram LR-QDC-M-70 (grid location D-5). Therefore, in light of the screening criteria set forth in 10 CFR 54.21(a)(1), the staff requested the applicant to provide the basis for not including flow elements as an entry in LRA Table 2.3.3-28.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.28-4 states that there are four components in the SSMP system with an assigned plant component type of "flow element." These four components are included in different component groups in LRA Table 2.3.3-28. Refer to boundary diagram LR-QDC-M-70.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.28-4 acceptable because the flow elements cited above were identified as being within scope of license renewal in accordance with the criteria set forth in 10 CFR 54.4(a) and were included in different component groups in LRA Table 2.3.3-28. Therefore, the staff considers its concern described in RAI 2.3.3.28-4 resolved.

RAI 2.3.3.28-5. In RAI 2.3.3.28-5, the staff identified that on boundary diagram LR-QDC-M-70 (grid location F-4), a segment of piping connected to in-scope piping is not highlighted as being within the scope of license renewal. This segment of piping is part of a piping line that is highlighted as being within the scope of license renewal on either side of the unhighlighted segment, and there are no valves or other pressure boundaries that isolate the unhighlighted segment. It is not apparent to the staff why the unhighlighted segment of piping is not considered to be within scope to ensure that the in-scope portions of the piping line are capable of performing their intended function for license renewal. Therefore, in light of 10 CFR 54.4(a), the staff requested the applicant to provide the basis for not including the unhighlighted piping segment within the scope of license renewal.

Applicant's Response and Staff's Evaluation

The applicant's response to RAI 2.3.3.28-5 states that the piping segment in question on LR-QDC-M-70 (F-4) is actually an instrument electrical lead. See LR-QDC-M-12-2 (E-7) for a clarification of boundary diagram symbols. It was correct not to highlight the questioned section. There are more sections of instrument electrical leads on LR-QDC-M-70 that are highlighted, but which should not have been. One example is the connection between the motor operators for MO 2-2901-08 (C-3), MO 1-2901-08 (D-3), and MO 1/2-2901-07 (E-4). When creating boundary diagrams for mechanical systems, it was the convention not to

highlight instrument electrical leads. Based on this, LR-QDC-M-70 should not have highlighted the instrument electrical leads.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.3.28-5 acceptable because the component cited above is an electrical lead and not a mechanical component. The applicant also stated that other electrical leads were wrongfully highlighted. Component support commodity groups for the SSMP system and electrical components that support the operation of the SSMP system are described in LRA Sections 2.4.15 and 2.4.16. Therefore, the staff considers its concern described in RAI 2.3.3.28-5 resolved.

2.3.3.28.3 Conclusions

The staff reviewed LRA Section 2.3.3.28, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the SSMP system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the SSMP system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.29 *Circulating Water System*

Resulting from the revised scoping methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, portions of the circulating water systems at Dresden and Quad Cities were added to the scope of license renewal. Previously, these systems were not included in the original license renewal application. The circulating water (CW) system is a non-safety-related system that could spatially interact with portions of the safety-related emergency diesel cooling water system at both sites. At Quad Cities, only the Unit 1 CW system can spatially interact with safety-related components; therefore, it is the only system which is added to the scope of license renewal for Quad Cities. Thus, the applicant created LRA Section 2.3.3.29 (to address the CW systems for Dresden Units 2 & 3 and Quad Cities Unit 1) for NRC staff review.

2.3.3.29.1 Summary of Technical Information in the Application

The applicant described the CW system in LRA Section 2.3.3.29 and provided a list of components subject to an AMR in LRA Table 2.3.3-29.

The primary function of the CW system is to remove the heat rejected from the main condenser. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following CW system intended functions:

- Preclude adverse effects on safety-related SSCs– Non-safety-related components that

could be a hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

At Dresden, the CW system takes supply from the Dresden cooling lake (with makeup from Kankakee River) or directly from the Kankakee River, directs the flow through the main condenser, and discharges it back to the Dresden cooling lake and/or the Illinois River system. Whereas at Quad Cities, the CW system takes suction directly from the Mississippi River, discharges the flow through the condenser, and directs it back to the river.

The CW system on each unit has three vertical, drypit, centrifugal, removable element CW pumps which deliver water from the crib house intake to the condenser water boxes. Each pump suction is sectionalized to permit dewatering of one pit for maintenance while the remaining two pumps are in operation. Upstream of each CW pump there is a bar-grille trash rack with a rake for periodic removal of river debris followed by traveling screens for removal of debris. Each pump is provided with a shutoff valve at its discharge. At the condenser pit the CW pipe becomes a supply header to the main condenser.

The applicant described the evaluation boundary for the CW system in LRA Section 2.3.3.29. In addition, the applicant highlighted on the P&I drawings those portions of the CW system that are within the scope of the Rule. These drawings are listed as "License Renewal Boundary Diagram References" in the LRA Section 2.3.3.29. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the CW system in LRA Table 2.3.3-29 as being within the scope of license renewal and subject an AMR:

- Piping and fittings (spatial interaction)
- Valves (spatial interaction)
- Pumps (spatial interaction - Dresden only)

2.3.3.29.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.29, Dresden UFSAR Section 10.4.5, and Quad Cities UFSAR Section 10.4.5 to determine whether there is reasonable assurance that the CW system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the CW system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the CW system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs. The staff then reviewed the referenced P&I drawings to verify that those portions of the CW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.29, and that the applicant identified all CW system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the CW system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.29. The CW system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-29. The staff did not identify any omissions.

2.3.3.29.3 Conclusions

The staff reviewed LRA Section 2.3.3.29 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. No omissions were found. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the CW system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the CW system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.30 *Dresden Laundry Treatment System*

Resulting from the revised scoping methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, a portion of the laundry waste treatment system at Dresden was added to the scope of license renewal. Non-safety-related laundry waste treatment system piping could spatially interact with safety-related electrical switchgear at Dresden. As a result, Section 2.3.3.30, Laundry Waste Treatment System has been created (for Dresden only) by the applicant and submitted for NRC staff review. Previously, this system was not included in the original license renewal application.

2.3.3.30.1 Summary of Technical Information in the Application

The applicant described the laundry waste treatment system in LRA Section 2.3.3.30 and provided a list of components subject to an AMR in LRA Table 2.3.3-30.

The function of the laundry waste treatment system is to collect potentially radioactive water for liquid radwaste processing. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following laundry waste treatment system intended functions:

- Preclude adverse effects on safety-related SSCs – Non-safety-related components that could be a hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

At Dresden, the laundry drain tank of the laundry waste treatment system collects liquid waste generated from the laundry facility which includes the Dresden Unit 1 laundry room, the maintenance shop floor drains, and the access control building personnel decontamination station drains. The liquid waste is pumped to the Dresden Unit 2/3 liquid radwaste system for sampling.

The applicant described the evaluation boundary for the laundry waste treatment system in LRA Section 2.3.3.30. In addition, the applicant highlighted those portions of the laundry waste treatment system within the scope of the Rule on the P&I drawing listed as references in the LRA Section 2.3.3.30. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the laundry waste treatment system in LRA Table 2.3.3-30 as being within the scope of license renewal and subject to an AMR:

- Piping and fittings (spatial interaction - Dresden only)

According to the applicant, while the laundry waste treatment system includes the laundry accumulator tank, drain tank vault sump eductor, laundry drain tank, laundry drain pump, and associated piping, valves and instruments, only discharge piping transferring water to radwaste is located in the same general area that includes safety-related electrical switchgear. For that reason, only piping and fittings require aging management.

2.3.3.30.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.30 and Dresden UFSAR Section 1.2.4.4.11 to determine whether there is reasonable assurance that the laundry waste treatment system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the laundry waste treatment system in the LRA. The staff did not identify any omissions.

The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the laundry waste treatment system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawing to the system drawing in the UFSAR to ensure that the referenced P&I drawing was representative of

the laundry waste treatment system. The staff then reviewed the referenced P&I drawing to verify that those portions of the laundry waste treatment system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.30, and that the applicant identified all laundry waste treatment system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the laundry waste treatment system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.30. The laundry waste treatment system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-29. The staff did not identify any omissions.

2.3.3.30.3 Conclusions

The staff reviewed LRA Section 2.3.3.30 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. No omissions were found. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the laundry waste treatment system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the laundry waste treatment system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.3.31 *Zinc Injection System*

Resulting from the revised scoping methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the zinc injection system at both sites was added to the scope of license renewal. Previously, this system was not included in the original license renewal application. The zinc injection system is a non-safety-related system that could spatially interact with safety-related piping. As a result, Section 2.3.3.31, Zinc Injection System has been created by the applicant and submitted for NRC staff review.

2.3.3.31.1 Summary of Technical Information in the Application

The applicant described the zinc injection system in LRA Section 2.3.3.31 and provided a list of components subject to an AMR in LRA Table 2.3.3-31.

The function of the zinc injection system is to reduce the amount of Cobalt-60 buildup on recirculation piping in the primary containment and reduce dose rates in the drywell during outages. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following zinc injection system intended functions:

- Preclude adverse effects on safety-related SSCs – Non-safety-related components that

could be a hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

The zinc injection system is mounted on a skid near the reactor feedwater pumps. A tap on the feedwater pump discharge header provides flow to a vessel on the skid which contain zinc oxide pellets and returns to the feedwater pump suction header. The driving force for the injection is the differential pressure between the discharge and suction of the feedwater pumps. The zinc oxide dilution rate is controlled by varying the flow through the skid with a manually operated flow control valve.

The applicant described the evaluation boundary for the zinc injection system in LRA Section 2.3.3.31. In addition, the applicant highlighted on the P&I drawings those portions of the zinc injection system that are within the scope of the Rule. These drawings are listed as “License Renewal Boundary Diagram References” in the LRA Section 2.3.3.31. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the zinc injection system in LRA Table 2.3.3-31 as being within the scope of license renewal and subject an AMR:

- Piping and fittings (spatial interaction)(includes dissolution columns, strainers and flow elements)
- Tubing (spatial interaction)
- Valves (spatial interaction)

The licensee included the dissolution columns, strainers, and flow elements to LRA Table 2.3.3-31 as part of the piping and fittings for aging management, because the leakage boundary for these components is comprised of the same material and experiences the same environment as the components evaluated under the “Piping and Fittings (spatial interaction)” group.

2.3.3.31.2 Staff Evaluation

The staff reviewed LRA Section 2.3.3.31, Dresden UFSAR Section 5.4.3.7, and Quad Cities UFSAR Section 10.4.7.2 to determine whether there is reasonable assurance that the zinc injection system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of the NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the zinc injection system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being

subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the zinc injection system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the zinc injection system. The staff then reviewed the referenced P&I drawings to verify that those portions of the zinc injection system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.31, and that the applicant identified all zinc injection system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the zinc injection system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.3.31. The zinc injection system components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.3-31. The staff did not identify any omissions.

2.3.3.31.3 Conclusions

The staff reviewed LRA Section 2.3.3.31 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. No omissions were found. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the zinc injection system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the zinc injection system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.4 Steam and Power Conversion Systems

The steam and power conversion systems consist of the main steam, feed water, condensate and condensate storage systems, main condenser, main turbine and auxiliaries, turbine oil (Quad Cities only), and main generator and auxiliaries (Quad Cities only), and the associated components.

2.3.4.1 Main Steam System

2.3.4.1.1 Summary of Technical Information in the Application

The applicant described the main steam system in LRA Section 2.3.4.1 and provided a list of components subject to AMR in LRA Table 2.3.4-1.

The function of the main steam system is to direct steam from the reactor pressure vessel to the

main turbine and balance of plant auxiliary steam loads. In performing this function, it serves as part of the primary boundary to prevent radioactive release to the surrounding environment. The system also provides the ability to bypass steam directly to the main condenser, and provides overpressure protection for the reactor vessel.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following main steam system intended functions:

- pressure boundary—maintains the integrity of the reactor coolant pressure boundary and provides steam-line isolation to support the reactor coolant pressure boundary
- core cooling—in conjunction with the automatic depressurization system, supports emergency core cooling by depressurizing the reactor pressure vessel as required to support low pressure coolant injection and core spray operation
- overpressure protection—provides overpressure protection in transient or accident events that increase pressure in the reactor pressure vessel
- primary containment isolation—provides containment isolation for those portions of the system that interface with the primary containment
- supports ESF function(s)—provides process signals for initiation of ESF functions, limits coolant inventory loss rate in some LOCA events, and (at Quad Cities only) provides steam supply for operation of the HPCI and RCIC systems
- credited in regulated event(s)—provides overpressure protection, reactor vessel isolation capability, and pressure control capability credited in mitigation of the Appendix R fire, ATWS, and SBO events (The system also contains components that are relied upon for compliance with 10 CFR 50.49, (EQ).)
- post accident plateout of MSIV seat leakage—provides surfaces for plateout of iodine releases resulting from MSIV bypass leakage
- limit steam line flow—limits potential radioactive release by restricting steam flow during a steam line rupture outside of primary containment: flow is also limited to ensure integrity of dryers in order to prevent restriction of MSIV closure
- steam flow measurement—provides main steam flow input for primary containment isolation
- preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The main steam system consists of four main steam lines that deliver steam from the reactor to

the main turbine. Each line is equipped with safety valves, at least one relief valve, a venturi-type flow restrictor, followed by an MSIV inside and outside the primary containment. Also connected to the main steam lines are tail pipes to the suppression pool for the safety/relief valves, main steam line drain piping, turbine main stop and bypass valves, and the associated main steam bypass piping to the condenser.

At Dresden, the main steam system downstream of the outboard isolation valve is described in Section 10.3 of the Dresden UFSAR. In addition to providing steam to drive the main turbine, it also provides steam to the turbine gland seal system, steam jet air-ejectors, off-gas recombiner system, main condenser low load reheat coils, and the liquid radwaste reboiler. The system can be aligned to bypass the main turbine via bypass valves to the main condenser when required. This is done by directing steam from the turbine bypass manifold, through nine 8-inch lines connected to the turbine bypass valves, which discharge to the main condenser. Drains are provided at several locations along the main steam system to drain condensate from the line and return it to the condenser.

At Quad Cities, the main steam system supplies steam to the main turbine, the turbine gland seal system, steam jet air-ejector system, booster air ejector (2B train only), off-gas preheater, and the condenser low load reheat coil supply. Also, it supplies steam to the HPCI and RCIC pump turbines as described in LRA Section 2.3.4.1. The main steam system downstream of the outboard isolation valve is described in Section 10.3 of the Quad Cities UFSAR. Low points of each of the main steam lines are provided with drains through a valved line to the main condenser.

In LRA Section 2.3.4.1, the applicant described the main steam system evaluation boundary. In addition, the applicant highlighted those portions of the main steam system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.1. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the main steam system in LRA Table 2.3.4-1 as being within the scope of license renewal and subject to an AMR:

- C accumulators (pressure boundary)
- C closure bolting (pressure boundary)
- C dampeners (pressure boundary, Quad Cities only)
- C filters/strainers (filter, Quad Cities only)
- C flexible hoses (pressure boundary)
- C flow elements (pressure boundary)
- C NSR vents or drains, piping, and valves (spatial interaction)
- C NSR vents or drains, piping, and valves (structural integrity/attached support)
- C piping and fittings (pressure boundary)
- C small bore piping and fittings (pressure boundary)
- C restricting orifices (pressure boundary)
- C rupture discs (pressure boundary)
- C tanks (pressure boundary, Quad Cities only)
- C thermowells (pressure boundary)

- C tubing (structural integrity/attached support)
- C vacuum breakers (pressure boundary)
- C valves (pressure boundary)
- C valves (structural integrity/attached support, Dresden only)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of non-safety-related sections of the main steam system at Dresden and Quad Cities were expanded and highlighted as shown on the revised boundary diagrams, and the new boundary diagrams added for Quad Cities. Additional piping components associated with main steam instrumentation racks that contain small bore piping and tubing that could spatially interact with safety-related equipment in the same general area was added to the scope of license renewal for both Dresden and Quad Cities. Walkdowns of the turbine building at Dresden identified several main steam lines which supply steam to the radwaste reboiler routed in the same general areas containing safety-related components. The main steam line piping and associated components located in these areas were also added to the scope of license renewal due to potential spatial interaction with safety-related equipment. Quad Cities does not have a radwaste reboiler subsystem. As such, the scoping of the main steam supply lines to the radwaste reboiler only applies to Dresden.

The applicant identified the following additional component groups and their intended functions within the main steam system as being within scope of license renewal, and added them to LRA table 2.3.4.1.

- C Piping and Fittings (spatial interaction)
- C Tubing (spatial interaction)
- C Valves (spatial interaction)

2.3.4.1.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.1, Dresden UFSAR Section 10.3, and Quad Cities UFSAR Section 10.3 to determine whether there is a reasonable assurance that the main steam system components within the scope of license renewal and subject to AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with the Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the main steam system in the LRA.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that the components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the main steam system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the main steam system. The staff then reviewed the referenced P&I drawings to verify that those portions of the main steam system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.1, and that the applicant identified all main steam system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.4.1-1. UFSAR Section 15.6.5.5 contains a discussion of the radiological dose analysis performed for the control room in accordance with guidance of NUREG-0737, Item III.D.3.4. Credit is taken for iodine plateout on surfaces of steam lines and condenser and radioactive decay prior to release. In assessing radioactive releases via the MSIV leakage pathway, MSIV leakage is assumed to pass through three different volumes which provide holdup and plateout. The volumes are the main steam piping section between the inboard and outboard isolation valves, the piping between the outboard isolation valves and the turbine stop valves, and the piping between the turbine stop valves and the turbine condenser complex. The licensee has identified postaccident plateout of MSIV seat leakage as a system intended function of the main steam system. The staff believes that in addition to the plateout function, the main steam system also provides for postaccident containment and holdup of MSIV bypass leakage, and that pressure boundary integrity for portions of the main steam system that are required to contain bypass leakage must be maintained during the postaccident period. The staff asked the applicant to clarify whether postaccident containment and holdup should be included as an intended function for the main steam system, and if not, please provide justification for its exclusion.

Applicant's Response and Staff's Evaluation

The main steam system intended function, identified in Section 2.3.4.1 of the LRA as "Post accident plateout of MSIV seat leakage," should have read as follows:

Post accident holdup and plateout of MSIV seat leakage—provides volumes for holdup and surfaces for plateout of elemental and particulate iodine resulting from MSIV bypass leakage

Based on its review, the staff finds the applicant's response acceptable because the applicant revised the intended function to clearly include post accident holdup and plateout of MSIV seat leakage. Therefore, the staff considers its concern described in RAI 2.3.4.1-1 resolved.

RAI 2.3.4.1-2. As stated in RAI 2.3.4.1-1, the staff believes that post accident containment, plateout, and holdup of MSIV bypass leakage is a system intended function of the main steam system. Therefore, the SSCs necessary to ensure this intended function are in scope of license renewal per 10 CFR 54.4(a). Hence, the steam drain lines and turbine bypass piping should be in scope of license renewal and subject to an AMR. License renewal boundary drawings LR-DRE-M-12-2, LR-DRE-M-345-2, LR-QDC-M-13-2, and LR-QDC-M-60-2 indicate that turbine bypass piping from the main steam line equalization header to the condenser, and the main steam piping from the equalization header up to and including the main steam stop valves, are not in scope. The staff asked the applicant to provide a justification for the exclusion of these sections of main steam system piping and their associated components.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.1-2, the applicant agreed that the subject sections of piping and their components are within the scope of license renewal, and identified the applicable revisions to boundary drawings LR-DRE-M-12-2, LR-DRE-M-345-2, LR-QDC-M-13-2, and LR-QDC-M-60-2. In addition, the applicant stated that these changes will result in additional main steam line piping and fittings, valves, and restricting orifices being added to the scope of license renewal with an intended function of "containment, hold up and plateout." These newly identified components are the same types of components as have already been evaluated and will be included in the AMPs currently applicable for the main steam system piping and piping components. The applicant further stated that LRA Table 2.3.4-1 should have included these additional components and their corresponding intended functions as subject to an AMR.

Based on its review, the staff finds the applicant's response acceptable because the applicant has (1) added the main steam line bypass piping sections to the scope of license renewal in accordance with the criteria set forth in 10CFR 54.4, and (2) acknowledged that LRA Table 2.3.4-1 should have included these additional components and their corresponding intended functions subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.4.1-2 resolved.

RAI 2.3.4.1-3. The main steam line drain lines provide an MSIV leakage pathway to the condenser which has an intended function of postaccident containment, holdup, and plateout of MSIV bypass leakage. Therefore, the main steam drain piping from the main steam line to the condenser is in scope of license renewal per 10 CFR 54.4(a). However, only the Dresden Unit 2 boundary drawing shows the entire drain line to the condenser as being in scope of license renewal. Dresden Unit 3, and Quad Cities Units 1 and 2, shows only drain line sections on drawings LR-DRE-M-345-2, LR-QDC-M-13-2, and LR-QDC-M-60-2, respectively, as being in scope of license renewal. A review of these drawings indicate that the drain lines are continued on Dresden Unit 3 drawing M-370, and Quad Cities drawings M-26 and M-73 for Units 1 and 2, respectively. The staff believes that the main steam drain line section that goes to the condenser, shown on the above-mentioned drawing, should be included as in scope of license renewal. The staff asked the applicant to provide a justification for the exclusion of the main steam drain line piping shown on drawing LR-DRE-M-370, and Quad Cities drawings M-26 and M-73, for which no boundary drawings were provided. The staff also asked the applicant whether boundary drawings exist for Quad Cities drawings M-26 and M-73, and, if so, to provide these drawings.

Applicant's Response and Staff's Evaluation

The applicant agreed that the continuation of the in-scope drain line to its point of interface with the main condenser is within the scope of license renewal and has identified the applicable revisions to boundary drawings LR-DRE-M-345-2, LR-QDC-M-13-2, and LR QDC-M-60-2. In addition, the applicant stated that these changes will result in additional main steam line piping and fittings with an intended function of "containment, hold up and plateout" being added to LRA Table 2.3.4-1 as being within the scope of license renewal and subject to an AMR. This newly identified piping is the same type of piping that has already been evaluated and is included in the AMPs currently applicable for the main steam system piping. The applicant further stated that LRA Table 2.3.4-1 should have included the additional piping and fittings and their corresponding intended functions as subject to an AMR.

Based on its review, the staff finds the applicant's response acceptable because the applicant has identified and included additional main steam line piping in the boundary drawings as within the scope of license renewal and subject to an AMR, and has stated that additional main steam line piping and fittings with an intended function of "containment, hold up and plateout" are being added to LRA Table 2.3.4-1 as being subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.4.1-3 resolved.

RAI 2.3.4.1-4. Acoustic flow sensing devices, flow elements FE-261-60A and FE-261-60D, on boundary drawing LR-DRE-M-12-1, for Dresden Unit 2, are not shown to be within scope. However, the corresponding devices for the B and C steam lines, flow elements FE-261-60B and FE-261-60C, are included in scope. The staff asked the applicant to provide justification for the exclusion of these components.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.1-4, the applicant stated that boundary diagram LR-DRE-M-12-1 should have highlighted acoustic flow sensing devices, flow elements 2-261-60A and 2-261-60D. Flow elements 2-261-60A and 2-261-60D are within the scope of license renewal.

Based on its review, the staff finds the applicant's response to RAI 2.3.4.1-4 acceptable because the two flow elements, 2-261-60A and 2-261-60D, are identified as being in scope of license renewal and subject to an AMR, and they were inadvertently not highlighted in the LR boundary diagram. Therefore, the staff considers its concern described in RAI 2.3.4.1-4 resolved.

RAI 2.3.4.1-5. The portion of the safety relief valve (SRV) discharge lines inside the wetwell, and their associated T-quenchers, are not identified as in scope in Dresden drawings LR-DRE-M-25 and LR-DRE-M-356. In addition, the T-quenchers for Dresden or Quad Cities have not been included in Table 2.3.4-1. The staff believes that the SRV discharge lines and T-quenchers are in scope of license renewal per 10 CFR 54.4(a)(1). The staff asked the applicant to provide a justification for exclusion of these components.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.1-5, the applicant stated that the complete SRV discharge lines and the associated T-quenchers shown on boundary diagrams LR-DRE-M-25 and LR-DRE-M-356 should have been highlighted. The SRV discharge lines and T-quenchers are within the scope of license renewal. The SRV discharge lines and T-quenchers were not explicitly called out, but they are included in LRA Table 2.3.4-1 under component group "piping and fittings."

Based on its review, the staff finds the applicant's response to RAI 2.3.4.1-5 acceptable because the complete SRV discharge lines and their associated T-quenchers are identified as being in scope of license renewal and subject to an AMR, and they were inadvertently not highlighted in the LR boundary diagram. And also, because the components associated with the SRV discharge lines and T-quenchers are included in LRA Table 2.3.4-1 under component group "piping and fittings." Therefore, the staff considers its concern described in RAI 2.3.4.1-5 resolved.

2.3.4.1.3 Conclusions

The staff reviewed LRA Section 2.3.4.1, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the main steam system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the main steam system that are subject to an AMR, as required by 10 CFR 54.4(a)(1).

2.3.4.2 Feedwater System

2.3.4.2.1 Summary of Technical Information in the Application

The applicant described the feedwater system in LRA Section 2.3.4.2 and provided a list of components subject to AMR in LRA Table 2.3.4-2.

The function of the feedwater system is to deliver condensate from the condenser to the reactor at a rate of water equivalent to what is being generated into steam by boil-off and removal by the main steam system. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following feedwater system intended functions:

- C flowpath—provide flowpath into the reactor pressure vessel for high pressure coolant injection, reactor water cleanup, and, for Quad Cities only, reactor core isolation cooling and safe shutdown makeup pump flow
- C pressure boundary—maintain the integrity of the reactor coolant pressure boundary

- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The feedwater system is a two train system consisting of the reactor feed pumps (RFPs), feedwater regulating valves (FWRVs), high pressure feedwater heaters, piping, isolation valves, controls and instrumentation, and subsystems that supply the reactor with regenerative feedwater heating in a closed steam cycle. The portion of the system from the reactor pressure vessel to the outermost primary containment isolation valve is safety-related. During normal plant operation, feedwater is supplied to the system from the outlet of the condensate demineralizers. The feedwater passes through the RFP and out the discharge check valve into a common header upstream of the FWRVs. It then passes through FWRVs, which are mounted in parallel and then again combines into a common header upstream of the high pressure feedwater heaters. The feedwater is then directed through the high pressure feedwater heaters and the associated inlet and outlet isolation motor operated valves (MOVs) to a common header. Flow then passes through the A and B feedwater headers in parallel through two outboard isolation check valves, one inboard isolation check valve, and an inboard main isolation valve in each line. Feedwater flow is finally directed into the reactor vessel.

The feedwater system lines are also used to provide a flow path to the reactor vessel for the HPCI system and the RWCU system.

At Dresden, the HPCI system and RWCU system tap into the “B” feedwater line to inject fluid during emergency operations (HPCI) or as a return path for water removed from the vessel (RWCU).

At Quad Cities, the RCIC system and the RWCU system tap into the “A” feedwater line to either inject fluid during emergency operations or as a return path for water removed from the vessel (RWCU). Also the Quad Cities HPCI and safe shutdown makeup pump system tap into the B feedwater line to either inject fluid during emergency operations (HPCI) or as an injection path for the discharge of the safe shutdown makeup pump.

In LRA Section 2.3.4.2, the applicant described the feedwater system evaluation boundary. In addition, the applicant highlighted those portions of the feedwater system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.2. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the feedwater system in LRA Table 2.3.4-2 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C NSR vents or drains, piping, and valves (structural integrity/attached support)
- C piping and fittings (spatial interaction)
- C piping and fittings (structural integrity/attached support)
- C small bore piping and fittings (pressure boundary, Quad Cities only)

- C valves (pressure boundary)
- C valves (structural integrity/attached support)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, and the licensee response to RAI 2.1-2b, the boundaries of non-safety-related sections of the feedwater system at Dresden and Quad Cities were expanded and highlighted as shown on the revised boundary diagrams. As a result of the scoping methodology change the entire feedwater system at both Dresden and Quad Cities are included in the scope of license renewal.

The applicant identified the following additional component groups and their intended functions within the feedwater system as being within scope of license renewal, and added them to LRA table 2.3.4.2.

- C Piping and Fittings (spatial interaction)
- C Pumps (spatial interaction)
- C Tubing (spatial interaction)
- C Valves (spatial interaction)

2.3.4.2.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.2, Dresden UFSAR Section 10.4.7, and Quad Cities UFSAR Section 10.4.7 to determine whether there is a reasonable assurance that the feedwater system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the feedwater system in the LRA.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the feedwater system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the feedwater system. The staff then reviewed the referenced P&I drawings to verify that those portions of the feedwater system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.2, and that the applicant identified all feedwater system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.4.2-1. Section 2.3.4-2 of the LRA lists the intended functions for the feedwater system. The feedwater system interfaces with the primary containment and is safety-related for the portion of the system from the reactor vessel to the outermost primary containment isolation valve. Containment isolation is not listed as an intended function. The staff asked the applicant to provide justification for not including containment isolation as an intended function for the feedwater system.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.2-1, the applicant stated that the portion of the feedwater system from the RPV to the outermost safety-related check valve (primary containment isolation valve) has the intended function of containment isolation. The containment isolation intended function should have been included in LRA Section 2.3.4.2 for Dresden and Quad Cities. This does not affect the aging management of the in-scope components for the feedwater system. The components providing primary containment isolation also have an intended function of pressure boundary. Aging management for these affected components is discussed in LRA Section 2.3.4.2, Table 2.3.4-2.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.4.2-1 acceptable because the portion of the feedwater system from the RPV to the outermost safety-related check valve containment isolation is identified as having an intended function of containment isolation in accordance with the criteria set forth in 10 CFR 54.4 (a)(1). Therefore, the staff considers its concern described in RAI 2.3.4.2-1 resolved.

RAI 2.3.4.2-2. In Dresden Unit 3 drawing LR-DRE-M-347 (E-2), the 0.75 in. line just inside the outermost check valve shows to be in scope only through valve 3-3299-54; valve 3-3299-120 and the corresponding piping section after the valve is not shown to be in scope. In all other similar piping sections connected to safety-related piping, the section of piping immediately downstream of the safety-related piping is included in scope per 10 CFR 54.4 (a)(2). The staff asked the applicant to justify the exclusion of this section of piping from the scope for license renewal.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.2-2, the applicant stated that line 3-32142-3/4"-C on boundary diagram LR-DRE-M-347 (E-2) is a feedwater drain line that includes drain valve 3-3299-54 (inboard, safety-related) and 3-3299-120 (outboard, non-safety-related). Non-safety-related outboard drain valve 3-3299-120 and the associated piping beyond the safety boundary are in scope of license renewal for 10 CFR 54.4 (a)(2) criteria. Boundary diagram LR-DRE-M-347

should have highlighted these components to include the outboard drain valve 3-3299-120 and the associated piping beyond the safety boundary within the scope of license renewal.

Based on its review, the staff finds the applicant's response to RAI 2.3.4.2-2 to be acceptable because the applicant, in accordance with the criteria set forth in 10 CFR 54.4 identifies drain valve 3-3299-120 and its associated piping to be within the scope of license renewal, and they were inadvertently not highlighted in the LR boundary diagrams. Therefore, the staff considers its concern described in RAI 2.3.4.2-2 resolved.

2.3.4.2.3 Conclusions

The staff reviewed LRA Section 2.3.4.2, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the feedwater system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the feedwater system that are subject to an AMR, as required by 10 CFR 54.4(a)(1).

2.3.4.3 *Condensate and Condensate Storage Systems*

2.3.4.3.1 Summary of Technical Information in the Application

The applicant described the condensate and condensate storage systems in LRA Section 2.3.4.3 and provided a list of components subject to AMR in LRA Table 2.3.4-3.

The function of the condensate and condensate storage systems (in conjunction with the feedwater system) is to provide water of quality and quantity required for operation of the power plant. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following condensate and condensate storage systems intended functions:

- C support ESF function(s)—provide reactor grade water to HPCI, RCIC (at Quad Cities), core spray, LPCI (at Dresden), and RHR (at Quad Cities)
- C credited in regulated event(s)—provide water to support mitigating actions for Appendix R fire, SBO, and ATWS
- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The condensate and condensate booster pump portion of the system supply reactor quality

demineralized water to the suction of the reactor feedwater pumps. The condensate storage system's contaminated condensate storage tanks (CCSTs) ensure reactor quality water is available for makeup requirements, and are designed to ensure a minimum of 90,000 gallons of water is available from each CCST for use by HPCI. The CCSTs are credited for providing makeup to the reactor via the CRD pumps (at Dresden) or the RCIC and SSMP systems (at Quad Cities) for safe shutdown scenarios in the FP Plan. The condensate and systems pumping functions are not credited to support safe shutdown or to perform any reactor safety function.

In LRA Section 2.3.4.3, the applicant described the condensate and condensate storage system evaluation boundary. In addition, the applicant highlighted those portions of the systems within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.3. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the condensate and condensate storage system in LRA Table 2.3.4-3 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C piping and fittings (pressure boundary)
- C piping and fittings (spatial interaction, Dresden only)
- C piping and fittings (structural integrity/attached support, Quad Cities only)
- C tanks (pressure boundary)
- C thermowells (pressure boundary, Dresden only)
- C tubing (pressure boundary)
- C valves (pressure boundary)
- C valves (structural integrity/attached support, Quad Cities only)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of non-safety-related sections of the condensate and condensate storage system at Dresden and Quad Cities were expanded and highlighted as shown on the revised boundary diagrams, and the newly added boundary diagrams. With the exception of the condensate demineralizers, steam jet air ejectors, and gland steam condensers, which reside in their own rooms isolated from safety-related equipment, the entire condensate and condensate storage systems at Dresden and Quad Cities were added to the scope of license renewal. This included condensate transfer pumps, condensate jockey pumps, and associated suction and discharge piping. The only component not included is the Dresden Unit 1 contaminated demineralized water storage tank which the applicant states was not included in the scope of license renewal because it is located outside the plant away from safety-related equipment.

The applicant identified the following additional component groups and their intended functions within the condensate and condensate storage system as being within scope of license renewal, and added them to LRA table 2.3.4.3.

- C Piping and Fittings (includes strainers, flow elements, thermocouples and heat exchangers) (spatial interaction)

- C Pumps (spatial interaction)
- C Tanks (spatial interaction)
- C Tubing (spatial interaction)
- C Valves (spatial interaction)

Components that were added to scope only because of their leakage boundary (spatial) function were grouped such that those that are comprised of the same material and exposed to the same environment were grouped together. This grouping results in the inclusion of drain coolers (heat exchangers), feedwater heaters (heat exchangers), strainers, flow elements, and thermocouples in the component group for piping and fittings. This grouping is valid since for these components only the leakage boundary (spatial) function must be maintained and require aging management.

2.3.4.3.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.3, Dresden UFSAR Sections 9.2.6 and 10.4.7, and Quad Cities UFSAR Sections 9.2.6 and 10.4.7 to determine whether there is a reasonable assurance that the condensate and condensate storage system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the condensate and condensate storage system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

To verify that the applicant identified the components of the condensate and condensate storage system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the condensate and condensate storage system. The staff then reviewed the referenced P&I drawings to verify that those portions of the condensate and condensate storage system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.3, and that the applicant identified all condensate and condensate storage system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified one area in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued an RAI to the applicant concerning the specific item to

determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAI, and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.4.3-1. In Quad Cities drawing LR-QDC-M-16-5 (D-5), lines 0-33107A and 0-33108A, and valves 0-3399-227A and 0-3399-228A, are identified as not in scope for license renewal. These lines connect level switch LS 0-3341-71A, which is shown as in scope, to line 0-3348, which is also shown to be in scope. The staff asked the applicant to clarify whether these SSCs should be included in scope for license review.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.3-1, the applicant stated that isolation valves 0-3399-227A and 0-3399-228A for LS-0-3341-71A and the connecting piping 0-33107A-1" and 0-33108A-1" are in scope of license renewal. Boundary diagram LR-QDC-M-16-5 should have highlighted these components designating them within the scope of license renewal. Aging management for the valves is addressed in LRA Table 2.3.4-3, under the component group "valves," and component intended function of "pressure boundary." Aging management for the connecting piping is addressed in LRA Table 2.3.4-3, under component group "piping and fittings," and component intended function of "pressure boundary."

Based on its review of the applicant's clarification discussed above, the staff concurs with the applicant's clarification that the above-cited segments of piping and their associated components are within the scope of the Rule, and were inadvertently not highlighted in the LR boundary diagram. The staff also concurs with the applicant that the components associated with the cited segments of piping are included in LRA Table 2.3.4-3, subject to an AMR, in accordance with the criteria set forth in 10 CFR 54.21(a)(1). Therefore, the staff finds the applicant's response to RAI 2.3.4.3-1 acceptable and considers its concern described in RAI 2.3.4.3-1 resolved.

2.3.4.3.3 Conclusions

The staff reviewed LRA Section 2.3.4.3, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the condensate and condensate storage system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the condensate and condensate storage system that are subject to an AMR, as required by 10 CFR 54.4(a)(1).

2.3.4.4 Main Condenser

2.3.4.4.1 Summary of Technical Information in the Application

The applicant described the main condenser in LRA Section 2.3.4.4 and provided a list of components subject to AMR in LRA Table 2.3.4-4.

The function of the main condenser is to—provide a heat sink for the turbine exhaust steam; condense the bypass steam after a turbine trip; accommodate feedwater heater drains, extraction steam, and steam line condensate routed to the condenser during operation with feedwater heaters out of service; retain the condensate for a brief time to allow for the decay of short-lived isotopes; deaerate the condensate and remove fission product gases, hydrogen, and oxygen; provide adequate net positive suction head for condensate pumps; and provide for iodine plateout and radioactive decay prior to release.

Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following main condenser intended function:

- C post accident containment, holdup and plateout of MSIV bypass leakage—the main condenser provides for post accident containment, holdup and plateout of MSIV bypass leakage

The main condenser is a divided water flow, single-pass, multipressure, deaerating type condenser, with capacity for reverse flow for each half of the condenser. The divided water flow permits circulating water to be reversed periodically through each bank of tubes in each half of the condenser for cleaning purposes. The condenser shell is supported on the turbine foundation mat. An expansion joint is fitted between each low-pressure turbine exhaust hood and condenser inlet connection. The condenser is divided into three separate compartments by two division plates.

The main condenser is credited in Dresden UFSAR Section 15.6 and Quad Cities UFSAR Section 15.6 for providing post accident containment, holdup and plateout of MSIV bypass leakage. The radiological consequences for the control room LOCA dose analysis assumes MSIV leakage travels down the steam piping to the turbine-condenser complex where it is released as a ground level release at a rate of 1 percent of the turbine condenser volume per day to the turbine building and then exhausted by the HVAC system if it was operating.

In LRA Section 2.3.4.4, the applicant described the main condenser evaluation boundary. In addition, the applicant highlighted those portions of the main condenser within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.4. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the main condenser system in LRA Table 2.3.4-4 as being within the scope of license renewal and subject to an AMR:

- C main condenser hotwells and false floors, including hatches (containment holdup and plateout)
- C main condenser tubes, including tubesheets and hatches (containment holdup and plateout)
- C main condenser waterboxes and hatches (containment holdup and plateout)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1 the main condenser, which was originally included within the scope of license renewal at both Dresden and Quad Cities for post accident containment holdup and plateout, has also been brought into scope of license renewal for spatial interaction at Quad Cities station . The main condenser at Quad Cities is a non-safety-related component that resides in the same general area as the discharge piping from the emergency diesel cooling water system and thus the potential for spatial interaction could occur. The licensee states that this change only applies to Quad Cities as the same physical equipment configuration does not exist at Dresden.

The applicant has added the following system intended function to LRA section 2.3.4.4

Preclude adverse effects on safety-related SSCs - Non-safety-related components that could be hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

The applicant identified the following additional component groups and their intended functions for the Quad Cities Main Condenser as being within scope of license renewal, and added them to LRA table 2.3.4.4.

- C Main Condenser Hotwells, False Floors (spatial interaction, Quad Cities only)
(includes hatches)
- C Main Condenser Waterboxes, hatches (spatial interaction, Quad Cities only)

2.3.4.4.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.4, Dresden UFSAR Sections 10.4 and 15.6.5.5.2, and Quad Cities UFSAR Sections 10.4 and 15.6.5.5.3 to determine whether there is a reasonable assurance that the main condenser system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the main condenser system in the LRA.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an

AMR to determine if any component were omitted.

To verify that the applicant identified the components of the main condenser system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the main condenser system. The staff then reviewed the referenced P&I drawings to verify that those portions of the main condenser system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.4, and that the applicant identified all main condenser system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified areas in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the August 4, 2003, letter, the staff issued RAIs to the applicant concerning the specific items to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAIs and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.4.4-1. In Section 2.3.4.4 of the LRA, it is indicated that an expansion joint is fitted between each low-pressure turbine exhaust hood and condenser inlet connection. These expansion joints are not included as a component group requiring AMR in Table 2.3.4-4. The staff asked the applicant to justify the exclusion of the expansion joints from the list of components requiring AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.4-1, the applicant stated that the condenser does not need a "pressure boundary" function. Holdup of radioiodines and noble gases that leak past the closed MSIVs is credited in the Dresden and Quad Cities LOCA and control rod drop accident (CRDA) analyses. Holdup is a function of the main condenser volume and leak rate. The Dresden and Quad Cities analyses assume the main condensers leak to the atmosphere at a rate of 1 percent per day throughout the accident. This value is a generic licensing basis assumption in SRP Section 15.4.9, "Radiological Consequences of Control Rod Drop Accident." This assumed leakage is larger than the actual leakage past the closed MSIVs into the main condenser. Therefore the condenser does not have to be leak tight.

The staff finds the applicant's response to RAI 2.3.4.4-1 acceptable since the limiting leak rate of the MSIV leakage from the condenser, used in the radiological analyses, did not credit the expansion joint between the turbine and the condenser inlet with providing a leak tight seal. Therefore, the staff considers its concern described in RAI 2.3.4.4-1 resolved.

RAI 2.3.4.4-2. In Table 2.3.4-4 the condenser shell is not included as a component group requiring AMR. The staff feels that this component is necessary to support the system intended function, and provides the component intended function of containment holdup and plateout, and thus should be included in Table 2.3.4-4. The staff asked the applicant to justify the

exclusion of the condenser shell from the list of components requiring AMR.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.4-2, the applicant stated that the condenser shell is included in LRA Table 2.3.4-4, in the component group "main condenser hotwells, false floors (including hatches)."

The staff finds the applicant's clarification described above acceptable because the condenser shell is included in LRA Table 2.3.4-4, as subject to an AMR. Therefore, the staff considers its concern described in RAI 2.3.4.4-2 resolved.

2.3.4.4.3 Conclusions

The staff reviewed LRA Section 2.3.4.4, the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the main condenser system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the main condenser system that are subject to an AMR, as required by 10 CFR 54.4(a)(1).

2.3.4.5 Main Turbine and Auxiliary Systems

2.3.4.5.1 Summary of Technical Information in the Application

The applicant described the main turbine and auxiliary systems in LRA Section 2.3.4.5 and provided a list of components subject to AMR in LRA Table 2.3.4-5.

The function of the main turbine is to convert the thermodynamic energy of reactor steam into rotational mechanical energy to drive the main generator. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following main turbine and auxiliary system intended function:

- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The main turbine and auxiliary systems consist of one high-pressure section and three low-pressure sections. Turbine steam flow is controlled by a set of four turbine control valves on the high-pressure element main steam supply. Steam is delivered from the reactor pressure vessel through four main steam lines and the turbine throttle to the main stop valves, or to other loads

of the main steam system. From the main stop valved, steam is passed through the steam chest (the area from below the seats of the main stop valves to the turbine control valve seats), through the turbine control valves, and then through the high-pressure turbine section. The steam is then routed to four moisture separators, where steam drying occurs. The dry steam is admitted through six combined intercept valves to the low-pressure turbine sections and exhausted to the main condenser.

The main turbine is supported by auxiliary systems. The gland sealing system provides gland-sealing steam to the high-pressure and low-pressure turbine glands to prevent steam from entering the turbine building and noncondensables from entering the condenser. The exhaust hood spray system provides cooling water to the condenser exhaust hood at low load, when steam flow through the last few turbine stages is low and insufficient cooling is provided. The turbine electrohydraulic control system provides high-pressure fluid and logic to control the turbine main stop valves, turbine control valves, combined intermediate valves, bypass valves, and the reactor pressure through pressure regulators.

The main turbine and auxiliary system starts with the steam chest (after the main stop valves) and ends at the condenser. Main turbine includes the steam chest, turbine control valves, turbine bypass valves, main turbine, moisture separator tanks, combined intermediate valves, low-pressure turbines, and associated piping, valves, instrumentation, and controls. Auxiliary systems include electrohydraulic control, off-gas booster air ejectors, turbine gland sealing, exhaust hood spray, gland seal exhaust, steam supply to steam jet air ejectors, and associated piping, valves, instrumentation, and controls.

In LRA Section 2.3.4.5, the applicant described the main turbine and auxiliary system evaluation boundary. In addition, the applicant highlighted those portions of the main turbine and auxiliary systems within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.5. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the main turbine and auxiliary system in LRA Table 2.3.4-5 as being within the scope of license renewal and subject to an AMR:

- C accumulators (spatial interaction)
- C closure bolting (pressure boundary)
- C piping and fittings (spatial interaction)
- C tubing, including flex hoses (spatial interaction)
- C valves, including flex hoses (spatial interaction)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of non-safety-related sections of the main turbine and auxiliary system at Dresden and Quad Cities were expanded and highlighted as shown on the revised boundary diagrams and additional new boundary diagrams. Based on the revised methodology the entire main turbine and auxiliary system is within the scope of license renewal at both plants. The expanded scope adds portions of the electrohydraulic control (EHC) system that had previously been excluded from scope based on the original methodology. Additional components such as ECH pumps, coolers, strainers, filters, accumulators and the EHC fluid reservoir are now brought into scope of license renewal.

The applicant identified the following additional component groups and their intended functions within the main turbine and auxiliary system as being within scope of license renewal, and added them to LRA table 2.3.4.5.

- C Filters/Strainers (spatial interaction)(includes oil mist eliminators and vapor extractors)
- C Pump Casing (spatial interaction)
- C Tanks (spatial interaction)

The applicant states that EHC coolers, strainers, and filters were evaluated with the “Filter/Strainers” component group for aging management and that the EHC reservoirs were evaluated with an existing component group already included in Table 2.3.4-5 titled Accumulators. The EHC coolers (Heat Exchangers) were added to the scope of license renewal for spatial interaction only; therefore, only the leakage boundary (spatial) function must be maintained and require aging management. The EHC coolers were included in the Filter/Strainers component group because the leakage boundary of the EHC coolers (Heat Exchangers) is comprised of the same materials and experience the same environment as the components evaluated under the “Filter/Strainers (spatial interaction)” component group.

2.3.4.5.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.5, Dresden UFSAR Sections 7.7.4 and 10.2, and Quad Cities UFSAR Sections 7.7.4 and 10.2 to determine whether there is a reasonable assurance that the main turbine and auxiliary system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the main turbine and auxiliary system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSARs that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the main turbine and auxiliary system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the main turbine and auxiliary system. The staff then reviewed the referenced P&I drawings to verify that those portions of the main turbine and auxiliary system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.5, and that the

applicant identified all main turbine and auxiliary system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the main turbine and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA 2.3.4.5. The main turbine and auxiliary systems components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.4-5. The staff did not identify any omissions.

2.3.4.5.3 Conclusions

The staff reviewed LRA Section 2.3.4.5 and accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the main turbine and auxiliary systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the main turbine and auxiliary systems that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.4.6 Turbine Oil System

2.3.4.6.1 Summary of Technical Information in the Application

The applicant described the turbine oil system in LRA Section 2.3.4.6 and provided a list of components subject to AMR in LRA Table 2.3.4-6.

The function of the turbine oil system is to supply all the necessary lubricating oil to the main turbine and its support systems to allow the turbine to operate properly. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following turbine oil system intended function:

- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The system is required to be in service during startups, normal operations, shutdowns, and at any time the turbine is on the turning gear. Depending upon the operating status of the turbine, the turbine oil system uses one of six oil pumps to transfer oil from the lube oil reservoir to the turbine generator components. The oil is cooled and filtered as necessary prior to delivery to the components.

Major system components include main turbine oil reservoir, oil driven turbine and booster pump, turbine oil coolers, vapor extractor, and the turbine oil filter and pumps. Also included are the turbine bearing oil lift pumps, emergency seal oil pump, main seal oil pump, recirculating

seal oil pump, seal oil vacuum pump, hydrogen seal oil vacuum tank, and the bulk lubricating oil storage and transfer system. Additionally included are the system piping, valves, and instrumentation and controls to fill the turbine oil tank, and to supply oil from the turbine oil tank to the main turbine lubricating oil system, hydrogen seal oil system, reactor feed pumps, and HPCI turbine lubricating oil and recirculation MG set lubricating oil systems.

In LRA Section 2.3.4.6, the applicant described the turbine oil system evaluation boundary. In addition, the applicant highlighted those portions of the turbine oil system within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.6. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant initially identified the following component groups and their intended functions within the plant heating system in LRA Table 2.3.4-6 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C filters/strainers (spatial interaction)
- C piping and fittings (spatial interaction)
- C piping and fittings (structural integrity/attached support)
- C pump casings (spatial interaction)
- C tanks (spatial interaction)
- C valves (spatial interaction)
- C valves (structural integrity/attached support)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of non-safety-related sections of the turbine oil system at Quad Cities were expanded and highlighted as shown on the revised boundary diagrams and the newly added boundary diagrams. In addition, the turbine oil system, including the hydrogen seal oil subsystem was brought into scope of license renewal at Dresden station and new boundary drawing identifying the SSCs in scope of licensee renewal were provided by the licensee.

The applicant identified the following additional component groups for Dresden and their intended functions within the turbine oil system as being within scope of license renewal, and added them to LRA table 2.3.4.6.

- C Closure Bolting (pressure boundary)
- C Filters/Strainers (spatial interaction)
- C Piping and Fittings (includes oil mist eliminator and vapor extractor) (spatial interaction)
- C Pump Casings (spatial interaction)
- C Tanks (spatial interaction)

C Valves (spatial interaction)

Aging management references for the components added to the scope of license renewal based on the revised methodology are already included in LRA Table 2.3.4-6, because the scope is no longer limited to Quad Cities, and now include both Dresden and Quad Cities, the additional components were added to the table by removing the Quad Cities only notation for the components identified in Table 2.3.4-6.

The lube oil mist eliminator and Vapor Extractor were added to the scope of license renewal for spatial interaction, typical component functions such as "Filtration" or "Pressure Boundary" do not require aging management and only the "Leakage boundary (spatial) function must be maintained and requires aging management. Since the leakage boundary of the lube oil mist eliminator and vapor extractor are comprised of the same material and experience the same environment as the components evaluated under the "Piping and Fitting (spatial interaction)" component group, they have been included as part of the "Piping and Fitting (spatial interaction)" component group in Table 2.3.4-6.

2.3.4.6.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.6 to determine whether there is a reasonable assurance that the turbine oil system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSARs to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the turbine oil system in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the turbine oil system that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the turbine oil system. The staff then reviewed the referenced P&I drawings to verify that those portions of the turbine oil system that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.6, and that the applicant identified all turbine oil system components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff's review of the LRA identified one area in which additional information is necessary to complete the staff's review of the applicant's scoping and screening results. Therefore, by the

August 4, 2003, letter, the staff issued an RAI to the applicant concerning the specific item to determine whether the applicant has properly applied the scoping and screening criteria of 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's RAI and the applicant's responses by letter, dated October 3, 2003, are described below.

RAI 2.3.4.6-1. The portion of turbine oil system, line 2-2362-2 shown on drawing LR-QDC-M-48-1 (G1) and continued on LR-QDC-M-87-3 (D6), that goes to the Unit 2 HPCI oil junction box is not identified as being in scope. The corresponding line to the Unit 1 oil junction box is shown as in scope. The staff asked the applicant to indicate whether this portion of the line should be included in scope and whether drawing LR-QDC-M-87 should be included as a reference in LRA Section 2.3.4.6.

Applicant's Response and Staff's Evaluation

In the response to RAI 2.3.4.6-1, the applicant stated that at the time that Exelon was completing the scoping and screening of the turbine oil system, a modification installation was in progress to remove both the Quad Cities Unit 1 and Unit 2 HPCI dirty oil transfer pumps and associated piping. As part of the modification, the 2 in. non-safety-related lines that penetrate the HPCI oil junction box were to be cut and capped. At the time that the scoping and screening was being performed, the HPCI turbine oil transfer line 2-2362-2" to the Unit 2 HPCI system was cut and capped prior to entering the HPCI oil junction box. Therefore, the small portion of non-safety-related turbine oil piping downstream of the cap was not included in scope of license renewal. The Unit 1 line had not yet been cut and capped, and was therefore included in scope. The present status is that the modification is complete and the lines on both units have been cut and capped.

Based on its review of the applicant's clarification discussed above, the staff finds the applicant's response to RAI 2.3.4.6-1 acceptable because a modification installation was performed to remove both the Quad Cities Unit 1 and Unit 2 HPCI dirty oil transfer pumps and associated piping. The subject lines on both units have been cut and capped. Therefore, the staff considers its concern described in RAI 2.3.4.6-1 resolved.

2.3.4.6.3 Conclusions

The staff reviewed LRA Section 2.3.4.6 , the accompanying scoping boundary drawings, and the applicant's response to RAIs, to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the turbine oil system that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the turbine oil system that are subject to an AMR, as required by 10 CFR 54.4(a)(1).

2.3.4.7 Main Generator and Auxiliary Systems

2.3.4.7.1 Summary of Technical Information in the Application

The applicant described the main generator and auxiliary systems in LRA Section 2.3.4.7 and provided a list of components subject to AMR in LRA Table 2.3.4-7.

The function of the main generator is to convert the mechanical energy of the turbine into electrical energy. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following main generator and auxiliary systems intended function:

- C preclude adverse effects on safety-related SSCs—maintains sufficient integrity of non-safety-related components that could be a hazard to safety-related SSCs so that the intended function of safety-related SSCs is not adversely affected

The main generator and auxiliary systems consist of the main generator, main exciter, main generator stator coolers, and the isolated phase bus system. The stator water cooling system removes the heat produced by heating losses and removes the heat produced in the main generator field rectifiers. The isolated phase bus system cools the conductors, which connect the generator to the main transformer. The main generator exciter provides regulated excitation to the generator field windings to control generator output voltage and current. The main generator stator coolers provide clean, de-ionized cooling water to the stator and exciter during plant operation. The isolated phase bus electrically connects the main generator and the unit auxiliary transformer, and cools the main phase conductors.

In LRA Section 2.3.4.7, the applicant described the main generator and auxiliary systems evaluation boundary. In addition, the applicant highlighted those portions of the main generator and auxiliary systems within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.7. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the plant heating system in LRA Table 2.3.4-7 as being within the scope of license renewal and subject to an AMR:

- C closure bolting (pressure boundary)
- C heat exchangers (spatial interaction)
- C housings heat exchangers (spatial interaction)
- C piping and fittings (spatial interaction)
- C pumps (spatial interaction)
- C tanks (spatial interaction)
- C valves (spatial interaction)

Resulting from the revised methodology described in the May 18, 2004 response to the draft SER Open Item 2.1-1, the boundaries of non-safety-related sections of the main generator and auxiliaries were expanded and highlighted as shown on the revised boundary diagrams and the

additional new boundary diagrams. The original scoping results described in section 2.3.4.7 of the LRA only included a portion of the main generator and auxiliaries (Stator Cooling) at Quad Cities. Portions of the stator cooling system were excluded under the old methodology has been brought into scope of license renewal based on application of the revised methodology. As a result of the change in methodology the entire main generator and auxiliaries system was brought into scope of license renewal at Dresden station and new boundary drawing identifying the SSCs in scope of licensee renewal were provided by the licensee. The change in methodology has resulted in the addition of the entire main generator and auxiliaries system within the scope of license renewal at both sites.

The applicant identified the following additional component groups for Dresden and their intended functions within the turbine oil system as being within scope of license renewal, and added them to LRA table 2.3.4.7.

- C Heat Exchangers (spatial interaction)
- C Housings (spatial interaction)
- C Piping and Fittings (includes filters and demineralizers) (spatial interaction)
- C Pump (spatial interaction)
- C Tanks (spatial interaction)
- C Valves (spatial interaction)

Aging management references for the components added to the scope of license renewal bases on the revised methodology are already included in LRA Table 2.3.4-7, because the scope is no longer limited to Quad Cities, and now include both Dresden and Quad Cities, the additional components were added to the table by removing the Quad Cities only notation for the components identified in Table 2.3.4-7.

The filters, generator filters, and stator water demineralizes highlighted on the boundary diagrams were added to the scope of license renewal for spatial interaction. Typical component functions such as “Filtration” or “Pressure Boundary” do not require aging management and only the “Leakage boundary (spatial) function must be maintained and requires aging management. Since the leakage boundary of the these components are comprised of the same material and experience the same environment as the components evaluated under the “Piping and Fitting (spatial interaction)” component group they have been included as part of the “Piping and Fitting (spatial interaction)” component group in Table 2.3.4-7.

2.3.4.7.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.7 and Quad Cities UFSAR Section 8.3 to determine whether there is a reasonable assurance that the main generator and auxiliary systems

components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the main generator and auxiliary systems in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the main generator and auxiliary systems that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the main generator and auxiliary systems. The staff then reviewed the referenced P&I drawings to verify that those portions of the main generator and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.7, and that the applicant identified all main generator and auxiliary systems components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the main generator and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.7. The main generator and auxiliary systems components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.4-7. The staff did not identify any omissions.

2.3.4.7.3 Conclusions

The staff reviewed LRA Section 2.3.4.7 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the main generator and auxiliary systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the main generator and auxiliary systems that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.4.8 *Extraction Steam System* (Quad Cities Only)

As a result of the revised scoping methodology, the extraction steam was added to the scope of

license renewal at Quad Cities. Specifically, the entire extraction steam piping system was added to the scope of license renewal because the system could spatially interact with safety-related pipe located in the feedwater heater area.

2.3.4.8.1 Summary of Technical Information in the Application

The applicant described the extraction steam system in LRA Section 2.3.4.8 and provided a list of components subject to AMR in LRA Table 2.3.4-8. This LRA section was not included in the original LRA but was added to the scope of license renewal at Quad Cities as a result of the revised scoping methodology and was provided to the staff in the applicants response to the draft SER Open Item 2.1-1.

The function of the extraction steam system is to preheat feedwater as it passes through the feedwater heaters prior to being returned to the reactor vessel. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following extraction steam system intended function:

- C preclude adverse effects on safety-related SSCs— Non-safety-related components that could be a hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

The extraction steam system extracts steam from various points on the main turbine and routes it along with water from the moisture separator drains to the feedwater heaters. The steam is then added to heat the condensate and feedwater which flows through the tube side of the feedwater heaters and flash tanks. Extraction steam provides the major heat source during normal operation of the feedwater heaters.

The extraction steam system boundary includes piping and valves that supply extraction steam from the low pressure turbine exhaust piping interface to the A, B, and C feedwater heaters and flash tanks. This includes pipe, valves, and associated instrumentation.

In LRA Section 2.3.4.8, the applicant described the extraction steam system evaluation boundary. In addition, the applicant highlighted those portions of the main generator and auxiliary systems within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.8. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the plant heating system in LRA Table 2.3.4-8 as being within the scope of license renewal and subject to an AMR:

- C Piping and Fittings (spatial interaction, Quad Cities only)
- C Valves (spatial interaction, Quad Cities only))

The LP heaters and Heater Flash Tanks that are highlighted on the boundary drawings for this system are in scope of license renewal and require aging management are evaluated as part of the Condensate and Condensate Storage System which is discussed in LRA Section 2.3.4.3.

2.3.4.8.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.8 and Quad Cities UFSAR Sections 10.1 and 10.4 to determine whether there is a reasonable assurance that the extraction steam system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the main generator and auxiliary systems in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the main generator and auxiliary systems that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the main generator and auxiliary systems. The staff then reviewed the referenced P&I drawings to verify that those portions of the main generator and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.8, and that the applicant identified all main generator and auxiliary systems components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the main generator and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.8. The main generator and auxiliary systems components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.4-8. The staff did not identify any omissions.

2.3.4.8.3 Conclusions

The staff reviewed LRA Section 2.3.4.8 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. No omissions were found. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the main generator and auxiliary systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the extraction steam system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.3.4.9 Feedwater Heater Drains and Vents System

2.3.4.9.1 Summary of Technical Information in the Application

The applicant described the feedwater heater drains and vents steam system in LRA Section 2.3.4.9 and provided a list of components subject to AMR in LRA Table 2.3.4-9. This LRA section was not included in the original LRA but was added to the scope of license renewal at Quad Cities as a result of the revised scoping methodology and was provided to the staff in the applicants response to the draft SER Open Item 2.1-1.

The function of the feedwater heater drains is to establish and maintain the desired level of condensate in the feedwater heater shells. The function of the feedwater heater vent system is to remove non-condensable gases from the heater shells and tubes during start-up and power generation. Using the methodology described in LRA Section 2.1.4.1 for identifying the mechanical components within the scope of license renewal, the applicant identified the following extraction steam system intended function:

- C preclude adverse effects on safety-related SSCs—Non-safety-related components that could be a hazard to safety-related SSCs maintain sufficient integrity so that the intended function of safety-related SSCs is not adversely affected.

The feedwater heater system is divided into three parallel strings. Each string contains three low pressure heaters A, B, and C and one high pressure heater D. Condensate cascades from the D high pressure heater to the A, B, and C low pressure heaters in each string. The condensate exits the A low pressure feedwater heater and is routed through a heater flash tank and low pressure feedwater heater drain coolers in each string. Drainage is ultimately routed to the main condenser.

The feedwater heater drain and vent system is comprised of the piping and components that connect each of the flash tanks, heaters, and coolers. The feedwater heater coolers, and tanks were are evaluated in the feedwater system and in the condensate and condensate makeup system.

In LRA Section 2.3.4.9, the applicant described the feedwater heater drains and vents system evaluation boundary. In addition, the applicant highlighted those portions of the feedwater heater vents and drains systems within the scope of the Rule in the P&I drawings listed as references in LRA Section 2.3.4.9. Also, based on the methodology described in LRA Section 2.1.5 for identifying the mechanical components subject to an AMR, the applicant identified the following component groups and their intended functions within the plant heating system in LRA Table 2.3.4-9 as being within the scope of license renewal and subject to an AMR:

- C Piping and Fittings (spatial interaction, Quad Cities only)
- C Valves (spatial interaction, Quad Cities only)

The LP heaters and Heater Flash Tanks, and Condensing Chambers that are highlighted on

the boundary drawings for this system are in scope of license renewal and require aging management . These components were evaluated as part of the Condensate and Condensate Storage System which is discussed in LRA Section 2.3.4.3.

2.3.4.9.2 Staff Evaluation

The staff reviewed LRA Section 2.3.4.9 and Quad Cities UFSAR Section 10.4.7.2 to determine whether there is a reasonable assurance that the extraction steam system components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 10 CFR54.21(a)(1). The staff's review was conducted in accordance with Section 2.3 of NUREG-1800.

In the performance of the review, the staff reviewed the UFSAR to determine if there were any system functions that were not identified in accordance with the requirements of 10 CFR 54.4 as an intended function of the main generator and auxiliary systems in the LRA. The staff did not identify any omissions.

Also, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any component were omitted.

To verify that the applicant identified the components of the main generator and auxiliary systems that are within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1), respectively, the staff compared the referenced P&I drawings to the system drawings and system descriptions in the UFSARs to ensure that the referenced P&I drawings were representative of the main generator and auxiliary systems. The staff then reviewed the referenced P&I drawings to verify that those portions of the main generator and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.9, and that the applicant identified all main generator and auxiliary systems components within the scope of license renewal and subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1).

The staff found that those portions of the main generator and auxiliary systems that meet the scoping requirements of 10 CFR 54.4 are included within the scope of license renewal and are identified as such by the applicant in LRA Section 2.3.4.9. The main generator and auxiliary systems components that are subject to an AMR in accordance with 10 CFR 54.4 and 10 CFR 54.21(a)(1) are included in LRA Table 2.3.4-9. The staff did not identify any omissions.

2.3.4.9.3 Conclusions

The staff reviewed LRA Section 2.3.4.9 and the accompanying scoping boundary drawings to determine whether any SSCs within the scope of license renewal had not been identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. No omissions were found. On the basis of its review, the staff concludes that the applicant has

adequately identified the components of the main generator and auxiliary systems that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has adequately identified the components of the extraction steam system that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4 Scoping and Screening Results: Structures

This section addresses the structure-related scoping and screening results for license renewal. The structures identified in LRA Table 2.2-2 as being in the scope of license renewal are as follows:

- Primary Containment (LRA 2.4.1)
- Reactor Building (LRA 2.4.2)
- Main Control Room and Auxiliary Electric Equipment Room (LRA 2.4.3)
- Turbine Building (LRA 2.4.4)
- Diesel Generator Buildings (LRA 2.4.5)
- Station Blackout Building and Yard Structures (LRA 2.4.6)
- Isolation Condenser Pump House (Dresden Only) (LRA 2.4.7)
- Makeup Demineralizer Building (Dresden Only) (LRA 2.4.8)
- Radwaste Floor Drain Surge Tank (LRA 2.4.9)
- Miscellaneous Foundations (LRA 2.4.10)
- Crib House (LRA 2.4.11)
- Unit 1 Crib House (Dresden Only) (LRA 2.4.12)
- Station Chimney (LRA 2.4.13)
- Cranes and Hoists (LRA 2.4.14)

In addition, the applicant has identified the following commodity groups as within the structures scope:

- Component Supports Commodity Group (LRA 2.4.15)
- Insulation Commodity Group (LRA 2.4.16)

Section 54.21(a)(1) of Title 10 of the *Code of Federal Regulations* requires an applicant to identify and list structures and components subject to an AMR. These are passive, long-lived structures and components that are within the scope of license renewal. To verify that the applicant has properly implemented its methodology, the staff focuses its review on the implementation results. Such a focus allows the staff to confirm that there is no omission of structural components that are subject to an AMR. If the review identifies no omission, the staff has the basis to find that the applicant has identified the structural components that are subject to an AMR.

LRA Table 2.2-2 also identifies the following structures that are not in scope of license renewal.

- fuel oil pump house and oil storage tank foundation (Dresden)

- meteorological tower
- miscellaneous administrative buildings
- miscellaneous yard structures
- miscellaneous radwaste buildings
- miscellaneous river water structures
- miscellaneous Dresden Unit 1 structures (Dresden)
- miscellaneous transmission and distribution structures

Except for the meteorological tower and miscellaneous administrative buildings (provided there are no seismic II/I intended functions associated with these structures), the staff was unable to evaluate whether these structures are correctly excluded from the license renewal scope.

As a result, the staff requested the applicant to provide additional descriptive information for the remaining six structures before a determination can be made on their inclusion in the scope. The staff asked the applicant the following in RAI 2.4-1:

- Submit a more detailed description of these six structures, define their function, and describe the technical bases for exclusion from the license renewal scope.
- Verify that none of the eight structures serve a seismic II/I intended function.

In its response to this RAI, the applicant stated the following:

The eight (8) structures listed in RAI 2.4-1 are groups of non-safety-related structures and major components that do not satisfy the requirements of 10 CFR 54.4(a). These structures provide structural support and anchorage for non-safety-related equipment and equipment that is not required to support regulated events (ATWS, FP, EQ, and SBO). None of structures and major components in these structural groups serves a seismic II/I intended function. This was the technical basis for exclusion from the license renewal scope. With the exception of the meteorological towers, a description of remaining structural groups along with their functions is provided below.

Dresden—Fuel Oil Pump House and Oil Storage Tank Foundation

This structural group contains structures that support the non-safety-related plant fuel supply subsystem for the plant heating steam boilers.

Dresden and Quad Cities Stations—Miscellaneous Administrative Buildings

This structural group covers a number of administrative, warehouse, and miscellaneous structures. Several of the structures provide protection for non-safety-related equipment from the outside environment.

Dresden and Quad Cities Stations—Miscellaneous Yard and Tank Structures

This structural group is a collection of miscellaneous non-safety-related structures located throughout the site. Several of the structures provide protection for equipment from the outside environment and also provide a barrier to contain potentially environmentally hazardous materials.

Dresden and Quad Cities Stations—Miscellaneous Radwaste Buildings

This structural group is a collection of miscellaneous non-safety-related structures that provide

structural support and anchorage of non-safety-related equipment and systems and treated/processed radwaste materials. Several of these structures provide protection of personnel and non-safety-related facilities, equipment and components from the outside environment and also provide radiation shielding.

Dresden Station—Miscellaneous River Water Structures

This structural group is a collection of miscellaneous non-safety-related structures related to the circulating water systems, cooling water canals, and reservoirs. These structures provide protection of personnel and non-safety-related equipment from the outside environment and provide structural support for non-safety-related equipment. A description of those structures and components included within this structural group along with their functions are provided below.

Units 2 & 3 Circ Water Discharge Pipes—The circulating water discharge pipes provide the means of discharge/dispersion of heated circulating water into the Dresden cooling lake and/or the Illinois River. The circulating water discharge also provides the means of discharge, dispersion and dilution of low level liquid radwaste.

2/3 Circ Water Flow Regulating Station—A structure with gates that distributes the water returning from the lake to the river (indirect open-cycle operation), to the intake flume to the crib house (closed cycle operation), or to a combination of both.

Unit 2 & 3 Lake Lift Station—The lift station provides protection for all non-safety-related systems and components contained within the structure from the outside environment. The lift station provides structural support for station cooling water system equipment. This equipment functions in controlling the flow of cooling water from the cooling lake through the intake and discharge canals. Additionally, the Lift Station maintains the hot canal and lake levels.

Circulating Water Cooling Towers (3)—The circulating water cooling towers provide supplemental cooling of the circulating water.

Goose Lake Pumping Station—The Goose Lake Pumping Station provides protection of pumps that control level in the adjacent retention pond.

Units 2 & 3 Cooling Lake, dikes and canals—The cooling lake provides cooling of the circulating water and service water prior to discharge into the Illinois River or return to the plant.

Quad Cities Station—Miscellaneous River Water Structures

This structural group is a collection of miscellaneous non-safety-related structures related to the circulating river water system. The circulating water system takes suction directly from the Mississippi River, discharges the flow through the condenser, and directs it back to the river. A description of those structures and components included within this structural group along with their functions are provided below.

Discharge Flume—The discharge flume controls direction of flow.

Discharge Flume Sample Pump (Structure)—The discharge flume sample pump structure houses and protects the non-safety-related sample pump.

Dock—The dock provides access to river.

Floating Boom—The primary function of the floating boom is to prevent floating river debris from entering the intake flume and/or the circulating water pumps.

Intake Flume—The intake flume directs water to Crib House.

Lift Station—Lift Station structure provides protection for the non-safety-related pumps and associated components that support the circulating water system from the outside environment. This facility is no longer in use.

Spray Canal—The spray canal was previously used to convey heated circulation water discharge for cooling. It is currently used in conjunction with the Fish Study Facility Building to produce walleye and hybrid striped bass fingerlings for stocking and release to the Mississippi River.

Spray Canal Blowdown Diffuser Pipe—The spray canal blowdown diffuser pipe provides measures for dispersion of circulating water. The spray canal blowdown south diffuser pipe and the discharge bay function as the three site release points for liquid effluents.

Spray Canal Diversion Wall—The spray canal diversion wall provides flow direction control.

Wing Dam (6)—Wing dams provide river flow control. Wing Dam 31 is located between the intake and discharge canals and functions as a recirculation barrier that helps preclude released radioactive materials from being introduced back into the circulating water system. The top of this wing dam is about 2 feet below the river surface which creates some downstream water flow to prevent stagnant water areas from forming.

Dresden Station—Miscellaneous Dresden Unit 1 Structures

This structural group is a collection of miscellaneous non-safety-related structures associated with Unit 1 at Dresden Station. Dresden Unit 1 shares the site and surrounding area with Units 2 and 3. Unit 1 has been placed in a safe storage condition until Units 2 and 3 are ready for decommissioning. None of these structures provide functional support for Units 2 and 3 and none of structures and major components in this structural group serves a seismic II/I intended function that could affect Units 2 and 3.

Dresden Station—Miscellaneous Transmission and Distribution Structures

This structural group is a collection of miscellaneous non-safety-related structures associated with the 138 KV and 345 KV switchyards. The purpose of the structures included in this group is to provide support and protection of the non-safety-related components that are used for transmitting electrical power generated by the plant. Those transmission towers necessary to provide offsite power restoration as defined by 10 CFR 50.63 (SBO) are included in the scope of license renewal and evaluated with the Station Blackout Building structure (See section 2.4.6 of the LRA). Those switchyard foundations providing necessary support for equipment and structures (e.g., breaker, end structures, and disconnect foundations) necessary to provide offsite power restoration as defined by 10 CFR 50.63 (SBO) are included in the scope of license renewal and evaluated with the Station Blackout Building structure (See section 2.4.6 of the LRA).

Quad Cities Station—Miscellaneous Transmission and Distribution Structures

This structural group is a collection of miscellaneous non-safety-related structures associated with the 345 KV switchyard. The purpose of the structures included in this group is to provide support and protection of the non-safety-related components that are used for transmitting electrical power generated by the plant. Those transmission towers necessary to provide offsite power restoration as defined by 10 CFR 50.63 (SBO) are included in the scope of license renewal and evaluated with the Station Blackout Building structure (See section 2.4.6 of the LRA).

For each group listed above, the applicant also identified the specific structures and major components within the group and the function of each structure or major component. The applicant's response to RAI 2.4-1 is complete. Based on its review of the information in the RAI response, the staff concludes that the applicant conducted a comprehensive study to identify the structures and components that are within the scope of license renewal. RAI 2.4-1 is, therefore, resolved.

2.4.1 Primary Containment

2.4.1.1 Summary of Technical Information in the Application

The applicant described the primary containment in LRA Section 2.4.1 and provided a list of components subject to an AMR in LRA Table 2.4-1.

The primary containment provides a barrier that controls the release of fission products to the secondary containment in the event of a loss-of-coolant accident (LOCA). It also provides structures and a water pool that limit the pressure increase in the containment in the event of a LOCA.

The primary containment is a General Electric Mark I design. It consists of a drywell, a pressure suppression chamber that is partially filled with water, and a vent system connecting the drywell and the suppression chamber. The design, fabrication, and inspection of the primary containment was in accordance with the requirements of the ASME Pressure Vessel Code, Section III, Class B. It is a Class I structure.

The drywell is a steel pressure vessel with a spherical lower section and a cylindrical upper section. A portion of the lower spherical section is embedded in concrete. This embedment, in combination with upper lateral supports that are attached to the cylindrical section, forms the reactor support system. The drywell houses the reactor vessel, the reactor coolant recirculation system, and branch connections of the reactor primary system. It includes structural steel framing, a concrete radiation shield wall between the reactor pressure vessel and the drywell walls, a removable steel head, an equipment hatch and other access hatches, a personnel airlock with two mechanically interlocked doors, and penetrations.

The drywell head is removed during refueling operations. The head is held in place by bolts and is sealed with a double gasket, tongue-and-groove arrangement that permits checks for leak tightness without pressurizing the entire containment.

The pressure suppression chamber is a toroidal-shaped, steel pressure vessel encircling the base of the drywell. The suppression chamber is commonly called the torus and includes internal steel framing, supports, access hatches, and penetrations. The suppression chamber is mounted on support structures that transmit loads to the concrete foundation of the reactor building.

Eight circular vent lines form a connection between the drywell and the pressure suppression

chamber. These drywell vent lines are connected to a header which is contained within the air space of the suppression chamber. The header downcomers terminate below the suppression chamber water level. The primary containment also contains structural interfacing components of the electrical penetrations.

The applicant identified the following UFSAR references for additional descriptive information about the primary containment:

- Dresden Station UFSAR Section(s): 6.2.1, 3.2.1
- Quad Cities Station UFSAR Section(s): 6.2.1, 3.2.1

The applicant defined the following intended functions for the primary containment:

- Primary containment—controls the release of fission products to the secondary containment in the event of design-basis LOCAs so that offsite consequences are within acceptable limits.
- Physical support and protection—provides physical support and protection for safety-related components and components relied upon to demonstrate compliance with fire protection, ATWS, and SBO-regulated events. The structure also contains components that are relied upon for compliance with 10 CFR 50.49, (EQ).
- Pressure suppression—provides sufficient air and water volumes to absorb the energy released to the containment in the event of design-basis events so that the pressure is within acceptable limits.
- Water source—provides a source of water for emergency core cooling systems.
- Radiation shielding—biological shield wall between the reactor pressure vessel and the drywell walls provides protection to personnel and components from radiation.

In LRA Table 2.4-1, the applicant listed the following component groups as requiring AMR for the primary containment:

Component	Component Intended Function	LRA Aging Management Ref No.
Beam Seats	Structural Support	3.5.1.20
Concrete and Grout	Structural Support	3.5.1.29
Concrete Slabs	Structural Support	3.5.1.20, 3.5.1.27
Concrete Walls	Structural Support	3.5.1.20, 3.5.1.27
Concrete Walls	Shelter, Protection, Shielding	3.5.1.20, 3.5.1.27
Containment Penetrations (Electrical)	Structural Support	3.5.1.3

Component	Component Intended Function	LRA Aging Management Ref No.
Containment Penetrations (Electrical)	Fission Product Barrier	3.5.1.3
Containment Penetrations (Electrical)	Structural Pressure Barrier	3.5.1.3
Containment Penetrations (Mechanical)	Structural Support	3.5.1.3
Containment Penetrations (Mechanical)	Fission Product Barrier	3.5.1.3
Containment Penetrations (Mechanical)	Structural Pressure Barrier	3.5.1.3
Containment Penetrations Bellows	Fission Product Barrier	3.5.1.2
Containment Penetrations Bellows	Structural Pressure Barrier	3.5.1.2
Downcomers	Structural Pressure Barrier	3.5.1.12, 3.5.1.14
Drywell Expansion Foam	Expansion/Separation	3.5.2.8
Drywell Heads	Structural Support	3.5.1.12, 3.5.1.14
Drywell Heads	Fission Product Barrier	3.5.1.12, 3.5.1.14
Drywell Heads	Structural Pressure Barrier	3.5.1.12, 3.5.1.14
Drywells	Structural Support	3.5.1.12, 3.5.1.14
Drywells	Fission Product Barrier	3.5.1.12, 3.5.1.14
Drywells	Structural Pressure Barrier	3.5.1.12, 3.5.1.14
Hatches	Structural Pressure Barrier	3.5.1.4, 3.5.1.5
Misc. Steel (includes Stairs, Ladders, Platforms, Gratings)	Non-S/R Structural Support	3.5.1.20
Penetration Sleeves, Penetration Bellows	Structural Support	3.5.1.1
Penetration Sleeves, Penetration Bellows	Fission Product Barrier	3.5.1.1
Penetration Sleeves, Penetration Bellows	Structural Pressure Barrier	3.5.1.1
Seals	Structural Pressure Barrier	3.5.1.6
Steel Embedments	Structural Support	3.5.1.20
Steel Panels and Cabinets	Structural Support	3.5.1.20
Structural Steel	Structural Support	3.5.1.20
Suppression Chambers	Structural Support	3.5.1.12, 3.5.1.13, 3.5.1.14
Suppression Chambers	Fission Product Barrier	3.5.1.12, 3.5.1.13, 3.5.1.14
Suppression Chambers	Structural Pressure Barrier	3.5.1.12, 3.5.1.13, 3.5.1.14
Thermowells	Structural Support	3.5.2.15

Component	Component Intended Function	LRA Aging Management Ref No.
Thermowells	Structural Pressure Barrier	3.5.2.15
Vent Headers	Structural Support	3.5.1.13
Vent Headers	Structural Pressure Barrier	3.5.1.12, 3.5.1.13, 3.5.1.14
Vent Line Bellows	Structural Support	3.5.1.13
Vent Line Bellows	Structural Pressure Barrier	3.5.1.13, 3.5.1.17
Vent Lines	Structural Support	3.5.1.12, 3.5.1.14
Vent Lines	Structural Pressure Barrier	3.5.1.12, 3.5.1.14
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the primary containment are provided in LRA Sections 3.3 and 3.5.

2.4.1.2 Staff Evaluation

The staff reviewed LRA Section 2.4.1, Dresden Station UFSAR Sections 6.2.1 and 3.2.1, and Quad Cities Station UFSAR Sections 6.2.1 and 3.2.1 to determine whether the primary containment structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Section 2.4.1 discusses the scoping and screening results for the primary containment. It is the staff's understanding that this section of the LRA addresses not only the primary containment (drywell, pressure suppression chamber, and the vent system connecting the two structures), but also all the structures inside the containment, all attachments to the containment, and the containment supports. LRA Table 2.4-1 identifies the primary containment component groups requiring AMR, the associated component intended function(s), and the AMR reference. Since LRA Table 2.4-1 combines many components under a single component group, the staff requested (RAI 2.4-2) that the applicant identify which component group is intended to cover the specific components listed in (a) through (k) below, or identify the location in the LRA where these specific components are addressed. If these specific components are not considered to be within the scope of license renewal, the applicant was requested to provide the technical bases for their exclusion. To assist in the review, the staff has noted figure numbers from either the Dresden or the Quad Cities UFSAR that identify specific components. However, the component list applies to all four units.

(a) reactor vessel to biological shield stabilizers (D—UFSAR Figures 3.9-1 and 3.9-2)

(b) biological shield to containment stabilizer (D—UFSAR Figures 3.9-1 and 3.9-2 and

QC—UFSAR Figures 3.9-5 and 3.9-8)

- (c) RPV male stabilizer attached to outside of drywell shell (QC—UFSAR Figures 3.9-5 and 3.9-8)
- (d) RPV female stabilizer and anchor rods (also referred to as gib) embedded in reactor building concrete wall (D—UFSAR Figure 3.9-1 and QC—UFSAR Figures 3.9-8 and 3.9-9)
- (e) biological shield wall and anchor bolts (D—UFSAR Figures 3.9-2 and 3.9-7 and QC—UFSAR Figures 3.9-5 and 3.9-6)
- (f) reactor vessel support skirt and anchor bolts (D—UFSAR Figures 3.9-2 and 3.9-3 and QC—UFSAR Figures 3.9-5, 3.9-6, and 3.9-10)
- (g) reactor vessel support ring girder and anchor bolts (D—UFSAR Figures 3.9-2 and 3.9-3 and QC—UFSAR Figures 3.9-5, 3.9-6, and 3.9-10)
- (h) reactor vessel support pedestal (D—UFSAR Figures 3.9-2 and 3.9-3 and QC—UFSAR Figures 3.9-5 and 3.9-6)
- (i) drywell internal 6x1-in. steel shear ring (QC—UFSAR Figures 3.9-5 and 3.9-7)
- (j) drywell steel support skirt and anchor bolts (QC—UFSAR Figures 3.9-5 and 3.9-7)
- (k) drywell head closure bolts and double gasket, tongue-and-groove seal arrangement (described in LRA Section 2.4.1)

In a letter dated December 5, 2003, in response to RAI 2.4-2, the applicant stated the following:

All of the components described below are included within the scope of license renewal. Items (a) through (k) below provide the LRA Table number and Component Group that address each specific component.

- (a) Reactor Vessel to Biological Shield Stabilizers—Table 2.4-1, Primary Containment, Component Group—Structural Steel
- (b) Biological Shield to Containment Stabilizer—Table 2.4-1, Primary Containment, Component Group—Structural Steel
- (c) RPV Male Stabilizer Attached to Outside of Drywell Shell—Table 2.4-1, Primary Containment, Component Group—Steel Embedments
- (d) RPV Female Stabilizer and Anchor Rods (also referred to as Gib) embedded in Reactor Building concrete wall—Table 2.4-1, Primary Containment, Component Group—Steel Embedments

- (e) Biological Shield Wall—Table 2.4-1, Primary Containment, Component Group—Concrete Walls (Structural Support and Shelter, Protection, Shielding)
- (f) Anchor bolts—Table 2.4-15, Component Supports, Component Group—Anchorage to Buildings, Including Bolted/Welded Connections (Structural Support)
- (g) Reactor Vessel Support Skirt—Table 2.3.1-1, Reactor Vessel, Component Group—Support Skirts and Attachment Welds

Anchor bolts—Table 2.4-15, Component Supports, Component Group—Anchorage to Buildings, Including Bolted/Welded Connections (Structural Support)

- (h) Reactor Vessel Support Ring Girder—Table 2.4-1, Primary Containment, Component Group—Support Members

Anchor bolts—Table 2.4-15, Component Supports, Component Group—Anchorage to Buildings, Including Bolted/Welded Connections (Structural Support)

- (i) Reactor Vessel Support Pedestal—Table 2.4-1, Primary Containment, Component Group—Concrete Walls (Structural Support)

- (j) Drywell internal 6x1-inch steel shear ring—Table 2.4-1, Primary Containment, Component Group—Steel Embedments

- (k) Drywell steel support skirt—Table 2.4-1, Primary Containment, Component Group—Support Members

Anchor bolts—Table 2.4-15, Component Supports, Component Group—Anchorage to Buildings, Including Bolted/Welded Connections (Structural Support)

- (l) The drywell head closure bolts—Table 2.4-1, Primary Containment, Component Group—Drywell Heads

Double Gasket—Exelon procedure requires the gasket material to be replaced during reactor reassembly (at least once per refuel cycle). These gaskets are not long lived and therefore do not require aging management.

Tongue-and-groove Seal Arrangement—Table 2.4-1, Primary Containment, Component Groups—Drywell Heads and Drywells

In its response, the applicant identified a specific component group for all items listed in the RAI, except for the double gasket. Since the double gasket is on a regular replacement schedule, the staff concurs that it does not require aging management for license renewal. The staff finds the applicant's response acceptable and, therefore, RAI 2.4-2 is resolved.

Leakage through the refueling seals located at the top of the drywell potentially exposes the carbon steel drywell shell inner and outer surfaces to loss of material due to corrosion. This is a particular concern for the embedded portion of the drywell shell. Corrosion detected on the outer shell surface in the sand pocket region in a number of Mark I steel containments has been attributed to leakage past the drywell-to-reactor building refueling seal, coupled with clogging of the sand pocket drains. Leakage into the drywell, past the reactor vessel-to-drywell refueling

seal, creates the potential for corrosion of the inaccessible portion of the inner surface of the drywell shell embedded in the concrete floor.

From the information contained in the LRA, it was not clear to the staff (1) whether the refueling seals have been included in the license renewal scope, and (2) if included, how aging management is being addressed. Therefore, the applicant was requested (RAI 2.4-3) to submit the following information:

- (a) verification that the refueling seals are included in the license renewal scope, or a detailed explanation for their exclusion
- (b) a detailed description of the plant-specific operating experience for the refueling seals in all four units, including incidences of degradation, method of detection, root cause, corrective actions, and current inspection procedures
- (c) a detailed description of the scoping, screening, and aging management review for the refueling seals
- (d) the aging management program(s) credited to manage aging of the refueling seals

In a letter dated December 12, 2003, in response to RAI 2.4-3, the applicant stated the following:

- (a) The refueling seals are not within the scope of license renewal. Title 10, CFR 54, Section 54.4(a), sets forth the criteria that determine whether plant systems, structures, and components are within the scope of license renewal. The refueling seals do not satisfy any of the requirements set forth in 10 CFR 54.4(a).

The refueling seals are not safety-related and they are not relied upon to remain functional during design basis events to ensure (i) the integrity of the reactor coolant pressure boundary, (ii) the capability to shutdown the reactor and maintain it in a safe shutdown condition, or (iii) the capability to prevent or mitigate potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 50.67(b)(2), or 100.11. Thus, the refueling seals are not brought into scope of license renewal by 10 CFR 54.4(a)(1).

Title 10 CFR 54.4(a)(2) sets forth the criterion that all non-safety-related systems, structures and components whose failure could prevent satisfactory accomplishment of any of the safety-related functions identified in 10 CFR 54.4(a)(1) are also within the scope of license renewal.

The drywell-to-reactor building refueling seal and the reactor pressure vessel (RPV)-to-drywell refueling seal, in conjunction with the refueling bulkhead, provides a watertight barrier to permit flooding above the RPV flange while preventing water from entering the drywell. Providing a watertight barrier to permit flooding above the RPV flange in support of refueling operations is not a safety-related function.

The NRC notified the nuclear industry of the potential for degradation of steel containments due to leakage past the drywell to reactor building refueling seals in IE Information Notice 86-99 and NRC Generic Letter 87-05. The Dresden and Quad Cities responses to these NRC communications are described in their respective UFSARs, Section 6.2.1.2.1.2 (Drywell Corrosion Potential). The UFSAR discussions include a commitment to monitor the sand

pocket drain lines during refuel activities and if leakage is detected during refuel flood-up, an inspection to determine the source will take place and further corrective measures will be initiated. Dresden/Quad Cities LRA Section 4.7.2.2 (Degradation Rates of Inaccessible Exterior Drywell Plate Surfaces) describes the calculation that projected corrosion rates for the steel drywell plates in the sand pocket area and determined that the wall thickness was sufficient for the remainder of the 40-year license period, and determines it to be a TLAA. The TLAA disposition includes a commitment to confirm corrosion rate assumptions used in the calculations by UT inspection prior to the period of extended operation and to revise the corrosion calculation and validate that an acceptable wall thickness will remain to the end of the 60-year license operating period. These commitments support a conclusion that even if leakage past the drywell to reactor building refueling seal occurs, there will be no consequential failure of any of the safety-related functions identified in 10 CFR 54.4(a)(1). Thus, the drywell to reactor building refueling seal is not brought into license renewal scope by 10 CFR 54.4(a)(2).

Potential leakage of water past the RPV to drywell refueling seal can occur only when the reactor is in a cold shutdown condition with the reactor cavity flooded to support refueling operations. Leakage past the RPV-to-drywell seal would result in cold (<150 °F), demineralized water entering the drywell. Leakage of cold, demineralized water into the drywell cannot result in failure of any safety-related equipment because 1) there is no equipment inside the drywell whose safety-related function is credited in support of refueling operations, 2) the drywell contains a drainage system and sumps to collect and monitor unidentified leakage inside the drywell, and 3) the frequent personnel entry into the drywell that occurs during most refueling outages would result in any substantial leakage past the RPV to drywell refueling seal being noticed and corrective actions being taken. These considerations support a conclusion that even if leakage past the RPV-to-drywell refueling seal occurs, there will be no consequential failure of any of the safety-related functions identified in 10 CFR 54.4(a)(1). Thus, the RPV-to-drywell refueling seal is not brought into license renewal scope by 10 CFR 54.4(a)(2).

The refueling seals are not relied upon in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for fire protection, environmental qualification, pressurized thermal shock (N/A for BWRs), anticipated transients without scram, or station blackout. Thus, the refueling seals are not brought into license renewal scope by 10 CFR 54.4(a)(3).

- (b) The refueling seals are not within the scope of license renewal. As such, evaluation of their operating experience is not included within the scope of the license renewal application.
- (c) The refueling seals are not within the scope of license renewal. A detailed explanation of the scoping considerations is provided in response to question 1), above. The refueling seals are passive components that are not within the scope of license renewal. As such, they have not been included within the scope of aging management review.
- (d) The refueling seals are not within the scope of license renewal. As such, the refueling seals are not within the scope of an aging management program.

The staff finds the applicant's response acceptable and, therefore, RAI 2.4-3 is resolved.

2.4.1.3 Conclusions

The staff reviewed LRA Section 2.4.1 to determine whether any structural components of the primary containment that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant.

On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the primary containment that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the primary containment that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.2 Reactor Building

2.4.2.1 Summary of Technical Information in the Application

The applicant described the reactor building in LRA Section 2.4.2 and provided a list of components subject to AMR in LRA Table 2.4-2.

The reactor building serves as the secondary containment. The secondary containment, in conjunction with other engineered safeguards and nuclear safety systems, limits the release of radioactive materials ensuring that site exposure resulting from a postulated design basis accident will remain below 10 CFR Part 100 guideline values. The reactor building provides secondary containment when the primary containment is in service, and provides primary containment during reactor refueling and maintenance operations when the primary containment system is open.

A single seismic Class I reactor building for each unit completely encloses both reactor and primary containment structures and auxiliary systems of the nuclear steam supply system. A major substructure within the reactor building is a reinforced concrete biological shield that surrounds each reactor and drywell portion of the primary containment. Additionally, the building houses the spent fuel pool, steam dryer/moisture separator storage pool, the new fuel storage vault, reactor cavity, reactor auxiliary equipment, refueling equipment, and reactor servicing equipment. The reactor building consists of monolithic reinforced concrete floors and walls from its foundation to the refueling floor, with a separation wall between the two units. Above this floor is the common refueling floor where the building superstructure, consisting of structural steel framing, sealed sheet metal siding, and a precast concrete roof, provides secondary containment integrity. The building is designed to contain positive internal pressure without structural failure and without pressure relief. Blow-off panels are installed as part of the reactor building superstructure siding to relieve pressure and control potential damage under short-term tornado loads. Personnel interlock/airlock access control doors have seals and are electrically controlled so that only one door in an "airlock" can be open at a time.

The containment barrier function of the reactor building is achieved through design and construction low leakage of air through the interlock/airlock doors, pipe and electrical penetration seals, and the building walls and roof. During normal operation, pressure in the building is automatically maintained at a slight negative pressure by controlling the exhaust to minimize exfiltration of airborne radioactive contamination, even under high wind conditions. The reactor building ventilation system (evaluated with HVAC-reactor building) is isolated on a secondary containment isolation signal.

Other structural components evaluated in this section include the reactor building penetrations and doors, equipment access building, the spent fuel pool, high-density spent fuel racks, crane

rails, and the new fuel storage vault with associated components.

Reactor building structural items evaluated in other areas include the refueling platforms (evaluated with refueling equipment) and reactor building cranes (evaluated with cranes and hoists).

The applicant identified the following UFSAR references for additional descriptive information about the reactor building:

- Dresden Station UFSAR Section(s): 6.2.3, 3.2.1
- Quad Cities Station UFSAR Section(s): 6.2.3, 3.2.1

The applicant defined the following intended functions for the reactor building:

- Containment—controls the potential release of fission products to the external environment so that offsite consequences of design-basis events are within acceptable limits. The reactor building provides secondary containment function when the primary containment is required to be in service and provides primary containment function during reactor refueling and maintenance operations when the primary containment systems are open.
- Physical support and protection—provides physical support for safety-related and non-safety-related components, protection for all personnel and safety-related components, and components relied upon to demonstrate compliance with regulated events.
- Protection and Radiation Shielding—provides leak-tight boundary to protect public health and safety in the event of postulated design-basis events and radiation shielding. Protection provides protection for safe storage of new fuel.

In LRA Table 2.4-2, the applicant listed the following component groups requiring AMR for the reactor building:

Component	Component Intended Function	LRA Aging Management Ref No.
Blowout Panels	Structural Pressure Barrier	3.5.1.20
Caulking/Sealants	Structural Pressure Barrier	3.5.2.4
Concrete and Grout	Structural Support	3.5.1.29
Concrete Beams	Structural Support	3.5.1.20, 3.5.1.21
Concrete Columns	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.27
Concrete Curbs	Direct Flow	3.5.1.20
Concrete Slabs	Structural Support	3.5.1.20, 3.5.1.21
Concrete Slabs	Shelter, Protection, Shielding	3.5.1.20
Concrete Walls	Structural Support	3.5.1.20, 3.5.1.21
Concrete Walls	Shelter, Protection, Shielding	3.5.1.20
Concrete Walls	Structural Pressure Barrier	3.5.1.20

Component	Component Intended Function	LRA Aging Management Ref No.
Door Seals	Flood Barrier	3.5.2.7
Fire Doors	Fire Barrier	3.3.2.4
Fire Doors (Dresden)	Shelter, Protection, Shielding	3.3.2.4
Fire Proofing	Fire Barrier	3.3.2.62
Fire Wrap	Fire Barrier	3.3.2.63
Foundations	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26
Liners	Structural Pressure Barrier	3.5.1.23
Masonry Walls	Structural Support	3.5.1.24
Masonry Walls	Fire Barrier	3.3.2.129
Masonry Walls	Missile Barrier	3.5.1.24
Masonry Walls	HELB Shielding	3.5.1.24
Metal Decking	Structural Support	3.5.1.20
Metal Siding	Shelter, Protection, Shielding	3.5.1.20
Metal Siding	Structural Pressure Barrier	3.5.1.20
Misc. Steel (Grating, Ladders)	Structural Support	3.5.1.20
Misc. Steel (Kick Plates, Ladders, Platforms, Stairs, Railing)	Non-S/R Structural Support	3.5.1.20
Neutron-Absorbing Sheets	Absorb Neutrons	3.3.1.12, 3.3.1.9
New Fuel Racks	Structural Support	3.5.2.10
Penetration Seals (includes Secondary Containment Boot Seal)	Fire Barrier	3.3.1.18
Penetration Sleeves	Non-S/R Structural Support	3.5.1.20
Precast Concrete Panels	Structural Support	3.5.1.20
Precast Concrete Panels	Shelter, Protection, Shielding	3.5.1.20
Roofing	Shelter, Protection, Shielding	3.5.2.11
Secondary Containment Boot Seals	Structural Pressure Barrier	3.5.2.12
Steel Doors	Shelter, Protection, Shielding	3.5.1.20
Steel Doors	Flood Barrier	3.5.1.20
Steel Doors	Structural Pressure Barrier	3.5.1.20
Steel Embedments	Structural Support	3.5.1.20
Steel Panels and Cabinets	Structural Support	3.5.1.20
Steel Plates	Missile Barrier	3.5.1.20
Steel Plates	HELB Shielding	3.5.1.20
Steel Plates	Direct Flow	3.5.1.20
Storage Racks	Structural Support	3.3.1.11
Structural Steel (includes flued head anchor support)	Structural Support	3.5.1.20
Structural Steel	HELB Shielding	3.5.1.20
Structural Steel	Pipe Whip Restraint	3.5.1.20
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the reactor building are provided in LRA Sections 3.3 and 3.5.

2.4.2.2 Staff Evaluation

The staff reviewed LRA Section 2.4.2, Dresden Station UFSAR Sections 6.2.3 and 3.2.1, and Quad Cities Station UFSAR Sections 6.2.3 and 3.2.1 to determine whether the reactor building structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Table 2.4-2 presents a comprehensive list of component groups. However, for certain components the staff requires further explanation to complete its evaluation. The applicant was requested to submit the following information in RAI 2.4-4.

- (a) a description of "Neutron-Absorbing Sheets," and an explanation why it is included as a structural component when the aging management results are documented in LRA 3.3—Auxiliary Systems
- (b) a description of "Secondary Containment Boot Seals"
- (c) verification that "Storage Racks" refers to spent fuel racks, and an explanation why it is included as a structural component when the aging management results are documented in LRA 3.3—Auxiliary Systems

In its response to RAI 2.4-4, the applicant stated the following:

- (a) The spent fuel pool racks contain neutron absorbing sheets that maintain a k_{eff} no greater than .95 when all of the spent fuel is in place. These neutron adsorbing sheets are made of boral at Dresden and boraflex at Quad Cities and are evaluated in Sections VII.A2.1-b and VII.A1.1-a of NUREG-1801, Generic Aging Lessons Learned Report, Volume 2. Exelon assigned an aging management reference for these components to Table 3.3.1, Aging Management Programs Evaluated in NUREG-1801 That Are Relied Upon for License Renewal for the Auxiliary Systems, because NUREG-1801 directs licensees to this same reference. Table 3.3.1 of the Dresden and Quad Cities License Renewal Application is a recreation of all BWR-related line items found in Table 3 of NUREG-1801, Volume 1. NUREG-1801 line items VII.A2.1-b and VII.A1.1-a are assigned to Table 3 of NUREG-1801, Volume 1. Exelon assigned these structural components to aging management references for auxiliary systems only because it is an expectation of NUREG-1801.
- (b) The Reactor Building serves as the secondary containment whose primary purpose is to minimize the ground level release of airborne radioactive materials and to provide for a controlled, elevated release of the building atmosphere under accident conditions. To achieve this function, the Reactor Building is designed to maintain an internal negative pressure $\frac{1}{4}$ inch H₂O under neutral wind conditions. Reactor Building pipe penetrations are sealed as necessary to minimize air in leakage and maintain the negative internal pressure. These pipe

penetration seals are called "Secondary Containment Boot Seals." Boot seals are fabricated with a silicone rubber material that allows pipe movement while providing a seal between the pipe and the Reactor Building.

- (c) "Storage Racks" refer to "Spent Fuel Storage Racks" and are consistent with the components evaluated in Section VII.A2.1-c of NUREG-1801, Volume 2. At Dresden and Quad Cities, Spent Fuel Storage Racks are treated as structures, rather than part of an auxiliary system. Therefore, they were included in Section 2.4 of the LRA, the scoping and screening results for structures. The NUREG-1801 line item for Spent Fuel Storage Racks (VII.A2.1-c) is assigned to Table 3 of NUREG-1801, Volume 1 for Auxiliary Systems. Exelon credited the aging management programs in NUREG-1801 for spent fuel storage racks. Therefore the aging management reference for the spent fuel racks listed in Section 2.4 for structures cross-references an aging management program in the NUREG-1801 section for auxiliary systems.

The additional information provided by the applicant in its RAI response sufficiently describes the three components and how each is covered in the AMR. The staff concludes that the applicant has appropriately addressed the "Neutron-Absorbing Sheets," "Secondary Containment Boot Seals," and "Storage Racks" in its scoping and screening review and, therefore, considers RAI 2.4-4 resolved.

2.4.2.3 Conclusions

The staff reviewed LRA Section 2.4.2 to determine whether any structural components of the reactor building that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the reactor building that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the reactor building that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.3 Main Control Room and Auxiliary Electric Equipment Room

2.4.3.1 Summary of Technical Information in the Application

The applicant described the main control room and auxiliary electric equipment room in LRA Section 2.4.3 and provided a list of components subject to an AMR in LRA Table 2.4-3.

The main control room and auxiliary electric equipment room provide protection and structural support of the control equipment required for normal station operation and for shutdown of the plant under abnormal conditions. The main control room provides protection to safety-related components and to operating personnel from radiation exposure, high energy line break (HELB), tornado, and internally generated missiles.

The main control room and auxiliary electric equipment room contain the controls for normal station operation and for shutdown of the plant under abnormal conditions. This combined structure is seismic Class I, primarily reinforced concrete, capable of accommodating loading conditions imposed during any design-basis accident (DBA) without failure.

The Dresden main control room has reinforced concrete and reinforced concrete block walls, with a reinforced concrete floor and ceiling. The Dresden auxiliary electric equipment room serves as the cable spreading room for both units and houses the computer room. It is classified as a Class II structure, which has been investigated to assure that the integrity of the Class I items are not compromised. The auxiliary electrical equipment room is a reinforced concrete structure with structural steel support elements, a reinforced concrete floor, and the control room floor above as its ceiling.

The Quad Cities main control room, auxiliary electrical equipment room, and the cable spreading room complex is a Class I structure designed to accommodate loading conditions imposed during any DBA without failure. The control room is heavy-walled, constructed of ordinary reinforced concrete and of magnetite (high-density) concrete, with ordinary reinforced concrete for the control room and cable spreading room floor, and ordinary reinforced concrete for the auxiliary electric equipment room floor slab and roof slab. The cable spreading room is located directly below the main control room and above the auxiliary electrical equipment room and is used solely for the routing of instrument and control cables. The auxiliary electrical equipment room contains alternate safe shutdown equipment and the cabling from the tunnel below to the cable spreading room.

The applicant identified the following UFSAR references for additional descriptive information about the main control room and auxiliary electric equipment room:

- Dresden Station UFSAR Section(s): 3.1.1.3.1, 3.2.1, 3.2.6, and 6.4
- Quad Cities Station UFSAR Section(s): 3.1.3.1, 3.2.1, and 6.4

The applicant defined the following intended functions for the main control room and auxiliary electric equipment room:

- Physical support and protection—provides physical support and protection for safety-related components and components relied upon to demonstrate compliance with fire protection and SBO-regulated events.
- Personnel protection—provides shelter, protection, and radiation shielding for essential operating personnel.

In LRA Table 2.4-3, the applicant listed the following component groups requiring AMR for the main control room and auxiliary electric equipment room:

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete and Grout	Structural Support	3.5.1.29
Concrete Beams (Quad Cities)	Structural Support	3.5.1.20
Concrete Columns (Quad Cities)	Structural Support	3.5.1.20
Concrete Curbs (Dresden)	Direct Flow	3.5.1.20
Concrete Manholes (Dresden)	Structural Support	3.5.1.20
Concrete Manholes (Dresden)	Fire Barrier	3.3.1.28

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete Slabs	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.27
Concrete Slabs	Shelter, Protection, Shielding	3.5.1.20, 3.5.1.21, 3.5.1.27
Concrete Walls	Structural Support	3.5.1.20
Concrete Walls	Shelter, Protection, Shielding	3.5.1.20, 3.5.1.27
Caulking/Sealants	Structural Pressure Barrier	3.5.2.3
Fire Doors	Fire Barrier	3.3.2.4
Fire Proofing	Fire Barrier	3.3.2.62
Fire Wrap	Fire Barrier	3.3.2.63
Foundations	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26
Masonry Walls	Structural Support	3.5.1.24
Masonry Walls	Fire Barrier	3.3.2.129
Masonry Walls	Shelter, Protection, Shielding	3.5.1.24
Masonry Walls	Missile Barrier	3.5.1.24
Metal Decking (Dresden)	Structural Support	3.5.1.20
Misc. Steel (Quad Cities)	Structural Support	3.5.1.20
Penetration Seals	Fire Barrier	3.3.1.18
Penetration Seals (Dresden)	Non-S/R Structural Support	3.3.1.18
Penetration Sleeves	Non-S/R Structural Support	3.5.1.20
Roofing (Quad Cities)	Shelter, Protection, Shielding	3.5.2.11
Steel Embedments	Structural Support	3.5.1.20
Steel Panels and Cabinets	Structural Support	3.5.1.20
Structural Steel	Structural Support	3.5.1.20
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the main control room and auxiliary electric equipment room are provided in LRA Sections 3.3 and 3.5.

2.4.3.2 Staff Evaluation

The staff reviewed LRA Section 2.4.3, Dresden Station UFSAR Sections 3.1.1.3.1, 3.2.1, 3.2.6, and 6.4, and Quad Cities Station UFSAR Sections 3.1.3.1, 3.2.1, and 6.4 to determine whether the main control room and auxiliary electric equipment room structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR, to determine if any components were omitted.

LRA Table 2.4-3 presents a list of structural components for the main control room and auxiliary

electric equipment room. In response to RAI 2.3.2.9-3, the applicant added caulking/sealants as a component to be in scope. The staff did not identify other omissions made by the applicant.

2.4.3.3 Conclusions

The staff reviewed LRA Section 2.4.3 to determine whether any structural components of the main control room and auxiliary electric equipment room that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the main control room and auxiliary electric equipment room that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the main control room and auxiliary electric equipment room that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.4 Turbine Building

2.4.4.1 Summary of Technical Information in the Application

The applicant described the turbine building in LRA Section 2.4.4 and provided a list of components subject to an AMR in LRA Table 2.4-4.

The purpose of the turbine building is the protection of the main turbine generators and other plant equipment from environmental hazards and missiles, as well as providing structural support for equipment and radiation shielding.

The turbine building is a common structure shared by both units at each station. Located in one side or half of the turbine building are the turbine-generator, exciter, condenser, feedwater heaters, feedwater and condensate pumps, demineralizer system, condenser circulating system, and electrical switchgear. Duplicate equipment and systems for the other unit are located in the other half of the building. Each turbine building superstructure consists of a structural steel frame-type design with metal siding from the turbine floor up. All Class I components in the turbine building are located in levels below the turbine main floor within a reinforced concrete structure with capabilities similar to the reactor building. Large equipment, located in the superstructure, is designed and supported to preclude failure that could damage equipment related to the ECCS systems or cause significant release of radioactivity.

The building is a Class II structure and provides Class I protection in areas where Class I items and associated SSCs are located. Exceptions are the swing emergency diesel generators and Quad Cities emergency diesel generators which are evaluated in the emergency diesel generator room. The turbine building cranes are evaluated with cranes and hoists.

The applicant identified the following UFSAR references for additional descriptive information about the turbine building:

- Dresden Station UFSAR Section(s): 1.2.2.2
- Quad Cities Station UFSAR Section(s): 1.2.2.2

The applicant defined the following intended functions for the turbine building.

- Physical support and protection—provides physical support and protection for safety-related components and components relied upon to demonstrate compliance with regulated events.
- Radiation shielding—provides shielding that protects personnel and components from radiation.
- Protection—provides missile barrier protection for internally and externally generated events and the flood protection for SSCs.

In LRA Table 2.4-4, the applicant listed the following component groups requiring AMR for the turbine building:

Component	Component Intended Function	LRA Aging Management Ref No.
Caulking/Sealants	Structural Pressure Barrier	3.5.2.3, 3.5.2.4
Concrete and Grout	Structural Support	3.5.1.29
Concrete and Grout	Non-S/R Structural Support	3.5.1.29
Concrete Beams	Structural Support	3.5.1.20, 3.5.1.27
Concrete Columns	Structural Support	3.5.1.20
Concrete Curbs	Direct Flow	3.5.1.20
Concrete Manholes	Structural Support	3.5.1.20
Concrete Manholes	Shelter, Protection, Shielding	3.5.1.20
Concrete Slabs	Structural Support	3.5.1.20
Concrete Walls	Structural Support	3.5.1.20
Fire Doors	Fire Barrier	3.3.1.18
Fire Proofing	Fire Barrier	3.3.2.62
Fire Wrap	Fire Barrier	3.3.2.63
Foundations	Structural Support	3.5.1.20, 3.5.1.25, 3.5.1.26
Masonry Walls	Structural Support	3.5.1.24
Masonry Walls	Fire Barrier	3.3.2.129
Masonry Walls	Shelter, Protection, Shielding	3.5.1.24
Masonry Walls	Non-S/R Structural Support	3.5.1.24
Metal Siding	Shelter, Protection, Shielding	3.5.1.20
Misc. Steel (includes Gratings, Ladders, Platforms, Railings, Stairs, Kickplates)	Non-S/R Structural Support	3.5.1.20
Penetration Seals	Flood Barrier	3.3.1.18
Penetration Sleeves	Non-S/R Structural Support	3.5.1.20

Component	Component Intended Function	LRA Aging Management Ref No.
Precast Concrete Panels	Structural Support	3.5.1.20
Precast Concrete Panels	Non-S/R Structural Support	3.5.1.20
Roofing	Shelter, Protection, Shielding	3.5.2.11
Steel Doors	Flood Barrier	3.5.1.20
Steel Doors	Non-S/R Structural Support	3.5.1.20
Steel Doors	Structural Pressure Barrier	3.5.1.20
Steel Embedments	Structural Support	3.5.1.20
Steel Panels and Cabinets	Structural Support	3.5.1.20
Steel Plates	Shelter, Protection, Shielding	3.5.1.20
Steel Plates (Dresden)	Flood Barrier	3.5.1.20
Structural Steel	Structural Support	3.5.1.20
Structural Steel	Pipe Whip Restraint	3.5.1.20
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the turbine building are provided in LRA Sections 3.3 and 3.5.

2.4.4.2 Staff Evaluation

The staff reviewed LRA Section 2.4.4, Dresden Station UFSAR Section 1.2.2.2, and Quad Cities Station UFSAR Section 1.2.2.2 to determine whether the turbine building structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Table 2.4-4 presents a comprehensive list of structural components for the turbine building. The staff did not identify any omissions made by the applicant.

2.4.4.3 Conclusions

The staff reviewed LRA Section 2.4.4 to determine whether any structural components of the turbine building that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the turbine building that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the turbine building that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.5 Diesel Generator Buildings

2.4.5.1 Summary of Technical Information in the Application

The applicant described the diesel generator buildings in LRA Section 2.4.5 and provided a list of components subject to an AMR in LRA Table 2.4-5. The purpose of the diesel generator buildings is to provide structural support and protection of the emergency diesel generators and HPCI system components (Dresden only).

The diesel generator buildings contain the Dresden Unit 2/3 (swing) emergency diesel generator and HPCI building (a structure which includes both the swing diesel generator and HPCI system components) and the Quad Cities Unit 1/2 and 1/2 (swing) emergency diesel generator rooms.

The Dresden diesel generator and HPCI building is a Class I concrete structure that houses the Unit 2/3 (swing) emergency diesel generator, HPCI system equipment, and other safe shutdown equipment. It abuts the Unit 3 reactor building and shares the reactor building wall on its north side. The Dresden Unit 2 and 3 emergency diesel generators are housed in the turbine building.

The three Quad Cities diesel generator rooms are Class II concrete structures that have been evaluated to ensure that they have the capability to protect safety-related components. The rooms provide structural support and protection of the emergency diesel generators as well as fire protection of adjacent safety-related structures. The Unit 1 diesel generator room is located in the southeast corner of the Unit 1 section of the turbine building. The Unit 2 diesel generator room is located in the northeast corner of the Unit 2 section of the turbine building. The Unit 1/2 (swing) diesel generator room is adjacent to the reactor building. It is centered on the reactor building east wall, which is shared with the Unit 1/2 diesel generator room.

The applicant identified the following UFSAR references for additional descriptive information about the diesel generator buildings:

- Dresden Station UFSAR Section(s): 3.2.6, 8.3
- Quad Cities Station UFSAR Section(s): 3.2.6, 8.3.1.6.1

The applicant defined the following intended functions for the diesel generator buildings.

- Physical support and protection—provides physical support and protection for safety-related components and components relied upon to demonstrate compliance with fire protection and SBO-regulated events (Dresden only).
- Containment—provides a leak-tight barrier protecting the health and safety of the public in the event of any postulated design-basis events and also provides a secondary containment boundary (Dresden 2/3 diesel generator room only)

- Protection—provides missile barrier for internally and externally generated events.

In LRA Table 2.4-5, the applicant listed the following component groups requiring AMR for the diesel generator buildings:

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete and Grout	Structural Support	3.5.1.29
Concrete and Grout	Non-S/R Structural Support	3.5.1.29
Concrete Beams (Dresden)	Structural Support	3.5.1.20
Concrete Curbs	Direct Flow	3.5.1.20
Concrete Shield Plugs (Dresden)	Structural Support	3.5.1.20
Concrete Shield Plugs (Dresden)	Fire Barrier	3.3.1.28
Concrete Shield Plugs (Dresden)	Shelter, Protection, Shielding	3.5.1.20
Concrete Slabs	Structural Support	3.5.1.20
Concrete Slabs	Shelter, Protection, Shielding	3.5.1.20
Concrete Walls	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.27
Concrete Walls	Shelter, Protection, Shielding	3.5.1.20
Concrete Walls	Missile Barrier	3.5.1.20
Fire Doors	Fire Barrier	3.3.1.18
Fire Proofing	Fire Barrier	3.3.2.62
Fire Wrap	Fire Barrier	3.3.2.63
Foundations (Dresden)	Structural Support	3.5.1.20
Masonry Walls (Dresden)	Structural Support	3.5.1.24
Masonry Walls (Dresden)	Fire Barrier	3.3.2.129
Metal Decking (Quad Cities)	Structural Support	3.5.1.20
Misc. Steel (includes Ladders, Railings, Stairs, Gratings, Kick Plates, Platforms)	Non-S/R Structural Support	3.5.1.20
Penetration Seals (Dresden)	Fire Barrier	3.3.1.18
Penetration Sleeves	Non-S/R Structural Support	3.5.1.20
Penetration Sleeves (Quad Cities)	Structural Pressure Barrier	3.5.1.20
Steel Doors (Dresden)	Structural Pressure Barrier	3.5.1.20
Steel Embedments	Structural Support	3.5.1.20
Steel Panels and Cabinets	Structural Support	3.5.1.20
Steel Plates (Dresden)	Direct Flow	3.5.1.20
Structural Steel	Structural Support	3.5.1.20
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the diesel generator buildings are provided in LRA Sections 3.3 and 3.5.

2.4.5.2 Staff Evaluation

The staff reviewed LRA Section 2.4.5, Dresden Station UFSAR Sections 3.2.6 and 8.3, and Quad Cities Station UFSAR Sections 3.2.6 and 8.3.1.6.1 to determine whether the diesel generator buildings structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR, to determine if any components were omitted.

LRA Table 2.4-5 presents a comprehensive list of structural components for the diesel generator buildings. The staff did not identify any omissions made by the applicant.

2.4.5.3 Conclusions

The staff reviewed LRA Section 2.4.5 to determine whether any structural components of the diesel generator buildings that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the diesel generator buildings that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the diesel generator buildings that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.6 Station Blackout Building and Yard Structures

2.4.6.1 Summary of Technical Information in the Application

The applicant described the station blackout (SBO) building and yard structures in LRA Section 2.4.6 and provided a list of components subject to an AMR in LRA Table 2.4-6.

The SBO building provides structural support and environmental protection for the SBO diesel generators and associated components. The offsite power structures are to provide sufficient capacity and capability to start and operate safety-related equipment.

Other structures grouped with the SBO building for evaluation are offsite power structures and foundations associated with the reserve auxiliary transformers, dead-end structures, bus duct supports and intermediate transmission towers. For both stations, the bus duct supports, dead end structures, and intermediate transmission towers are either galvanized or coated steel with reinforced concrete foundations. Foundations for supporting transformers and circuit breakers are also reinforced concrete.

Structural boundaries include the physical extent of the circuit breaker foundations in the switchyards serving the reserve auxiliary transformer, 345-kV and 138-kV dead end structures, intermediate transmission towers serving the reserve auxiliary transformer, 345-kV and 138-kV dead end structures serving adjacent to the reserve auxiliary transformer (Dresden only), reserve auxiliary transformer foundations, and bus ducts and their supports and foundations terminating at the turbine building (Dresden) and terminating at the diesel generator/turbine building (Quad Cities).

The Dresden SBO building is a Class I structure that houses the SBO diesel generators and safety-related components, including the Unit 2 alternate 125V DC batteries. It is a heavy-walled, reinforced concrete structure capable of protecting its contents from weather-related events that could initiate an SBO event. The underground diesel oil tank foundation on the eastern side of the building supports the 15,000-gallon fuel tank.

The Quad Cities SBO building protects the diesel generators and associated components from weather-related events, which could initiate an SBO event, and provides physical isolation from safety-related components. It is a two-floor structure consisting of a reinforced concrete ground floor slab/foundation, steel framed exterior walls with corrugated metal siding, metal deck supported concrete slab second floor, and a roof consisting of a fully adhered single-ply system on rigid insulation supported by metal decking. The SBO diesel generators are supported within the building by independent reinforced concrete foundation slabs. Fire-rated block walls separate the Unit 1 and 2 diesel generator rooms, the day tank rooms, and the second floor battery rooms.

The applicant identified the following UFSAR references for additional descriptive information about the SBO building and yard structures:

- Dresden Station UFSAR Section(s): 9.5.9, 8.2
- Quad Cities Station UFSAR Section(s): 8.3.1.9, 8.2

The applicant defined the following intended function for the SBO building and yard structures.

- Physical support and protection—provides physical support and protection for safety-related components and components relied upon to demonstrate compliance with the SBO regulated event. For Quad Cities only, the structure also provides protection for components relied upon to demonstrate compliance with the fire protection regulated event.

In LRA Table 2.4-6, the applicant listed the following component groups requiring AMR for the SBO building and yard structures:

Component	Component Intended Function	LRA Aging Management Ref No.
Bus Duct Covers	Non-S/R Structural Support	3.5.2.1
Bus Duct Supports	Non-S/R Structural Support	3.5.2.2
Caulking/Sealants	Flood Barrier	3.5.2.4
Caulking/Sealants	Expansion/Separation	3.5.2.4

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete and Grout	Structural Support	3.5.1.29
Concrete and Grout	Non-S/R Structural Support	3.5.1.29
Concrete Curbs	Direct Flow	3.5.1.20
Concrete Manholes (Quad Cities)	Structural Support	3.5.1.20
Concrete Manholes (Quad Cities)	Non-S/R Structural Support	3.5.1.20, 3.5.1.21
Concrete Slabs	Structural Support	3.5.1.20
Concrete Slabs	Non-S/R Structural Support	3.5.1.20
Concrete Walls (Dresden)	Structural Support	3.5.1.20, 3.5.1.21
Dead End Structures	Non-S/R Structural Support	3.5.2.6
Doors	Fire Barrier	3.3.1.18
Fire Proofing	Fire Barrier	3.3.2.62
Fire Wrap	Fire Barrier	3.3.2.63
Foundations	Structural Support	3.5.1.20, 3.5.1.25, 3.5.1.26, 3.5.1.27
Foundations	Non-S/R Structural Support	3.5.1.20
Masonry Walls	Structural Support	3.5.1.24
Masonry Walls	Fire Barrier	3.3.2.129
Masonry Walls	Shelter, Protection, Shielding	3.5.1.24
Metal Decking	Non-S/R Structural Support	3.5.1.20
Metal Decking (Dresden)	Shelter, Protection, Shielding	3.5.1.20
Misc. Steel (Dresden—includes Gratings, Kick Plates, Ladders, Platforms, Railings)	Non-S/R Structural Support	3.5.1.20
Penetration Seals (Quad Cities)	Fire Barrier	3.3.1.18
Penetration Seals (Quad Cities)	Expansion/Separation	3.3.1.18
Penetration Sleeves	Non-S/R Structural Support	3.5.1.20
Steel Embedments	Structural Support	3.5.1.20
Steel Panels and Cabinets	Non-S/R Structural Support	3.5.1.20
Steel Piles (Dresden)	Non-S/R Structural Support	3.3.2.207
Steel Plates (Dresden)	Missile Barrier	3.5.1.20
Structural Steel	Non-S/R Structural Support	3.5.1.20
Transmission Towers	Non-S/R Structural Support	3.5.2.16
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the SBO building and yard structures are provided in LRA Sections 3.3 and 3.5.

2.4.6.2 Staff Evaluation

The staff reviewed LRA Section 2.4.6, Dresden Station UFSAR Sections 9.5.9 and 8.2, and Quad Cities Station UFSAR Sections 8.3.1.9 and 8.2 to determine whether the SBO building and yard structures structural components within the scope of license renewal and subject to an

AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

Based on information provided in LRA Section 2.4.6, the exact scope of structural components included in this section was not clear to the staff. Also, clarification was needed for several "Components" listed in Table 2.4-6.

In order to complete the screening review for the SBO building and yard structures, the staff requested, in RAI 2.4-5, the applicant to submit the following information:

- (a) LRA Table 2.4-6 lists the following components requiring an AMR—"bus duct covers," "bus duct supports," "dead-end structures," and "transmission towers." These appear to be the yard structures. The staff asked the applicant to verify that this interpretation is correct, or to describe more completely the yard structures included in the scope of this section.
- (b) The staff has assumed that the foundations for the bus duct supports, dead end structures, and transmission towers, and also for the transformers and circuit breakers are included with the SBO building foundation under the LRA Table 2.4-6 component group "foundations." The staff asked the applicant to verify that this interpretation is correct, or to describe more completely the foundations included in the scope of this section.
- (c) The component "steel piles (Dresden only)" is also listed in LRA Table 2.4-6. LRA Section 2.4.6 provides no description of the steel piles. The staff asked the applicant to describe the steel piles at Dresden and define their intended function(s). The applicant should also explain why the "Aging Management Ref" for the steel piles is 3.3.2.207. LRA Section 3.3 covers Auxiliary Systems. The staff believes this may be a documentation error in the LRA.

In its response to RAI 2.4-5, the applicant stated the following:

Exelon has reviewed LRA Section 2.4.6, Table 2.4-6, and provides the following clarifications:

- (a) Components Groups "Bus Duct Covers," "Bus Duct Supports," "Dead End Structures," and "Transmission Towers" are yard structures that require aging management review. Initially, these were not included within the scope of license renewal and were included in Miscellaneous Yard Structures discussed in the response to RAI 2.4-1. The Station Blackout offsite power feeds were not initially included in scope. However, these specific component groups were later added to the scope of License Renewal to comply with interim staff guidance concerning scoping of offsite power systems necessary to support the Station Blackout Rule (10 CFR 50.63). As such, they were evaluated with the Station Blackout Building in section 2.4.6 of the LRA. These component groups are not included in "Miscellaneous Yard Structures" shown on Table 2.2-1, which is a grouping of yard structures that do not satisfy the requirements of 10 CFR 54(a).
- (b) Table 2.4-6, Component Groups Requiring Aging Management Review - Station Blackout Building, contains two foundation groups. The foundation group with the "Non-S/R Structural

Support” component function includes the foundations for the bus duct supports, dead end structures, and breaker foundations serving the Reserve Auxiliary Transformers and Transmission Towers. The foundation group with the “Structural Support” component function includes the Station Blackout Building foundations.

- (c) The component group “steel piles (Dresden only)” listed in LRA Table 2.4-6 are associated with a transmission tower that carries power transmission cables from the switch yard to Reserve Auxiliary Transformer 22 located outside of the Turbine Building. The concrete foundation for this transmission tower is supported by seven steel “H” piles resting on bedrock. The steel piles provide structural support for the transmission tower and associated concrete foundation. Aging Management Reference 3.3.2.207 accurately evaluates the aging of these steel piles. However, the aging management reference for these steel piles was inadvertently included in LRA Table 3.3-2 and should have been included in LRA Table 3.5-2.

Table 2.4-6 line item for Steel Piles (Dresden only) should have read as follows:

Component	Component Intended Function	LRA Aging Management Ref No.
Steel Piles (Dresden only)	Non-S/R Structural Support	3.5.2.17

Table 3.5-2 should have included a new line item that is identical to 3.3.2.207, as follows:

Ref No.	Component Group	Material	Environment	Aging Effect/Mechanism	Aging Management Program	Discussion
3.5.2.17	Steel Piles	Carbon Steel	Soil and groundwater	None	None	NUREG-1801 does not address carbon steel piles in a soil and ground water environment. The intended function of steel piles driven in undisturbed soils is not affected by corrosion.

The additional information provided by the applicant in its RAI response sufficiently answers the three questions posed by the staff and how each is covered in the AMR. The staff concludes that the applicant has appropriately addressed these components in its scoping and screening review. The staff’s evaluation of the AMR for “steel piles (Dresden only)” is in Section 3.5 of this SER. Therefore, RAI 2.4-5, is resolved.

2.4.6.3 Conclusions

The staff reviewed LRA Section 2.4.6 to determine whether any structural components of the SBO building and yard structures that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the SBO building and yard structures that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the SBO building and yard structures that are subject to

an AMR, as required by 10 CFR 54.21(a)(1).

2.4.7 Isolation Condenser Pump House (Dresden)

2.4.7.1 Summary of Technical Information in the Application

The applicant described the isolation condenser pump house (Dresden) in LRA Section 2.4.7 and provided a list of components subject to an AMR in LRA Table 2.4-7.

The isolation condenser pump house provides structural support and environmental protection for the two diesel-driven isolation condenser makeup water pumps.

The isolation condenser pump house is a two-floor Class II structure with the first floor at grade and the other floor being a reinforced concrete basement. The above-grade exterior north, south, and east walls, as well as an interior center wall, are constructed of concrete block. The west wall that borders the reactor building is reinforced concrete with Rodofoam seismic gap separation at the reactor building wall. The first floor is a metal deck supported concrete slab. The roof consists of a single-ply system on rigid insulation supported by metal decking on structural steel.

The applicant identified the following UFSAR references for additional descriptive information about the isolation condenser pump house (Dresden):

- Dresden Station UFSAR Section(s): 5.4.6
- Quad Cities UFSAR Section(s): Not Applicable

The applicant defined the following intended function for the isolation condenser pump house (Dresden).

- Credited in regulated events—provides physical support and protection for components relied upon to demonstrate compliance with the fire protection regulated event.

In LRA Table 2.4-7, the applicant listed the following component groups as requiring AMR for the isolation condenser pump house (Dresden):

Component	Component Intended Function	LRA Aging Management Ref No.
Caulking/Sealants (Dresden)	Expansion/Separation	3.5.2.4
Concrete Duct Banks (Dresden)	Non-S/R Structural Support	3.5.1.21
Concrete Walls (Dresden)	Structural Support	3.5.1.20
Concrete Walls (Dresden)	Non-S/R Structural Support	3.5.1.20
Doors (Dresden)	Fire Barrier	3.3.1.18
Foundations (Dresden)	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26
Foundations (Dresden)	Non-S/R Structural Support	3.5.1.20

Component	Component Intended Function	LRA Aging Management Ref No.
Masonry Walls (Dresden)	Structural Support	3.5.1.24
Masonry Walls (Dresden)	Fire Barrier	3.3.2.129
Masonry Walls (Dresden)	Non-S/R Structural Support	3.5.1.24
Metal Decking (Dresden)	Shelter, Protection, Shielding	3.5.1.20
Metal Decking (Dresden)	Non-S/R Structural Support	3.5.1.20
Penetration Seals (Dresden)	Fire Barrier	3.3.1.18
Penetration Sleeves (Dresden)	Non-S/R Structural Support	3.5.1.20
Roofing (Dresden)	Shelter, Protection, Shielding	3.5.2.11
Seismic Gap Filler (Dresden)	Expansion/Separation	3.5.2.13
Steel Doors (Dresden)	Non-S/R Structural Support	3.5.1.20
Steel Embedments (Dresden)	Structural Support	3.5.1.20
Steel Panels and Cabinets (Dresden)	Non-S/R Structural Support	3.5.1.20
Structural Steel (Dresden)	Non-S/R Structural Support	3.5.1.20
Walls, Ceilings, Floors (Dresden)	Fire Barrier	3.3.1.28

The applicant's AMR results for the isolation condenser pump house are provided in LRA Sections 3.3 and 3.5.

2.4.7.2 Staff Evaluation

The staff reviewed LRA Section 2.4.7 and Dresden Station UFSAR Section 5.4.6 to determine whether the isolation condenser pump house (Dresden only) structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR, to determine if any components were omitted.

LRA Table 2.4-7 presents a comprehensive list of structural components for the isolation condenser pump house (Dresden). The staff did not identify any omissions made by the applicant.

2.4.7.3 Conclusions

The staff reviewed LRA Section 2.4.7 to determine whether any structural components of the isolation condenser pump house (Dresden only) that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the isolation condenser pump house

(Dresden only) that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the isolation condenser pump house (Dresden only) that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.8 Makeup Demineralizer Building (Dresden)

2.4.8.1 Summary of Technical Information in the Application

The applicant described the makeup demineralizer building (Dresden) in LRA Section 2.4.8 and provided a list of components subject to an AMR in LRA Table 2.4-8. The makeup demineralizer building at Dresden provides support and protection for instrumentation required for remote monitoring of water level of the "B" contaminated condensate storage tank in the event that the main control room is evacuated due to fire.

The makeup demineralizer building is a preengineered steel building that includes an interior reinforced concrete slab, anchor bolt hardware, instrument rack, and foundation support for the level indicator.

The applicant did not identify any UFSAR references for the Dresden makeup demineralizer building.

The applicant defined the following intended function for the makeup demineralizer building (Dresden).

- Physical support and protection—provides physical support and protection for components relied upon to demonstrate compliance with the fire protection regulated event.

In LRA Table 2.4-8, the applicant listed the following component groups requiring AMR for the makeup demineralizer building (Dresden):

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete and Grout (Dresden)	Structural Support	3.5.1.29
Concrete Slabs (Dresden)	Structural Support	3.5.1.20
Concrete Slabs (Dresden)	Non-S/R Structural Support	3.5.1.20
Foundations (Dresden)	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26, 3.5.1.27
Foundations (Dresden)	Non-S/R Structural Support	3.5.1.20
Metal Decking (Dresden)	Shelter, Protection, Shielding	3.5.1.20
Metal Siding (Dresden)	Shelter, Protection, Shielding	3.5.1.20
Steel Doors (Dresden)	Shelter, Protection, Shielding	3.5.1.20
Steel Panels and Cabinets (Dresden)	Structural Support	3.5.1.20
Structural Steel (Dresden)	Non-S/R Structural Support	3.5.1.20

The applicant's AMR results for the makeup demineralizer building are provided in LRA Section 3.5.

2.4.8.2 Staff Evaluation

The staff reviewed LRA Section 2.4.8 to determine whether the makeup demineralizer building (Dresden) structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Table 2.4-8 presents a comprehensive list of structural components for the makeup demineralizer building (Dresden). The staff did not identify any omissions made by the applicant.

2.4.8.3 Conclusions

The staff reviewed LRA Section 2.4.8 to determine whether any structural components of the makeup demineralizer building (Dresden) that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the makeup demineralizer building (Dresden) that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the makeup demineralizer building (Dresden) that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.9 Radwaste Floor Drain Surge Tank

2.4.9.1 Summary of Technical Information in the Application

The applicant described the radwaste floor drain surge tank in LRA Section 2.4.9 and provided a list of components subject to an AMR in LRA Table 2.4-9. The floor drain surge tank provides the necessary surge volume for the floor drain system, which collects potentially radioactive liquids.

The aboveground floor drain surge tank has thick reinforced concrete walls for shielding and electric heaters to prevent freezing during cold weather. The tank bottom is sloped to reduce sludge buildup. The floor drain surge tank is a Class I structure and is, therefore, not considered an aboveground tank for the purpose of the curies content requirements. The floor drain surge tank includes the attached pump house structure, foundations, floors, walls, roof, and stainless steel liner.

The applicant identified the following UFSAR references for additional descriptive information about the radwaste floor drain surge tank:

- Dresden Station UFSAR Section(s): 11.2, 3.2.1
- Quad Cities Station UFSAR Section(s): 11.2

The applicant defined the following intended function for the radwaste floor drain surge tank:

- Radioactive fluid containment—provides physical barrier and support to contain potentially radioactive liquid waste.

In LRA Table 2.4-9, the applicant listed the following component groups requiring AMR for the radwaste floor drain surge tank:

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete Manholes	Structural Support	3.5.1.20, 3.5.1.21
Concrete Manholes	Shelter, Protection, Shielding	3.5.1.20
Concrete Slabs	Structural Support	3.5.1.20
Concrete Slabs	Shelter, Protection, Shielding	3.5.1.20
Concrete Walls	Structural Support	3.5.1.20
Concrete Walls	Shelter, Protection, Shielding	3.5.1.20
Foundations	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26
Liners	Structural Pressure Barrier	3.5.1.28
Steel Embedments	Structural Support	3.5.1.20

The applicant's AMR results for the radwaste floor drain surge tank are provided in LRA Section 3.5.

2.4.9.2 Staff Evaluation

The staff reviewed LRA Section 2.4.9, Dresden Station UFSAR Sections 11.2 and 3.2.1, and Quad Cities Station UFSAR Section 11.2 to determine whether the radwaste floor drain surge tank structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Table 2.4-9 presents a comprehensive list of structural components for the radwaste floor drain surge tank. The staff did not identify any omissions, the component groups are clearly identified, and all component groups reference LRA Section 3.5 for the AMR results.

2.4.9.3 Conclusions

The staff reviewed LRA Section 2.4.9 to determine whether any structural components of the radwaste floor drain surge tank that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the radwaste floor drain surge tank that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the radwaste floor drain surge tank that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.10 Miscellaneous Foundations

2.4.10.1 Summary of Technical Information in the Application

The applicant described the miscellaneous foundations in LRA Section 2.4.10 and provided a list of components subject to an AMR in LRA Table 2.4-10.

The contaminated condensate storage tank foundations provide physical support for the non-safety-related contaminated condensate storage tanks.

The diesel generator fuel oil storage tank foundations provide structural support for the safety-related diesel generator fuel oil storage tanks.

The condensate storage facilities provide a storage volume for clean and potentially contaminated water of suitable quality for use in the reactor and other systems throughout the plant. The Dresden condensate storage facilities ensure that an adequate amount of water is available from each contaminated condensate storage tank for use by HPCI pumps. The Quad Cities condensate storage facilities ensure that an adequate amount of water is available from each contaminated condensate storage tank for use by HPCI, RCIC, and safe shutdown pumps. The contaminated condensate storage tank foundations are Class II reinforced concrete foundations and include anchor bolts.

Each diesel generator fuel oil storage tank, except for the Quad Cities Unit 1 fiberglass tank, is supported on three reinforced concrete foundation pads and anchored with anchor bolts (four per pad). The Quad Cities Unit 1 fiberglass tank is anchored to two reinforced concrete foundations and is restrained in place by stainless steel straps and turnbuckle assemblies.

The applicant identified the following UFSAR references for additional descriptive information about the miscellaneous foundations:

- Dresden Station UFSAR Section(s): 9.2.6, 9.5.4
- Quad Cities Station UFSAR Section(s): 9.2.6, 9.5.4

The applicant defined the following intended functions for the miscellaneous foundations:

Contaminated Condensate Storage Tank Foundations

- Regulated event component support—provides support for components relied upon to demonstrate compliance with fire protection, ATWS, and SBO regulated events.

Diesel Generator Fuel Oil Storage Tank Foundations

- Safety-related component support—provides support for safety-related, seismically qualified fuel oil storage tanks provided for emergency diesel generators.

In LRA Table 2.4-10, the applicant listed the following component groups requiring AMR for the miscellaneous foundations:

Component	Component Intended Function	LRA Aging Management Ref No.
Caulking/Sealants (Dresden)	Shelter, Protection, Shielding	3.5.2.4
Foundations	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26
Foundations	Non-S/R Structural Support	3.5.1.20, 3.5.1.26
Steel Embedments (Quad Cities)	Structural Support	3.5.1.20

The applicant's AMR results for miscellaneous foundations are provided in LRA Section 3.5.

2.4.10.2 Staff Evaluation

The staff reviewed LRA Section 2.4.10, Dresden Station UFSAR Sections 9.2.6 and 9.5.4, and Quad Cities Station UFSAR Sections 9.2.6 and 9.5.4 to determine whether the miscellaneous foundations structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Table 2.4-10 presents the list of structural components applicable to the miscellaneous foundations. The staff did not identify any omissions and all component groups reference LRA Section 3.5 for the AMR results.

However, the applicant's description of the miscellaneous foundations does not explain the component "Caulking/Sealants (Dresden)." It was not clear to the staff what the application would be for foundations. The applicant was requested in RAI 2.4-6 to submit a detailed description of this component and its intended function.

In its response to RAI 2.4-6, the applicant stated the following:

The Component Group, "Caulking/Sealants (Dresden Only)," is a rubber sealant (type-A) used to seal the Contaminated Condensate Storage Tank between the foundation and tank bottom. The sealant prevents moisture from entering the area between the concrete foundation and the tank bottom, preventing exposure of embedded anchor bolts to moisture.

The additional information provided by the applicant in its RAI response sufficiently answers the question posed by the staff. The staff concludes that the applicant has appropriately addressed this component in its scoping and screening review. RAI 2.4-6 is, therefore, resolved.

2.4.10.3 Conclusions

The staff reviewed LRA Section 2.4.10 to determine whether any structural components of the miscellaneous foundations that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the miscellaneous foundations that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the miscellaneous foundations that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.11 Crib House

2.4.11.1 Summary of Technical Information in the Application

The applicant described the crib house in LRA Section 2.4.11 and provided a list of components subject to an AMR in LRA Table 2.4-11. The crib house serves as the entry point for river water into plant systems. It protects and supports the pumps and pipes which deliver river water to the plant. The crib house is a reinforced concrete structure with a concrete block and steel superstructure. It contains the circulating water, service water and diesel-driven fire pumps.

At Dresden, the crib house includes the diesel generator cooling water pumps and the suction piping for the containment cooling service water system pumps. The diesel generator cooling water pumps and the containment cooling service water system are safety-related. The crib house also contains stop logs that can be used to isolate the compartment and raise its water level where the containment cooling service water system pump and the diesel fire pump take their suction. The crib house is classified as Class II and was investigated to assure that the integrity of the Class I items is not compromised.

At Quad Cities, the crib house includes the suction lines for the RHR service water system. The RHR service water system is safety-related. The crib house is classified as Class II and was investigated to assure that it will not fail and isolate the plant from the river water source. For license renewal evaluation purposes, the Quad Cities discharge flume weir wall that forms one of the boundaries of the ultimate heat sink is included as part of the crib house.

The applicant identified the following UFSAR references for additional descriptive information about the crib house:

- Dresden Station UFSAR Section(s): 1.2.2.2, 3.3.2.3.2, 3.8.5, 9.2.5, and 9.5.5
- Quad Cities Station UFSAR Section(s): 3.3, 3.8.6, and 9.2.5

The applicant defined the following intended functions for the crib house:

- Physical support and protection—provides physical support and protection for safety-related components and components relied upon to demonstrate compliance with the fire protection regulated event.
- Heat sink—provides heat sink during SBO or design-basis events.
- Water source—provides source of cooling water for plant shutdown.

In LRA Table 2.4-11, the applicant listed the following component groups requiring AMR for the crib house:

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete and Grout	Structural Support	3.5.1.29
Concrete and Grout	Non-S/R Structural Support	3.5.1.29
Concrete Canal Weirs (Quad Cities)	Heat Sink	3.5.1.22
Concrete Curbs	Direct Flow	3.5.1.22
Concrete Slabs	Structural Support	3.5.1.22, 3.5.1.26
Concrete Slabs	Shutdown Cooling Water	3.5.1.22
Concrete Slabs	Heat Sink	3.5.1.22, 3.5.1.26
Concrete Stairs	Structural Support	3.5.1.22
Concrete Stairs	Non-S/R Structural Support	3.5.1.22
Concrete Walls	Structural Support	3.5.1.22
Concrete Walls	Non-S/R Structural Support	3.5.1.22
Concrete Walls	Shutdown Cooling Water	3.5.1.22
Concrete Walls	Heat Sink	3.5.1.22
Fire Doors (Dresden)	Fire Barrier	3.3.1.18
Foundations	Structural Support	3.5.1.22, 3.5.1.26
Foundations	Non-S/R Structural Support	3.5.1.22
Masonry Walls	Structural Support	3.5.1.24
Masonry Walls	Shelter, Protection, Shielding	3.5.1.24
Metal Siding (Dresden)	Shelter, Protection, Shielding	3.5.1.22
Misc. Steel (Dresden)	Non-S/R Structural Support	3.5.1.22
Misc. Steel (Dresden)	Direct Flow	3.5.1.22

Component	Component Intended Function	LRA Aging Management Ref No.
Precast Concrete Panels	Structural Support	3.5.1.22
Precast Concrete Panels	Shelter, Protection, Shielding	3.5.1.22
Roofing	Shelter, Protection, Shielding	3.5.2.11
Steel Embedments	Structural Support	3.5.1.20, 3.5.1.22
Steel Embedments (Dresden)	Non-S/R Structural Support	3.5.1.22
Steel Panels and Cabinets	Structural Support	3.5.1.20, 3.5.1.22
Steel Panels and Cabinets (Quad Cities)	Non-S/R Structural Support	3.5.1.20
Steel Plates (Dresden)	Direct Flow	3.5.1.22
Steel Sump Screens (Quad Cities)	Non-S/R Structural Support	3.5.1.22
Structural Steel	Non-S/R Structural Support	3.5.1.22
Walls, Ceilings, Floors	Fire Barrier	3.3.1.28

The applicant's AMR results for the crib house are provided in LRA Sections 3.3 and 3.5.

2.4.11.2 Staff Evaluation

The staff reviewed LRA Section 2.4.11, Dresden Station UFSAR Sections 1.2.2.2, 3.3.2.3.2, 3.8.5, 9.2.5, and 9.5.5, and Quad Cities Station UFSAR Sections 3.3, 3.8.6, and 9.2.5 to determine whether the crib house structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

UFSAR Section 9.2.5 describes the ultimate heat sink for each of the stations. A summary of these descriptions is contained in LRA Section 2.3.3.22, "Ultimate Heat Sink." The staff reviewed this information in depth in order to ensure that all structures and structural components, including earthen embankments, that are necessary to guarantee the ultimate heat sink have been identified to be within the scope of license renewal and subject to an AMR. To complete its review of LRA Section 2.4.11, the staff required a number of clarifications concerning the ultimate heat sink at both stations.

Quad Cities: LRA Section 2.4.11 Crib House states that at Quad Cities, the crib house includes the suction lines for the RHR service water system. It also states that for license renewal purposes, the Quad Cities discharge flume weir wall that forms one of the boundaries of the ultimate heat sink is included as part of the crib house. To complete the review the staff requested the following information:

- (a) Clarify why the suction lines for the Quad Cities diesel generator cooling water pumps are not included in the discussion since they are described in LRA Section 2.3.3.22 as taking

suction from the crib house.

(b) Explain why the following components related to the Quad Cities crib house are not included in the AMR, or identify the component group in LRA Table 2.4-11 that includes them (for reference, some of the items are identified in Figure 2.4-2 of the Quad Cities UFSAR):

- intake flume/canal (define all boundaries that form the basin)
- log Boom
- crib house wire mesh screens, if applicable
- crib house stop logs, if applicable
- crib house dewatering valves and trash rake refuse pit, if applicable
- discharge structure, including rolling gates
- 16-ft diameter discharge piping
- 96-in ice melting line, including gate
- 14-in circulating water pipe
- discharge flume/canal (define all boundaries that form the basin)
- weir gate in the discharge canal

Dresden: LRA Section 2.4.11 Crib House states that at Dresden, the crib house includes the diesel generator cooling pumps and the suction piping for the containment cooling service water system pumps. It also states that the crib house contains stop logs that can be used to isolate the compartment and raise its water level where the containment cooling service water system pump and the diesel fire pump take their suction. To complete the review the staff requested the following information in RAI 2.4-7:

(a) Confirm that for Dresden the cooling lake and associated “hot” and “cold” canals, described in Dresden Station UFSAR Section 2.4, are not part of the ultimate heat sink and do not serve an intended function for license renewal. If they do, submit the AMR, including the credited AMP(s).

(b) Explain why the following components related to the Dresden crib house are not included in the AMR, or identify the component group in LRA Table 2.4-11 that includes them (for reference, some of the items are identified in Figure 2.4-1 of the Dresden UFSAR):

- intake flume/canal (define all boundaries that form the basin)
- floating boom protecting intake canal
- crib house wire mesh screens
- crib house stop logs
- crib house dewatering valves and trash rake refuse pit

- discharge outfall structure, including rolling gates
- 14.0-ft diameter circulating water pipe from power plant
- 8.0-ft diameter ice melt recirculating pipe, including ice melt gate (or deicing valve)
- circulating water pipe, similar to 14-in circulating water pipe shown on Figure 2.4-2 of the Quad Cities UFSAR, if applicable
- discharge flume/canal (define all boundaries that form the basin)
- flow-regulating station

In its response to RAI 2.4-7, the applicant stated the following:

Quad Cities

- (a) The suction lines in the Quad Cities Crib House are associated with RHR service water system. The Diesel Generator Cooling Water Pumps take suction off of the RHR service water line (see boundary diagrams LR-QDC-M-37, location E-3 and E-8 and LR-QDC-M-79, location F-4.) These branch connections are physically located in the Turbine Building, in the RHR service water pump vaults. The difference between LRA Sections 2.4.11 and 2.3.3.22 is that LRA Section 2.4.11 discusses the equipment contained in the structure and LRA Section 2.3.3.22 discusses the functions served by maintaining the UHS.
- (b) The following provides the additional requested information for each of the Quad Cities components listed above:
 - Intake flume/canal (define all boundaries that form the basin)—The intake flume boundaries include the topographic basin from the high point (at approximately 565' elevation) on the river bottom between the crib house and the main river channel on the west side and extending to the crib house on the east side. This basin is rock and earthen bottom. LRA Table 2.4-11, Component Group Concrete Walls, addresses the crib house walls.
 - Log Boom—The log boom is a floating structure that functions as a barrier to floating debris during normal operations. However, it does not perform any function to retain water in the event of a loss of lock and dam 14 (the design basis event bringing the UHS in scope). Therefore, the log boom does not fall within the scope of License Renewal and does not require aging management.
 - Crib House wire mesh screens (if applicable)—Quad Cities has Wire Mesh Screens filtering the RHR Service Water intake. These wire mesh screens do not perform a function in maintaining the UHS and therefore are not in the scope of License Renewal and do not require aging management.
 - Crib House stop logs (if applicable)—The stop logs are installed to perform maintenance in crib house bays (intake and discharge bays). At Quad Cities, they do not perform any function relative to maintaining the UHS. As such, they are not in the scope of License Renewal and do not require aging management.

- Crib house dewatering valves and trash rake refuse pit, (if applicable)—The dewatering valves are used to drain circulating water piping and bays. Station procedures require the unit to be in cold shut down prior to draining these areas; therefore, the UHS would not be required. Additionally, these valves are not required to perform pressure boundary functions for the UHS. As such, the dewatering valves are not in the scope of License Renewal and do not require aging management. Quad Cities does not have a Trash Rake Refuse Pit.
- Discharge structure, including rolling gates—At Quad Cities, the discharge structure shown on UFSAR Figure 2.4-2 is attached to and managed as part of the crib house. The crib house walls are addressed in LRA Table 2.4-11 under Component Group—Concrete Walls. The rolling gates shown on this same figure are installed for maintenance of the circulating water system only. They are open during normal operations and are not required to support any UHS function. Therefore, they are not within the scope of License Renewal and do not require aging management.
- 16-ft diameter discharge piping—This component falls within the scope of license renewal and is evaluated in LRA Table 2.3.3-22 under Component Group—Piping and Fittings.
- 96" Ice Melting Line, including gate—The Ice Melting Line falls within the scope of License Renewal and is evaluated in LRA Table 2.3.3-22 under Component Group—Piping and Fittings. The gate is the Ice Melt Valve which also falls within the scope of License Renewal and is evaluated in LRA Table 2.3.3-22 under Component Group—Valves. Note that LRA Table 2.3.3-22, Component—Group Valves, should have been revised to delete "(Dresden Only)" as shown below.
- 14" Circulating Water Pipe—The 14" Circulating Water Pipe shown on UFSAR Figure 2.4-2 is the service water return line from the RHR Service Water system and the Diesel Generator Cooling Water system. This non-safety-related piping, located outside of the turbine building, is not required to support any intended function and does not fall within the scope of License Renewal. As such, it does not require aging management.
- Discharge flume/canal (define all boundaries that form the basin)—The discharge flume falls within the scope of license renewal. Those portions within the scope of License Renewal begin at the crib house (LRA Table 2.4-11, Component Group—Concrete Walls) and extend to the discharge canal weir (LRA Table 2.4-11, Component Group—Concrete Canal Weirs).
- Weir gate in the discharge canal—The weir gate falls within the scope of License Renewal and is evaluated in LRA Table 2.4-11 under Component Group —Concrete Canal Weirs.

Dresden

- (a) Dresden cooling lake and the associated hot and cold canals are not credited with water supply in the event that the normal heat sink (the river) is unavailable. Therefore, the cooling lake and the associated hot and cold canals do not require aging management.
- (b) The following provides additional requested information for each of the Dresden components listed above:
 - Intake flume/canal (define all boundaries that form the basin)—The intake canal falls within the scope of license renewal. The intake flume starts at the Kankakee River intake canal interface with the canal bottom high point at elevation 495'-0" and runs to the crib house. LRA Table 2.3.3-22 should have added "Earthen Structures" to address the canal, as shown below. LRA Table 2.4-11, Component Groups—Concrete Slabs and Concrete Walls, addresses the crib house.

- Floating Boom protecting intake canal—The floating boom is a floating structure that functions as a barrier to floating debris during normal operations. However, it does not perform any function in retaining water in the event that the normal heat sink (the river) is unavailable. Therefore, the log boom does not fall within the scope of License Renewal and does not require aging management.
- Crib House wire mesh screens—In the event that the normal heat sink becomes unavailable, the Crib House Wire Mesh Screens are removed to allow the installation of the stop logs. These screens therefore provide no function in maintaining the UHS and are not in the scope of License Renewal and do not require aging management.
- Crib House stop logs—The stop logs are needed to support the UHS should have been added to LRA Tables 2.3.3-22 and 3.3-2 as shown below.
- Crib house dewatering valves and trash rake refuse pit—LRA Table 2.3.3-22, Component Group Valves, addresses the dewatering valves. The trash rake refuse pit is part of the crib house structure. LRA Table 2.4-11, Component Groups Concrete Slabs and Concrete Walls, address the crib house.
- Discharge Outfall Structure, including rolling gates—Portions of the Outfall Structure fall within the scope of the Rule and perform a structural pressure barrier function for the UHS. The Outfall Structure should have been added to LRA Table 2.3.3-22, under Component Group—Concrete Slabs and Concrete Walls, as shown below. The rolling gates are available for performing maintenance on the Discharge Outfall Structure bays, are normally open, and are not required to perform any function associated with the UHS. As such they are not within the scope of License Renewal and do not require aging management.
- 14.0-ft Diameter Circulating Water Pipe from Power Plant—The circulating water pumps are secured in the event that the normal heat sink (the river) is unavailable. Therefore this piping is not relied upon for the UHS and does not require aging management.
- 8.0-ft Diameter Ice Melt Recirculating Pipe, including ice melt gate (or deicing valve)—LRA Table 2.3.3-22, Component Group Piping and Fittings
- Circulating water pipe, similar to 14" circulating water pipe shown on Figure 2.4-2 of the QC UFSAR (if applicable)—This piping is not applicable to Dresden. At Quad Cities the Circulating Water discharges at the crib house, at Dresden it discharges at the Discharge Structure.
- Discharge flume/canal (define all boundaries that form the basin)—The discharge canal falls within the scope of License Renewal. The discharge flume starts at the Discharge Outfall Structure and runs to the discharge canal interface with the Illinois River at Elevation 498'-0". LRA Table 2.3.3-22 should have added "Earthen Structures" to address the canal. "Concrete Walls" and "Concrete Slabs" should have also been added to LRA Table 2.3.3-22 to address the Discharge Outfall Structure, as shown below.

Flow-regulating station—Failure of the flow-regulating station would not affect plant safety or the ability to accomplish safe shutdown in either configuration (open or closed cycle). Therefore, the flow-regulating station was considered out of scope and does not require aging management.

Note: Systems do not usually contain structures. Structures usually line up with structures between Chapter 2 and Chapter 3, but there are some exceptions. In this unusual circumstance where the ultimate heat sink system does contain structural components, the aging management reference provided in the system portion of Chapter 2 is to the structural portion of Chapter 3 of the

LRA, when applicable.

Table 2.3.3-22 Component Groups Requiring Aging Management Review—Ultimate Heat Sink

Component	Component Intended Function	Aging Management Ref No.
Concrete Slabs (Dresden only)	Structural Pressure Barrier	3.5.1.22
Concrete Walls (Dresden only)	Structural Pressure Barrier	3.5.1.22
Earthen Structures (Dresden only)	Structural Pressure Barrier	3.5.1.22
Stop Logs (Dresden only)	Structural Pressure Barrier	3.3.2.304
Valves	Pressure Boundary	3.3.2.278, 3.3.2.300

The information provided by the applicant in its RAI response and additional clarification provided in a submittal, dated December 5, 2003, sufficiently answers the questions posed by the staff. RAI 2.4-7 is, therefore, resolved.

2.4.11.3 Conclusions

The staff reviewed LRA Section 2.4.11 to determine whether any structural components of the crib house that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the crib house that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the crib house that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.12 Unit 1 Crib House (Dresden)

2.4.12.1 Summary of Technical Information in the Application

The applicant described the Dresden Unit 1 crib house in LRA Section 2.4.12 and provided a list of components subject to an AMR in LRA Table 2.4-12.

The Unit 1 crib house at Dresden supports a diesel-driven fire pump, which is required to support the Unit 2 and 3 fire protection system.

The diesel-driven fire pump assembly is located on a reinforced concrete floor slab and takes its suction from the center bay of the Unit 1 crib house. The diesel engine is supported by a reinforced concrete pedestal and anchored by cast-in-place anchor bolts. The fire pump

support consists of a steel leveling/bearing plate, on grout, with cast-in-place anchor bolts. The anchor bolts and the steel leveling bearing plate are evaluated in the component support commodity group.

The applicant identified the following UFSAR references for additional descriptive information about the Dresden Unit 1 crib house:

- Dresden Station UFSAR Section(s): 9.2.2
- Quad Cities Station UFSAR Section(s): Not Applicable

The applicant defined the following intended function for the Dresden Unit 1 crib house:

- Credited in regulated events—provides physical support for components relied upon to demonstrate compliance with the fire protection regulated events.

In LRA Table 2.4-12, the applicant listed the following component groups requiring AMR for the Dresden Unit 1 crib house:

Component	Component Intended Function	LRA Aging Management Ref No.
Concrete and Grout (Dresden)	Non-S/R Structural Support	3.5.1.29
Concrete Slabs (Dresden)	Structural Support	3.5.1.22
Concrete Slabs (Dresden)	Non-S/R Structural Support	3.5.1.22
Walls, Ceilings, Floors (Dresden)	Fire Barrier	3.3.1.28

The applicant's AMR results for the Unit 1 crib house are provided in LRA Sections 3.3 and 3.5.

2.4.12.2 Staff Evaluation

The staff reviewed LRA Section 2.4.12 and Dresden Station UFSAR Section 9.2.2 to determine whether the Dresden Unit 1 crib house structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

Based on the information provided in LRA Section 2.4.12, it was not clear to the staff that "fire barrier" is the only intended function for the walls and ceilings of the Dresden Unit 1 crib house. The applicant was requested in RAI 2.4-8 to submit the following information:

- (a) How would collapse of the building walls and ceiling effect the availability of the diesel-

driven fire pump?

- (b) Are the walls and ceiling inspected as part of Maintenance Rule structures monitoring, and is this program credited to manage aging of the walls and ceiling for license renewal?

In its response to RAI 2.4-8, the applicant stated the following:

Exelon has reviewed LRA Section 2.4.12 and provides the following clarifications:

- (a) While the Unit 1 Crib House walls and ceiling have been evaluated as fire barriers, they were not evaluated for the secondary effect they could have on the diesel-driven fire pump if they were to collapse. Such an evaluation would be performed if the structure contained safety-related components. However, the Unit 1 Crib House is not a safety-related structure and there are no safety-related components contained within the building. Since the walls and ceiling do not perform a safety-related function and there are no safety-related components that can be affected by the collapse of the walls or ceiling, the criteria stated in 10 CFR 54.4(a)(2) are not applicable to this situation. For these reasons, structural support is not an intended function of the walls and ceiling. This position is supported by NUREG-1800, Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants. Table 2.1-2 of NUREG-1800 states:

An applicant need not consider hypothetical failures or second, third, or fourth level support systems. For example, if a non-safety-related diesel generator is only relied upon to remain functional to demonstrate compliance with the NRC's SBO regulations, an applicant may not need to consider (1) an alternate/backup cooling water system, (2) the diesel generator non-seismically qualified building walls, or (3) an overhead segment of non-seismically qualified piping (in a Seismic II/I configuration).

The Unit 1 Crib House is not "explicitly credited" in the Dresden current licensing basis documents for Fire Protection. In addition, the Unit 1 diesel-driven fire pump provides a backup supply of river water to the fire protection system. It is not the primary system credited for maintaining fire protection system pressure.

- (b) The Unit 1 Crib House structure is included within the scope of the Maintenance Rule Structural Monitoring program. While the walls and ceiling are inspected per the Structural Monitoring Program criteria, this activity is not credited for License Renewal for the reasons stated in (a) above.

The additional information provided by the applicant in its RAI response sufficiently answers the two questions posed by the staff. The staff concludes that the applicant has appropriately addressed the Dresden Unit 1 crib house in its scoping and screening review. Therefore RAI 2.4-8 is resolved.

2.4.12.3 Conclusions

The staff reviewed LRA Section 2.4.12 to determine whether any structural components of the Dresden Unit 1 crib house that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the

structural components of the Dresden Unit 1 crib house that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the Dresden Unit 1 crib house that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.13 Station Chimney

2.4.13.1 Summary of Technical Information in the Application

The applicant described the station chimney in LRA Section 2.4.13 and provided a list of components subject to an AMR in LRA Table 2.4-13. The station chimney provides an elevated discharge point for treated gaseous radioactive effluents. The chimney is a 310-ft tall tapered structure that contains and/or directs the release of fission products. The reinforced concrete chimney is founded on bedrock. The lower section of the chimney is divided into five cells consisting of reinforced concrete walls that provide a holdup volume for the gland exhausters.

The applicant identified the following UFSAR references for additional descriptive information about the station chimney:

- Dresden Station UFSAR Section(s): 11.3
- Quad Cities Station UFSAR Section(s): 11.3

The applicant defined the following intended functions for the station chimney:

- Elevated release—provides for the discharge of treated gaseous waste to meet the requirements of 10 CFR Part 100.
- Pressure control path—provides a secondary pressure control path for primary containment.

In LRA Table 2.4-13, the applicant listed the following component groups requiring AMR for the station chimney:

Component	Component Intended Function	LRA Aging Management Ref No.
Caulking/Sealants	Gaseous Release Path	3.5.2.4
Concrete Slabs	Structural Support	3.5.1.20
Concrete Walls	Structural Support	3.5.1.20
Concrete Walls	Gaseous Release Path	3.5.1.20
Foundations	Structural Support	3.5.1.20, 3.5.1.21, 3.5.1.25, 3.5.1.26
Masonry Walls (Quad Cities)	Structural Pressure Barrier	3.5.2.9
Masonry Walls (Quad Cities)	Gaseous Release Path	3.5.2.9
Misc. Steel (Includes Platforms, Ladders, Railings)	Non-S/R Structural Support	3.5.1.20
Steel Doors (Dresden)	Gaseous Release Path	3.5.1.20

Component	Component Intended Function	LRA Aging Management Ref No.
Steel Embedments	Structural Support	3.5.1.20
Steel Plates	Gaseous Release Path	3.5.1.20
Structural Steel	Non-S/R Structural Support	3.5.1.20

The applicant's AMR results for the station chimney are provided in LRA Section 3.5.

2.4.13.2 Staff Evaluation

The staff reviewed LRA Section 2.4.13, Dresden Station UFSAR Section 11.3, and Quad Cities Station UFSAR Section 11.3 to determine whether the station chimney structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

LRA Table 2.4-13 presents a comprehensive list of structural components for the station chimney. The staff did not identify any omissions made by the applicant.

2.4.13.3 Conclusions

The staff reviewed LRA Section 2.4.13 to determine whether any structural components of the station chimney that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the station chimney that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the station chimney that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.14 Cranes and Hoists

2.4.14.1 Summary of Technical Information in the Application

The applicant described the cranes and hoists in LRA Section 2.4.14 and provided a list of components subject to an AMR in LRA Table 2.4-14. Cranes and hoists provide systems for lifting, transporting, and handling of loads. Cranes and hoists include those cranes and hoists whose failure could affect safety-related components, except for the refueling bridge platform, which is covered with refueling equipment. Cranes and hoists include the reactor building crane, the turbine building cranes, smaller capacity cranes and hoists, and jib cranes that are located in various parts of the reactor and turbine buildings. Cranes and hoists and jib cranes are classified as Safety Class II components.

The reactor building crane services the operating floor, which is shared by both units. It is a bridge-type crane equipped with a 125-ton main hoist and a 9-ton auxiliary hoist and can reach major component storage areas on the operating floor. The reactor building crane is used for lifting and transporting the spent fuel cask between the spent fuel pools and the cask decontamination work area, and handling other equipment and reactor components accessible from the refueling floor. The crane hoist system consists of a dual load path through the hoist gear train, the reeving system, and the hoist load block along with restraints at critical points to provide load retention and minimization of uncontrolled motions of the load in the event of failure of any single hoist component. Redundancy has also been designed into the hoist, trolley brakes, the spent fuel cask lifting devices, and crane control components.

The two turbine building overhead cranes are equipped with a 175-ton hoist, with a 25-ton auxiliary hoist (for the south crane at Quad Cities and the west crane at Dresden), and a 125-ton hoist with a 10-ton auxiliary hoist (for the north crane at Quad Cities and the east crane at Dresden).

The applicant identified the following UFSAR references for additional descriptive information about the cranes and hoists:

- Dresden Station UFSAR Section(s): 9.1.4
- Quad Cities Station UFSAR Section(s): 9.1.4

The applicant defined the following intended function for the cranes and hoists:

- Lifting and transporting loads—provide a safe means for handling safety-related components and loads above or near safety-related components.

In LRA Table 2.4-14, the applicant listed the following component groups requiring AMR for the cranes and hoists:

Component	Component Intended Function	LRA Aging Management Ref No.
Cranes	Structural Support	3.3.1.3
Cranes	Non-S/R Structural Support	3.3.1.14
Rails	Non-S/R Structural Support	3.3.1.14

The applicant’s AMR results for cranes and hoists are provided in LRA Section 3.3.

2.4.14.2 Staff Evaluation

The staff reviewed LRA Section 2.4.14, Dresden Station UFSAR Section 9.1.4, and Quad Cities Station UFSAR Section 9.1.4 to determine whether the cranes and hoists structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions described in the UFSAR that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

Based on information provided in LRA Section 2.4.14, the staff cannot identify which "LRA Aging Management Ref No" is applicable to each of the crane/rail systems included in the scope of LRA 2.4.14. Also, it is unclear to the staff why cranes and hoists have been split into two groups, covered under different sections of LRA Section 2.0, and why all references to aging management results point to LRA Section 3.3, Auxiliary Systems.

The applicant was requested in RAI 2.4-9 to clarify the treatment of cranes and hoists in the scoping and screening, and in the AMR. In addition, the applicant was requested to submit the following information:

- (a) a list of all cranes/hoists/rails and associated components in the scope of license renewal
- (b) a list of all cranes/hoists/rails and associated components excluded from the license renewal scope, and the technical bases for their exclusion
- (c) a list of all cranes/hoists/rails and associated components requiring an AMR (i.e., passive, long-lived)
- (d) a list of all cranes/hoists/rails and associated components requiring aging management and/or TLAA, and the specific AMP(s) and TLAAs credited to manage aging

In its response to RAI 2.4-9, the applicant stated the following:

With the exception of cranes and hoists associated with the refueling system, most cranes are integral parts of structures for which they provide service. For this reason, Exelon separated overhead lifting systems into two separate groups. Those cranes and hoists associated with the refueling system are evaluated in LRA Section 2.3.3.1, Refueling Equipment. All other cranes and hoists were evaluated in LRA Section 2.4.14, Cranes and Hoists. Only overhead lifting systems associated with refuel handling are evaluated in NUREG-1801 (Section VII.B.1-a). Components from this section of the NUREG are evaluated for aging management under Auxiliary Systems (see Table 3 in NUREG-1801 Volume 1). In order to maintain consistency with NUREG-1801, Exelon decided to evaluate the aging for all overhead lifting systems (refueling and non-refueling) in LRA Section 3.3, Aging Management of Auxiliary System.

- (a) Crane subsystems are installed throughout various buildings at Dresden and Quad Cities. A list of crane subsystems included within the scope of License Renewal is provided below for each site. Each crane subsystem includes rails, structural girders required for support of the crane loads, and the crane mechanism. The crane mechanism includes drive tires/wheels, bolts, nuts, rivets, load blocks, suspension housing, hand chain wheels, chain attachments, clevis, yokes, suspension bolts, shafts, gears, bearings, pins, rollers, locks and clamping devices, hook retaining nuts, hook retaining collars/pins, retaining member welds, load sprockets, drums, sheaves, mechanical brake mechanisms, and hooks.

In addition to crane subsystems, a number of monorail tracks have been installed over various locations throughout each site to facilitate maintenance. Portable hoists are installed on these

monorails when maintenance is required or equipment requires movement. Those instances below for which the description does not include a crane or hoist only refer to monorails.

Dresden Reactor Building—In Scope

- Unit 2 Reactor Building (613Æ Elevation) Hatch Jib Crane
- Unit 3 Reactor Building (613Æ Elevation) Hatch Jib Crane
- Reactor Building (Elevation 613Æ) New Fuel Storage Vault Jib Crane
- Reactor Service Platform Jib Crane
- Unit 2 Reactor Building (545Æ Elevation) Hatch Jib Crane
- Reactor Building Overhead Crane

Dresden Turbine Building—In Scope

- Unit 3 Diesel Generator Room Monorails (2)
- Diesel Generator Room Monorail Crane
- Unit 2 Turbine Building Overhead Crane
- Unit 2 Diesel Generator Room Monorails (2)
- Unit 3 Turbine Building Overhead Crane

Dresden Primary Containment—In Scope

- Unit 2 Drywell Equipment Hatch Monorails
- Unit 2 Drywell CRD Pit Jib Monorails
- Unit 2 Drywell Ground Floor Continuous Monorails
- Unit 2 Drywell 2nd Floor Jib Monorails
- Unit 3 Drywell Equipment Hatch Monorails
- Unit 3 Drywell CRD Pit Jib Monorails
- Unit 3 Drywell Ground Floor Continuous Monorails
- Unit 3 Drywell 2nd Floor Jibs Monorails

Dresden Miscellaneous Buildings—In Scope

- 2/3 Diesel Generator Room Monorails (3)
- Unit 2 HPCI Room Trolley Chain Hoist
- Unit 3 HPCI Room Trolley Chain Hoist
- 2/3 Cribhouse Service Water Pump Electric Hoist (a single monorail that is used to move and position the stop logs for set up of the ultimate heat sink)
- Circ water pump monorails and trolleys (4) (these non-safety-related monorails pass over the safety-related Unit 2 and Unit 3 diesel generator cooling water pumps)

Quad Cities Reactor Building—In Scope

- Unit 1 CRD Repair Floor Jib
- Unit 2 CRD Repair Floor Jib
- New Fuel Inspection Stand Jib
- Unit 1 and 2 Reactor Service Platform Jib
- Unit 1 and 2 Reactor Building Overhead Crane
- Unit 1 Reactor Building (Elevation 666Æ) Jib crane (does not exist on Unit 2)

Quad Cities Turbine Building—In Scope

- Unit 1 Turbine Building Overhead Crane
- Unit 2 Turbine Building Overhead Crane
- Unit 1 Emergency Diesel Generator Room Monorails

Unit 2 Emergency Diesel Generator Room Monorails
Unit 1 HPCI Monorail Hoist
Unit 2 HPCI Monorail Hoist
RHR Service Water Pump Monorails (8)

Quad Cities Primary Containment—In Scope
Unit 1 Drywell First Level Monorail
Unit 2 Drywell First Level Monorail
Unit 1 Drywell 2nd Floor Jibs for SRV work
Unit 2 Drywell 2nd Floor Jibs for SRV work

Quad Cities Miscellaneous Buildings—In Scope
Unit ½ (Common) Emergency Diesel Generator Room Monorails

- (b) The following list contains all cranes, hoists, and rails at each site that have been excluded from the scope of License Renewal. The list only applies to cranes, hoists and rails that are located within structures that have been included within the scope of License Renewal. Cranes, hoists, and monorails physically located in structures that are not within the scope of License Renewal are not listed below. Out-of-scope structures do not include safety-related equipment. As such, any crane, hoist or monorail located within the structure could not affect safety-related equipment. For this reason they were excluded from the scope of License Renewal along with the associated structure. The cranes, hoists, or monorails listed below are not safety-related, are not required for any safety-related system to perform any intended function, and are not capable of moving any load over or spatially interact with safety-related equipment. For these reasons, they were excluded from the scope of License Renewal.

Dresden Reactor Building—Out of Scope

Unit 2 Reactor Building (517Æ Elevation) Material Interlock Underhung Jib Crane
Unit 3 Reactor Building (517Æ Elevation) Material Interlock Underhung Jib Crane
Unit 2 Reactor Building (589Æ Elevation-RWCU Filter Demon. blocks) Monorails (1)
Unit 3 Reactor Building (589Æ Elevation-RWCU Filter Demon. blocks) Monorails (1)
Unit 2 Reactor Building (545Æ Elevation - north of RBCCW HX) Monorails (1)
Unit 3 Reactor Building (570 Elevation - north of main hatch) Monorails (1)
Unit 3 Reactor Building (517Æ Elevation - East & West) Monorails (2)

Dresden Turbine Building—Out of Scope

Control Rod Drive Overhaul Shop Crane Underhung
Control Rod Drive Overhaul Shop Jib Crane
Unit 2 Turbine Building Trackway (Elevation 538Æ) Elevator Air Hoist Crane Monorail
Unit 3 Turbine Building Trackway (Elevation 538Æ) Elevator Air Hoist Crane Monorail
Control Rod Drive Flush Tank Jib Crane
Unit 3 Safety Valve Test Boiler Jib Crane
Unit 3 Safety Valve Test Boiler Crane Monorail
Unit 2 Turbine Building Trackway Rollup Door Hoist Mechanism
Unit 3 Turbine Building Trackway Rollup Door Hoist Mechanism
All condensate / booster pump monorails (16)
All control rod drive hydraulic pump monorails (4)
Reactor Recirculation Motor Generator Set Monorails (4)
All stator cooling water heat exchanger monorails (2)
Reactor feedwater pump monorails (2)

- Instrument air compressor monorails (3)
- Feedwater regulating valve station monorails (5)
- Turbine Building floor / equipment drain sump pump monorails & jib
- Turbine Building freight elevator monorail (549æ elevation)
- Main Condenser pull/pit monorail (1)
- Low pressure heater monorails (12)
- Low pressure heater bay area monorails (4)
- South Turbine Building 2/3 MG Sets Rollomatic Filters Underhung Crane

Dresden Miscellaneous Buildings—Out of Scope

- 2/3 Cribhouse Refuse Basket Underhung Crane
- Station Blackout Building monorails (4)
- Service water pump monorails and trolleys (5)
- Service water strainer monorail and trolley (1)
- 2/3 Cribhouse East/West Monorail Electric Hoist/Trolley

Quad Cities Reactor Building—Out of Scope

- Unit 1 Reactor Building (Elevation 666Æ) Monorail Hoist
- Unit 2 Reactor Building (Elevation 666Æ) Monorail Hoist
- CRD Repair Area Monorail Hoist
- CRD Repair Room Monorail

Quad Cities Turbine Building—Out of Scope

- Unit 1 Condensate Pit Jib
- Unit 2 Condensate Pit Jib
- Unit 1 Condensate Demineralizer Monorail
- Unit 2 Condensate Demineralizer Monorail
- Unit 1 Turbine Building Trackway Crane
- Unit 2 Turbine Building Trackway Crane
- Radwaste Truck Bay Crane
- Max Recycle Crane
- Radwaste Basement Jib
- Radwaste Shield Door Hoists (#94-#96)
- “C” Warehouse Overhead Cranes (East & West)
- Unit 1 CRD pump Monorail
- Unit 2 CRD pump Monorail
- Reactor Recirc MG Set Monorails (4)
- Instrument Air Compressor Monorails (2)
- Unit 1 Battery Room Area Monorail
- Unit 2 Battery Room Area Monorail
- Unit 2 Reactor Feed Pump Vent Fan area Monorail (does not exist on Unit 1)
- Generator Lifting Beam (on Turbine Deck)
- 10 Ton Lifting Beam with Hoist (on Turbine Deck)
- Trolley Monorail (on Turbine Deck)
- Unit 1 Off Gas Filter Room Area Monorail
- Unit 2 Off Gas Filter Room Area Monorail
- Unit 1 TBCCW Heat Exchanger Area Trolley with Underhung Hoist
- Unit 1 Outside the West end of the Heater Bay Ground Floor Monorail (2)

Unit 2 TBCCW Heat Exchanger Area Monorail Trolley with Underhung Hoist
 Unit 1 (Elevation 595/Æ) Outside the West end of the Heater Bay Ground Floor Monorail (2)
 Unit 2 (Elevation 595/Æ) Outside the West end of the Heater Bay Ground Floor Monorail (2)
 Unit 1 (Elevation 611/Æ) Outside the West end of the Heater Bay Second Floor Monorail (7)
 Unit 2 (Elevation 611/Æ) Outside the West end of the Heater Bay Second Floor Monorail (7)
 Unit 1 Reactor Feed Pump Exhaust Fan Area Monorail (does not exist on Unit 2)
 Unit 1 (Elevation 668/Æ) Floor Elevation Monorail
 Unit 2 (Elevation 648/Æ) Floor Elevation Monorail

Quad Cities Miscellaneous Buildings—Out of Scope

Unit 1 Station Blackout Diesel Room Monorail
 Unit 2 Station Blackout Diesel Room Monorail
 Crib House Monorail for circulating water pumps
 Fish Basket Jib
 Trash Rake Crane

(c) All cranes, hoists, and monorails within the scope of License Renewal require aging management review are listed in the response to (a) above. While the type of components comprising crane subsystems can vary, the following cranes component types require aging management:

- a. Load carrying flanges
- b. Support structures
- c. Bolts, nuts, or rivets
- d. Load blocks
- e. Suspension housings
- f. Hand chain wheels
- g. Chain attachments
- h. Clevis
- i. Yokes
- j. Suspension Bolts
- k. Shafts
- l. Gears
- m. Bearings
- n. Pins
- o. Rollers
- p. Lock and Clamping Devices
- q. Hook Retaining Nuts
- r. Hook Retaining Collars/Pins
- s. Retaining Member Welds
- t. Load Sprockets
- u. Drums
- v. Sheaves
- w. Hydraulic Subsystems
- x. Cable
- y. Cable Clamps

- z. Brakes
 - aa. Bridge/Beam Structures
- (d) All cranes, hoists, and monorails within the scope of License Renewal (listed in the response to (a) above) require aging management review. Aging for these cranes, hoists, and monorails will be managed under Aging Management Program B.1.15, Overhead Heavy Load and Light Load Handling Systems. The reactor building overhead cranes at Dresden and Quad Cities were designed to meet or exceed the design fatigue loading requirements of the Crane Manufacturers Association of America (CMAA) Specification 70, Class A1. The evaluation of expected cycles over the life of each plant is the basis of a safety determination and is therefore a TLAA. Section 4.7.1, Reactor Building Crane Load Cycles, provides the disposition for this TLAA.

The additional information provided by the applicant in its RAI response is comprehensive and sufficiently answers all four questions posed by the staff. The staff concludes that the applicant has appropriately addressed cranes and hoists in its scoping and screening review. Therefore RAI 2.4-9 is resolved.

2.4.14.3 Conclusions

The staff reviewed LRA Section 2.4.14 to determine whether any structural components of the cranes and hoists that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the cranes and hoists that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the cranes and hoists that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.15 Component Supports Commodity Group

2.4.15.1 Summary of Technical Information in the Application

The applicant described the component supports commodity group in LRA Section 2.4.15 and provided a list of components subject to an AMR in LRA Table 2.4-15.

The component support commodity group consists of support members (includes support members, welds, bolted connections, and support anchorage to building structures), high strength bolting for Class I supports, and miscellaneous supports (includes constant and variable load springs, guides, stops, sliding surfaces, design clearances, vibration isolators, and clevis pins).

The applicant stated that grout (which includes reinforced concrete, grout, and masonry) is evaluated as a component group within structures.

The component supports commodity group includes the following:

- supports for ASME Class I, 2, and 3 piping and components

- supports for ASME Class MC components, including suppression chamber seismic restraints, suppression chamber support saddles and columns, and vent system supports
- supports for cable trays, conduit, HVAC ducts, tube track, instrument tubing and non-ASME piping and components
- anchorage of racks, panels, cabinets, and enclosures for electrical equipment and instrumentation
- supports for emergency diesel generator, HVAC system components, and miscellaneous mechanical equipment
- supports for platforms, pipe whip restraints, jet impingement shields, masonry walls, and miscellaneous structures

In LRA Table 2.4-15, the applicant listed the following component groups requiring AMR for the component supports commodity group:

Component	Component Intended Function	LRA Aging Management Ref No.
Anchorage to Buildings, Including Bolted/Welded Connections	Structural Support	3.5.1.29, 3.5.1.30
Anchorage to Buildings, Including Bolted/Welded Connections	Non-S/R Structural Support	3.5.1.29
Bolting	Structural Support	3.5.1.32
Clevis Pins: Suppression Chamber Columns, Vent	Structural Support	3.5.2.5
Instrument Racks, Frames, Panels, etc.	Structural Support	3.5.1.29
Instrument Racks, Frames, Panels, etc.	Non-S/R Structural Support	3.5.1.29
Raceways	Structural Support	3.5.1.29
Sliding Surfaces	Structural Support	3.5.1.31
Support Members (includes Spring Hangers)	Structural Support	3.2.2.79, 3.2.2.80, 3.2.2.81, 3.5.1.29, 3.5.1.31, 3.5.2.14
Support Members	Non-S/R Structural Support	3.5.1.29
Vibration Isolation Elements (Quad Cities)	Structural Support	3.5.1.29

The applicant's AMR results for component supports are provided in LRA Sections 3.2 and 3.5.

2.4.15.2 Staff Evaluation

The staff reviewed LRA Section 2.4.15 to determine whether the component supports commodity group structural components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR, to determine if any components were omitted.

Based on information provided in LRA Section 2.4.15, it is not clear to the staff that all component supports within the scope of license renewal are included in the component supports commodity group. Also, clarification is needed for several "Components" listed in Table 2.4-15.

In order to complete the screening review for component supports, the staff requested in RAI 2.4-10 the applicant to submit the following information:

- (a) Clarify if the ASME Class 1 supports in this commodity group include the reactor vessel support skirt/support ring and reactor vessel upper lateral stabilizer support. If not, where are these supports addressed in the LRA? If not managed by ASME Section XI, Subsection IWF, submit the technical basis for crediting an alternate AMP.
- (b) Clarify if the ASME Class MC supports in this commodity group include the drywell lower ring support and the drywell upper lateral support. If not managed by ASME Section XI, Subsection IWF, submit the AMR for the drywell supports, including the technical basis for this exception.
- (c) Since LRA Section 2.4.15 is not referenced anywhere in LRA Sections 2.3 or 2.4, verify that all supports associated with "Components" listed in LRA Sections 2.3 and 2.4.1 through 2.4.14 are included in the component supports commodity group. If not, identify the supports not included and submit the AMR, including credited AMPs.
- (d) Verify that the "Anchorage to Buildings Including Bolted/Welded Connections" component in LRA Table 2.4-15 includes anchors directly into concrete.

In its response to RAI 2.4-10, the applicant stated the following:

- (a) The ASME Class 1 supports discussed in Section 2.4-15 of the LRA do not include the reactor vessel support skirt. The reactor vessel support skirt was evaluated in LRA Section 2.3.1.1, "Reactor Vessel." The reactor vessel support skirt was included in LRA Table 2.3.1-1 under the Component Group "Support Skirts and Attachment Welds." This is in alignment with NUREG-1801, which assigns "Support Skirt and Attachment Welds" to Section IV.A1, "Reactor Vessel (Boiling Water Reactor)." The aging management of the support skirts and attachment welds has been analyzed as a TLAA and is discussed in LRA Section 4.3.1, Reactor Vessel Fatigue Analysis. Specifically, the reactor vessel support skirt will be managed for fatigue under aging management program, B.1.34, Metal Fatigue of the Reactor Coolant Pressure Boundary.

The reactor vessel support ring girder and upper lateral stabilizer supports were analyzed in LRA Section 2.4.15, "Component Supports Commodity Group" as part of the "Support Members (Includes Spring Hangers)" Component Group. The upper lateral stabilizer supports are managed by Aging Management Program B.1.27, "ASME Section XI, Subsection IWF." The reactor vessel support ring girder is not an ASME Section XI, Subsection IWF component. The reactor vessel support ring girder is managed under Aging Management Program B.1.30, Structures Monitoring Program.

- (b) The drywell lower ring support and the drywell upper lateral support are included in the ASME Class MC supports discussed in LRA Section 2.4.15, Component Supports Commodity Group. The drywell lower ring support and the drywell upper lateral support will be managed under Aging Management Program B.1.27, ASME Section XI, Subsection IWF.
- (c) LRA Section 2.4.15, "Component Supports Commodity Group," includes all supports associated with the "Components" listed in LRA Sections 2.3 and 2.4.1 through 2.4.14, with two exceptions:

Table 2.3.1-1 of LRA Section 2.3.1.1, "Reactor Vessel," includes supports for the reactor vessel and reactor vessel internals. The aging management of the support skirts and attachment welds has been analyzed as a TLAA and is discussed in LRA Section 4.3.1, Reactor Vessel Fatigue Analysis. Specifically, the reactor vessel support skirt will be managed for fatigue under aging management program, B.1.34, Metal Fatigue of the Reactor Coolant Pressure Boundary.

Table 2.3.1-2 of LRA Section 2.3.1.2, "Internals," includes components internal to the reactor vessel that provide support for other internal components. Aging Management Programs B.1.2, Water Chemistry, and B.1.9, BWR Vessel Internals, manage the aging of these internal components. Jet pump assemblies and orificed fuel support pieces are managed under Aging Management Program B.1.10, Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS). In addition to these Aging Management Programs, several Component Groups found in LRA Table 2.3.1-2 with a structural support function have been analyzed as a TLAA and are discussed in LRA Section 4.2, Neutron Embrittlement of the Reactor Vessel and Internals.

For all other component supports included in LRA Section 2.4.15 (other than the two exceptions discussed), the following Aging Management Programs apply:

B.1.27, "ASME Section XI, Subsection IWF" will manage ASME Class 1, 2, and 3 component supports.

B.1.27, "ASME Section XI, Subsection IWF" will manage ASME Class MC component supports during the period of extended operation, as stated in (b) above.

B.1.2, "Water Chemistry" and AMP B.1.23, "One-Time Inspection" will manage component supports exposed to a torus water environment.

B.1.30, "Structures Monitoring Program" will manage component supports other than in the above categories.

- (d) The Component Group, Anchorage to Buildings Including Bolted/Welded Connections, found in LRA Table 2.4-15 includes anchors directly into concrete. The concrete surrounding the anchors is addressed with the corresponding structures as identified in LRA Section 2.4.

The additional information provided by the applicant in its RAI response sufficiently clarifies the scoping and screening for component supports, and clearly identifies the credited AMPs for

each subset of component supports. The staff concludes that the applicant has appropriately addressed these components in its scoping and screening review. The staff evaluation of the AMR and AMPs for component supports is in Section 3.5 of this SER. Therefore RAI 2.4-10 is resolved.

2.4.15.3 Conclusions

The staff reviewed LRA Section 2.4.15 to determine whether any structural components of the component supports commodity group that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the structural components of the component supports commodity group that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the structural components of the component supports commodity group that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.4.16 Insulation Commodity Group

2.4.16.1 Summary of Technical Information in the Application

The applicant described the insulation commodity group in LRA Section 2.4.16 and provided a list of components subject to an AMR in LRA Table 2.4-16.

The insulation commodity group consists of the following categories of insulation:

- mirror insulation inside containment
- insulation and jacketing inside containment
- insulation and jacketing outside containment
- asbestos insulation outside containment
- anti-sweat insulation outside containment
- outdoor insulation and jacketing

Plant areas where systems and equipment in the scope of license renewal require temperature control include—inside the drywell, the ECCS pump rooms, the outboard MSIV rooms, and on outdoor heat-traced piping for freeze protection. Plant areas where insulation jacketing is subjected to periodic wetting is limited to outdoor heat-traced piping.

Insulation materials in use at the stations include both originally installed materials and replacement materials. These include metallic reflective insulation, asbestos, fiberglass batts, calcium silicate, quilted fiberglass blankets, preformed fiberglass, and closed cell foam. Outdoor insulation installed over electric heat tracing consists of either calcium silicate or preformed fiberglass with aluminum jacketing.

Insulation requiring aging management consists of asbestos and fiberglass batt insulation

located in the drywell, ECCS pump rooms, outboard MSIV rooms, and outdoor insulation and jacketing installed over heat-traced piping.

In LRA Table 2.4-16, the applicant listed the following component groups requiring AMR for the insulation commodity group:

Component	Component Intended Function	LRA Aging Management Ref No.
Insulation	Insulating Characteristics	3.2.2.44, 3.2.2.45, 3.2.2.46, 3.2.2.47, 3.3.2.122, 3.4.2.22
Insulation Jacketing	Insulation Jacket Integrity	3.2.2.48, 3.3.2.123, 3.4.2.23

The applicant's AMR results for insulation are provided in LRA Sections 3.2, 3.3, and 3.4.

2.4.16.2 Staff Evaluation

The staff reviewed LRA Section 2.4.16 to determine whether the insulation commodity group components within the scope of license renewal and subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

In the performance of the review, the staff selected system functions that are required by 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

Based on information provided in LRA Section 2.4-16, the staff cannot identify the insulation and insulation jacketing included in the license renewal scope nor the specific subset that is included in this commodity group. It is also unclear whether insulation and jacketing on the reactor coolant system have been included.

In LRA Table 2.4-16, the aging management references are to LRA Sections 3.2 (Engineered Safety Features), 3.3 (Auxiliary Systems), and 3.4 (Steam and Power Conversion Systems). However, in LRA Section 2.3 (Scoping and Screening Results: Mechanical), insulation is not discussed and there are no references to LRA Section 2.4.16.

In order to complete the screening review for insulation and insulation jacketing, the staff requested the applicant in RAI 2.4-11 to submit the following information:

- (a) Specifically identify the mechanical systems or portions of systems that have insulation and/or insulation jacketing within the license renewal scope, and their location in the plant.
- (b) Specifically identify the structures and structural components that have insulation and/or insulation jacketing within the license renewal scope, and their location in the plant.

- (c) Specifically identify any insulation and/or insulation jacketing within the license renewal scope, but not included in the insulation commodity group; submit the AMR for this insulation and/or insulation jacketing.
- (d) List all insulation and insulation jacketing materials included in the insulation commodity group and the results of the AMR for each.
- (e) For insulation and insulation jacketing materials not requiring aging management, submit the technical basis for this conclusion, including plant-specific operating experience.
- (f) For insulation and insulation jacketing materials requiring aging management, identify the AMP(s) credited to manage aging.

In its response to RAI 2.4-11, the applicant stated the following:

- (a) The methodology used for scoping and screening of mechanical system insulation is described in LRA Section 2.1.6, Additional Considerations Incorporated into the Methodology, Treatment of Piping and Equipment Insulation During Scoping and Screening.

Scoping and screening identified the following systems to have insulation and/or insulation jacketing within the license renewal scope.

System	Location	System	Location
Reactor vessel	Inside Containment	Feedwater system	Inside and Outside Containment
Reactor recirculation system	Inside Containment	Main Condenser	Outside Containment
Reactor core isolation cooling system (Quad Cities only)	Inside and Outside Containment	HVAC - radwaste building	Outside Containment
Head spray system (Dresden only)	Inside Containment	Condensate and condensate booster system	Outside Containment
Reactor vessel head vent system	Inside Containment	Feedwater heater drains and valves	Outside Containment
Nuclear boiler instrumentation system (Quad Cities only)	Inside Containment	Reactor building closed cooling water	Inside and Outside Containment

System	Location	System	Location
Shutdown cooling system (Dresden only)	Inside and Outside Containment	Service water system	Outside Containment
Standby liquid control system	Outside Containment	Diesel generator service water system	Outside Containment
Reactor water cleanup system	Inside and Outside Containment	HVAC—main control room	Outside Containment
Isolation condenser (Dresden only)	Inside and Outside Containment	SBO building HVAC	Outside Containment
Core spray system	Inside Containment	Plant heating steam	Outside Containment
Low pressure coolant injection system (Dresden only)	Inside and Outside Containment	HVAC—auxiliary electric room and computer room	Outside Containment
Residual heat removal system (Quad Cities only)	Inside and Outside Containment	HVAC—high radiation sampling system	Outside Containment
Containment cooling service water system (Dresden only)	Outside Containment	Emergency diesel generators and auxiliaries	Outside Containment
Residual heat removal service water system (Quad Cities only)	Outside Containment	SBO diesel generator and auxiliaries	Outside Containment
High-pressure coolant injection system	Inside and Outside Containment	Drywell nitrogen inerting	Outside Containment

System	Location	System	Location
Main steam system	Inside and Outside Containment	Nitrogen containment atmosphere dilution system	Outside Containment
Extraction steam system	Outside Containment		

(b) Scoping and screening identified the following buildings or structures as having insulation (fire wrapping/fire proofing) within the scope of license renewal:

- Reactor Buildings (Section 2.4.2)
- Main Control Room and Auxiliary Electric Equipment Room (Section 2.4.3)
- Turbine Buildings (Section 2.4.4)
- Diesel Generator Buildings (Section 2.4.5)
- Station Blackout Buildings (Section 2.4.6)

(c) For mechanical systems, all insulation and insulation jacketing within the license renewal scope are included in the Insulation Component Group (Section 2.4.16). For buildings and structures, the fire wrapping or fire proofing are included as line items in the LRA Section 2.4 component tables for the buildings listed above. The Aging Management Reference in the Section 2.4 component tables points to the aging management review results.

(d) The requested information for mechanical systems is contained in the LRA at the following points:

Section 3.2, Table 3.2-2, Aging Management References 3.2.2.44, 3.2.2.45, 3.2.2.46, 3.2.2.47 and 3.2.2.48

Section 3.3, Table 3.3-2, Aging Management References 3.3.2.122 and 3.3.2.123

Section 3.4, Table 3.4-2, Aging Management References 3.4.2.22 and 3.4.2.23

The requested information for structures is contained in LRA Section 3.3, Table 3.3-2, Aging Management References 3.3.2.62 and 3.3.2.63.

(e) The line items listed in response to Item (d) include identification of insulation and/or insulation jacketing materials that do not exhibit aging effects and that do not require aging management. This information is included in the columns headed "Aging Effect/Mechanism" and "Aging Management Program" associated with each line item identified. The "Discussion" column for each line item where there are no aging effects provides a technical basis for this conclusion.

The aging management review that evaluated insulation and insulation jacketing included a search of problem identification forms and work orders to identify documented insulation failures at Dresden or Quad Cities. This search identified a total of fifteen (15) documented insulation failures. Of these fifteen failures, three failures were attributed to age-related degradation, seven failures were attributed to causes unrelated to aging (e.g., damage by personnel), and five were attributed to indeterminate causes.

(f) The requested information for mechanical systems is contained in the LRA at the following points:

- Section 3.2, Table 3.2-2, Aging Management References 3.2.2.44, 3.2.2.45, 3.2.2.46, 3.2.2.47 and 3.2.2.48
- Section 3.3, Table 3.3-2, Aging Management References 3.3.2.122 and 3.3.2.123
- Section 3.4, Table 3.4-2, Aging Management References 3.4.2.22 and 3.4.2.23

The requested information for structures is contained in the LRA at the following points:

- Section 3.3, Table 3.3-2, Aging Management References 3.3.2.62 and 3.3.2.63

The additional information provided by the applicant in its RAI response sufficiently clarifies the scoping and screening for the insulation commodity group, and clearly identifies the aging management reference for each subset of insulation and insulation jacketing. The staff concludes that the applicant has appropriately addressed the insulation commodity group in its scoping and screening review. The staff evaluation of the AMRs for each subset of insulation and insulation jacketing is in Section 3.5 of this SER. RAI 2.4-11 is, therefore, resolved.

2.4.16.3 Conclusions

The staff reviewed LRA Section 2.4.16 to determine whether any components of the insulation commodity group that should be within the scope of license renewal were not identified by the applicant. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. On the basis of its review, the staff concludes that the applicant has adequately identified the components of the insulation commodity group that are within the scope of license renewal, as required by 10 CFR 54(a), and that the applicant has adequately identified the components of the insulation commodity group that are subject to an AMR, as required by 10 CFR 54.21(a)(1).

2.5 Scoping and Screening Results: Electrical and Instrumentation and Controls

This section addresses the scoping and screening results of electrical and instrumentation and control (I&C) systems at Dresden and Quad Cities for license renewal. Per 10 CFR 54.21 (a)(1) an applicant is required to identify and list structures and components subject to an AMR. These are passive, long-lived structures and components that are within the scope of license renewal. To verify that the applicant has properly implemented its methodology, the staff focuses its review on the implementation results. Such a focus allows the staff to confirm that there is no omission of electrical system components that are subject to an AMR. If the review identifies no omission, the staff has the basis to find that there is reasonable assurance that the applicant has identified the electrical system components that are subject to an AMR.

The applicant utilized the guidance provided in NEI 95-10, Appendix B, to define passive, long-lived electrical commodities. As described in LRA Section 2.1.2, the passive and long-lived electrical and instrumentation and control component groups were evaluated using plant “spaces” approach to identify aging effects, and then, “bounding environmental conditions” were used to evaluate the identified aging effects with respect to component function.

The following electrical commodity groups were determined to require AMR:

- C Cables and connections (splices, connectors, fuse blocks, and terminal blocks)
- C Bus Duct
- C High-voltage transmission conductors and insulators
- C Electrical penetration

2.5.1 Insulated Cables and Connections

LRA Section 2.5.1.1, "Cables And Connections," identifies cables and connections as long-lived and non-EQ component groups that perform an electrical passive function in support of its system intended function as defined by 10 CFR 54.21 (a)(1)(i).

2.5.1.1 Summary of Technical Information in the Application

The applicant describes the insulated cable and connections in LRA Section 2.5.1.1 and provides a list of components subject to an AMR in LRA Table 2.5-1.

The applicant stated that all electrical insulated cables and connections were evaluated, using the "spaces" approach, for aging management based on the comparison of material property capability with environmental conditions. As appropriate, electrical cables and connections were excluded from aging management if they were identified as feeding an electrical component that performed no license renewal intended function.

The function of insulated cables and connections is to electrically connect specified sections of an electrical circuit to deliver voltage, current or signals. Electrical cables and their connections are reviewed as commodity groups. The types of connections included in this review are splices, connectors, fuse blocks, and terminal blocks.

2.5.1.2 Staff Evaluation

The staff reviewed LRA Section 2.5.1.1 to determine whether the insulated cable and connections within the scope of license renewal and are subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21 (a)(1).

As part of the review, the staff selected system functions described in UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

The applicant evaluated the cables and connectors as a single component commodity group. Insulated cables and connections that perform an intended function within the scope of license renewal, but are not included in the EQ Program, meet the criterion of 10 CFR 54.21 (a)(1)(ii) and are subject to AMR. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

The applicant stated that “as appropriate, electrical cables and connections were excluded from aging management if they were identified as feeding an electrical component that performed no license renewal intended function.” The staff requested the applicant to clarify whether Dresden and Quad Cities AMR for cables have included those cables that do not perform license renewal intended function, but share same cable trays/raceways with cables that do perform license renewal intended function (RAI 2.5-2(a)).

In its response dated November 20, 2003, the applicant stated that cables that perform no license renewal intended function and share the same cable trays/raceways with cables that do perform license renewal function are included in the scope of license renewal. Because these cables share the same trays/raceways, the applicant included all of the cables within the scope of license renewal. The only cables that were excluded from the scope of license renewal are the medium voltage cables to the Quad Cities circulating pump motors and the cables within the Radwaste Building. The circulating pump motor cables are routed in dedicated raceways that do not contain cables performing license renewal functions. The Radwaste Building does not contain any electrical components within the scope of license renewal. As such, all of the cables contained in the trays/raceways found in the Radwaste Building are excluded from the scope of license renewal and do not require aging management.

The staff agrees that the applicant has correctly identified the cables and connections as component commodity group that perform their function without moving parts or a change in configuration or properties (passive and long lived), and, are therefore subject to an AMR.

2.5.1.3 Conclusions

The staff reviewed the LRA to determine whether any structures, systems, or components that should be within the scope of license renewal were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the insulated cables and connections that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the insulated cable and connections that are subject to an aging management review, as required by 10 CFR 54.21(a)(1).

2.5.2 Bus Duct

LRA Section 2.5.1.2, "Bus Duct," identifies bus ducts as passive long-lived component commodity groups that connect power supplies and switchgear in order to deliver voltage and current to support the system's intended function as defined in 10 CFR 54.21(a)(1)(i).

2.5.2.1 Summary of Technical Information in the Application

The applicant describes the bus ducts in LRA Section 2.5.1.2 and provides a list of components subject to an AMR in LRA Table 3.6-2.

The bus ducts within the scope of license renewal include those bus ducts used for safety-related systems and those associated with the 4160 V power feeds between the reserve

auxiliary transformers (RATs) and switchgear. The bus ducts utilize pre-assembled raceway (enclosure) design with conductors supported by electrical insulators. The function of bus ducts is to electrically connect power supplies and load centers to deliver voltage and current. The function of bus duct insulators is to support and insulate the bus bar conductors.

2.5.2.2 Staff Evaluation

The staff reviewed LRA Section 2.5.1.2 to determine whether the bus ducts within the scope of license renewal and that are subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The bus ducts identified by the applicant as requiring AMR are used for safety-related systems and those associated with the 4160V power feeds between the reserve auxiliary transformers and switchgear. The staff reviewed these component categories against the requirements of 10 CFR 54.4 (a)(1) and 10 CFR 54.4(a)(3) and found these categories are included in these requirements.

As part of this review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

2.5.2.3 Conclusions

The staff reviewed the LRA to determine whether any structures, systems, or components that should be within the scope of license renewal were not identified by the applicant. No omissions were found. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the bus duct components that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the bus ducts components that are subject to an aging management review, as required by 10 CFR 54.21 (a)(1).

2.5.3 High Voltage Transmission Conductors and Insulators

LRA Section 2.5.1.3, "High Voltage Transmission Conductors and Insulators," identifies high voltage transmission conductors and insulators as passive long-lived component commodity groups that connect switchyard bus and reserve auxiliary transformers in order to supply offsite power to the plant systems and perform its intended function as defined in 10 CFR 54.21 (a)(1)(i).

2.5.3.1 Summary of Technical Information in the Application

The applicant describes the high voltage transmission conductors and insulators in LRA Section 2.5.1.3. The high voltage transmission conductors and insulators within the scope of license renewal rule are those associated with the power feeds from the switchyard to RATs. The function of the high voltage transmission conductors is to supply power to the plant systems

through the RATs. The function of high voltage insulators is to support and insulate the high voltage transmission conductors.

2.5.3.2 Staff Evaluation

The staff reviewed LRA Section 2.5.1.3 to determine whether the high voltage transmission conductors and insulators within the scope of license renewal and that are subject to an AMR have been identified in accordance with 10 CFR 54.4 and 54.21(a)(1). The high voltage transmission conductors and insulators identified by the applicant as requiring AMR are associated with the power feeds from the switchyard to the reserve auxiliary transformers. The staff reviewed these component categories against the requirements of 10 CFR 54.4(a)(3) and found this category is included in this requirement.

In the performance of the review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

On the basis of its review, the staff finds that the switchyard bus and high-voltage transmission conductor connections are passive, long-lived electrical components subject to an AMR and are not identified by the applicant. The staff asked the applicant to provide justification for excluding these components from AMR; otherwise, the applicant was to submit an AMR for the subject components (RAI 2.5-2(b)). In its response dated November 20, 2003, the applicant stated that switchyard buses and high voltage transmission conductor connections are in the scope of license renewal and that the associated AMR is provided in Section 3.6 of the LRA.

2.5.3.3 Conclusions

The staff reviewed the LRA to determine whether any structures, systems, or components that should be within the scope of license renewal were not identified by the applicant. The staff did not identify any omissions. In addition, the staff performed an independent assessment to determine whether any components that should be subject to an AMR were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified high voltage transmission conductors and connections, insulators, and switchyard bus that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified high voltage transmission conductors and connections, insulators, and switchyard bus that are subject to an aging management review, as required by 10 CFR 54.21 (a)(1).

2.5.4 Electrical/I&C Penetration

Electrical/I&C penetration are used to pass electrical circuits through the containment wall while maintaining containment integrity. They provide electrical continuity for the circuit, as well as a pressure boundary for the containment. The pressure boundary function of electrical penetration is addressed in LRA Section 2.4-1.

2.5.4.1 Summary of Technical Information in the Application

The applicant describes the electrical/I&C penetration in LRA Section 2.5.1.4. The applicant stated that electrical penetrations perform the functions of primary containment boundary (pressure integrity) and electrical continuity across the primary containment boundary. All primary containment electrical penetrations are included in the scope of the rule. The electrical continuity function of penetrations is managed under environment qualification (EQ) program which is discussed in Section 4.4, Environmental Qualification of Electrical Equipment(EQ). The pressure boundary function of every primary containment electrical penetration is evaluated in LRA Section 2.4.1, Primary Containment, and the aging management program is referenced in Section 3.5.1.3.

2.5.4.2 Staff Evaluation

The staff reviewed Section 2.5.1.4 of the LRA to determine whether the applicant has identified the electrical components within the scope of license renewal, in accordance with 10 CFR 54.4, and those subject to an AMR, in accordance with 10 CFR 54.21 (a)(1).

As part of this review, the staff selected system functions described in the UFSAR that were set forth in 10 CFR 54.4 to verify that components having intended functions were not omitted from the scope of the Rule. The staff also focused on components that were not identified as being subject to an AMR to determine if any components were omitted.

The staff asked the applicant whether there are any electrical penetrations that are not covered under EQ program (RAI 3.6-2). In its response dated October 3, 2003, the applicant stated that at Dresden Station, all electrical penetrations are covered under the Environmental Qualification (EQ) program. However, at Quad Cities Station, all but three electrical related penetrations (1-X102B, 2-X100A, and 2-X105A) are part of the station EQ program. These three penetrations serve circuits (such as drywell booster fans and main steam line vibration monitoring instrumentation) that do not perform any license renewal intended function. As stated in Section 2.5.1.4 of the LRA, the intended function (electrical continuity) is managed by the EQ program. The mechanical and structural related intended functions of all electrical penetrations, including the three Quad Cities penetrations not included within the station EQ program, are addressed in Table 2.4-1 under Component Group "Containment Penetrations (Electrical)" and the associated aging management is discussed in Table 3.5-1, Aging Management Reference 3.5.1.3 of the LRA.

2.5.4.3 Conclusions

The staff reviewed the LRA to determine whether any structures, systems, or components that should be within the scope of license renewal were not identified by the applicant. The staff did not identify any omissions. On the basis of this review, the staff concludes that the applicant has appropriately identified the components of the electrical/I&C penetrations that are within the scope of license renewal, as required by 10 CFR 54.4(a), and that the applicant has appropriately identified the components of the electrical/I&C penetration assemblies system that are subject to an aging management review, as required by 10 CFR 54.21 (a)(1).

2.5.5 References

1. NEI 95-10, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54-The License Renewal Rule," Revision 3, Nuclear Energy Institute, March 2001.
2. NUREG-1801, "Generic Aging Lessons Learned (GALL) Report, U.S. Nuclear Regulatory Commission," April 2001.
3. NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," April 2001.
4. 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants."
5. NRC letter to Alan Nelson and David Lochbaum, "Staff Guidance On Scoping of Equipment Relied on to Meet the Requirements of the Station Blackout (SBO) Rule (10 CFR 50.63) for License Renewal (10 CFR 54.4(a)(3)," dated April 1, 2002.

3. AGING MANAGEMENT REVIEW

3.0 Aging Management Review

The applicant has fully utilized the Generic Aging Lessons Learned (GALL) process defined in the standard review plan-license renewal (SRP-LR) (NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants," issued April 2001) and the GALL report (NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," issued July 2001, Volumes 1 and 2). The GALL Report provides the staff with a summary of staff-approved aging management programs (AMPs) for the aging of most structures and components that are subject to an aging management review (AMR). If an applicant commits to implementing these staff-approved AMPs, the time, effort, and resources used to review an applicant's license renewal application (LRA) will be greatly reduced, thereby improving the efficiency and effectiveness of the license renewal review process.

The GALL report is a compilation of existing programs and activities used by commercial nuclear power plants to manage the aging of structures, systems, and components (SSCs) within the scope of license renewal and which are subject to an AMR. The GALL report summarizes the aging management evaluations, programs, and activities credited for managing aging for most of the structures and components used throughout the industry, and serves as a reference for both applicants and staff reviewers to quickly identify those aging management programs and activities that the staff has determined will provide adequate aging management during the period of extended operation.

The GALL report identifies (1) systems, structures, and components, (2) component materials, (3) the environments to which the components are exposed, (4) the aging effects associated with the materials and environments, (5) the AMPs that are credited with managing the aging effects, and (6) recommendations for further applicant evaluations of aging effects and their management for certain specific components types.

In order to determine whether the GALL process would improve the efficiency of the license renewal review, the staff conducted a demonstration project to exercise the GALL process and determine the format and content of a safety evaluation based on the GALL review process. The SRP-LR was prepared based on both the GALL model and the lessons learned from the demonstration project.

As part of its review of the LRA, the staff performed an AMR inspection (Inspection Report 50-237/03-10(DRS), 50-249/03-10(DRS), 50-254/03-14(DRS), 50-265/03-14(DRS)) from September 29– October 22, 2003, at both Dresden and Quad Cities Stations. The purpose of the inspection was to examine activities that support the LRA and consisted of a selected examination of procedures, representative records, and interviews with the applicant regarding proposed aging management activities. The team also reviewed the proposed implementation of all AMPs credited in the LRA for managing aging.

The staff also performed an AMP audit on October 7-8, 2003. The audit team reviewed those AMPs credited in the LRA for managing aging that the applicant claimed were consistent with GALL. The audit team evaluated each of the 10 attributes of the applicant's AMP, which the applicant claimed were consistent with the attributes of the associated AMP described in the

GALL report. The applicant provided those AMPs that were not claimed to be consistent with the GALL Report, and those attributes that were deviations from the attributes described in the GALL Report AMPs, to the NRC staff for review. The team concluded that, with the exception of the Fire Protection Program, One-Time Inspection Program, and the Selective Leaching Program, the applicant's AMPs were consistent with the GALL Report AMPs with differences/exceptions as stated in the LRA/requests for additional information (RAIs). As result of this audit, the applicant has implemented enhancements to these AMPs. The AMP audit issues can be found in the staff's AMP Audit Report, dated April 23, 2004, and are addressed in this safety SER.

As a result of the staff's review of the LRA, including the additional information and clarifications submitted subsequently, the staff identified two proposed license conditions. The first license condition requires the applicant to include the updated final safety analysis report (UFSAR) Supplement in the next UFSAR update required by Title 10, Section 50.71(e), of the *Code of Federal Regulations* (10 CFR 50.71(e)) following issuance of the renewed license. The second license condition requires that the applicant complete the future activities identified in the UFSAR Supplement before the period of extended operation.

3.0.1 The GALL Format for the LRA

The Dresden/Quad Cities LRA closely follows the standard LRA format. This format has been used by previous applicants and will continue to be used by future applicants. However, there are several important changes within the format that reflect the GALL process. First, the tables in LRA Section 2 that identify the structures and components that are subject to an AMR now include a third column which links plant-specific structures and components in the Section 2 tables to generic GALL component groups in Section 3 (this is discussed in more detail below). Second, the tables in LRA Section 3 are different from the Section 3 tables used in previous LRAs. There are no system-specific tables in Section 3 of the LRA. The individual components within a system have been rolled up into a series of system group tables. For example, Section 2.3.3 of the Dresden/Quad Cities LRA addresses scoping and screening results for 28 auxiliary systems. Each system has several components. In previous LRAs, each system had a separate table that listed the components in the system, but with the Dresden/Quad Cities LRA, there are no such individual system tables. Instead, all the components in the 28 auxiliary systems are rolled up into two separate auxiliary system tables. LRA Table 3.3-1 consists of auxiliary system components that were evaluated in the GALL report, and LRA Table 3.3-2 consists of auxiliary systems components that were not evaluated in the GALL report. Similarly, the LRA tables for the other system groups (3.1 - reactor systems, 3.2 - engineered safety feature systems, 3.4 - steam and power conversion systems, 3.5 - structures, and 3.6 - electrical systems) have 3.X-1 LRA tables for components that were evaluated in the GALL report and 3.X-2 LRA tables for components that were not evaluated in the GALL report (where X corresponds to the appropriate subsection in Section 3).

The 3.X-1 tables provide information regarding AMPs that are consistent with the GALL Report. The first four columns of Table 3.X-1 are derived from Tables 3.1-1 through 3.1-6 of the SRP-LR. Included in this table is a discussion column. The discussion column provides a conclusion indicating if the aging management evaluation results are consistent with GALL, along with any clarifications or explanations required to support the conclusion, if the conclusion is different than those of the GALL Report. For a determination to be made that a table line item is "Consistent with GALL," several criteria must be met. First, the plant-specific component is

reviewed against the GALL to ensure that the component, materials of construction, and internal or external service environments are comparable to those described in a particular GALL item. Second, for those that are comparable, the results of the plant aging management review/aging effect evaluation are compared to the aging effects/mechanisms in the GALL.

Finally, the programs credited in the GALL for managing those aging effects are compared to the programs described in the plant evaluation. If, using good engineering judgment, it could be reasonably concluded that the plant evaluation is in agreement with the GALL evaluation, a line item was considered consistent with GALL or NUREG-1801. There are cases where components, and component material/environment combinations, and aging effects are common between a NUREG-1801 line item and the plant evaluation, but the AMP selections differ. In those cases the discussion column indicates the plant AMP selection, but no conclusion is made that the line item is consistent with the GALL.

The 3.X-2 tables provide information regarding AMPs that are different from or not addressed in the GALL Report. A plant component is considered not addressed by the GALL report if the component type is not evaluated in the GALL or has a different material of construction or operating environment than that evaluated in the GALL report.

The 3.X-2 tables are different from the 3.X-1 tables. The 3.X-2 tables include the component types, materials, environments, aging effects requiring management (AERMs), programs and activities for managing aging, and a discussion column. Because these structures and components were not evaluated in GALL, the staff performed a review, similar to those done for past applications.

3.0.2 The Staff's Review Process for GALL

The staff reviewed the Dresden/Quad Cities LRA for the AMR results and the associated AMPs in three phases. In Phase 1, the staff reviewed the applicant's AMP descriptions to identify those AMPs for which the applicant claimed consistency with those reviewed and approved in the GALL report. In Section 3.0 of the LRA, the applicant stated the following in describing what it means for AMPs to be considered "consistent" with the GALL report (NUREG-1801):

Identifies aging management reviews that are consistent with the NUREG-1801. This means that the component group, material and environment are applicable, the aging effect and aging mechanisms identified require management, the aging management program identified is appropriate, and the review results of the key elements provided in Appendix B concludes that the program elements are consistent with those elements provided in Chapters X and XI of NUREG-1801.

For the AMPs for which the applicant claimed consistency with the AMPs in the GALL report, the staff conducted an audit to confirm that the applicant's AMPs were consistent with the AMPs in the GALL report.

Several AMPs were described by the applicant as being consistent with the GALL report, but with some deviation. These deviations are of three types: (1) exceptions to the GALL report - those evaluations where several of the individual NUREG-1801 line items may be evaluated as consistent with NUREG-1801 while other line items may be evaluated as exception to NUREG-1801; (2) further evaluations recommended by the GALL report - provides reference to sections providing further evaluation of aging management recommended by NUREG-1801; and (3) clarifications to the GALL report - provides notes to clarify NUREG-1801 Volume 2 line items

such as those that are not in scope of license renewal or not installed at Dresden or Quad Cities. For each AMP that had one or more of these deviations, the staff reviewed each deviation to determine whether the AMP, as modified, would adequately manage the aging effect(s) for which it is credited. Through a license condition, the staff will require that any revisions to the AMP and UFSAR Supplement that must be made as a result of the deviation(s) are completed and implemented before the start of the period of extended operation.

Some AMPs were identified by the applicant as exceptions to the GALL report which means: those evaluations which are an exception to the NUREG-1801 aging effects or aging management program or activity and provides reference in Section 3 and/or Appendix B which provides further explanation and justification. In these cases, the exception refers to all of the NUREG-1801 line items. For those AMPs that are either identified as exceptions to the GALL report or not evaluated in the GALL report, the staff evaluated each AMP against the 10 AMP elements (Branch Technical Position RLSB-1 in Section A-1 of SRP-LR Appendix A). Through a license condition, the staff will confirm any new AMPs and associated UFSAR Supplements will be developed and implemented before the start of the period of extended operation.

The AMRs and associated AMPs in the GALL report fall into two broad categories: those AMRs and associated AMPs that the GALL report concludes are adequate to manage aging of the components referenced in the GALL report, and those AMRs and associated AMPs for which the GALL report concludes that aging management is adequate, but further evaluation must be done for certain aspects of the aging management process. In Phase 2, the staff compared the applicant's AMR results and associated AMPs to the AMR results and associated AMPs in the GALL report, to determine whether the applicant's AMRs and associated AMPs were consistent with those reviewed and approved in the GALL report. For those AMR results and associated AMPs for which the applicant claimed to be consistent with the GALL report, the staff conducted an inspection to confirm that the applicant's AMRs and associated AMPs were consistent with AMRs and associated AMPs in the GALL report. For AMRs and associated AMPs that were not consistent with the GALL report, the staff's review determined whether the AMRs and associated AMPs were adequate to manage the aging effects for which they were credited. Finally, for those AMRs and associated AMPs for which the GALL report recommended further evaluation, the staff reviewed the applicant's evaluation to determine whether the applicable aging effect would be adequately managed during the period of extended operation.

Once it had determined that the applicant's AMRs and associated AMPs were adequate to manage aging, the staff performed Phase 3 of its review by reviewing plant-specific structures and components to determine whether the applicant demonstrated that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis (CLB) for the period of extended operation, as required by 10 CFR 54.21(a)(3). Specifically, this review involved a component-by-component review to determine whether the applicant properly applied the GALL program to the aging management of components within the scope of license renewal and subject to an AMR (i.e., the staff evaluated whether the applicant had properly identified the aging effects, and the AMPs credited for managing the aging effects, for each structure and component within the scope of license renewal and subject to an AMR). For structures and components evaluated in GALL, the staff reviewed the adequacy of aging management against the GALL criteria. For structures and components not evaluated in GALL, the staff reviewed the adequacy of aging management against the 10 criteria in Appendix A of the SRP-LR. Some structures and components were not evaluated in GALL, but the applicant determined that the GALL AMR results could be

applied to these structures and components and provided justification to support this determination. In these cases, the staff reviewed the adequacy of aging management against the GALL criteria to determine whether the GALL AMPs were adequate to manage the aging effects for which they were credited.

3.0.3 Common Aging Management Programs

Table 3.0.3-1 presents the common aging management programs.

Table 3.0.3-1: Common Aging Management Programs

Applicant's AMP (LRA section)	Associated GALL AMP	LRA System Groups that Credit the AMP for Aging Management	Staff Evaluation (SER Section)
Inservice Inspection (B.1.1)	XI.M1, XI.S3	3.1 - RCS 3.5 - Structures	3.0.3.1
Water Chemistry (B.1.2)	XI.M2, XI.M21	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion 3.5 - Structures	3.0.3.2
BWR Stress Corrosion Cracking AMP (B.1.7)	XI.M7	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary	3.0.3.3
Flow-Accelerated Corrosion (B.1.11)	XI.M17	3.1 - RCS 3.4 - Steam and Power Conversion	3.0.3.4
Bolting Integrity (B.1.12)	XI.M3, XI.M18	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.5
Open-cycle Cooling Water System (B.1.13)	XI.M20, XI.M21	3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.6
Closed-cycle Cooling Water System (B.1.14)	XI.M20, XI.M21	3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.7
Compressed Air Monitoring (B.1.16)	XI.M24	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.8
Above Ground Carbon Steel Tanks (B.1.20)	XI.M29	3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.9
One-Time Inspection (B.1.23)	XI.M32	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.10
Selective Leaching (B.1.24)	XI.M33	3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion 3.5 - Structures	3.0.3.11

Applicant's AMP (LRA section)	Associated GALL AMP	LRA System Groups that Credit the AMP for Aging Management	Staff Evaluation (SER Section)
Buried Piping and Tanks Inspection (B.1.25)	XI.M34	3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.12
Containment ISI (B.1.28)	X.S1, XI.S1, XI.S2	3.5 - Structures 4.5 - Concrete and Containment Tendon Pre-Stress TLAA	3.0.3.13
Structures Monitoring (B.1.30)	XI.S6, XI.S7	3.3 - Auxiliary 3.5 - Structures	3.0.3.14
Corrective Action Program (B.2.1)	Plant Specific	All	3.0.4
Heat Exchanger Test and Inspection Activities (B.2.6)	Plant Specific	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.15
Lube Oil Monitoring Activities (B.2.5)	Plant Specific	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.16
Periodic Inspection of Ventilation System Elastomers (B.2.3)	Plant Specific	3.1 - RCS 3.2 - ESF 3.3 - Auxiliary 3.4 - Steam and Power Conversion	3.0.3.17

Table 3.0.3-2 presents the system-specific aging management programs, the associated GALL program, the system groups that credit the program for management of component aging, and the SER section that contains the staff's review of the program.

Table 3.0.3-2: System-Specific Management Programs

Applicant's AMP (LRA section)	Associated GALL AMP	LRA System Groups that Credit the AMP for Aging Management	Staff Evaluation (SER Section)
Reactor Head closure studs AMP (B.1.3)	XI.M3	3.1 - RCS	3.1.2.3.1
BWR vessel ID attachment welds AMP (B.1.4)	XI.M4	3.1 - RCS	3.1.2.3.2
Feedwater nozzle AMP (B.1.5)	XI.M5	3.1 - RCS	3.1.2.3.3
CRD return line nozzle AMP (B.1.6)	XI.M6	3.1 - RCS	3.1.2.3.4
BWR penetrations AMP (B.1.8)	XI.M7	3.1 - RCS	3.1.2.3.5
BWR vessel internals AMP (B.1.9)	XI.M13, XI.M16	3.1 - RCS	3.1.2.3.6
Thermal aging and neutron irradiation embrittlement (B.1.10)	XI.M13	3.1 - RCS	3.1.2.3.7

Applicant's AMP (LRA section)	Associated GALL AMP	LRA System Groups that Credit the AMP for Aging Management	Staff Evaluation (SER Section)
Reactor vessel surveillance (B.1.22)	XI.M31	3.1 - RCS	3.1.2.3.8
Periodic testing of drywell/torus nozzles (B.2.4)	Plant Specific	3.2 - ESF	3.2.2.3.2
Overhead load handling system (B.1.15)	XI.M23	3.3 - Auxiliary	3.3.2.3.1
Reactor water cleanup system inspection (B.1.17)	XI.M25	3.3 - Auxiliary	3.3.2.3.2
Fire Protection (B.1.18)	XI.M26	3.3 - Auxiliary	3.3.2.3.3
Fire water system (B.1.19)	XI.M27	3.3 - Auxiliary	3.3.2.3.4
Fuel oil chemistry (B.1.21)	XI.M30	3.3 - Auxiliary	3.3.2.3.5
Boraflex monitoring (B.1.36)	XI.M22	3.3 - Auxiliary	3.3.2.3.6
Main generator stator cooling water chemistry (B.2.7)	Plant Specific	3.4 - Steam and Power Conversion	3.4.2.3.1
Containment ISI (B.1.26-ASME Code, Section XI, Subsection IWE)	XI.S1, XI.S4	3.5 - Structures	3.5.2.3.1
ASME Code, Section XI, Subsection IWF (B.1.27)	XI.S3	3.5 - Structures	3.5.2.3.2
Masonry wall program (B.1.29)	XI.S5	3.5 - Structures	3.5.2.3.3
Inspection of water-control structures (B.1.31)	XI.S7	3.5 - Structures	3.5.2.3.4
Protective coating monitoring and maintenance (B.1.32)	XI.S8	3.5 - Structures	3.5.2.3.5
Electrical Cables and Connections not Subject to EQ (B.1.33)	XI.E1	3.6 - Electrical	3.6.2.3.1
Electrical Cables used in Instrumentation Circuits not Subject to EQ (B.1.37)	XI.E2	3.6 - Electrical	3.6.2.3.2
Inaccessible Medium voltage Cables not Subject to EQ (B.1.37)	XI.E3	3.6 - Electrical	3.6.2.3.3
Bus Ducts	Plant Specific	3.6 - Electrical	3.6.2.4.1
High Voltage Switchyard Bus	Plant Specific	3.6 - Electrical	3.6.2.4.2
High Voltage Transmission Conductors	Plant Specific	3.6 - Electrical	3.6.2.4.3
High Voltage Insulators	Plant Specific	3.6 - Electrical	3.6.2.4.4

Applicant's AMP (LRA section)	Associated GALL AMP	LRA System Groups that Credit the AMP for Aging Management	Staff Evaluation (SER Section)
Non-EQ Electrical Penetration Assemblies	Plant Specific	3.6 - Electrical	3.6.2.4.5
Environmental Qualification (B.1.35)	X.E1	3.6 - Electrical	4.4

3.0.3.1 ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD (B.1.1)

3.0.3.1.1 Summary of Technical Information in the Application

The applicant's inservice inspection program is discussed in LRA Section B.1.1. "ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD." The applicant states that with enhancements the program is consistent with the ten elements of aging management program XI.M1. "ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD," identified in the GALL, with the exception that the GALL specifies that the aging management of the isolation condenser be performed under Subsection IWB (for Class 1 components) of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI. However, the isolation condenser of Dresden is classified as ASME Code Class 2 on the tube side and Class 3 on the shell side. Therefore, the applicant stated in the LRA that Subsections IWC and IWD are applicable for aging management of the isolation condenser in lieu of Subsection IWB, since Class 1 requirements do not apply.

This AMP is credited with managing aging in the reactor coolant system (RCS) piping, reactor internals, and components in the RCS except the reactor vessel and structures. The GALL specifies that the program to comply with the 1995 Edition through the 1996 Addenda of the ASME Code, Section XI. The current Code of record for Dresden and Quad Cities is the 1989 Edition of ASME Section XI. The LRA contains a commitment by the applicant to enhance the program to be consistent with the requirements of the 1995 Edition through the 1996 Addenda of the ASME Code, Section XI. This enhancement is scheduled for implementation prior to the period of extended operation. This is Commitment #1 in Appendix A of this SER.

The LRA notes that both Dresden and Quad Cities have successfully identified indications of age-related degradation prior to any loss of intended function of components, and have taken appropriate corrective actions through evaluation, repair, or replacement of components in accordance with the ASME Code, Section XI and station implementing procedures.

The applicant concludes that the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD aging management program provides reasonable assurance that aging effects are adequately managed so that the intended functions of components within the scope of license renewal that are covered by this program are maintained during the period of extended operation.

3.0.3.1.2 Staff Evaluation

In LRA Section B.1.1, "ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD," the applicant described its AMP to manage aging in the reactor coolant pressure retaining piping and components within the scope of license renewal, except for the reactor pressure

vessel. The LRA stated that this AMP is consistent with the GALL AMP XI.M1, "ASME Section XI, Subsections IWB, IWC, and IWD," with an exception regarding the application of Subsection IWB for the Dresden isolation condenser, which is not a Class 1 component and therefore, Subsection IWB does not apply. For this AMP, the GALL recommends further evaluation. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the deviation and enhancement and justification of the deviation to determine whether the AMP, with the deviation, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. Finally, the staff determined whether the applicant properly applied the GALL program to its facilities. In a letter dated, August 7, 2003, the staff requested additional information from the applicant relative to the inservice inspection (ISI) program. The applicant responded in a letter dated October 3, 2003.

In response to RAI B.1.1(d) the applicant provided additional clarification related to ASME Code, Section XI, Subsection IWB and IWC program requirements and the alternative risk-informed inservice inspection (RI-ISI) programs for Class 1 and 2 piping within the scope of license renewal previously reviewed and approved by the NRC. The applicant stated that LRA Appendix B, Section B.1.1 should have noted an exception for the implementation of RI-ISI and its alternative inspections for Class 1 and 2 piping within the scope of license renewal, which will be implemented at both Dresden and Quad Cities. In addition the applicant confirmed that the plant specific RI-ISI evaluations have not identified any particular risk significant components subject to aging management or particular aging effects not addressed in the GALL. Since the Dresden and Quad Cities RI-ISI programs have been approved as an acceptable alternative to the ASME Code, Section XI, Subsection IWB and IWC program requirements and the alternative risk-informed inservice inspection (RI-ISI) programs for Class 1 and 2 piping and since the RI-ISI evaluations did not identify any particular risk significant components subject to aging management or particular aging effects not addressed in the GALL, the staff finds the use of RI-ISI to be acceptable.

3.0.3.1.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.2 *Water Chemistry Program (B.1.2)*

3.0.3.2.1 Summary of Technical Information in the Application

The applicant's water chemistry program is discussed in LRA Section B.1.2 "Water Chemistry". The applicant states that with exceptions and enhancements the program is consistent with the ten elements of aging management program XI.M2. "Water Chemistry," specified in the GALL.

The applicant identified the following exceptions to the GALL:

- The Dresden and Quad Cities water chemistry programs are based on EPRI-TR-103515-Rev. 2, while the GALL references Revision 1.
- The GALL indicates that hydrogen peroxide is monitored to mitigate degradation of structural materials. Dresden and Quad Cities programs do not monitor for hydrogen peroxide.
- The GALL indicates that the condensate storage tank, demineralized water storage tank, and torus (pressure suppression pool) water are sampled for dissolved oxygen. The Dresden and Quad Cities programs do not sample for dissolved oxygen.
- The GALL indicates that water quality (pH and conductivity) is maintained in accordance with established guidance. Dresden and Quad Cities programs do not monitor pH in the condensate storage tank, demineralized water storage tank, or torus (pressure suppression pool) water.
- Aging of SBLC system components not in the reactor coolant pressure boundary section of SBLC system relies on monitoring of SBLC makeup water chemistry. The makeup water is monitored in lieu of the storage tank. The effectiveness of the water chemistry program will be verified by a one-time VT-3 inspection of a Dresden SBLC pump discharge valve casing and a Quad Cities SBLC pump casing as discussed in the One-Time Inspection (B.1.23) aging management program.

The applicant indicated that the Dresden and Quad Cities Water Chemistry programs will be enhanced by revising procedures to provide for increased sampling to verify corrective actions taken to address abnormal chemistry conditions. It will revise the Quad Cities procedure for turbine building sample panel collection will be revised to assure maintenance of the chemistry integrity of samples. These enhancements are scheduled for implementation prior to the period of extended operation. This is Commitment #2 in Appendix A of this SER.

The applicant stated that appropriate guidance for maintaining the contaminants below specific limits is provided and that periodic self-assessments of the water chemistry activities have been and continue to be performed to identify areas that need improvement to maintain the quality performance of the activity.

According to the applicant, the water chemistry program has identified instances where parameters were outside the established specifications. The applicant initiated increased sampling and actions to bring the parameters back into specification.

This AMP is credited with managing the RCS, engineered safety features (ESF), auxiliary, and steam and power conversion systems and structures.

The applicant concluded that with the exceptions and enhancements, the Water Chemistry aging management program provides reasonable assurance that aging effects are adequately managed so that the intended functions of components within the scope of license renewal that are covered by this program are maintained during the period of extended operation.

3.0.3.2.2 Staff Evaluation

In LRA Section B.1.2, "Water Chemistry," the applicant described its AMP to manage aging of components exposed to reactor water, condensate and feedwater, control rod drive (CRD) water, demineralized water storage tank water, condensate tank water, torus water (pressure suppression pool), and spent fuel pool water. The LRA stated that this AMP is consistent with GALL AMP XI.M2, "Water Chemistry," with exceptions and enhancements. For this AMP, GALL recommends further assessment in the form of a plant specific evaluation. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the exceptions and their justifications to determine whether the AMP, with the exceptions, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. The staff also reviewed the applicant's evaluation to determine whether it addressed the additional issues recommended in the GALL report and confirmed that the AMP would adequately address these issues. Finally, the staff determined whether the applicant properly applied the GALL program to its facility.

In a letter dated, August 7, 2003, the staff requested additional information from the applicant relative to the water chemistry program. The applicant responded to these RAIs in a letter dated October 3, 2003.

The GALL water chemistry program references revision 1 of the EPRI BWR Water Chemistry Guidelines, TR-103515, while the applicant currently employs revision 2 of the EPRI BWR Water Chemistry Guidelines. The exceptions identified in the applicant's LRA all relate to the applicant's use of Revision 2 of EPRI TR-103515, "BWR Water Chemistry Guidelines". In addition to the exceptions identified in the applicant's LRA, the staff requested that the applicant outline the key differences between revision 1 and revision 2 and justify why revision 2 is acceptable for use at Dresden and Quad Cities in RAI B.1.2a. The applicant indicated that Revision 2 of the EPRI BWR Water Chemistry Guideline recommends that chlorides and sulfates need not be measured on a daily basis provided conductivity is trended to ensure action level I limits are not exceeded. The applicant has not implemented this change and continues to monitor chlorides and sulfates in accordance with the guidance of Revision 1. The applicant indicated that Revision 2 of the EPRI BWR Water Chemistry Guideline recommends that plants using hydrogen water chemistry (HWC) with noble metals chemical addition (NMCA) no longer need to measure electrochemical potential (ECP) on a continuous basis. The applicant uses HWC with NMCA; however, the applicant continues to use ECP monitoring. The applicant indicated that Revision 2 of the EPRI BWR Water Chemistry Guideline allows plants utilizing HWC with NMCA to employ higher action levels for chlorides and sulfates based on the increased protection provided by the HWC with NMCA. The applicant indicated these increased chloride and sulfate limits have been incorporated into chemistry procedures. The applicant further stated that corrective action is required to reduce chloride and sulfate level if parameters exceed plant goal values which are established at values significantly below the EPRI Guideline chloride and sulfate action levels. The applicant indicated that Revision 2 of the EPRI BWR Water Chemistry Guideline recommends the reactor water iron levels be monitored as a new diagnostic parameter and that the action level for feedwater copper be decreased. The applicant has incorporated these conservative actions into the plant chemistry procedures. The applicant indicated that Revision 2 of the EPRI BWR Water Chemistry Guidelines recommends that the action level for minimum feedwater dissolved oxygen be increased. This change is considered conservative relative to reducing the FAC wear rates and the applicant has

incorporated this change into the plant chemistry procedures. The staff finds that the applicant's use of revision 2 of the EPRI BWR Water Chemistry Guidelines acceptable because the applicant has conservatively implemented the requirements of revision 2 by continuing to monitor chlorides and sulfates on a daily basis, continuing to monitor ECP in conjunction with the use of HWC with NMCA, implementing monitoring of new parameters (feedwater iron concentration) and conservatively adjusting the limits of other parameters (feedwater copper and dissolved oxygen) as recommended in revision 2 of the EPRI BWR Water Chemistry Guidelines. Further, the staff has previously reviewed implementation of Revision 2 of the EPRI BWR Water Chemistry Guidelines as documented in NUREG-1769, "Safety Evaluation Report Related to the License Renewal of Peach Bottom Atomic Power Station, Units 2 and 3". Therefore, the staff finds the use of revision 2 to be acceptable.

The applicant took exception to the GALL BWR water chemistry program and indicated that dissolved oxygen and pH are not monitored in the condensate storage tank, demineralized water storage tank, and the torus water. In RAIs B.1.2c and e, the staff requested the applicant to identify if alternative methods are applied to characterize the aggressiveness of the water chemistry in lieu of pH and oxygen measurements, and, if so, to describe the methods and its implementation. The applicant responded that the following alternative methods are applied: monitoring of conductivity, chlorides, and sulfates are in accordance with limits set by EPRI TR-103515, Rev.2 and plant procedures employ goal values set below the EPRI guideline action limits. Furthermore, the applicant indicated that if parameters exceed the goal values, the parameters are verified, and if necessary corrective action is implemented to return the parameters to the desired ranges. These actions include increased sampling frequency to verify the effectiveness of corrective action. The staff finds the response to be acceptable because the alternate methods are recommended in the EPRI guidelines, plant goal values are conservatively set, and corrective actions, including increased sampling, are taken when the goal values are exceeded.

The applicant indicated that aging management for the SBLC system relies on monitoring the SBLC make-up water in lieu of the storage tank water because the sodium pentaborate solution would likely mask most chemistry parameters monitored. Since the applicant does not monitor the storage tank solution, the staff requested in RAI B.1.2d, that the applicant provide assurance that the receipt inspection process will preclude introduction of unexpected impurities with the sodium pentaborate to avoid aggressive conditions in the tank. The applicant stated that Borax and Boric Acid (which are combined to make the sodium pentaborate) are purchased and verified by receipt inspection to meet General Electric Material Specification D50YP1, Revision 3.

The staff noted that due to a potential difference in the concentration of sodium pentaborate in the system (the tank and suction piping are typically at a much higher concentration from the remainder of the system), that the proposed chemistry inspections may not provide information on the condition of the tank and pump suction piping. The staff requested in RAI B 1.2 -1 that the applicant provide supplemental information regarding how aging degradation of the SBLC tank and suction piping will be managed, since sampling chemistry downstream of the tank and receipt inspection of the chemicals used in the tank will not provide adequate assurance that degradation is not occurring in this section of the system. The staff identified this issue as Confirmatory Item B.1.2-1.

The applicant responded in letters dated December 22, 2003 and March 25, 2004, that it will perform an ultrasonic examination of portions of the SBLC tank. This is part of Commitment #23 of Appendix A of this SER. The ultrasonic examinations will be used to identify potential loss of material and stress corrosion cracking. The applicant will perform one ultrasonic inspection in each quadrant, near the bottom of the tank. The applicant considers this location to be the most susceptible location for degradation. The ultrasonic testing (UT) examinations will include a portion of the tank shell and vertical seam weld and, if accessible, a portion of a circumferential weld in accordance with the applicant's nondestructive examination (NDE) procedures. If necessary, the exam results will be addressed by the applicant's corrective action program.

The staff finds that the applicant will adequately manage aging in the SBLC system through the combined use of inspection of pump casing, ultrasonic inspection of the SBLC tank and control of additional chemicals according to the applicant's receipt inspection program. Therefore, Confirmatory Item B.1.2-1 is closed.

The staff requested in RAI B.1.2g that the applicant indicate how the One-Time Inspection Program will be applied to the most vulnerable areas, the basis for selection of these areas, how these areas are applicable to other system locations covered by the Water Chemistry AMP, and to confirm the effectiveness of the AMP to manage aging effects in areas of low flow and other areas subject to degradation if the management of water chemistry is inadequate. A similar request was made in RAI B.1.23-1. The applicant's response indicated that components are selected based on materials of construction and system conditions, such as stagnant or low flow areas, that would be most susceptible to general, crevice and pitting corrosion and noted that if test or inspection results do not satisfy inspection criteria, an evaluation will be performed and a condition report initiated to document the concern in accordance with plant administrative procedures. The staff requested the applicant clarify their response regarding chemistry one-time inspections for detecting general and pitting corrosion. The applicant responded in a letter dated December 12, 2003 and indicated that the Chemistry One-Time Inspections will inspect for general, pitting and crevice corrosion of carbon steel and stainless steel components. The staff concluded that the applicant's use of one time inspection will adequately verify the effectiveness of the water chemistry program to manage aging because the applicant will perform inspections in stagnant and low flow areas to detect general crevice and pitting corrosion as outlined in the GALL.

The staff requested in RAI B.1.2h, the applicant provide further information with regard to how the water chemistry program will manage the effects of aging of the aluminum tanks containing condensate and demineralized water. The applicant responded that crevice and pitting corrosion are the aging mechanisms of concern for the aluminum tanks and described the guidance that will be followed in maintaining a low impurity environment (EPRI TR-103515, Rev. 2) to minimize crevice and pitting corrosion. Further, the applicant stated in a letter dated December 12, 2003, that the aluminum tanks will have periodic internal visual inspections and UT inspection will be performed on the tank bottoms as part of the above ground tank AMP described in Section 3.0.3.9. The response is acceptable to the staff because the aging mechanisms identified are those of concern with these components, the applicant will follow the EPRI BWR Chemistry guidelines and internal inspections will be performed.

In RAI B.1.2i, the staff requested the applicant to provide additional information relative to its operating experience by discussing the abnormal chemistry conditions mentioned in the LRA,

and the actions taken. The applicant responded with several examples where water chemistry parameters were observed to be outside established specifications, and discussed the conditions and the resulting corrective actions, including increased sampling to verify the effectiveness of corrective actions. The applicant indicated that its review of operating experience at both Dresden and Quad Cities did not note any degradation attributable to abnormal chemistry conditions. The staff finds the applicant's response acceptable because the applicant's review of operating experience indicates that degradation has not been traceable to instances of abnormal chemistry.

3.0.3.2.3 Conclusions

On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.3 *BWR Stress Corrosion Cracking (B.1.7)*

3.0.3.3.1 Summary of Technical Information in the Application

The applicant's stress corrosion cracking aging management program is discussed in LRA Section B.1.7 "BWR Stress Corrosion Cracking". The purpose of this program is to mitigate intergranular stress corrosion cracking (IGSCC) in stainless steel reactor coolant pressure boundary components and in stainless steel piping four inches and greater nominal pipe size. Preventive measures include monitoring and controlling of water impurities by water chemistry program activities and providing replacement stainless steel components in the solution annealed condition with a maximum carbon content of 0.035 wt.% and a minimum ferrite level of 7.5 wt. %. The applicant conducts inspection and flaw evaluation activities in accordance with the inservice inspection program plans for the stations.

This AMP is credited with managing aging in RCS, ESF, and auxiliary systems.

The applicant stated that the program will be enhanced prior to the period of extended operation to be consistent with the requirements of the 1995 Edition through the 1996 Addenda of the ASME Code Section XI Code. With the enhancement, the applicant states that the program is consistent with the 10 elements of aging management program XI.M7."BWR Stress Corrosion Cracking" specified in the GALL report. An exception is that GALL specifies the 1993 revision of EPRI TR-103515, "BWR Water Chemistry Guidelines." The applicant is applying the 2000 revision of the EPRI guidelines.

According to the applicant, the BWR stress corrosion cracking aging management program activities have detected flaw indications in reactor coolant pressure boundary piping prior to loss of intended functions of the component. Examples are indications on the reactor vessel safe ends, and recirculation piping. The applicant's engineering staff evaluated these indications and, where necessary, performed repairs in accordance with ASME Code Section XI and

station procedural requirements. The LRA indicates that periodic self-assessments of program activities have been performed and will continue to be performed to identify areas that need improvement. The applicant states that when problems have been identified, corrective actions have been taken to prevent recurrence.

The applicant concluded that the BWR Stress Corrosion Cracking aging management program including the exception and enhancement provides reasonable assurance that IGSCC aging effects will be adequately managed so that the intended functions of the stainless steel components in the reactor coolant pressure boundary are maintained during the period of extended operation.

3.0.3.3.2 Staff Evaluation

In LRA Section B.1.7, "BWR Stress Corrosion Cracking," the applicant described its AMP and stated that this AMP is consistent with the GALL AMP XI.M7, "BWR Stress Corrosion Cracking," with exceptions regarding the use of an updated edition of EPRI-TR-103515 "BWR Water Chemistry". The staff evaluation of exceptions to the water chemistry program is contained in Section 3.0.3.2 of this SER. The staff confirmed the applicant's claim of consistency with GALL. Furthermore, the staff reviewed the exception and justifications to determine whether the AMP, with the exception, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. In addition, for D/QCNPS, the staff determined whether the applicant properly applied the GALL program.

In a letter dated August 7, 2003, the staff requested the applicant to expand on the operating experience in the BWR Stress Corrosion Cracking Program description by providing plant specific experiences with managing IGSCC using this program. The staff also asked the applicant to provide information regarding whether hydrogen water chemistry and noble metal chemical addition (NMCA) are implemented at the Dresden and Quad Cities plants and how implementation has affected monitoring of water chemistry parameters.

The applicant responded in a letter dated October 3, 2003, providing a representative account of past experience in managing IGSCC at Dresden and Quad Cities. The applicant has identified IGSCC throughout plant history at D/QCNPS and has performed engineering evaluations and repairs or has replaced components with IGSCC resistant material. Mitigative actions such as induction heat stress improvement (IHSI) of susceptible welds and HWC with NMCA have been implemented to assist in managing IGSCC. The applicant related cases where the program inspection schedule has been conservatively adjusted based on plant operating experience to support management of IGSCC detection.

For instance, the applicant indicated that at Quad Cities it follows the inspection frequencies identified in Boiling Water Reactor Vessel and Internals Project (BWRVIP)-75, "Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (NUREG-0313)," issued October 1999, for Category C through E welds (there are no Category B welds) for normal water chemistry, although HWC with NMCA has been implemented and BWRVIP 75 would support reduced inspection frequencies with HWC with NMCA implemented. At Dresden, the applicant indicated that inspection frequencies are based on BWRVIP-75 guidelines for either normal water chemistry or HWC with NMCA. The applicant stated that inspection frequencies are only reduced (per BWRVIP-75) in Unit 2 where improved water chemistry has been demonstrated to

be effective. The applicant indicated that improved water chemistry has been used in Unit 2 since 1983, but was not implemented in Unit 3 until 1996. The staff finds the applicant's response acceptable because the applicant's program follows the guidelines of BWRVIP-75 and has incorporated plant operating experience to manage IGSCC.

3.0.3.3.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.4 *Flow-Accelerated Corrosion (B.1.11)*

3.0.3.4.1 Summary of Technical Information in the Application

The applicant's flow-accelerated corrosion (FAC) aging management program is discussed in LRA Section B.1.11, "Flow-Accelerated Corrosion," and is based on EPRI guidelines found in NSAC-202L-R2, "Recommendations for an Effective Flow Accelerated Corrosion Program." The program predicts, detects, and monitors for loss of material by wall thinning in piping, fittings, and valve bodies due to FAC.

This AMP is credited with managing aging in piping, fittings, and valve bodies in the RCS and Steam and Power Conversion systems.

The applicant states that analytical evaluations and periodic examinations of locations that are most susceptible to wall thinning due to FAC are used to predict the amount of wall thinning in pipes and fittings. Program activities include analyses to determine critical locations, baseline inspections to determine the extent of thinning at these critical locations, and follow-up inspections to confirm the predictions. Repairs and replacements are performed as necessary. The applicant states that operating experience has shown that the program can determine susceptible locations for FAC, predict component degradation, and detect wall thinning in piping and valves due to FAC.

The applicant states that with an enhancement, the FAC AMP is consistent with the ten elements of aging management program XI.M17, "Flow-Accelerated Corrosion," specified in NUREG-1801. The enhancement required to make the applicant's program consistent with the GALL is to expand the program scope to include main steam piping within the scope of license renewal. The applicant stated that this enhancement is scheduled for implementation prior to the period of extended operation.

3.0.3.4.2 Staff Evaluation

In LRA Section B.1.11, "Flow-Accelerated Corrosion," the applicant described its AMP to manage flow-accelerated corrosion in piping, fittings, and valves within the scope of license

renewal. The LRA stated that this AMP is consistent with GALL AMP XI.M17, "Flow-Accelerated Corrosion" with no deviations. The program will require one enhancement, which the applicant has committed to make prior to the period of extended operation, to make it consistent with GALL. This is Commitment #11 in Appendix A of this SER. The staff confirmed the applicant's claim of consistency with GALL during the AMR inspection. In addition, the staff determined whether the applicant properly applied the GALL program to its facilities. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

In a letter dated, August 7, 2003, the staff requested in RAI B.1.11, that the applicant provide operating experience demonstrating the effectiveness of the program such as corrective actions taken, identifying changes to the program to ensure that flow accelerated corrosion has been successfully managed and provide evidence that the current aging management program has been effective to successfully mitigate and detect wall thinning during the time period addressed by the LRA.

In a letter dated October 3, 2003, the applicant responded with a detailed account of operating experience related to the Flow Accelerated Corrosion (FAC) programs at both Dresden and Quad Cities. The applicant noted that the FAC programs at Dresden and Quad Cities have identified wall thinning prior to the loss of intended function of the piping. Program changes made to improve effectiveness were also identified. The EPRI approved FAC software (CHECWORKS) is maintained by the applicant to improve the modeling and prediction of wall thinning. In addition, when degradation is detected, additional inspections are performed to ensure that the area of thinning has been bounded. The program has resulted in the timely replacement of degraded piping, in most cases with piping made of FAC resistant materials, and the programs have been maintained and upgraded on the basis of plant operating experience. The response addresses the issues posed in the RAI and demonstrated to the staff satisfaction that the FAC programs have been effective in managing aging effects from wall thinning.

The staff finds the Flow-Accelerated Corrosion Program to be acceptable because the program is consistent with the GALL report and because the program has used plant specific experience to ensure that the program is adequately managing aging effects.

3.0.3.4.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.5 *Bolting Integrity (B.1.12)*

3.0.3.5.1 Summary of Technical Information in the Application

The applicant's bolting integrity program is discussed in LRA Section B.1.12, "Bolting Integrity Program." The applicant states that the program is consistent with GALL program XI.M18, "Bolting Integrity," with the following exceptions:

- The GALL report indicates that EPRI TR-104213, "Bolted Joint Maintenance and Applications Guide," is used as a basis for evaluation of the structural integrity of non-safety-related (NSR) bolting. The Dresden and Quad Cities programs address the guidance contained in EPRI TR-104213 but do not specifically cite its use.
- The GALL report indicates that the program covers all bolting within the scope of license renewal including structural bolting. The Dresden and Quad Cities bolting integrity programs do not address structural bolting. The Structures Monitoring Program (B.1.30) covers aging management of structural bolting.
- The GALL report indicates that the program covers all bolting within the scope of license renewal including bolting for Class 1 nuclear steam supply system (NSSS) component supports. The Dresden and Quad Cities bolting integrity programs do not address Class 1 NSSS component support bolts which are covered under the ASME Section XI, Subsection IWF aging management program (B.1.27).
- The GALL report indicates that the program generally includes periodic inspection for loss of preload. The Dresden and Quad Cities programs do not include inspections for loss of preload because loss of preload in a mechanical joint is a design driven effect and not an aging effect.

The applicant also identified two enhancements which will be required to make the AMP consistent with GALL. The program will be revised to be in accordance with the 1995 Edition through the 1996 Addenda and approved relief requests of ASME Section XI for inservice inspection of Class 1,2, and 3 components. Also, the program will provide for formal inspections of bolted joints in diesel generator components and performing periodic inspection of components with bolted joint is in high humidity/moisture areas (pump vaults). These enhancements will be implemented prior to the period of extended operation.

The applicant stated that Dresden and Quad Cities have experienced isolated cases of bolting degradation attributed to aging effects due to loss of material and cracking. System engineer walkdowns have also identified incidental surface rust on exterior component surfaces. In all cases, the existing inspection and testing methodologies have discovered deficiencies and corrective actions were implemented prior to loss of system or component intended functions.

This AMP is credited for managing degradation of bolting in the RCS, ESF, Auxiliary, and Steam and Power Conversion Systems.

3.0.3.5.2 Staff Evaluation

In LRA Section B.1.12, "Bolting Integrity Program," the applicant described its AMP to manage effects of aging in bolting. The LRA states that this AMP is consistent with GALL AMP XI.M18, "Bolting Integrity," with the exceptions in regard to (1) the reference to EPRI TR-104213; (2) this AMP does not cover structural bolting; (3) this AMP does not include aging management of ASME Section XI Class 1, 2, and 3, and Class MC support members, including mechanical connections; and (4) inspection for loss of preload is not included in this AMP. The staff reviewed the applicant's claim of consistency with GALL, including the exceptions and justifications, during the AMR inspection. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program. In a letter dated August 7, 2003, the staff requested additional information from the applicant on the bolting integrity program. The applicant responded to staff's RAI in letter dated October 3, 2003.

With regard to non-safety-related bolting, the applicant clarified its compliance with the GALL referenced industry consensus recommendations in EPRI TR-104213 in their response to RAI B.1.12(c). The applicant confirmed that the non-safety-related bolting integrity program addressed in LRA Section B.1.12 meets the intent of the aging management attributes delineated in EPRI TR-104213 including material procurement, use of approved lubricants and sealants, proper torquing, and leakage evaluations. However, the bolting program implementing procedures do not specifically reference EPRI TR-104213. The applicant committed to enhance the implementing procedures for this aging management program to reference maintenance evaluations and repairs of non-safety-related bolted connections following the EPRI bolting guidelines per EPRI NP-5769, "Degradation and Failure of Bolting in Nuclear Power Plants," and TR-113859 "Proceeding of the 1st International Conference on Sealing Technology and Plant Leakage Reduction (ICSTPLR-99)" for the evaluation and repairs of the flange and bolts. This is part of Commitment #12 in Appendix A of this SER. The staff finds that the applicant's bolting integrity aging management program for non-safety-related bolting consistent with the recommendations in the GALL and will meet or exceed the standards delineated in EPRI TR-104213.

For safety-related bolting, the GALL relies on the NRC recommendations and guidelines on comprehensive bolting integrity program delineated in NUREG-1339 "Resolution of Generic Safety Issue 29: Bolting Degradation or Failure in Nuclear Power Plants," and industry's technical basis for the program and guidelines in regard to material selection and testing, bolting preload control, inservice inspection (ISI), plant operation and maintenance, and evaluation of structural integrity of bolted joints outlined in EPRI NP-5769, with the exceptions noted in NUREG-1339. The LRA states that the bolting integrity program at Dresden and Quad Cities incorporates industry recommendations addressed in EPRI NP-5769, yet makes no reference to the NRC recommendations delineated in NUREG-1339 and NRC exceptions to EPRI NP-5769.

In their response to RAI B.1.12(d) the applicant confirmed that Dresden and Quad Cities programs meets the intent of EPRI NP-5769, and the exceptions noted in NUREG-1339, for material selection, testing, inservice inspection (ISI), and plant surveillance and maintenance practices. The corporate and station implementing procedures specifically cite EPRI NP-5769, however NUREG-1339 was not specifically referenced. The applicant committed to enhance the implementing procedures for this aging management program to reference NUREG-1339. This is part of Commitment #12 in Appendix A of this SER.

The scope of the Bolting Integrity program in the GALL primarily applies to the ASME code piping and components including high strength bolting used in NSSS component supports where the actual yield strength is greater than 150 ksi (GALL item number III.B.1.1.2-a). Other structural bolting used in supports, including expansion and anchor bolts are managed under ASME Code, Section XI, Subsection IWF (B.1.27) or the Structures Monitoring program (B.1.30) in accordance with GALL.

The LRA states that the Dresden and Quad Cities bolting integrity programs do not include bolting for Class 1 NSSS component support bolts. However, the applicant identified two uses of high strength bolting in supports for Class 1 piping and components - refer to Staff's discussion in Section 3.5.2.4.5.2 of this SER. The staff finds that the applicant's information related to American Society for Testing and Materials (ASTM) A193, Grade B7 bolting material is sufficient to establish that the upper limit on yield strength is less than 150 ksi; consequently, the additional inspections of XI.M.18 Bolting Integrity are not warranted for A193, Grade B7. However, in part (c) of its response, the applicant has assumed that the bolt material used in "a friction type connection at the reactor skirt base" is ASTM A193, Grade B7 or equivalent. The applicant was requested to confirm that assumption or commit to inspection in accordance with NUREG-1801, Program XI.M.18 Bolting Integrity. In a letter dated December 5, 2003, the applicant stated that it would commit to inspection in accordance with NUREG-1801, Program XI.M.18 Bolting Integrity since it could not confirm that the yield strength of the bolts would be less than 150 ksi. This is part of Commitment #12 in Appendix A of this SER. The staff finds the applicant's response acceptable and considers RAI 3.5-13 resolved.

In response to RAI B.1.12(e) the applicant stated that the monitoring of the loss of preload for closure bolting in the reactor vessel, recirculation pumps, reactor recirculation valves, vessel head vent valves, and the reactor coolant piping will be monitored under the Bolting Integrity Program. Further, in response to staff's RAI 3.3-9, the applicant also included management of age-related degradation due to general corrosion on the external surfaces of non-bolting components such as piping, valves, and mufflers within the Bolting Integrity Program and will rely on component inspections under preventive maintenance, and routine walk down inspections. Presence of external surface corrosion will require engineering evaluation. The applicant asserted that these activities will detect early leakage and material degradation of closure bolting.

The staff has previously accepted the use of periodic inservice inspections of closure bolting as an acceptable aging management program for loss of mechanical closure integrity since failure of the mechanical joint, as evidenced by leakage, can be attributed to, loss of material, cracking of bolting materials, and loss of preload. The staff determined that periodic ASME Section XI inservice inspections and plant preventative maintenance programs can be effectively relied upon to identify loss of closure integrity for bolted assemblies. Therefore, the applicant's management of loss of mechanical closure integrity is adequate for managing the aging effects of loss of material, cracking, and loss of preload.

3.0.3.5.3 Conclusions

On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately

managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.6 Open-Cycle Cooling Water System (B.1.13)

3.0.3.6.1 Summary of Technical Information in the Application

The applicant's open-cycle cooling water system program is discussed in LRA Section B.1.13, "Open-Cycle Cooling Water Program." The applicant states that, with enhancements, the program is consistent with GALL program XI.M20, "Open-Cycle Cooling Water Program" with exceptions. The following enhancements and exceptions are identified in the LRA.

Enhancements

The program will provide for inspection of cooling water pump internal lining, additional heat exchangers and sub-components, inspection of external surfaces of various submerged pumps and piping.

The program will provide for new periodic component inspections in the pump vaults that have a high humidity/moisture environment.

Exceptions to NUREG-1801

NUREG-1801 indicates that program testing and inspections are performed annually and during refueling outages. The Dresden/Quad Cities open-cycle cooling water system aging management program activities provide for adjustment of inspection intervals due to specific inspection results as stated in the response to GL 89-13.

In LRA Section B.1.13 and UFSAR supplement A.1.13, the applicant describes the Open-Cycle Cooling Water System program as an existing aging management program that manages loss of material, cracking, buildup of deposits and flow blockage aging effects in cooling water systems that are tested and inspected in accordance with the guidelines of Generic Letter (GL) 89-13, "Service Water System Problems Affecting Safety-Related Equipment," issued August 8, 1988. More specifically, the Open-Cycle Cooling Water System program is credited with managing the following aging effects during the period of extended operation:

- loss of material due to general, pitting, crevice corrosion, galvanic, erosion, wear, selective leaching and microbiologically influenced corrosion (MIC)
- cracking due to stress corrosion cracking and mechanical fatigue
- buildup of deposit/fouling/flow blockage due to biofouling and silting.

This AMP is credited with managing the ESF, Auxiliary, and Steam and Power Conversion systems.

The applicant states that the operating experience of the Dresden/Quad Cities Nuclear Stations has shown that its open-cycle cooling water system aging management activities have detected aging degradation and implemented appropriate corrective actions to maintain system and

component intended function. The applicant also states that the program consists of system test procedures, inservice testing, periodic component inspections, piping nondestructive examinations, station maintenance inspections, component preventive maintenance testing, inservice inspections, and inspections for the Class 3 portions of raw water system. The LRA credits system and component tests, visual inspections, NDE, flushing and chemical treatment to ensure that aging effects are managed such that system and component functions are maintained. The applicant also identifies that inservice inspections of the Class 3 portions of the raw water systems are also conducted to provide periodic leakage detection of the aboveground and buried piping, but external surfaces of buried components are managed by AMP B.1.25.

In Section B.1.13 of the LRA, the applicant concluded that the open-cycle cooling water program provides reasonable assurance that the aging effects are adequately managed so that the intended functions of open-cycle cooling water components within scope of license renewal are maintained during the period of the extended operation.

3.0.3.6.2 Staff Evaluation

In LRA Section B.1.13, "Open-Cycle Cooling Water System," the applicant described its AMP to manage aging on raw cooling water system piping and components. The LRA stated that with enhancements this AMP is consistent with GALL AMPs XI.M20, "Open-Cycle Cooling Water System" with an exception. The staff confirmed the applicant's claim of consistency during the AMR inspection. The staff reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. The staff also reviewed the exception and its justification to determine whether the AMP, with the exception, remains adequate to manage the aging effects for which it is credited. Finally, the staff determined whether the applicant properly applied the GALL program to its facility.

In the description of the AMP B.1.13, the applicant includes an exception to NUREG-1801 concerning the adjustment of inspection intervals due to specific inspection results as stated in the response to GL 89-13. By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (a), the applicant to clarify if these adjustments are in accordance with the information provided in GL 89-13 concerning a routine inspection and maintenance program and section D, "frequency of testing and maintenance," in GL 89-13, Supplement 1.

In its response dated October 3, 2003, the applicant stated that the adjustments to the inspection intervals for the Dresden and Quad Cities open-cycle cooling water system aging management program activities are in accordance with the information provided in GL 89-13 concerning routine inspection and maintenance programs and section D, "frequency of testing and maintenance", in GL 89-13, Supplement 1. The applicant clarified that one representative heat exchanger for each heat exchanger type with similar operating conditions would be tested/inspected as required by Supplement 1 of GL 89-13 to establish the appropriate test frequency for that type of heat exchanger.

On the basis of its review, the staff finds the applicant's response to RAI B.1.13 (a) adequate and acceptable because the applicant has demonstrated that the test frequency would be tested/inspected as required by Supplement 1 of GL 89-13. Therefore, this issue is resolved.

In the description of AMP B.1.13, the applicant lists its first enhancement to NUREG-1801 as

"The program will provide for inspection of cooling water pump internal linings, additional heat exchangers and sub-components, inspection of external surfaces of various submerged pumps and piping." By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (b), the applicant to identify the specific additional heat exchangers and sub-components that will be inspected, the inspection frequency, and the technical basis, including operating experience, for the inspection frequency.

In its response dated October 3, 2003, the applicant stated that additional inspection requirements were added for the heat exchanger as shown in the table below. The applicant identified that the frequencies of these inspections are based on reviews of industry, company, and vendor operating experience. The applicant clarified that station and corporate procedures and policies contain provisions for adjustment of inspection frequencies based on periodic reviews of operating experience, inspection results, and vendor recommendations.

Heat Exchanger	EPN(s)	Frequency
Dresden TBCCW Heat Exchanger (tube side only)	2(3)-3802-A(B)	6-year
Dresden RBCCW Heat Exchanger	2/3-3702, 2(3)-3702-A(B)	3-year

In addition, the applicant identified that new inspection requirements delineated specific sub-components to be inspected for the affected heat exchanger. The specific sub-components include:

- C Inlet/outlet end bells, divider plates, joint welds as applicable
- C Inlet/outlet tube sheets, divider plates, joint welds as applicable
- C Inlet side tubes
- C Outlet side tubes
- C Inlet/outlet piping
- C Anodes
- C Supports (particularly tube/support joint and support/shell joint areas)
- C Shell/fins as applicable
- C Inlet/outlet nozzles, primary and secondary process sides as applicable.

On the basis of its review, the staff finds that the applicant's response to RAI B.1.13 (b) adequate and acceptable because; (1) the applicant used a combination of periodic reviews of operating experience, inspection results, and vendor recommendations, and (2) the applicant clearly identified the components that are to be inspected and tested, and these identified components are the most susceptible locations for the identified aging effects.

In the description of AMP B.1.13, the applicant identified an enhancement regarding new periodic component inspections in the pump vaults that have a high humidity/moisture environment. By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (c), the applicant to specify the inspection frequency and its technical basis, including operating experience.

In its response dated October 3, 2003, the applicant stated that the frequency for the new periodic component inspections in the pump vaults is once per year and the frequency of these inspections is based on input provided by cognizant system/program engineers. Less intensive inspections of the affected areas are conducted on a more frequent basis as part of operator rounds, maintenance activities, and routine walkdowns; surface degradation, leakage or other

adverse conditions would be noted as part of these inspections.

On the basis of its review, the staff finds the applicant's response to RAI B.1.13 (c) adequate and acceptable because the combination of the applicant's annual intensive inspection and less intensive inspections of the affected areas conducted on a more frequent basis as part of operator rounds, maintenance activities, and routine walkdowns will provide that the aging effects on the applicable components will be detected and managed.

In the description of the AMP B.1.13, the applicant states: "the open-cycle cooling water system aging management activities have detected aging degradation and implemented appropriate corrective actions to maintain system and component intended functions..." This operating experience suggests that the preventive actions prescribed in this AMP may not be as effective as expected. By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (d), the applicant to provide justifications on the effectiveness of the preventive actions based on the plant operating experience, with consideration of Information Notice 94-03.

In its response dated October 3, 2003, the applicant addressed their program effectiveness relative to Information Notice 94-03 regarding deficiencies identified by the NRC during service water system operational performance inspections to assess licensee actions in response to GL 89-13. The applicant stated that testing and procedures governing service water system and performance at Dresden Station and Quad Cities Station are part of the station GL 89-13 program and that periodic GL 89-13 system performance tests and component visual inspections provide for timely detection of loss of material and flow blockage. The periodicity of the testing and inspections is based on previous findings and are adjusted accordingly. NDE tests consist of eddy current testing (for heat exchanger) and piping UTs and/or RTs to detect loss of material aging effects. Available flow to the heat exchangers and coolers is used to determine the extent of blockage (fouling) in the system. The station GL 89-13 program procedures outline the requirements to ensure that the testing and inspection activities have been performed and the results have been documented and sent to the appropriate station personnel for trending and analysis. The piping and components that are periodically inspected form a representative sampling for evaluating potential system-wide aging degradation. In addition, the applicant further stated that IST procedures provide for the periodic monitoring and trending of system performance per the notification of the appropriate system engineer of test results and notification of both the system engineer and unit supervisor of any inspection deficiencies. The response identified that documentation results are maintained in accordance with ASME Section XI, IWP-6000 and ISI documentation facilitates comparison with previous and subsequent inspection results are also maintained in accordance with ASME Section XI, IWA-6000.

On the basis of its review, the staff finds that the applicant's response to RAI B.1.13 (d) adequate and acceptable because the applicant has provided that the preventive actions prescribed in the AMP are effective.

In the operating experience section of AMP B.1.13, the applicant stated that "Engineering evaluations have resulted in various specific component and programmatic enhancements and correction actions. In addition, program assessments have been reviewed for heat sink performance." By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (e), the applicant to describe the appropriate corrective actions made and the operating experience since these corrective actions were implemented and provide the results on the assessment for

the heat sink performance review in regard to the adequacy of this AMP.

In its response dated October 3, 2003, the applicant described the appropriate corrective actions made:

- implementing procedure revisions for more frequent pump bay cleaning to reduce silt and clam buildup
- revising the ISI boundary to include additional piping for periodic inspection
- monitoring minor Zebra Mussel infestations to prevent flow restriction
- implementing new inspections to periodically inspect components found to be susceptible to blockage (Y-strainers and keep-fill check valves)
- repairing or replacing specific piping and component minimum wall conditions and pinhole leaks (follow-up root cause evaluations were performed)
- implementing closer monitoring of marginal conditions (flow rates and piping wall thickness) to confirm continued system and component operability
- implementing additional flushing for lines determined to be susceptible to blockage.

In its response dated October 3, 2003, the applicant further stated that prior to the implementation of the station GL 89-13 program activities, component blockage was a recurring problem resulting in valves being unable to function and flow restrictions in the heat exchanger. More recent periodic system flushing and component inspections and cleaning have detected minor levels of biofouling and silting, primarily in system drain lines that were removed without any loss of system function.

In addition, the applicant stated: "Self-assessments of heat sink performance were performed for Dresden and Quad Cities in January 2001 and February 2001, respectively, to identify site heat exchanger deficiencies and verify resolution of previously identified heat sink performance issues. These self-assessments were reviewed in preparation of the LRA. The self-assessments were noted as identifying the following in support of the adequacy of the open-cycle cooling water system AMP:

- adequately identified areas for improved inspection/testing and/or component replacement/refurbishment to ensure adequate heat exchanger performance
- provided assurance that consideration was given to inclusion of risk significant heat exchanger, not just safety-related heat exchanger
- adequately identified deficiencies and initiated appropriate corrective actions
- provided on-going review of heat exchanger testing, maintenance, and performance documentation activities for incorporation of recent industry, regulatory, or vendor guidance.

The applicant concluded that the above information provides evidence that the GL 89-13

program and self-assessments have been effective at managing associated aging effects.

On the basis of its review, the staff finds the applicant's response to RAI B.1.13 (e) adequate and acceptable because the applicant has provided a verification that the corrective actions prescribed in the AMP are effective.

In AMP B.1.13, the applicant stated: "The open-cycle cooling water AMP... provides for managing loss of material aging degradation on the outside surfaces... by condition monitoring of the accessible external surfaces of components in moist air (indoor) or submerged (raw water) environments." However, this AMP does not address managing the loss of material on inaccessible outside surfaces. By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (f), the applicant to provide an explanation of how the loss of material aging effects on the outside surfaces in inaccessible locations is managed for the period of extended operation. The staff asked the applicant to indicate to what extent it used eddy current testing.

In its response dated October 3, 2003, the applicant stated that management of the loss of material is not provided for all outside surfaces of inaccessible locations. The piping and components that are periodically inspected form a representative sampling for evaluating potential system-wide aging degradation. The applicant identified that eddy current testing is used for heat exchanger tubes, but not necessarily for all piping and components with inaccessible outside surfaces.

On the basis of its review, the staff finds the applicant's response to RAI B.1.13 (f) adequate and acceptable because the applicant used the results of piping and components that are periodically inspected to form a representative sampling for evaluating potential system-wide aging degradation.

LRA Table 3.3-2 credits the Open-Cycle Cooling Water System (AMP B.1.13) with managing galvanic corrosion. By letter dated August 4, 2003, the staff requested, in RAI B.1.13 (g), the applicant to; (1) identify any preventive measures used to minimize the effects of galvanic corrosion in heat exchangers such as sacrificial anodes or internal coatings and indicate if inspections verify that they are performing their intended function, and (2) clarify whether the inspection and testing described in the AMP "Open-Cycle Cooling Water System" (B.1.13) are targeted or opportunistic with respect to managing loss of material due to galvanic corrosion.

In its response dated October 3, 2003, the applicant stated that no credited preventive measures used to minimize the effects of galvanic corrosion in affected heat exchangers and the the aging effects of galvanic corrosion are managed through periodic inspections of in-scope components as appropriate.

On the basis of its review, the staff finds the applicant's response to RAI B.1.13 (g) adequate and acceptable because the applicant has stated that, although there are no credited preventive measures to minimize galvanic corrosion, galvanic corrosion will be managed by periodic heat exchanger inspections.

The staff reviewed the UFSAR supplement in LRA Appendix A.1.13 and found that the description of the Open-Cycle Cooling Water System is consistent with Section B.1.13 of the LRA.

3.0.3.6.3 Conclusions

On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.7 Closed-Cycle Cooling Water System (B.1.14)

3.0.3.7.1 Summary of Technical Information in the Application

The applicant's closed-cycle cooling water system aging management program is discussed in LRA Section B.1.14, "Closed-Cycle Cooling Water Program." The applicant states that with enhancements the program is consistent with GALL program XI.M21, "Closed-Cycle Cooling Water Program." Enhancements consist of procedure revisions to provide for monitoring of specific parameters in accordance with EPRI TR-107396 guidance and to provide for monitoring pH and ammonia in the Dresden diesel generator jacket water. In LRA Section B.1.14 and UFSAR supplement A.1.14, the applicant describes the Closed-Cycle Cooling Water System program as an existing aging management program that manages loss of material, cracking and buildup of deposit through the use of preventive measures to minimize corrosion by maintaining inhibitors and by performing non-chemistry monitoring consisting of inspection and NDE based on industry-recognized guidelines of EPRI-TR-107396. More specifically, the Closed-Cycle Cooling Water System is credited with managing the following aging effects during the period of extended operation:

- loss of material due to general, pitting, crevice corrosion, erosion, wear and MIC
- cracking due to stress corrosion cracking and mechanical fatigue
- buildup of deposit/fouling

In the LRA Operating Experience Section, the applicant stated that its closed-cycle cooling water system aging management activities have detected aging degradation in heat exchangers prior to loss of system intended functions. The applicant further states that engineering evaluations have resulted in various specific component and programmatic corrective actions. The applicant also stated that performance monitoring provides indications of degradation in closed-cycle cooling water systems, with plant operating conditions providing indications of degradation in normally operating systems. Station maintenance inspections and NDE provide condition monitoring of heat exchangers exposed to closed-cycle cooling water environments.

This AMP is credited with managing the ESF, Auxiliary, and Steam and Power Conversion systems.

In Section B.1.14 of the LRA, the applicant concludes that the closed-cycle cooling water aging management program provides reasonable assurance that the aging effects are adequately managed so that the intended functions of components exposed to closed-cycle cooling water environments within scope of license renewal are maintained during the period of extended

operation.

3.0.3.7.2 Staff Evaluation

In LRA Section B.1.14, "Closed-Cycle Cooling Water System," the applicant described its AMP to manage aging on components exposed to closed-cycle cooling water environments. The LRA states that with enhancements this AMP is consistent with GALL AMP XI.M21, "Closed-Cycle Cooling Water System." The staff confirmed the applicant's claim of consistency during the AMR inspection. The staff reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. The staff also reviewed the program enhancements and its justification to determine whether the AMP, with the enhancements, remains adequate to manage the aging effects for which it is credited. The program enhancements will be implemented prior to the period of extended operation. This is Commitment #14 of Appendix A in this SER. Finally, the staff determined whether the applicant properly applied the GALL program to its facility.

During its review, the staff determined that it needed additional information to complete its evaluation. In LRA AMP B.1.14, the applicant stated that closed-cycle cooling water system activities have detected aging degradation, and engineering evaluations have resulted in various specific component and programmatic corrective actions. This operating experience suggests that the preventive actions prescribed in this AMP may not be as effective as expected. Furthermore, in the operating experience section, the AMP states, "engineering evaluations have resulted in various specific component and programmatic corrective actions." By letter dated August 4, 2003, the staff requested, in RAI B.1.14 (a), the applicant to describe the appropriate corrective actions made, and the operating experience since these corrective actions were implemented.

In its response dated October 3, 2003 to RAI B.1.14 (a), the applicant stated that the preventive activities relied on by the closed-cycle cooling water system activities program include measures to maintain water purity and the addition of corrosion inhibitors to minimize corrosion. The activities will not by themselves eliminate corrosion altogether. The preventive activities of the program are only a part of a comprehensive program, which also includes periodic heat exchanger functional testing and monitoring of system parameters (i.e., flows, temperatures, pressures). The applicant further stated that the program activities, in total, will provide an effective means for management of the aging effects of the in-scope closed-cycle cooling water heat exchangers. The applicant provided specific examples of the program corrective actions made as a result of aging degradation and stated that no operating experience involving recurrence of heat exchanger degradations similar to those identified has been identified since implementation of the associated corrective actions.

On the basis of its review, the staff finds that the applicant's response to RAI B.1.14(a) acceptable because (1) the applicant has shown that the preventive activities of the program are only a part of a comprehensive program, which also includes periodic heat exchanger functional testing and monitoring of system parameters (i.e., flows, temperatures, pressures), and that the program activities, in total, will provide an effective means for management of the aging effects of the in-scope closed-cycle cooling water heat exchangers, and (2) the applicant has further specified several explicit examples of the program corrective actions made.

LRA Table 3.3-2 credits the Closed-Cycle Cooling Water System Program (B.1.14) for

managing galvanic corrosion for certain components. By letter dated August 4, 2003, the staff requested, in RAI B.1.14 (b), the applicant to identify any preventive measures used to minimize the effects of galvanic corrosion in heat exchangers such as sacrificial anodes or internal coatings and to indicate if inspections verify that preventive measures are performing their intended function.

In its response dated October 3, 2003 to RAI B.1.14 (b), the applicant stated that some of the heat exchangers monitored in the closed cooling water aging management program contain sacrificial anodes, however, the applicant clarified that this preventive measure has not been credited to minimize the effects of galvanic corrosion in affected heat exchangers.

On the basis of its review, the staff finds the applicant's response to part (b) of RAI B1.14 acceptable because the applicant has clarified that, although some of the heat exchangers monitored in the closed cooling water aging management program contain sacrificial anodes, this preventive measure has not been credited to minimize the effects of galvanic corrosion in affected heat exchangers. Therefore, chemistry control, inspections, and performance monitoring are used to mitigate and detect galvanic corrosion.

The applicant's UFSAR supplement for the Closed-Cycle Cooling Water System is documented in Section A.1.14 of Appendix A to the LRA and provides an overview of the program as described in Section B.1.14 of Appendix B to the LRA. The staff finds that the information provided in the UFSAR supplement is consistent with that in the AMP.

3.0.3.7.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.8 *Compressed Air Monitoring (B.1.16)*

3.0.3.8.1 Summary of Technical Information in the Application

The applicant's compressed air monitoring aging management program is discussed in LRA Section B.1.16 "Compressed Air Monitoring". The applicant states that with enhancements, the program is consistent with the ten elements of aging management program XI.M24, "Compressed Air Monitoring" specified in the GALL report, with exceptions. The following enhancements and exceptions are identified in the LRA:

Enhancements

- The program will provide for new periodic inspections for those portions of instrument air distribution piping at Dresden and Quad Cities that are within the scope of the rule.
- The program will provide for periodic blowdowns of instrument air receiver tanks located upstream of

the instrument air dryers at Dresden.

Exceptions to NUREG-1801

- NUREG-1801 indicates that the program is based on responses to GL 88-14 and INPO SOER 88-01, "Instrument Air System Failures," as well as EPRI NP-7079-1990, EPRI TR-108147, "Compressor and Instrument Air System Maintenance Guide," ASME OM-S/G-1998, and ANSI/ISA-S7.0.01-1996. The Dresden and Quad Cities programs are based on the guidance provided in the GL 88-14 and ANSI/ISA-S7.3-1975 documents, which are part of the current licensing basis. Enhancements include inspection of instrument air distribution piping based on EPRI TR-108147.
- NUREG-1801 indicates that inservice inspection and testing is performed to verify proper air quality, and confirm that maintenance practices, emergency procedures, and training are adequate to ensure that the intended function of the air system is maintained. Inservice inspections at Dresden and Quad Cities do not verify air quality because air quality testing is performed in accordance with specific procedures based on ANSI/ISA-S7.3-1975. Maintenance practices, emergency procedures, and training are plant performance issues that are not directly related to aging management of the instrument air. Aging management consists of air quality tests and pressure decay tests of MSIV and safety/relief valve pneumatic system including accumulators, piping, and check valves, and periodic inspections to verify the integrity of the systems.

The compressed air monitoring aging management program activities manage loss of material due to general, crevice, and pitting corrosion for portions of the instrument air system within the scope of license renewal. Program activities consist of air quality testing, pressure decay testing, and visual inspections at various system locations.

In supplemental response to RAI B.1.16-1 dated June 22, 2004, the applicant provided the following additional operating experience:

Dresden has experienced corrosion, corrosion product buildup, and dirt buildup in instrument air system receiver tanks and dryers leading to a receiver tank connection failure in 1994. The program enhancement of crediting periodic blowdowns of instrument air receiver tanks addresses this condition. No similar failure has occurred at Dresden since the receiver tank blowdowns were implemented. Dresden and Quad Cities have not experienced a failure of a pneumatically operated components within the scope of license renewal due to aging effects in the instrument air system since implementation of actions in response to GL 88-14.

The LRA states that Dresden and Quad Cities have experienced equipment failures including MSIVs, dampers, and process valves due to instrument air leaks. These failures were to individual components and did not propagate to other components within the system. Dresden and Quad Cities have not experienced a common mode failure caused by the instrument air system. The Dresden and Quad Cities enhancements of performing predefined tasks that require periodic inspections of instrument air distribution piping address this condition.

This AMP is credited with managing the RCS, ESF, Auxiliary, and Steam and Power Conversion systems.

The applicant concludes that with the exceptions and enhancements, the Compressed Air Monitoring aging management program provides reasonable assurance that loss of material aging effects are adequately managed so that the intended functions of the instrument air components within the scope of license renewal are maintained during the period of extended operation.

3.0.3.8.2 Staff Evaluation

In LRA Section B.1.16, "Compressed Air Monitoring," the applicant described its AMP to manage loss of material due to general, crevice, and pitting corrosion for portions of the instrument air system within the scope of license renewal. The LRA stated that this AMP is consistent with GALL AMP XI.M24, "Compressed Air Monitoring," with exceptions and enhancements as noted above. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the exceptions and their justifications to determine whether the AMP, with the exceptions, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. The staff also reviewed the applicant's evaluation to determine whether it addressed the additional issues recommended in the GALL report and confirm that the AMP would adequately address these issues. Finally, the staff determined whether the applicant properly applied the GALL program to its facility.

The staff noted that maintenance practices, emergency procedures, and training are not aging management issues and the applicant's exception to this is acceptable.

The staff noted that the applicant's Compressed Air Monitoring program as described in the LRA, is not based on all of the references (IN 81-38, IN 87-28, IN 87-28S1, INPO SOER 88-01, EPRI-108147, ASME OM-S/G-1998, Part 17, American National Standards Institute (ANSI)/Instrument Society of America (ISA)-S7.0.01-1996, and EPRI 7079 identified in the GALL report AMP XI.M24. In RAI B.1.16a dated August 4, 2003, the staff requested the applicant explain why these references were not included in the development of the applicant's program. In the response dated October 3, 2003 and supplemental response dated December 12, 2003, the applicant stated the following:

The Dresden and Quad Cities programs are based on GL 88-14 and ANSI/ISA-S7.3-1975 and are enhanced with inspection based on EPRI TR-108147. NUREG-1801 XI.M24 (Compressed Air Monitoring) states that GL 88-14 is augmented by References IN 81-38, IN 87-28, IN 87-28S1 and INPO SOER 88-01. The sentence in the exception section of LRA Appendix B, Section B.1.16, that currently reads:

The Dresden and Quad Cities programs are based on the guidance provided in the GL 88-14 and ANSI/ISA-S7.3-1975 documents, which are part of the current licensing basis.

should have read:

The Dresden and Quad Cities programs are based on the guidance provided in ANSI/ISA-S7.3-1975 and GL 88-14 which is augmented by previous NRC Information Notices IN 81-38, IN 87-28, IN 87-28 S1, and by the Institute of Nuclear Power Operations Significant Operating Experience Report (INPO SOER) 88-01.

In response to GL 88-14, Exelon committed to implementing an instrument air quality-monitoring program using ANSI/ISA-S7.3-1975. ANIS/ISA-S7.0.01-1996 is a newer revision to ANSI/ISA-S7.3-1975 that is less conservative than ANSI/ISA-S7.3-1975. Exelon has a licensing commitment contained in the response to GL 88-14 that uses ANSI/ISA-S7.3-1975. The following is a comparison of ANIS/ISA-S7.0.01-1996 to ANSI/ISA-S7.3-1975:

Parameter	ANSI/ISA-S7.0.01-1996	ANSI/ISA-S7.3-1975
Dewpoint	18°F below the minimum temperature of any part of the air system. The dewpoint shall not exceed 39°F at line pressure.	18°F below the minimum temperature of any part of the air system. The dewpoint shall not exceed 35°F at line pressure.
Particle Size	40 microns maximum.	3 microns maximum. (Test procedures allow up to 4 particles/ft ³ to exceed the 3 micron size limit)
Hydrocarbons (lubricant content)	As close to zero as possible, not to exceed 1ppm w/w or v/v.	As close to zero (0) w/w or v/v as possible, not to exceed 1ppm w/w or v/v under normal operating conditions.

EPRI TR-108147 is a new revision to EPRI NP-7079. Exelon has enhanced the Dresden and Quad Cities programs to include inspection of instrument air distribution piping based on ERPI TR-108147.

The scope of components included in the compressed air monitoring aging management activities includes distribution piping, valves, and accumulators for air operated safety-related valves, and the containment isolation valves of the instrument air system. The instrument air system compressors, receivers, filters, and dryers are not within the scope of license renewal. Exelon takes exception to ASME OM-S/G-1998, Part 17 as specified in NUREG-1801 XI.M24. ASME OM-S/G-1998, Part 17 provides guidance concerning the performance testing of instrument air systems in light-water reactor power plants. Because the instrument air system compressors, receivers, filters, and dryers are not within the scope of license renewal, the instrument air systems do not require performance testing for aging management. Exelon aging management program B.1.16 (Compressed Air Monitoring) provides adequate aging management for the select number of instrument air system components that have been included within the scope of license renewal.

The staff finds that the applicant's program adequately addresses the reference documents contained in the GALL program and is acceptable based on the additional information provided.

In RAI B.1.16b, the staff noted that it is not readily apparent how the Compressed Air Monitoring program will adequately manage the aging effect of loss of material due to corrosion, corrosion product build-up, or dirt build-up for brass or bronze valve components in the control rod drive hydraulic system. The applicant's response dated October 3, 2003 stated that occurrences of corrosion have not been noted in brass or bronze valve components in the control rod drive hydraulic system. Furthermore, RAI B.1.16-1 supplemental response dated June 22, 2004 stated that Dresden has experienced corrosion, corrosion product buildup, and dirt buildup only in the instrument air system receiver tanks and dryers leading to a receiver tank connection failure in 1994. The program enhancement of crediting periodic blowdowns of instrument air receiver tanks addresses this condition. No similar failure has occurred at Dresden since the receiver tank blowdowns were implemented.

3.0.3.8.3 Conclusions

On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.9 Above Ground Carbon Steel Tanks (B.1.20)

3.0.3.9.1 Summary of Technical Information in the Application

The applicant's above ground carbon steel tanks aging management program is discussed in LRA Section B.1.20, "Above Ground Carbon Steel Tanks" and provides for management of loss of material aging effects for outdoor carbon steel nitrogen storage tanks. The applicant states that the program is consistent with GALL program XI.M29 with the enhancement that the program provides for initiating documentation of inspection results of periodic system engineer walkdowns of the nitrogen storage tanks. The LRA contains a commitment that this enhancement will be implemented at both Dresden and Quad Cities prior to the period of extended operation. This is part of Commitment #20 in Appendix of A of this SER.

The program provides for the application of paint as a corrosion preventive measure and for periodic visual inspections to monitor degradation of the paint and any resulting metal degradation. The LRA notes that the Dresden and Quad Cities outdoor carbon steel storage tanks have not experienced leakage or degradation due to loss of material. The applicant states that the nitrogen storage tanks are above ground and are not directly supported by earthen or concrete foundations. Therefore, inspection of the sealant or caulking at the tank/foundation interface and inspection of inaccessible tank locations does not apply.

This AMP is credited with managing aging in auxiliary and steam and power conversion systems.

3.0.3.9.2 Staff Evaluation

In LRA Section B.1.20, "Above Ground Carbon Steel Tanks," the applicant described its AMP to manage corrosion of above ground carbon steel tanks by protecting the external surfaces with paint or coatings in accordance with standard industry practice. The LRA stated this AMP is consistent with the GALL AMP XI.M29 with the exception that aging of aluminum tanks are managed by this AMP as well as carbon steel tanks. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the deviation and its justification to determine whether the AMP, with the deviation, remains adequate to manage the aging effects for which it is credited, and reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. In addition, the staff determined whether the applicant properly applied the GALL program to its facilities.

The applicant has aluminum above ground storage tanks used as condensate water storage tanks and demineralized water storage tanks at both the Dresden and Quad Cities sites. The applicant's LRA specified that the applicable aging management program for the above ground aluminum water storage tanks would be the Buried Carbon Steel Pipe and Tank Program in Section B.1.25 of the LRA (GALL Program XI. M29). In a letter dated August 7, 2003, the staff requested additional information in RAI B.1.25 regarding the applicability of the Buried Carbon Steel Pipe and Tank Program B.1.25 (GALL Program XI. M29) for managing aging of above ground Aluminum Storage Tanks. The staff also requested that the applicant describe the inspection criteria, potential corrective actions if acceptance criteria are not met and why a one time UT inspection of a single tank bottom at one site will be representative of all tanks.

In a letter dated October 3, 2003, the applicant responded to the staff's request for additional

information. The applicant indicated that the proposed Buried Piping and Tank AMP, and associated aging mechanisms are not relevant to an above ground aluminum tank. The applicant indicated that the Buried Carbon Steel Pipe and Tank Program B.1.25 (GALL Program XI. M29) was inadvertently identified instead of the correct AMP, which is the Above Ground Carbon Steel Tanks AMP, LRA section B.1.20. The applicant also indicated the LRA should have included the following changes:

LRA Section B.1.20, Aboveground Carbon Steel Tanks, should have referenced the UT inspection requirement for the associated above ground aluminum tanks. Since the AMP for aboveground carbon steel tanks does not include aluminum as a material type, an exception statement to this effect should have been included in this section.

LRA Section B.1.25, Buried Piping and Tanks Inspection, should have removed reference to the UT inspection requirement for the associated above ground aluminum tanks.

Item 3.4.2.42 of LRA Table 3.4-2 should have referenced the aboveground carbon steel tanks AMP.

LRA Section A.1.20 (for Dresden and Quad Cities) should have referenced the UT inspection requirement for the associated above ground aluminum tanks.

LRA Section A.1.25 (for Dresden and Quad Cities) should have removed the reference to the UT inspection requirement for the associated above ground aluminum tanks.

In the applicant's response to RAI B.1.25, it also indicated that the tank selected for inspection would be a Quad Cities tank and would be based on operating experience input from the site. The applicant indicated that a Quad Cities tank would be selected because the tank bottoms were older than the Dresden tank bottoms which had been replaced in the 1992/1993 time frame because of corrosion. The applicant indicated that because the tanks are made of the same material, constructed in a like manner, and have similar internal and external environments and because the Quad Cities tank bottoms are older they will more likely show any aging effects and thus are representative of all the aluminum above ground tanks.

The staff requested that the applicant provide additional clarifying information related to its RAI response regarding tank selection. The staff requested that the applicant provide sufficient information relative to the elements of an aging management program to evaluate the program exception of aluminum tanks and to provide operating experience relative to the corrosion mechanism which led to the Dresden tank bottom replacement and what inspections have been performed at Dresden since tank bottom replacement for assessment of further corrosion. The applicant in a letter dated November 20, 2003 provided additional clarifying information. The applicant reiterated that aluminum was considered to be an exception to the Above Ground Carbon Steel Tank AMP, B.1.20 and provided pertinent information for managing the aging of the Aluminum Tanks in the form of the elements of an aging management program. The applicant indicated that there are no protective coatings used in or on the aluminum tanks and a sealant is used at the interface between the tank and its concrete foundation. The applicant indicated that the sealant is periodically monitored as part of the Structures Monitoring Program and that periodic internal/external inspections of the tanks will be in place prior to the period of extended operation. The applicant indicated aging effects will be detected by the periodic visual internal/external inspection, a UT inspection of one of the Quad Cities tank bottoms and through the periodic inspection of the foundation sealants. The applicant indicated the periodic visual examinations will be performed at a five year periodicity rather than every other outage, that detection of corrosion or degradation of the sealant would require further evaluation and that the UT inspection results would be compared against tank design criteria. This is part of

Commitment #20 of Appendix A of this SER. The applicant also reiterated that the Dresden tank bottoms had been replaced due to corrosion and indicated that no inspections of the tank bottoms at Dresden had occurred since replacement. The applicant further stated that a requirement for periodic visual inspection of the tank bottoms was in development which would inspect for corrosion and pitting and if evidence of corrosion or pitting was observed NDE methods capable of determining wall thickness would be employed.

In a letter dated December 12, 2003, the applicant responded to the staff's request for further clarification regarding the operating experience associated with corrosion of the Dresden tank bottoms. The applicant indicated that the corrosion initiated from the aluminum/soil interface and stated that no inspections of the Dresden tank bottoms had occurred since replacement. Because the periodic internal visual inspection cannot inspect this surface, the Dresden operating experience indicates corrosion has led to tank bottom replacement and no inspections of the Dresden tank bottoms have occurred since replacement the applicant will incorporate a periodic inspection of one Dresden tank bottom using an NDE method capable of detecting corrosion and pitting at the aluminum/soil interface into the program. The applicant indicated the periodicity of the tank bottom inspection was yet to be determined, but would not exceed a 10 year period. This is part of Commitment #20 of Appendix A of this SER.

The staff finds the applicant's response acceptable because the program is consistent with GALL, will provide for periodic internal visual inspection of the aluminum tanks, will provide for a one-time inspection of a Quad Cities aluminum tank bottom using UT and will provide for a periodic inspection of a Dresden aluminum tank bottom using UT. The staff finds the one-time inspection of a Quad Cities tank bottom acceptable because operating history has not indicated that degradation of the Quad Cities aluminum tank bottoms is occurring, and these tank bottoms have greater accumulated service time than the tank bottoms replaced at Dresden. Therefore, one time inspection will focus on the lead component and identify if aging is occurring. The staff finds the maximum periodicity of 10 years for the UT of the Dresden aluminum tank bottoms acceptable because the tanks had been in service over 20 years prior to the degradation which lead to replacement of the tank bottoms. Therefore, the future inspections should be appropriate and adequate to manage the aging prior to loss of intended function.

The applicant indicated that Section A.1.20 of the LRA Appendix A (for each site) will be revised to reflect the inspections and information provided in the response.

3.0.3.9.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.10 One Time Inspection (B.1.23)

3.0.3.10.1 Summary of Technical Information in the Application

The applicant's one-time inspection aging management program (AMP) is discussed in LRA Section B.1.23, "One-Time Inspection." The applicant states that the program is consistent with the ten elements of AMP XI-M32, "One-Time Inspection," specified in the GALL report. The One-Time Inspection program provides one-time inspections that manage aging effects of identified components within the scope of license renewal. The purpose of the program is to determine if a specified aging effect is occurring. If the aging effect is occurring, the program provides for an evaluation the effect will have on the ability of affected components to perform their intended functions for the period of extended operation. The program also provides appropriate corrective actions if aging effects are found.

Based on the above, the applicant concludes that implementation of the One -Time Inspection program provides reasonable assurance that the aging effects are adequately managed so that the intended functions of components within the scope of license renewal that are covered by this program are maintained during the period of extended operation.

3.0.3.10.2 Technical Evaluation

The applicant's One-Time Inspection program is described in LRA Section B.1.23. The LRA states that the One-Time Inspection program is consistent with the ten elements of AMP XI-M32, "One-Time Inspection," specified in the GALL report. No exceptions or enhancements to the GALL report AMP XI.M32 were identified by the applicant. The staff confirmed the applicant's claim of consistency during the AMR inspection. The staff determined whether the applicant properly applied the GALL program to its facilities. The staff also reviewed the UFSAR supplements for Dresden and Quad Cities to determine whether they provide an adequate description of the program.

The GALL report recommends use of the One-Time Inspection program to verify the effectiveness an aging management program and to confirm the absence of an aging effect. The one-time inspection is needed to address concerns for the potential long incubation period for certain aging effects on structures and components. There are cases where either (a) an aging effect is not expected to occur but there is insufficient data to completely rule it out, or (b) an aging effect is expected to progress very slowly. For these cases, there is to be a confirmation that either the aging effect is not occurring, or the aging effect is occurring very slowly as not to affect the component or structure intended function. The staff reviewed the tables in Sections 2 and 3 of the LRA to confirm that the structures and components that credit the One-Time Inspection program are commensurate with the GALL report. The staff identified material and environment combinations for components where the One-Time Inspection program is used in conjunction with an aging management program to confirm the absence of aging effects or when the aging effect is not expected to occur. The staff considers the applicant's One-Time Inspection program appropriate to manage these types of aging effects.

However, the staff also identified that one-time inspections are credited for material and environment combinations where aging could be expected to occur. Where an aging effect is expected to occur, the GALL report recommends either; (a) an appropriate aging management program is used to manage the aging effect and a one-time inspection augments the aging management program to confirm the effectiveness of the program, or (b) the use of periodic inspections in lieu one-time inspections. By RAIs B.1.23-1, B.1.23-2, B.1.23, and B.1.23-2.1 through B.1.23-2.6, the applicant was requested to justify use of the One-Time Inspection program to manage aging effects for various carbon steel, alloy steel, stainless steel, cast iron,

and neoprene components in environments such as moist air, steam, water (condensate), and containment atmosphere. By letters dated October 3, 2003, January 26, 2004, and March 25, 2004, the applicant responded to the staff's RAIs as follows:

1) By RAIs B.1.23-1, B.1.23-2(a), B.1.23-2.3 and B.1.23-2.4, the staff questioned use of the One-Time Inspection program to manage loss of material and cracking for carbon steel, stainless steel, cast iron, brass or bronze, and iron components in lube oil and fuel oil environments. This was identified as Confirmatory Item B.1.23-1. By letters dated October 3, 2003, January 26, 2004 and April 9, 2004, the applicant stated that aging management program, B.2.5, "Lubricating Oil Monitoring Activities," will be expanded to manage loss of material and cracking for oil coolers and other components in lube oil, turbine electro-hydraulic control (EHC) fluid, and generator hydrogen seal oil environments for the emergency diesel generator system, station blackout diesel generator system, high pressure coolant injection system, electro-hydraulic control system, reactor core isolation cooling system (Quad Cities), and generator hydrogen seal oil system (Quad Cities). Aging management program, B.1.23, "Fuel Oil Chemistry," will be expanded to manage loss of material for components in a fuel oil environment for the station blackout diesel generator system. The One-Time Inspection program will not be credited to manage the aging effects for these components since periodic inspections will be implemented. The staff considers the Lubricating Oil Monitoring Activities and Fuel Oil Chemistry aging management programs appropriate to manage these aging effects; therefore, staff finds this acceptable.

2) Table 3.3.2 of the LRA identifies components in the Plant Heating System which credit the One-Time Inspection program to manage aging effects for components in a saturated steam or condensate environment. By RAIs B.1.23-1 and B.1.23-2(a) & (b), staff requested the applicant to justify use of one-time inspections to manage the aging effects for these components. By letters dated January 26, 2004 and March 25, 2004, the applicant stated that Plant Heating System components in a saturated steam or condensate environment would be managed by aging management program, B.2.8, "Periodic Inspection of Plant Heating System." The program includes periodic inspections to manage cracking, loss of material, or leakage of selected brass/bronze, carbon steel, cast iron, and stainless steel components. The staff considers the Periodic Inspection of the Plant Heating System program appropriate to manage these aging effects; therefore, staff finds this acceptable.

3) For the main steam system flexible hoses in a containment nitrogen environment, Reference Number 3.4.2.18 of the LRA does not identify any aging effects for these neoprene hoses. By RAIs 3.4.1-3 and B.1.23-2.1, the staff requested the applicant to justify with respect to temperature, radiation levels, and time, why neoprene hoses do not require aging management. In responses dated October 3, 2003 and January 26, 2004, further review by the applicant indicated that hoses in Reference Number 3.4.2.18 and 3.4.2.19 of the LRA are not comprised of an elastomer material as earlier reported but are made of stainless steel with an overall stainless steel outer braided jacket. Based on the hose material being stainless steel, the applicant will use the One-Time Inspection program to verify that the hoses are constructed of metal rather than an elastomer material. Any hoses found to be constructed of an elastomer during the one-time inspection will be replaced with metal flexible hoses. The One-Time Inspection program will perform inspections of the installed metal hoses for mechanical damage. This applies to Quad Cities only. The applicant has noted that stainless steel hoses are installed at Dresden. The staff considers use of the One-Time Inspection program acceptable to verify that stainless steel hoses are installed and to inspect the stainless steel

hoses for damage.

4) For non-safety-related (NSR) vents or drains, piping, and valves in various systems, the LRA identifies loss of material due to corrosion for carbon steel, stainless steel, brass, or bronze in an environment of air, moisture, humidity, and leaking fluid. By RAI 3.3-2, the staff requested the applicant to describe the types of corrosion expected and to provide criteria for selecting one-time sample locations for these types of corrosion. The applicant stated in its letter dated October 3, 2003 that general, crevice, and pitting corrosion are expected in these components. The applicant compiled a list of the in-scope NSR vents and drains for the various systems throughout the plants. The One-Time Inspection program will inspect a selected number of NSR vent and drains for the affected systems. The sample population will be representative of all material and environment combinations but may not include components for every system. The criteria used for selection of susceptible inspection locations are as follows: 1) Corrosiveness of fluid passing through the vent, drain, or piping when in service. Those components servicing more corrosive fluids are given preference. 2) Duration of service when performing venting and draining operations. Those components with higher durations of service are given preference. 3) Frequency of performance of venting and draining operations through the selected components. Those components with higher performance frequencies are given preference. 4) Period that component has been in service. Those components that have been in service longest are given preference. By RAIs B.1.23-2(b) and B.1.23-2.2, staff requested further justification that a one-time inspection is adequate to manage the aging effects for these vent, drains, and valves. By letters dated October 3, 2003 and January 26, 2004, the applicant stated that the NSR vents, drains, valves, and piping are normally outboard of closed safety relief valves or closed isolation valves and are not likely to contain moisture. Any appreciable leakage or condensation inside these vents and drains would be identified in the course of periodic operations or through the daily monitoring of unidentified inputs to radwaste by the operating department. Malfunctioning isolation valves or other degraded conditions are promptly repaired, replaced, or corrected. For the reasons stated above, the applicant considers the rate of material loss due to corrosion to be slow; therefore, one-time inspections will confirm the assumption that loss of material due to corrosion is occurring at a sufficiently slow rate for the subject components. In the event that the results of the one-time inspections fail to provide this confirmation, evaluations will be performed in accordance with the site corrective action process to identify actions, including possible periodic inspections of the vents and drains. Based on the applicant's response, staff concurs that the loss of material due to corrosion for the subject vents, drains, piping, and valves are considered to occur at a sufficiently slow rate such that a one-time inspection is adequate to manage this aging effect; therefore, staff finds this acceptable.

5) By RAIs B.1.23-2 and B.1.23-2.6, the staff requested the applicant to provide justification for using one-time inspections to manage carbon steel, cast iron, alloy steel, elastomer, and neoprene components in a moist air environment that 1) varies with normal plant conditions, 2) is impractical to monitor or control routinely, and 3) is similar to the environments associated with the Aging Management References listed in part b of RAI B.1.23-2. This was identified as Open Item B.1.23-2. By letter dated March 25, 2004, the applicant concluded by further review that periodic inspections of components in this population would be appropriate. A new aging management program, B.2.9, "Periodic Inspection of Components Subject to Moist Air Environments," was developed for these components. Specifically, the applicant will perform periodic inspections of a representative sample of stainless steel, carbon steel, cast iron, aluminum, copper, brass, and bronze components normally exposed to environments of air and

steam; moist air; saturated air; warm moist air; moist containment atmosphere; steam or demineralized water; and hot diesel engine exhaust gases containing moisture and particulates. In addition, the program inspects flexible hoses to detect age-related degradation prior to the loss of function.

The applicant considers a one-time inspection appropriate for managing aging effects for the standby gas treatment system and HVAC systems components with an internal environment of "occasional exposure to moist air" and an external environment of "ambient plant air" or "warm moist air." Components in these systems include doors, closure bolts, equipment frames, piping, fittings, valves, ducts, and filters fabricated of cast iron, carbon steel, brass, bronze, stainless steel, and copper. Based on the materials and environments for these ventilation system components, the applicant believes that either (a) an aging effect is not expected to occur but there is insufficient data to completely rule it out, or (b) an aging effect is expected to progress very slowly. Based on favorable operating history that revealed no widespread corrosion in the affected system, a limited number of components were selected as representative of the ventilation systems. The worst-case one-time inspection locations will include the following: the air intake ductwork of the standby gas treatment system; main control room HVAC ductwork; emergency diesel generator HVAC air intake ductwork; reactor building HVAC ductwork downstream of the steam coils and chilled water cooling coils; and main control room HVAC drip pan and drainpipe. If the one-time inspection detects corrosion resulting in material loss, results of the examination will be evaluated by engineering to determine the rate of material loss and the need for additional inspections. Unacceptable results will be documented in the corrective action program.

Based on the applicant's response, staff considers the Periodic Inspection of Components Subject to Moist Air Environments acceptable to manage components in a moist air environment and the One-Time Inspection program acceptable to manage ventilation systems components where either (a) an aging effect is not expected to occur but there is insufficient data to completely rule it out, or (b) an aging effect is expected to progress very slowly. Therefore Open Item B.1.23-2 and Confirmatory Item B.1.23-1 are closed.

3.0.3.10.3 Conclusion

On the basis of its inspection of the applicant's program, the staff finds that the program is consistent with the GALL program. The staff also reviewed the UFSAR supplement for this aging management program and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

Therefore, on the basis of its review, the staff concludes that the applicant has demonstrated that the One-Time Inspection program will verify the effectiveness of aging management programs so that there is reasonable assurance that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.0.3.11 *Selective Leaching of Materials (B.1.24)*

3.0.3.11.1 Summary of Technical Information in the Application

The applicant's Selective Leaching of Materials aging management program is discussed in LRA Section B.1.24 "Selective Leaching of Materials". The Selective Leaching of Materials aging management program consists of numerous one-time inspections to determine if selective leaching of materials is occurring. The scope of the program includes susceptible components within the scope of license renewal that are exposed to chemically treated water, demineralized water, raw water and ground water, and moist ventilation and gas environments. Susceptible component materials are gray cast iron, copper alloys with less than 85% copper, aluminum-bronze, and Muntz metal.

This AMP is credited with managing aging in the ESF, Auxiliary and Steam and Power Conversion systems and structures.

The LRA indicates that this new program will consist of one-time inspections including visual inspection or other appropriate examination methods of components of the different susceptible materials selected from each applicable environment. The purpose of the program is to determine if loss of material due to selective leaching is occurring. If selective leaching is occurring, the program provides for evaluation as to the effect it will have on the ability of the affected components to perform their intended function for the period of extended operation, and the need to expand the sample of components to be tested.

The applicant indicates that the Selective Leaching of Materials aging management program is consistent with the ten elements of aging management program XI.M33, "Selective Leaching of Materials" specified in the GALL, with the exception that the applicant will not perform hardness measurements on selected components. The GALL Program XI.M33 recommends both visual inspection and Brinell hardness measurements be made to assess the potential for selective leaching.

The applicant indicates that the Dresden and Quad Cities Selective Leaching of Materials program will be implemented prior to the period of extended operation.

The applicant concludes that the Selective Leaching of Materials aging management program (including the exception) provides reasonable assurance that selective leaching aging effects are adequately managed so that the intended functions of the components within the scope of license renewal are maintained during the period of extended operation.

3.0.3.11.2 Staff Evaluation

In LRA Section B.1.24, "Selective Leaching of Materials," the applicant described its AMP to ensure the integrity of components exposed to chemically treated water, demineralized water, raw water, ground water, and moist ventilation and gas environments. Susceptible component materials are described as gray cast iron, copper alloys with less than 85 percent copper, aluminum-bronze and Muntz metal. The LRA stated that this AMP is consistent with GALL AMP XI.M33, "Selective Leaching of Materials," with the exception that the Dresden and Quad Cities programs provide for only visual examination and do not include hardness testing. The applicant indicated that components that exhibit visual indications of selective leaching will

receive further examination or evaluation, which may include non-destructive testing or other examinations that provide definitive results regarding the presence of selective leaching. The applicant indicates that the plant specific evaluation may include removal of specific components for examination under microscope. The applicant also committed to expand the sample size based on unfavorable inspection results. This is Commitment #24 in Appendix A of this SER. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the exception and associated justifications to determine whether the AMP, with the exception, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. Finally, the staff determined whether the applicant properly applied the GALL program to its facility.

In a letter dated August 7, 2003, the staff requested additional information in RAI B.1.24 relative to the program exception not to perform hardness testing. The staff asked why visual inspection could be relied on especially when it was noted that selective leaching often occurs under deposits and in non-visible areas and what basis would be used for visual inspection. The staff requested the applicant to identify the criteria for selecting sample locations and how operating experience will be factored into the applicant's program. The staff also requested that the applicant supplement the UFSAR description of the program to specifically address visual inspection.

The applicant responded to the staff request in a letter dated October 3, 2003. In the response, the applicant provided additional justification for the program exception not to perform hardness testing. The applicant's justification focused on a lack of accurate baseline hardness values for susceptible plant components, difficulty in performing in-situ hardness testing and the need to interpret the results. The applicant indicated that visual inspection would be performed consistent with the requirements of ASME Code Section XI VT-1 visual inspection. The applicant indicated that inspectors would inspect surfaces for evidence of weak, porous or spongy layers in localized (plug-type) or general areas and if visual inspection indicated the potential for selective leaching other NDE methods (i.e., UT) may be used to assess the component. The applicant also noted that the program performs a number of one-time inspections on components with susceptible material environment combinations and the program scope will be expanded to additional components if selective leaching is identified. The applicant noted that the selective leaching of materials aging management program is new and that no programmatic operating experience is available at Dresden and Quad Cities.

The staff requested additional clarifying information related to the determination of selective leaching under deposits and guidance on scope expansion if selective leaching is identified. The applicant responded in a letter dated November 20, 2003. The applicant indicated that visual inspection will be performed in accordance with ASME Code Section XI VT-1 requirements and will be supplemented by work instructions. The applicant provided sample work instructions that include steps for surface preparation including the removal of dirt grease or other foreign material that could mask indications of selective leaching. The applicant's work steps also indicate that if selective leaching is identified, the affected area must be removed to sound metal and that minimum wall thickness be determined in conjunction with initiation of a corrective action report documenting identification of selective leaching. Regarding the scope expansion, the applicant indicated that sampling would start with the most aggressive environments and, if necessary, expand into less aggressive environments. Additional samples

of the same material in the same environment as well as the less aggressive environments will be chosen for inspection.

The staff reviewed the applicant's program exception not to perform hardness testing, and the responses to the RAIs and the requests for clarification. The staff concurs with the applicant that the program will provide that aging will be managed because visual inspection will be performed using ASME Section XI VT-1 requirements, if necessary alternate NDE methods may be used to assess the component's condition, the applicant has taken steps to ensure that indications of selective leaching will not be masked through the use of surface preparation, which will provide a somewhat qualitative assessment of surface hardness.

In response to the staff's request for the applicant to supplement the UFSAR description, the applicant responded in a letter dated October 3, 2003. The applicant indicated that the following statement should have been included in the UFSAR description:

The selective leaching of materials aging management program includes numerous one-time inspections of components of the different susceptible materials selected from each of the applicable environments to determine if loss of material due to selective leaching is occurring. These inspections will consist of visual inspection consistent with ASME Section XI VT-1 visual inspection requirements. If selective leaching is occurring the program requires evaluation of the effect it will have on the ability of the affected components to perform their intended functions for the period of extended operation, and of the need to expand the test sample. For systems subjected to environments where water is not treated (i.e., the open-cycle cooling water system) the program also follows the guidance of NRC Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment.

The staff finds the applicant's response to modify the UFSAR description of the program acceptable because it identifies that program inspections will be performed in accordance with ASME Section XI VT-1 visual inspection requirements and scope expansion will occur if selective leaching is identified.

3.0.3.11.3 Conclusions

On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.12 *Buried Piping and Tanks Inspection (B.1.25)*

3.0.3.12.1 Summary of Technical Information in the Application

The applicant's Buried Piping and Tanks Inspection aging management program is discussed in LRA Section B.1.25, "Buried Piping and Tanks Inspection". The applicant states that with enhancements, the program is consistent with the ten elements of GALL aging management program XI.M34, "Buried Piping and Tanks Inspection" specified in The GALL. The applicant states that the program consists of preventive and condition monitoring measures to manage

loss of material due to corrosion from external environments for buried piping and tanks in the scope of license renewal.

This AMP is credited with managing loss of material in the ESF, Auxiliary and Steam and Power Conversion systems.

The applicant's program takes exception to the program as described in the GALL, which indicates that buried piping and tanks are inspected when they are excavated during maintenance. The applicant noted that access to buried components does not occur on specified frequencies, therefore the applicant's program includes the use of piping and component coatings and wrappings and enhancements that include periodic pressure testing, buried tank leakage checks, inspections of buried tank internal surfaces, and inspections of the ground above buried tanks and piping. The program enhancements also include one-time internal ultrasonic testing (UT) of buried steel tanks, a one-time internal UT of the bottom of an outdoor aluminum storage tank, and a one-time visual inspection of the external surface of a buried piping section. This AMP will be implemented at Dresden and Quad Cities prior to the period of extended operation.

3.0.3.12.2 Staff Evaluation

In LRA Section B.1.25, "Buried Piping and Tanks Inspection", the applicant described its AMP to perform inspections on buried piping and tanks. This AMP is provided to manage loss of material due to corrosion from external environments for buried piping and tanks in the scope of license renewal. The LRA stated that this AMP is consistent with GALL AMP XI.M34, "Buried Piping and Tanks Inspection", with an exception regarding the visual inspection during maintenance, which the applicant regarded as not having a defined frequency. Therefore, the applicant proposed the use of coating and wrapping, periodic pressure testing, buried tank leakage checks, inspection of buried tank internal surfaces, and inspections of the ground above buried tanks and piping. The applicant's program will also include one-time internal UT of buried steel tanks, and a one-time visual inspection of the external surface of a buried piping section. This is part of Commitment #25 of Appendix A of this SER. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the deviation and its justification to determine whether the AMP with the deviation and enhancements, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement (A.1.25, "Buried Piping and Tanks Inspection") to determine whether it provides an adequate description of the program. In addition, the staff determined whether the applicant properly applied the GALL program to its facilities.

The staff finds the applicant's exception to the GALL program acceptable, because the applicant will inspect buried piping and tanks which are uncovered during maintenance and the applicant will supplement this activity by performing one time inspections of selected components as well as using flow and pressure testing to assess system integrity. The enhancements proposed by the applicant verify that the aging of buried pipe will be managed.

Based on its review of the LRA, the staff requested further information from the applicant related to the buried piping and tanks inspection AMP in a letter dated August 7, 2003. The applicant replied to the staff RAIs in a letter dated October 3, 2003.

In RAI B.1.25a, the applicant was requested to indicate if all buried tanks at both plants will be subject to a one time UT inspection and if not, how the tanks and internal areas will be selected, to provide the acceptance criteria for the UT inspections and the actions to be taken if the acceptance criteria are not met. The applicant responded that only one buried steel tank at each site will be inspected. This is part of Commitment #25 of Appendix A of this SER. The applicant also stated that selection and acceptance criteria will be based on applicable ASME Codes and ASTM Standards as well as engineering judgement. If tank wall thicknesses are outside the acceptance criteria the applicant indicated they will expand the sample area or population, evaluate results, and implement necessary repairs. The staff requested that the applicant clarify why scope expansion might not include expansion to other tanks with the same corrosion environment. The applicant in a letter dated December 12, 2003 indicated that there are only 2 buried tanks at each site and that the population of tanks inspected will be increased if acceptance criteria are not met during the one time inspection. The staff finds this response to be acceptable, because the applicant will apply engineering judgement to select the susceptible areas for age related degradation and acceptance criteria are based on tank design codes. Furthermore, expanding the sample scope to include other tanks with similar environments will provide assurance that aging is managed in similar components.

The applicant originally included a one time inspection of an above ground aluminum storage tank bottom in this AMP. The staff requested an explanation of how the features of this AMP are relevant to an above ground aluminum tank and what correlation exists between degradation of the buried pipe and tank materials with degradation of the aluminum tank bottom in RAI B.1.25. The applicant was also requested to explain how the tank will be selected and why the inspection of one tank at either Dresden or Quad Cities will be representative of the soil-to-tank bottom interactions for all aluminum tanks at both plant sites. The applicant's response noted that this AMP was inadvertently identified instead of the correct AMP, which is the Above Ground Carbon Steel Tanks AMP (AMP B.1.20). The staff agrees that this activity is more correctly placed in AMP B.1.20 and the request for additional information is further discussed in Section 3.0.3.9 of the SER.

The applicant provided operating experience in the LRA indicating that failures had occurred in buried piping. In order to understand the failures, the staff requested in RAI B.1.25 that the applicant explain how operating experience illustrates the AMP is effective, what was the root cause of the related piping degradation, how pressure and flow testing are used to manage aging and what changes in the program resulted from operating experience. The applicant responded that the failures occurred in Fire Protection concrete asbestos piping and in demineralized water carbon steel piping. The applicant indicated that the failures were attributed to the aging effect "loss of material", but that a specific aging mechanism was not identified. The applicant also indicated the concrete asbestos piping was replaced with PVC. The applicant indicated that a comprehensive approach is used to manage aging in buried piping which includes inspections during excavation, one time inspections, flow and pressure testing as well as system walkdowns. The applicant related operating experience with the buried fire protection piping to illustrate how pressure and flow testing had been used to identify degradation. The applicant responded that pressure and flow testing were not intended to solely manage aging. Further, the applicant stated that based on the operating experience, the flow testing acceptance criteria were being enhanced to indicate that minor variations in system pressure could be indicative of pinhole leaks, although system pressure and flow requirements were still met. The applicant indicated that flow testing is performed on a three year periodicity

which will identify pipe degradation prior to a loss of system function based on their operating experience.

The staff finds the applicant's response acceptable relative to the program's effectiveness based on the applicant's operating experience and the use of system and pressure tests because the applicant will perform one time inspections in conjunction with GALL recommended inspections during excavation. The staff finds the program appropriate and adequate to manage the aging of the buried piping prior to the loss of its intended function. However, the staff requested the applicant to provide additional clarifying information regarding how operating experience with buried concrete asbestos piping is applicable to managing buried carbon steel, whether all the concrete asbestos piping had been replaced with PVC, if concrete asbestos and PVC piping are exceptions to GALL, how aging of these materials are addressed and to provide information regarding the demineralized water line failure including why one time inspection of a similar section of pipe was not warranted.

The applicant responded to the additional questions in a letter dated December 12, 2003. The applicant indicated that experience with buried concrete asbestos piping was relative to the program based on the operating experience of how degradation was identified and that this method would be applicable to all piping material types. The applicant indicated that potential degradation of some of the replaced fire main piping was initially identified on the basis of periodic pressure drop testing. The applicant indicated that both concrete asbestos and PVC piping are currently used. The applicant stated that PVC piping in these environments has no aging effects and was identified as an exception to the GALL in the LRA. The applicant indicated that the concrete asbestos piping should have been included in the LRA as an exception to the GALL. The applicant stated the internal environment of the concrete asbestos piping is "raw water" and the external environment is "soil and groundwater." The applicant also stated that the concrete asbestos pipe is in an excellent environment; buried deep to avoid freeze/thaw cycles, heat and stress and that there are no know chemicals that adversely affect the concrete in the raw water or soil and ground water environments. The potential aging effects associated with both the internal and external environments are "increase in porosity and permeability, cracking and loss of material (spalling, scaling)" due to aggressive chemical attack. In addition, the applicant stated that the internal environment has the potential aging effect of "build up of deposits" due to biofouling. The applicant stated that the aging is managed by the use of Fire System flow and pressure drop testing along with the Buried Pipe Program B.1.25. The applicant indicated that the failure of the demineralized water line was provided as an example of operating experience related to failure and repair of buried piping. The applicant stated that the specific failure mechanism was not identified in maintenance history and that this portion of the demineralized water line was not within the scope of license renewal, thus, a one time inspection of the line was not warranted.

The staff had additional concerns regarding concrete asbestos piping and buried carbon steel piping and requested clarifying information. Specifically, with regard to concrete asbestos piping, the applicant's operating history indicated that failures of the piping have occurred. On the basis of this experience, the staff requested justification for why a one-time inspection was not warranted, as well as confirmation that the soil environment for the piping was not aggressive. With regard to buried carbon steel piping, the applicant indicated that much of the piping may not be coated. Given that some of the piping may not be coated, the staff questioned why this was not identified as an exception to the GALL program. The staff identified this issue as Confirmatory Item B.1.25-1.

The applicant responded to the staff's request for supplemental information in letters dated December 12, 2003 and March 25, 2004. The applicant indicated that the buried concrete piping likely failed as a result of ground shifting or heavy loads transported in the vicinity of the piping. This piping is located in a soil and ground water environment which is not aggressive to concrete based on pH values between 7 to 9, chlorides 5 to 30 ppm, and sulfates 10 to 30 ppm. These values are within the NUREG 1801 criteria (chlorides less than 500 ppm, sulfates less than 1500 ppm and pH greater than 5.5). The applicant indicated that buried carbon steel and ductile iron piping in the Fire Suppression System are externally coated with coal tar wrapping; however, there was some question regarding use of coating on other carbon steel buried piping. The applicant provided supplemental information after a detailed review of plant documents that indicates that all carbon steel buried piping at Dresden and Quad Cities was externally coated. The applicant further indicated that the installation specification required an inspection of the coating integrity prior to burial. The applicant provided operating experience from a recent plant modification that required excavation of some Fire Suppression System piping at Quad Cities. A section of 10 inch schedule 40 carbon steel piping was recently excavated. The applicant indicated that the piping was coated with coal tar wrapping and had been buried in the early 1970's. The nominal wall thickness of this piping is 0.365 inches. The measured minimum and maximum wall thicknesses were 0.320 inches and 0.400 inches respectively. The applicant concluded that there was little effect of aging on this piping after burial for approximately 30 years. The applicant also surveyed the craft personnel who performed the work to assess the condition of the external pipe coating. The applicant provided qualitative information that the coating was "generally in good condition" based on the craft personnel. The staff finds the applicant's response acceptable because the applicant provided information regarding the cause of the concrete piping degradation, provided information consistent with NUREG 1801 that indicates the environment is not aggressive to concrete, that there is reasonable assurance that the buried piping is coated and provided additional operating experience that indicates there is limited aging degradation of buried piping. Therefore, Confirmatory Item B.1.25-1 is closed.

The staff requested in RAI B.1.25 the applicant to explain why a one-time inspection of the buried ductile iron fire pipe including a mechanical joint was appropriate to manage aging, given the failures identified in the operating history. The staff also requested the applicant to address how pipe sections would be selected to represent the most likely location for degradation. The applicant's LRA and operating history did not indicate that the failures were located in concrete asbestos piping. The applicant indicated that the one time inspection is used in conjunction with inspection of piping uncovered during excavation. This is part of Commitment #25 of Appendix A of this SER. The applicant also stated that engineering judgement, including factors such as, age, operating experience, susceptible location and accessibility would be used to select the locations. The applicant's program will include provisions for expanding sample size if acceptance criteria are not met, establishing root cause and specifying corrective actions. The staff finds the applicant's response acceptable because one time inspections will be used in addition to inspections performed when piping is exposed during excavations in accordance with the GALL report and the related operating history pertained to failures of a different material type.

In RAI B.1.25, the staff requested the applicant to clarify that inspections of buried pipe would occur during excavation and that pipe coatings and wraps are considered a program element instead of an enhancement. The applicant confirmed that inspections would occur during,

excavations and that coatings and pipe wraps are used. The staff finds the applicants response acceptable because the applicant confirmed these program elements were consistent with the elements of the GALL program.

3.0.3.12.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.13 10 CFR Part 50, Appendix J (B.1.28)

3.0.3.13.1 Summary of Technical Information in the Application

The applicant stated in LRA Section B.1.28 that the 10 CFR Part 50, Appendix J aging management program is consistent with the ten elements of aging management program XI.S4, "10 CFR Part 50, Appendix J", specified in NUREG-1801.

The 10 CFR Part 50, Appendix J aging management program is credited for aging management of pressure boundary degradation due to loss of material in the primary containment and various systems penetrating primary containment. The program also manages changes in material properties of gaskets, O-rings, and packing materials for the primary containment pressure boundary access points.

The program consists of tests performed in accordance with the regulations and guidance provided in 10 CFR 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Option B, Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," NEI 94-01, "Industry Guideline for Implementing Performance-Based Options of 10 CFR Part 50, Appendix J," ANSI/ANS 56.8, "Containment System Leakage Testing Requirements," and station procedures. Containment leak rate tests are performed to assure that leakage through the primary containment and systems and components penetrating primary containment does not exceed allowable leakage limits specified in the Technical Specifications. An integrated leak rate test (ILRT) is performed during a period of reactor shutdown at the frequency specified in 10 CFR Part 50, Appendix J, Option B. Local leak rate tests (LLRT) are performed on isolation valves and containment access penetrations at frequencies that comply with the requirements of 10 CFR 50 Appendix J, Option B.

With regard to "operating experience", the applicant indicated that the industry has found that 10 CFR Part 50, Appendix J testing has been effective in maintaining the pressure integrity of the containment boundaries, including identification of leakage within the various systems' pressure boundaries. The Dresden and Quad Cities facilities have demonstrated experience in effectively maintaining the integrity of the containment boundaries as evidenced by the selection of Option B of 10 CFR Part 50 Appendix J leakage testing requirements. Both stations have experienced "as found" LLRT results in excess of individual containment penetration administrative limits.

Evaluations were performed and corrective actions were taken to restore the individual penetration leakage rates to within the established administrative leakage limits in accordance with the Appendix J testing program.

The applicant concludes that the 10 CFR Part 50, Appendix J aging management program provides reasonable assurance that the loss of material and changes in material properties aging effects are adequately managed so that the intended functions of primary containment components within the scope of license renewal are maintained during the period of extended operation.

3.0.3.13.2 Staff Evaluation

In LRA Section B.1.28, "10 CFR Part 50, Appendix J", the applicant described its AMP to manage containment leak-tight integrity. The LRA stated that this AMP is consistent with GALL AMP XI.S4, "10 CFR Part 50, Appendix J". The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for both Dresden and Quad Cities to determine whether they provide an adequate description of the program.

3.0.3.13.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.14 Structures Monitoring Program (B.1.30)

3.0.3.14.1 Summary of Technical Information in the Application

The applicant stated in LRA Section B.1.30 that, with enhancements, the structures monitoring aging management program is consistent with the ten elements of aging management program XI.S6, "Structures Monitoring Program," specified in NUREG-1801.

The structures monitoring program is credited for aging management of various structures and external surfaces of mechanical components within the scope of license renewal. The program, which was developed for structures monitoring under 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," is based on the guidance in Regulatory Guide 1.160 Revision 2, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and NUMARC 93-01 Revision 2, "Industry Guidelines for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and implemented through procedures. The program is not credited for managing protective coatings.

The program will provide for visual inspections of structures and components not included in the ASME Section XI, Subsection IWF (B.1.27) aging management program. For licence renewal, the following enhancements will be made. Enhancements are scheduled for implementation prior to the period of extended operation.

- The program will provide for inspections of structural steel components in secondary containment, flood barriers, electrical panels and racks, junction boxes, instrument racks and panels, offsite power structural components and their foundations, and the Quad Cities discharge canal weir as part of the ultimate heat sink.
- The program will provide for periodic reviews of chemistry data on below-grade water to confirm that the environment remains non-aggressive for the license renewal term for the aging mechanisms of corrosion of embedded steel and aggressive chemical attack of concrete.
- The program will provide for inspection of a sample of non-insulated indoor piping external surfaces at locations immediately adjacent to periodically inspected piping supports.
- Program procedures will reference specific insulation inspection criteria for existing cold weather preparation and inspection procedures for outdoor insulation, and establish new inspections for various indoor area piping and equipment insulation.
- The program will provide for inspection parameter specificity for non-structural joints, roofing, grout pads, and isolation gaps.
- The program will extend inspection criteria to the structural steel, concrete, masonry walls, equipment foundations, and component support sections of the program to provide consistency with NUREG-1801 component supports.

In its discussion of operating experience, the applicant stated that roof leaks were detected and corrective actions were taken for the Dresden turbine building and main control room and for the Quad Cities reactor building and turbine building. Minor degradation of concrete has been detected such as cracks with water stains, pitting, and leaching for various structures including the Dresden reactor building and crib house. Similar degradation has been detected in the Quad Cities reactor building and circulating water intake bays. The degradation was evaluated and dispositioned in accordance with the corrective action process. Cracks and small gaps were detected in elastomer seals at both Dresden and Quad Cities. Most of the degraded conditions were attributed to man-made occurrences. None were determined to be significant. Damage and degradation of insulation has been observed and repaired.

The applicant concludes that the structures monitoring program for aging management provides reasonable assurance that the aging effects are adequately managed so that the intended functions of structures within the scope of license renewal are maintained during the period of extended operation.

3.0.3.14.2 Staff Evaluation

In LRA Section B.1.30, "Structures Monitoring Program," the applicant described its AMP to manage aging of structures and structural components within the scope of license renewal that

are not managed by one of the other structural AMPs. The LRA stated that this AMP, with the enhancements described above in Section 3.0.3.14.1 of this report, is consistent with GALL AMP XI.S6, "Structures Monitoring Program". The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the enhancements to determine whether this AMP, with the enhancements, is adequate to manage the aging effects for which it is credited. In addition the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for both Dresden and Quad Cities to determine whether they provide an adequate description of the revised program.

In its description of the program and the enhancements, the applicant made several statements that needed clarification before the staff could complete its evaluation. Therefore, the applicant was requested by RAI B.1.30 to submit the following additional information:

(a) The LRA states that "The program will provide for visual inspections of structures and components not included in the ASME Section XI, Subsection IWF (B.1.27) aging management program." The staff asked if this statement was intended to encompass component supports not covered by Subsection IWF. The staff requested the applicant to clearly define the scope of structures and components encompassed by this statement.

(b) The last item under "Enhancement" states that "The program will extend inspection criteria to the structural steel, concrete, masonry walls, equipment foundations, and component support sections of the program to provide consistency with NUREG-1801 component supports." The staff is unable to interpret the meaning of this enhancement. The staff requested the applicant to describe in detail the structures and structural components included in this enhancement; the associated aging effects in need of aging management; the inspection methods to be used, and the acceptance criteria to be applied.

In its response to RAI B.1.30 dated October 3, 2003, the applicant stated the following:

Exelon has reviewed LRA Appendix B.1.30 and the following clarification is provided.

The Structural Monitoring Program is intended to encompass component supports that are not covered by the ASME Section XI, Subsection IWF. The ASME Section XI, Subsection IWF program provides for inspection of ASME Class 1, 2, and 3 supports. It will be enhanced to include ASME Class MC supports. The Structures Monitoring Program consists of defining and performing periodic structural evaluations which will ensure the timely identification, assessment and repair of degraded structural elements. One of the elements to be evaluated includes component supports. Component supports include:

- Pipe Whip Restraint Supports
- Jet Impingement Shield Supports
- Instrument Tubing Supports
- Tube Track Supports
- HVAC Supports
- Conduit and Junction Box Supports
- Cable Tray Supports
- Instrument Racks, panels and supports
- Electrical panels, racks, MCCs, Switchgears, junction boxes and supports
- Piping Component Supports including immediately adjacent piping/tubing.

A fixed number of supports for each type of component are selected for evaluation. The selection includes representation of supports throughout the plant, considering environmental conditions as well

as configuration. Component selection includes sample sizes for each component classifications mentioned above. The component support includes all auxiliary steel members (i.e., all steel plates, shapes, bolts, and anchors) between the supported component and the main structural element (i.e., the concrete slab/beam or the structural steel floor framing). The program does not include standard components such as snubbers, struts and spring cans. Grout pads for support base plates are also in-scope.

The last item under "Enhancement" in LRA Appendix B.1.30 related to consistency with NUREG 1801 component supports is not an enhancement in the sense that new areas of inspection are being added, but it is rather a clarification to NUREG 1801 terminology to ensure that the proper attributes are considered for specific types of installed plant components and structures. The following includes the types of clarifications that were added to in the structural monitoring program implementing procedure for structural steel, concrete, masonry walls, equipment foundations, and component support sections to ensure consistency with NUREG 1801.

- Added several support sub-categories under "Component Supports" for Tube Track Supports, Instrument Tubing Supports, Jet Impingement Shield Supports, and Pipe Whip Restraint Supports
- Added platform support clarification wording under "Structural Steel Elements" examination guidelines.
- Added aging effect (loss of material due to environmental corrosion-pitting, corrosion, general corrosion) to bolted connection inspection.
- Added aging effect (loss of material due to environmental corrosion-pitting, corrosion, general corrosion) to wall support inspection.
- Added aging effect (loss of material due to environmental corrosion-pitting, corrosion, general corrosion) to anchorage and welds inspection.
- Added panels, cabinets and enclosures for electrical equipment.
- Added emergency diesel generators, HVAC system components, and other miscellaneous equipment under "Equipment Foundations."
- Added aging mechanism (service induced cracking or other concrete aging degradation) to Grout Pads/Concrete Pedestals examination.

The above clarifications are not enhancements, but rather are clarifications to provide consistency with NUREG 1801 terminology. All associated aging effects in need of aging management for the structures and structural components included in the above clarifications are presently being managed.

The additional information provided by the applicant in its response to RAI B.1.30 sufficiently answers the questions posed by the staff, with two exceptions. It was not clear whether the category "Piping Component Supports including immediately adjacent piping/tubing," listed in the response to item (a) of the RAI is meant to include non-ASME piping supports. It also was not clear as to why the Structures Monitoring Program does not include "standard components such as snubbers, struts and spring cans." In order to completely resolve the response to this RAI, the staff requested that the applicant confirm the following:

- (a) the B.1.30 program covers non-ASME piping supports
- (b) there are no snubbers, struts, or spring cans on non-ASME piping and components

This issue was identified as Confirmatory Item 3.0.3.14.2-1.

In its response to Confirmatory Item 3.0.3.14.2-1, dated December 5, 2003, the applicant stated:

Exelon has reviewed the supplemental Information Request and provides the following clarification and confirmation.

1)The Structure Monitoring Program, B.1.30, includes non-ASME piping supports for aging management. The selection of component supports includes a representation of supports throughout the plant, considering environmental conditions as well as configuration.

2)There are standard components such as snubbers, struts, and spring cans on non-ASME piping and components that are in-scope of the License Renewal, which are required to be managed for aging. The Structural Monitoring Program, B.1.30, will inspect the non-ASME component supports including the standard components. The in-scope non-ASME component supports are addressed in LRA Section 2.4.15, Table 2.4-15 under the Component Groups "Support Members" with a "Non-S/R Structural Support" component intended function. Aging Management Reference 3.5.1.29 discusses the aging management of the non-ASME component supports.

The staff finds the applicant's response to Confirmatory Item 3.0.3.14.2-1 to be acceptable, because it clarified that the "Structural Monitoring Program," (B.1.30), will inspect non-ASME piping and component supports, including snubbers, struts, and spring cans. This commitment is stated in the enhancements as "The program will provide for inspection of a sample of non-insulated indoor piping external surfaces at locations immediately adjacent to periodically inspected piping supports and inspection of standard components such as snubbers, struts, and spring cans," under B.1.30, Structures Monitoring Program, in the applicant's response to Open Item 3.5.2.3.2 1: (Section 3.5.2.3.2 of ASME Code, Section XI, Subsection IWF (B.1.27)), dated June 22, 2004. Therefore Confirmatory Item 3.0.3.14.2-1 is resolved. This is part of Commitment #30 in Appendix A of this SER.

3.0.3.14.3 Conclusions

On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and concludes that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.15 *Heat Exchanger Test and Inspection Activities (B.2.6)*

3.0.3.15.1 Summary of Technical Information in the Application

The heat exchanger test and inspection activities are a plant specific program, not addressed in the GALL report. In Section B.2.6 of the LRA, the applicant addressed the ten program elements using guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR. The following information was provided in the LRA:

The LRA describes the heat exchanger test and inspection activities as providing condition monitoring, inspection, and performance testing. The activities manage loss of material, cracking, and buildup of deposits in heat exchangers in the scope of license renewal that are not tested and inspected by the Open-Cycle Cooling Water System (B.1.13) and Closed-Cycle Cooling Water System (B.1.14) aging management programs. The augmentation activities identified in the GALL report lines IV.C1.4-a and IV.C1.4-b to manage loss of material and cracking for the Dresden isolation condensers are included in this aging management program.

The applicant indicates that the inspection activities are new and will be implemented prior to the period of extended operation.

The applicant utilizes surveillance testing, inspections and in-service nondestructive examinations (ISI, NDE) to verify that heat exchanger performance is adequate and to detect aging effects. Results are trended to confirm that aging effects are managed and that system and component functions are maintained.

Isolation condenser test and inspection augmentation activities detect cracking due to stress corrosion cracking or cyclic loading, and detect loss of material due to pitting and crevice corrosion. These augmentation activities are not part of the ISI program, but are used by the applicant to verify that the ISI program is effective, for ensuring that significant degradation is not occurring, and the intended function of the isolation condenser is maintained during the extended period of operation. These augmentation activities consist of temperature and radioactivity monitoring of the shell-side (cooling) water, and eddy current testing of tubes.

The inservice inspection, water chemistry management and lubricating oil management activities applied to the heat exchangers in the scope of this aging management program are described in other aging management program evaluations.

3.0.3.15.2 Staff Evaluation

Because the Heat Exchanger Test and Inspection Activities program is not included in the GALL, The staff review was performed against the 10 elements of the Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls are part of the site-controlled Quality Assurance Program. The staff's evaluation of the Quality Assurance Program is provided separately in Section 3.0.4 of this SER. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program. The staff identified a need for additional information which was requested in the staff letter to the applicant of August 7, 2003. The applicant responded by letter dated October 3, 2003.

[Program Scope] The LRA identified the following heat exchangers as being subject to these test and inspection activities:

- Dresden Unit 2 and 3 HPCI lubricating oil coolers
- Dresden Unit 2 and 3 HPCI gland seal condensers
- Dresden main control room air handling unit heat exchanger
- Dresden Unit 2 and 3 isolation condensers
- Quad Cities Unit 1 and 2 HPCI lubricating oil coolers
- Quad Cities Unit 1 and 2 HPCI gland seal condensers
- Quad Cities main control room air handling unit heat exchanger
- Quad Cities Unit 1 and 2 battery/station blackout room HVAC heat exchangers

The staff finds the scope to be appropriate for the AMP.

[Preventive Actions] The LRA stated that these heat exchanger test and inspection activities do not provide any preventive actions. These activities provide condition monitoring to detect degradation prior to a loss of function. The staff finds this acceptable and notes that preventive actions are not required.

[Parameters Monitored/Inspected] The LRA stated that performance tests verify system operability by verifying proper fluid flows, temperatures, or differential pressures during system operation under load. Wall loss and surface condition of heat exchanger tubes will be monitored by eddy current inspection. Radioactivity monitoring of the Dresden isolation condenser is monitored through periodic sampling. The staff finds that the parameters monitored will identify loss of material or loss of heat transfer and therefore, are acceptable.

[Detection of Aging Effects] Loss of material, cracking, or build up of deposits would result in degradation of heat exchanger or system performance. Inspection activities monitor the effects of corrosion and buildup of deposits. Periodic inspections and NDE tests may consist of visual inspections, eddy-current testing, and ultrasonic tests or radiography to detect loss of material, cracking, or buildup of deposits. System performance testing will be used to detect loss of heat transfer in heat exchangers. The staff requested additional information in RAI B.2.6 a, regarding detection of local corrosion mechanisms affecting the battery station blackout room heat exchangers and the HPCI lube oil coolers and gland seal condensers. The applicant's response stated that periodic inspections (visual and eddy current) of accessible tube internal surfaces for the HPCI lubricating oil coolers and gland seal condenser tubes will be used to identify galvanic, crevice and pitting corrosion and MIC and FAC. One-time visual inspections will be used to identify the potential for selective leaching in a component with similar material environment combination as the HPCI lubricating oil coolers and gland seal condenser tube internal surfaces. The applicant stated that visual inspections of accessible internal surfaces of the Quad Cities battery/station blackout room heat exchanger will identify loss of material in that component. The staff finds that the applicant's program will detect aging effects within the program scope through the use of system performance testing, visual inspection and other NDE methods such as eddy current testing. Furthermore, the applicant's related operating experience in response to Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment," issued July 18, 1989 illustrates that the program will be capable of detecting aging.

[Monitoring and Trending] Heat transfer testing results are documented in plant test procedures, and are trended and reviewed by the appropriate plant personnel. Isolation condenser temperatures are recorded in surveillance logs and radiation monitoring of the isolation condensers is conducted by procedure. The applicant has established the frequency and extent of inspections and testing to ensure detection of aging effects before the loss of intended function of the heat exchanger or associated system. The applicant relies on system operability testing to verify heat removal capabilities. Inspections are generally conducted at 10-year intervals or less, with shorter intervals based on industry guidelines or plant operating experience. Eddy current testing is to be performed at least once every 10 years, and the procedure provides for increasing the inspection frequency based on the results.

After initial inspection, subsequent inspection frequencies will be based on the as-found condition of the equipment. The inspection and testing intervals may be adjusted on the basis of the results of the reliability analysis, type of service, frequency of operation, or age of components and systems.

The staff asked the applicant in RAI B.2.6d to provide additional details describing the methods that will it will use to evaluate inspection results and assess remaining component life predications for material loss and cracking mechanisms. The applicant's response stated that cracking and loss of material are documented in plant procedures and evaluations are performed for inspection results that do not satisfy the acceptance criteria. Condition reports are initiated to document concerns and the resolution of the condition reports includes engineering evaluations including an assessment of remaining component life and the need for additional aging management activities.

The staff finds the applicant's monitoring and trending is acceptable because system performance testing and NDE results are documented and the frequency of tests and inspections are established with provisions to reevaluate the frequency to ensure aging is managed in the future. Further, the staff finds the program acceptable because corrective action reports will be used to document aging concerns and ensure evaluations are performed to evaluate degradation and remaining life evaluations.

[Acceptance Criteria] The LRA states that specific acceptance criteria are provided in the inspection or test procedures, as required to ensure continued system and component operability. The applicant stated system functional testing must confirm the system's ability to meet minimum Technical Specification requirements and EPRI guidance is used to determine allowable percent wall loss, plugging criteria, and for projections of remaining life. Indications of degradation are evaluated by the applicant to determine if the material condition will maintain the system intended function prior to returning the system to operable status. The applicant performs engineering evaluations if aging is identified and to determine corrective action. The staff requested that the applicant provide additional details on the evaluation methods and acceptance criteria/standards in RAI B.2.6c. The applicant's response to this RAI noted that EPRI documents are used as a basis to determine allowable wall loss, plugging criteria, and projections of remaining life. The applicant indicated that these documents included the following:

- EPRI TR-106857, Volume 34, "Preventive Maintenance Program Basis: Main Condensers," July 1988
- EPRI CS-5235, "Recommended Practices for Operating and Maintaining Steam Surface Condensers," July 1987
- EPRI TR-100385, "Balance-of-Plant Heat Exchanger Condition Assessment Guidelines," July 1992
- EPRI TR-101772, "Electromagnetic NDE Guide for Balance-of-Plant Heat Exchangers," Rev. 2, December 1997
- ERPI TR-110392, "Eddy Current Testing of Service Water Heat Exchangers for Engineers Guideline, Final Report," February 1999

Furthermore, the applicant stated that these procedures, governing eddy current testing, contain criteria for establishing inspection timing, inspection interval reduction or expansion, and tube random sampling schemes based on criteria such as the following:

- Number of tubes plugged
- Rate of tube wall loss
- Evidence of tube cracking
- Wall degradation factors (e.g., flaw growth rate)

Similar acceptance criteria are provided in procedures governing other NDE methods utilized by the program. The applicant stated that acceptance criteria for visual inspection may vary depending on a number of parameters associated with the particular heat exchanger being inspected. The applicant stated that in general the visual acceptance criteria will include ensuring the number of plugged/blocked tubes is less than that allowed by a review of the heat exchanger load calculation or engineering judgement. The applicant stated that the visual acceptance criteria for evidence of tube fouling would be based on operating experience and system performance. The applicant stated that visual acceptance criteria will also include inspection for pitting and general corrosion. The applicant indicated that evaluations will be performed for inspections that do not satisfy acceptance criteria and condition monitoring reports are initiated to document conditions in accordance with corrective action program. The applicant indicated that resolution of the corrective action documents would include engineering evaluations assessing the remaining component life and determine the need for additional aging management activities.

The staff found that the applicant's acceptance criteria were acceptable because the acceptance criteria are based on industry guidelines and current practice that account for frequency of inspection, sample expansion and applicable aging mechanisms as well as incorporation of operating history and system performance criteria.

[Operating Experience] The LRA stated that this is a new aging management program. Therefore, no program operating experience exists at this time. However, the LRA indicated that similar controls implemented for the GL 89-13, "Service Water System Problems Affecting Safety-Related Equipment," program have been effective in detecting aging effects in heat exchangers. Instances of loss of material, cracking, and buildup of deposits in heat exchangers have been detected in Dresden and Quad Cities heat exchangers prior to loss of system intended functions. In RAI B.2.6b, the staff requested that the applicant provide additional details regarding these occurrences, including the heat exchanger, type of degradation mechanism, how it was detected, and corrective action taken, etc. The applicant's response to this RAI provided a list of the heat exchangers identified by the GL 89-13 program and provided examples of the types of degradation, methods of detection and associated corrective actions as follows:

Loss of material for TBCCW tubing identified by eddy current testing as part of periodic inspections. Corrective actions included evaluating inspection results and replacing tubes with minimum wall thicknesses not meeting acceptance criteria.

Buildup of deposits for ECCS room cooler components identified by cooler flow surveillance or operator rounds instrumentation inspections. Corrective actions included cleaning and subsequent inspection of surfaces.

Loss of material of ECCS room cooler tubing identified by eddy current testing. Corrective actions included revising procedures to require periodic eddy current testing and replacing the associated cooling coil.

The staff finds that the applicant's operating experience related to GL 89-13 confirms that the

applicant's heat exchanger test and inspection program will adequately manage aging because similar degradation mechanisms have been identified using similar techniques in plant heat exchangers and the applicant has incorporated this experience into this program.

3.0.3.15.3 Conclusions

On the basis of its review of the applicant's program, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.16 *Lube Oil Monitoring Activities (B.2.5)*

3.0.3.16.1 Summary of Technical Information in the Application

The applicant's Lube Oil Monitoring program is discussed in LRA Section B.2.5, "Lube Oil Monitoring Activities." The applicant states that the program is not consistent with a GALL report program; therefore, the applicant summarized the program in terms of the 10-element program as described in Branch Technical Position, Appendix A of the SRP-LR. The LRA credits this program with managing loss of material and cracking of lubricating oil coolers in the HPCI, emergency diesel generator, station blackout (SBO) diesel generator, electro-hydraulic control, reactor core isolation cooling, reactor recirculation motor generator oil and generator hydrogen seal oil systems at the D/QCNPS. The applicant stated that the program will use periodic sampling, testing, and trending for maintaining physical and chemical properties in lubricating oil.

The applicant stated that this program manages the physical and chemistry properties in the lubricating oil. The complete aging management for the lubricating oil heat exchangers in the scope of this program also includes activities under the "Closed-Cycle Cooling Water System" and/or "Heat Exchanger Test and Inspection Activities," AMPs B.1.14 and B.2.6, respectively.

The applicant concluded that the Lube Oil Monitoring program will mitigate, detect, monitor, and trend the effects of aging to provide reasonable assurance that the intended functions will be maintained during the period of extended operation.

3.0.3.16.2 Staff Evaluation

In LRA Section B.2.5, "Lube Oil Monitoring Activities," the applicant described its AMP to manage loss of material and cracking in lubricating oil coolers within the scope of license renewal. The staff reviewed this program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls are part of the site-controlled Quality Assurance Program. The staff's evaluation of the Quality Assurance Program is provided separately in Section 3.0.4 of

this SER. The remaining seven elements are discussed below. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

In its October 3, 2003, response to RAI B.1.23-2(a), the applicant committed to include the following additional components in the scope of this program: components in the reactor core isolation cooling (RCIC) system, additional components in the high pressure coolant injection (HPCI) system, additional components in the emergency diesel generator and auxiliaries system, and additional components in the station blackout diesel system. In addition, the applicant committed to add components exposed to EHC oil (main turbine and auxiliary systems) and generator hydrogen seal oil (turbine oil system - Quad Cities only) to the scope of this program. The staff found that adding the above components to the scope of this program is appropriate, since maintaining oil quality is important for preventing aging effects. However, the applicant did not provide updates to the program elements to address the increased scope of the program. The applicant was requested to provide the appropriate revisions to the 10 elements and the UFSAR summary description of this program. The staff identified this issue as Confirmatory Item B.2.5-1.

In its draft supplemental response dated December 18, 2003, the applicant further committed to add components exposed to EHC oil (main turbine and auxiliary systems) and generator hydrogen seal oil (turbine oil system) to the scope of this program. The applicant added these components to the scope of the program by letter dated January 26, 2004. The staff found that adding the above components to the scope of this program is appropriate, since maintaining oil quality is important for preventing aging effects in these components.

In a letter dated June 22, 2004, the applicant committed to include the following additional component in the scope of this program: components in the reactor recirculation motor generation oil system. The staff found that adding the above component to the scope of this program is appropriate, since maintaining oil quality is important for preventing aging effects in these components.

[Program Scope] The applicant stated that this AMP is applicable to heat exchanger and other components exposed to a lubricating oil environment in the HPCI, emergency diesel generator and auxiliaries, (SBO) diesel and auxiliaries, reactor core isolation cooling (RCIC), generator hydrogen seal oil (HSO), main turbine and auxiliaries (electro-hydraulic control (EHC) oil subsystem), and reactor recirculation motor generator systems. The staff finds that the scope is acceptable because it includes those components that rely on the program for aging management.

[Preventive or Mitigative Actions] The applicant's program monitors and controls the oil properties and impurity levels. When the parameters exceed predefined limits, actions are taken to restore the conditions. The staff finds that maintaining the oil parameters mitigates loss of material and cracking in lubricating oil systems; therefore, the staff finds this acceptable.

[Parameters Monitored or Inspected] The applicant stated that the parameters monitored by the program include viscosity, total acid number, total base number, rotary bomb oxidation test, water demulsability, particle count, fuel and combustion byproducts, sediment, water, anti-foaming characteristics, whole particle counting, air release and emission spectrum. The applicant also stated that the parameters monitored by the program depends on oil type and type of service. The staff notes that loss of material due to general, crevice, and pitting

corrosion and cracking are applicable aging effects for lubricating oil cooler components in a lubricating oil environment at locations containing water or contaminants such as chloride ions. By RAI B.2.5(a), the staff asked the applicant to clarify whether water, moisture, and chloride ions are monitored for all type of oil and service. If not, the staff requested the applicant to provide justification for not including these parameters in monitoring. In its response dated October 3, 2003, the applicant stated that water/moisture is monitored as part of the Lubricating Oil Monitoring Activities program. No monitoring for chloride ions is provided in this program. The applicant explained that EPRI 1003056, Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, Appendices C and G were reviewed in the development of the Lubricating Oil Monitoring Activities program. These appendices address oil environments in general and lubricating oil environments for heat exchangers, respectively. Appendix C identifies damaging effects associated with chlorides in fuel oil environments, but no similar effects are identified for lubricating oil environments. Appendix G does not identify any applicable aging effects associated with chlorides for lubricating oil environments in heat exchanger components. The applicant also stated that there is no site operating experience of failure or degradation in oil environments attributed to the presence of chlorides. Therefore, the applicant concluded that monitoring for chloride ions is not required for the Lubricating Oil Monitoring Activities program. Based on the applicant's operating experience, the staff finds that the applicant's response satisfactorily addresses the staff's concerns and RAI B.2.5(a) is considered closed. The staff concludes that the applicant is monitoring the appropriate oil parameters; therefore, the staff finds this acceptable.

[Detection of Aging Effects] The applicant stated that samples of lubricating oil are taken monthly for EDGS, EHC oil, reactor recirculation motor generator oil, and HSO systems, quarterly for HPCI, SBO diesel generators, semi-annually for the RCIC pump, and every 24 months for the RCIC turbine. Sampling frequency is increased if plant and equipment operating conditions indicate a need to do so. The applicant stated that the sampling would reveal aging degradation because increased impurities and degradation of oil properties indicate degradation of material in lubricating oil systems. The staff finds this acceptable because sampling and analyses are performed periodically, and the analysis is capable of detecting aging degradation.

The staff also notes that the aging effects of the heat exchangers are also managed by the "Closed-Cycle Cooling Water System" and/or "Heat Exchanger Test and Inspection Activities," AMPs B.1.14 and B.2.6, respectively. For other components, the applicant uses the One-Time Inspection Program (B.1.23) to verify the effectiveness of the Lube Oil Monitoring Activities AMP. The inspections and performance testing under these programs provides additional assurance that loss of material and cracking will be detected before the loss of intended function; therefore, the staff finds this acceptable.

[Monitoring and Trending] The Lube Oil Monitoring program monitors the relevant parameters via samples taken monthly for EDGs, quarterly for HPCI, SBO diesel generators, EHC oil, and HSO systems, semi-annually for the RCIC pump, and every 24 months for the RCIC turbine. The oil analysis results are trended and evaluated using computer software and a database. The applicant stated that the lubricating oil analysis results are trended and evaluated using computer software and a database. The staff finds that monitoring through sample analysis is appropriate and that the frequency is consistent with industry experience; therefore, the staff finds the monitoring and trending to be acceptable.

[Acceptance Criteria] The applicant stated that normal, alert, and fault levels have been

established for the various chemical and physical properties, wear metals, additives, and contaminant levels based on information from oil manufacturers, equipment manufacturers, and industry guidelines, for the specific oil type and application. The applicant also stated that the program maintains contaminant and parameter limits within the application-specific limits. By RAI B.2.5(b), the staff asked the applicant to explain the acceptance criteria of water, moisture, and contaminants. In its response dated October 3, 2003, the applicant provided the acceptable limits for water/moisture and contaminants at normal, alert, and fault levels for emergency diesel generator and SBO diesel components with MOBILGARD 450 NC oil and for HPCI turbine components with MOBIL VAPROTEC LIGHT oil. The applicant stated the acceptable limits are based on EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Revision 3, and that any failures to meet these criteria result in a condition evaluation, an identification of root causes, and correction of the adverse condition. The staff finds that the acceptance criteria are consistent with industry guidelines and that the applicant's activities in case of failure to meet these acceptance criteria are reasonable; therefore, the staff finds these criteria acceptable.

[Operating Experience] The applicant stated that oil sampling and analysis have detected particulate or water contamination (or both) in lubricating oil systems. The operating experience has produced procedure and program changes, which have improved the effectiveness of lubricating oil testing and inspection activities. In RAI B.2.5(c), the staff asked the applicant to describe the corrective actions made and the facilities' operating experience since these corrective actions were implemented. In its response dated October 3, 2003, the applicant provided four examples of corrective actions made as a result of operating experience involving lube oil sampling and analysis. In one of the examples, the applicant stated that the October 28, 1999 oil analysis of the Unit 1A (1B) SBO diesel engine crankcases indicated high percentage volume for sediment of 0.3 percent (upper limit of 0.05 percent volume). All physical parameters other than sediment were found to be suitable for use. A recommendation was made to continue sampling/trending oil sample results on a quarterly frequency. The sampling procedure was revised to include requirements to perform sampling on a quarterly basis, and trend results. In another example, the applicant stated that a number of Quad Cities oil analysis results for RHRSW pump bearings showed high metal levels. It was determined that the high/increased wear level concentrations could have been indications of pump shaft, housing, rolling element bearing or bearing cage clearance wear. It was determined that the pump bearing oil analysis required large amounts of oil to be collected because smaller sample amounts had a tendency to show high/erratic wear levels. The sampling procedure was revised to include requirements to draw a relatively large sample. The applicant stated that no operating experience involving recurrence of heat exchanger degradations since implementation of the associated corrective actions. The staff finds that the applicant's response satisfactorily addresses the staff's concerns and RAI B.2.5(c) is considered closed. The staff finds that the applicant's operating experience supports the conclusion that the program will be effective in preventing aging of the components in the scope of this program; therefore, the staff finds this acceptable.

Therefore, Confirmatory Item B.2.5-1 is closed.

3.0.3.16.3 Conclusions

On the basis of its review of the applicant's program, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended

functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.17 Periodic Inspection of Ventilation System Elastomers (B.2.3)

3.0.3.17.1 Summary of Technical Information in the Application

The applicant's periodic inspection of ventilation system elastomers is discussed in LRA Section B.2.3, "Periodic Inspection of Ventilation Elastomers." The applicant noted that this program is not addressed in the GALL Report and therefore summarized the program in terms of the 10-element program described in Branch Technical Position Appendix A-1 of the SRP-LR. The applicant stated that GALL Sections V.B1, V.B2, VII.F1, VII.F3, and VII.F4 state that ventilation system elastomers used for flexible boots, access door seals, and filter seals are susceptible to hardening and loss of strength, and loss of material aging effects and that the GALL aging management program column for these sections states that a plant-specific aging management program is to be evaluated. The applicant claimed that the improved program for periodic inspection of ventilation system elastomers provides routine inspection of certain elastomers in ventilation systems in accordance with plant procedures and predefined tasks.

This AMP is credited with providing condition monitoring to detect degradation prior to a loss of function via inspections for cracking, loss of material, or other evidence of aging of all flexible boots, access door seals and gaskets, filter seals and gaskets, and room temperature vulcanizing (RTV) silicone used as a duct sealant and testing of seals for hardening if evidence of aging is found. This AMP calls for periodic inspection of ventilation system elastomers including those in the standby gas treatment, reactor building ventilation, emergency diesel generator building ventilation, station blackout diesel generator building ventilation, and main control room ventilation systems.

The applicant performed elastomer inspections at intervals sufficient to detect aging prior to the equipment failing a leakage test or filter efficiency test. Review of the plant-specific operating experience indicates that, although Dresden and Quad Cities have experienced leaks in ventilation systems due to deterioration of or damage to elastomers, including flexible boots and access door seals and gaskets, the leaks were found and corrected in a timely manner and did not result in a loss of function of the ventilation system train.

In its LRA, the applicant concludes that implementation of the Periodic Inspection of Ventilation Elastomers program will either verify that there are no aging effects requiring management for the subject components, or ensure that the appropriate corrective actions will be taken so that the component intended functions will be maintained during the period of extended operations.

3.0.3.17.2 Staff Evaluation

In LRA Section B.2.3, "Periodic Inspection of Ventilation Elastomers," the applicant described its AMP to routinely inspect elastomers for cracking, loss of material, or other evidence of aging of all flexible boots, access door seals and gaskets, and filter seals and gaskets in the components of those systems that are within the scope of license renewal. This AMP is not consistent with a GALL AMP. Therefore, the staff reviewed this AMP against the 10 program elements using the

guidance in the Branch Technical Position RLSB-1 in Appendix A of the SRP-LR.

The staff reviewed this program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls for license renewal are in accordance with the site-controlled Quality Assurance Program. The staff's evaluation of the applicant's Quality Assurance Program is provided separately in Section 3.0.4 of this SER; the evaluation of the remaining seven elements is provided below. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

In the second paragraph of the Description section of AMP B.2.3, the applicant stated, "The improved program for periodic inspection of ventilation system elastomers provides routine inspection of certain elastomers in ventilation systems in accordance with plant procedures and predefined tasks." Elastomer wear and degradation of elasticity are functions of material composition, dynamic load, environment, and time. All elastomer components with the same material composition/dynamic load/environment will roughly have the same degree of aging. By letter dated August 4, 2003, the staff requested, in RAI B.2.3-a, the applicant to explain what are the certain elastomers and technical basis for selecting these certain elastomers.

In its response dated October 3, 2003, the applicant stated that the scope of the program applies to the elastomer seals in the ventilation systems that are in the scope of license renewal. The in-scope systems for Dresden and Quad Cities are control room ventilation, station blackout diesel generator building ventilation, and standby gas treatment. Additionally, the Dresden reactor building ventilation and the Quad Cities emergency diesel generator building ventilation systems are included. The certain elastomers include flexible boots, access door seals and gaskets, and RTV used as duct sealant. The basis for selecting these certain elastomers was to provide an inspection of the elastomers of in scope ventilation systems. On the basis of its review, the staff finds that the applicant's response to B.2.3-a adequate and acceptable because the applicant explained the technical basis and the types of elastomers included in the scope of license renewal. The staff considers this issue to be resolved.

[Program Scope] The applicant stated that this AMP is applicable to elastomers utilized in ventilation systems within the scope of license renewal, including flexible boots, access door seals, filter seals, and RTV silicone used as a duct sealant. Further the applicant stated (LRA Section 3.3.1.1.5) that aging management of control room, emergency diesel generator building, station blackout diesel generator building, and reactor building (using the requirements of the containment ventilation) ventilation system elastomers will be performed by the periodic inspection of elastomers in accordance with the plant-specific aging management program Periodic Inspection of Ventilation System Elastomers. The applicant further states that Exelon may elect to periodically replace certain ventilation system elastomer and RTV seals instead of inspecting them and that periodic replacement will be evaluated on a case-by-case basis. By letter dated August 4, 2003, the staff requested, in RAI B.2.3-b, the applicant to provide specific information such as replacement frequency, replacement criteria and the associated technical basis, including applicable operating experience about the proposed periodic replacement. The staff further requested that the applicant describe how the variable combinations of material

composition, dynamic load, and environment will be weighed in determining the frequency of inspection.

In its response dated October 3, 2003, the applicant stated that there are no plans or schedules to perform replacements of ventilation system elastomers at this time and the intent of this statement in the program scope was to provide the opportunity to credit replacement of elastomers in lieu of performing the inspection. By letter dated December 17, 2003, the applicant stated that, upon further evaluation, it does not need to include the flexibility of being able to replace elastomers in lieu of performing the inspection. Therefore, the applicant will revise the AMP to delete the flexibility to replace the elastomers. The Scope of Activity for the Periodic Inspection of Ventilation System Elastomers AMP will be revised as follows:

The program inspects elastomers utilized in ventilation systems within the scope of license renewal, including flexibility boots, access door seals, filter seals, and RTV used as a duct sealant. These elastomers prevent external leakage and bypass of HEPA and carbon filters. These inspections apply to the standby gas treatment system and ventilation systems within the scope of license renewal; that is, to the main control room ventilation, station blackout diesel generator building ventilation, Dresden reactor building ventilation, and Quad Cities emergency diesel generator building ventilation systems.

This is part of Commitment #41 of Appendix A of this SER. The staff finds the applicant's response acceptable because the replacement of elastomers is no longer an options; therefore, the specific information for replacement of elastomers such as replacement frequency, replacement criteria and the associated technical basis, including applicable operating experience about the proposed periodic replacement is not required.

[Preventive Actions] The applicant stated that no actions are taken as part of this program to prevent the aging effect; the inspections provide condition monitoring to detect degradation prior to a loss of function. By letter dated August 4, 2003, the staff noted, in RAI B.2.3-e, that elastomers may crack, harden, or lose strength due to relative motion between vibrating equipment, exposure to warm moist air, temperature changes, oxygen, and/or radiation and requested the applicant to clarify if the elastomer components are also used at Dresden and Quad Cities as vibration isolators to prevent transmission of vibration and dynamic loading to the rest of the system. If these isolators degrade, vibration and subsequent dynamic loads applied to the ductwork and fasteners cannot be eliminated. The staff further requested that the applicant provide the frequency of the subject inspection for the applicable elastomer components, including a discussion of the operating history to demonstrate that the applicable aging degradations will be detected prior to the loss of their intended function.

In its response dated October 3, 2003, the applicant stated that elastomer components are not used in Dresden or Quad Cities HVAC systems as vibration isolators to prevent transmission of vibration or dynamic loading to the rest of the system. On the basis of its review, the staff finds that the applicant's response to B.2.3-e adequate and acceptable because the applicant explained how, since there are no elastomeric isolators, their degradation is not an aging management issue. The issue is characterized as resolved.

[Parameters Monitored or Inspected] The applicant stated that the parameters inspected as part of this AMP include elastomers used in ventilation system; flexible boots, access door seals and gaskets, filter seals and gaskets, and RTV used as a duct sealant are inspected to ensure they are free of cracking, loss of material, and damage. The seals will be tested for hardening if cracking or loss of material is noted. This is part of Commitment #41 of Appendix A of this SER.

For the standby gas treatment and main control room ventilation systems, the results of the elastomer inspections are verified by the performance of system leakage tests and filter efficiency tests. Since the applicant stated that the condition of elastomers used in ventilation systems will be determined by visual inspection, by letter dated August 4, 2003, the staff requested, in RAI B.2.3-f, the applicant to explain how this visual inspection will be conducted in the inaccessible areas.

In its response dated October 3, 2003, the applicant stated that all elastomer components with the same material composition/dynamic load/environment would roughly have the same degree of aging. Therefore, the inspections of the accessible areas bound the inaccessible areas. When unacceptable age related degradation is found, the impact of the degradation will be evaluated for the remaining (inaccessible) portions of that system. On the basis of its review, the staff finds that the applicant's response to RAI B.2.3-f adequate and acceptable because the applicant explained how information from accessible areas would be extrapolated to inaccessible areas. The staff considers RAI B.2.3 to be resolved.

[Detection of Aging Effects] The applicant stated that the AMP will rely on inspections of elastomers performed at intervals sufficient to detect aging prior to the equipment failing a leakage test or filter efficiency test and that seals will be inspected for hardening if cracking or loss of material is observed. The applicant further states, in LRA Section 3.3.1.1.5, that the AMP will manage the aging of elastomeric components due to hardening and cracking or loss of strength due to elastomer degradation or loss of material due to wear for the period of extended operation. Since the AMP does not contain a statement that the inspection will be conducted by qualified personnel, or reference to authoritative criteria to detect hardening or cracking due to elastomer degradation or loss of material due to wear, by letter dated August 4, 2003, the staff requested, in RAI B.2.3-c, the applicant to address this issue.

In its response dated October 3, 2003, the applicant stated that personnel that have been trained and qualified in accordance with station procedures perform these examinations. The inspections visually look for evidence of cracking and loss of material. When indications are found, additional examinations are performed for hardening of the material. On the basis of its review, the staff finds that the applicant's response to B.2.3-c adequate and acceptable because the applicant verified that qualified personnel would conduct the inspection. The staff considers this RAI B.2.3-c to be resolved.

[Monitoring and Trending] The applicant stated that the conditions of the elastomers used in ventilation systems are monitored, but not trended and that flexible boots, filter seals, and access door seals and gaskets are repaired or replaced if damage or deterioration is detected. The staff finds the above monitoring acceptable; the staff did not identify the need for trending in this AMP.

[Acceptance Criteria] The applicant stated that the acceptance criteria are no unacceptable cracking, loss of material, and damage. The seals will be inspected for hardening if cracking or loss of material is observed and repaired or replaced if a degraded condition is found. Surveillance tests of the standby gas treatment and main control room ventilation systems ensure that system leakage meets the requirements of the current licensing basis. Since the AMP does not specifically refer to an acceptance criterion to evaluate indications related to hardening or cracking due to elastomer degradation or loss of material due to wear, by letter dated August 4, 2003, the staff requested, in RAI B.2.3-d, the applicant to address this issue.

In its response dated October 3, 2003, the applicant stated that the elastomers are inspected for signs of cracking, loss of material, damage, or other abnormal conditions. If signs of cracking or loss of material is noted then an inspection for hardness is performed. Discrepant conditions are recorded in the corrective action program for further evaluation and disposition. On the basis of its review, the staff finds that the applicant's response to B.2.3-d adequate and acceptable because the applicant explained its procedure for identifying and recording discrepant conditions in the corrective action program for further evaluation and disposition. The staff considers RAI B.2.3-d to be resolved.

[Operating Experience] The applicant stated that Dresden and Quad Cities have experienced leaks in ventilation systems due to deterioration of or damage to elastomers, including flexible boots and access door seals and gaskets. The leaks were found and corrected in a timely manner and did not result in a loss of function of the ventilation system train. By letter dated August 4, 2003, the staff requested, in RAI B.2.3-g, the applicant to discuss how the program has been modified to avoid seepage or leakage through boots, seals, and gaskets.

In its response dated October 3, 2003, the applicant stated that the operating experiences summarized in element 10 of B.2.3 are indicative of an effective program identifying age related degradation prior to loss of intended function of a component and taking appropriate and timely corrective action. As such, there were no program enhancements made. However, the applicant noted that some of the specific examples cited include:

- In 1987, Dresden identified minor leakage in the reactor building ventilation access doors. The door seals were replaced and stiffeners were added to the door.
- In 1988, Dresden identified cracking in some HVAC system piping flexible boot seal. All of the HVAC system piping flexible boot seals were replaced.
- In 1988, Dresden identified minor leakage in the reactor building ventilation inspection doors. The door seals were replaced and new latches were installed.
- In 1994, Quad Cities identified a high efficiency particulate air (HEPA) filter door leak. The damaged door and seal were replaced.
- In 1996, Quad Cities identified minor leakage in the standby gas treatment access doors. The doors were re-adjusted and the seals were replaced.

On the basis of its review, the staff finds that the applicant's response to B.2.3-g adequate and acceptable because the applicant explained and provided examples of how the program adequately provides remediation to any seepage or leakage through boots, seals, and gaskets. The issue is characterized as resolved.

The staff reviewed the UFSAR supplement in LRA Appendix A.2.3 and found that the description of the periodic inspection of ventilation system elastomers is consistent with Section B.2.3 of the LRA. The staff finds that the information provided in the UFSAR supplement provides an adequate summary of the program activities as required by 10 CFR 54.21 (d).

3.0.3.17.3 Conclusions

On the basis of its review of the applicant's program, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.3.18 Periodic Inspection of Components Subject to Moist Environments (B.2.9)

3.0.3.18.1 Summary of Technical Information in the Application

The applicant's Periodic Inspection of Components Subject to Moist Environments program is discussed in the applicant's letter dated March 25, 2004. This program manages loss of material for stainless steel, carbon steel, cast iron, aluminum, copper, brass, and bronze components in various systems exposed to moist air environments and subject to wetting conditions based on system operation. The program also inspects flexible hoses for age-related degradation. Thickness measurements and visual inspections will be used to detect degradation. The periodic inspections will be performed once before the end of the current operating term and periodically at intervals of approximately every 10 years during the period of extended operation. The program is not based on a GALL report program; therefore, the applicant summarized the program in terms of the 10-element program as described in Branch Technical Position, Appendix A of the SRP-LR.

The applicant concluded that periodic inspections of selected components exposed to alternate wetting and drying conditions are representative of the population of components normally exposed to moist air environments. The Periodic Inspection of Components Subject to Moist Environments program provides reasonable assurance that the components are routinely inspected for deterioration and corrective action is taken to maintain the intended functions consistent with the current licensing basis during the period of extended operation.

3.0.3.18.2 Staff Evaluation

By letter dated March 25, 2004, the applicant described the Periodic Inspection of Components Subject to Moist Environments program to manage the loss of material for stainless steel, carbon steel, cast iron, aluminum, copper, brass, and bronze components and degradation (such as elastomer hardening or cracking) of flexible hoses located in moist air environments and subject to wetting conditions. Ultrasonic and visual inspections will be performed on selected carbon steel and cast iron components as representative samples for all materials managed by this program since these materials have a greater susceptibility to loss of material. The staff reviewed this program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls are part of the site-controlled Quality Assurance Program. The staff's evaluation of the Quality Assurance Program is provided separately in Section 3.0.4 of

this SER. The remaining seven elements are discussed below. The staff also reviewed the UFSAR supplements for Dresden and Quad Cities to determine whether they provide an adequate description of the program.

[Program Scope] The applicant stated that this program will manage age related degradation of selected components such as piping and fittings, valves, turbine casings, flexible hoses, filter/strainers, air accumulator vessels, and mufflers normally exposed to moist air environments. These components are located in various systems. The staff finds that the scope is acceptable because it includes those components that rely on the program for aging management.

[Preventive or Mitigative Actions] The applicant's program monitors the condition of the components and does not provide preventative or mitigative actions. This is a condition monitoring program that does not rely on preventative or mitigative actions; therefore, the staff finds this acceptable.

[Parameters Monitored or Inspected] The applicant stated that the program would perform periodic thickness measurements (UT) of a representative sample of steel piping, fittings, and air accumulator vessels, and periodic visual inspections (VT-3) of a representative sample of valves, filters/strainers, and mufflers to determine if aging degradation is occurring. The components are inspected to ensure they are free of unacceptable loss of material due to general corrosion, pitting and crevice corrosion. Inspections will be performed in accordance with ASME Code requirements and certified NDE examiners will conduct UT and VT-3 inspections. Visual inspections of flexible hoses will be performed to determine the presence of age-related degradation. The staff concludes that the applicant is inspecting the appropriate parameters to identify the aging effects; therefore, the staff finds this acceptable.

[Detection of Aging Effects] The applicant stated that periodic thickness measurements and visual inspections will be performed to determine if loss of material aging degradation is occurring to the interior surfaces of selected components subject to moist air environments. The applicant also stated that visual inspections of the flexible hoses will be performed to determine any age-related degradation of the flexible hose. If the hoses exhibit such degradation, they will be replaced. The staff concludes that the applicant is inspecting the appropriate parameters to detect the aging effects; therefore, the staff finds this acceptable.

[Monitoring and Trending] The applicant states that periodic inspections will be performed once before the end of the current operating term and at intervals of approximately every 10 years during the period of extended operation. Abnormal corrosion or pitting found during visual inspections will be evaluated by engineering to determine if loss of material aging is occurring, and if so, the rate at which the material is being lost. Engineering evaluations of the test or inspection results will determine the need for follow-up examinations to monitor the progression of aging degradation, and identify appropriate corrective actions to mitigate any excessive rates of loss of material discovered. The staff finds the periodic inspection and engineering evaluation of material loss is acceptable for monitoring these aging effects.

[Acceptance Criteria] The applicant stated that Engineering will determine the component thickness measurement acceptance criteria prior to conducting the examinations. Thickness measurements will be conducted in accordance with approved plant procedures and will be consistent with ASME Code requirements. Results of the UT examinations and abnormal

corrosion or pitting found during visual inspections will be evaluated by engineering to determine if loss of material aging is occurring, and if so, the rate at which the material is being lost. Engineering evaluations of the test or inspection results will determine the need for follow-up examinations to monitor the progression of aging degradation, and identify appropriate corrective actions to mitigate any excessive rates of loss of material discovered. Corrective actions, if necessary, would expand to include other components. Any degradation (such as elastomer hardening or cracking) found during the inspection of flexible hoses requires an Engineering evaluation to determine acceptance criteria. Corrective actions will include replacement and, if necessary, inspection of additional hoses. The staff finds that the applicant's proposal to perform engineering evaluations of degradation for plant heating system piping components and hoses will provide acceptance criteria against which the need for corrective actions will be evaluated; therefore, staff finds this acceptable.

[Operating Experience] Dresden and Quad Cities have experienced age-related degradation of components exposed to moist air environments. The degradation was found during routine maintenance activities, corrected in a timely manner and did not result in a loss of function of any safety-related systems, structures or components (SSCs). The staff finds that the operating experience supports the conclusion that the Periodic Inspection of Components Subject to Moist Environments program used in conjunction with routine maintenance is effective at preventing age-related degradation of components exposed to moist air environments; therefore, the staff finds this acceptable.

3.0.3.18.3 Conclusion

On the basis of its review of the applicant's program, the staff finds that the program adequately addresses the ten program elements defined in Branch Technical Position RLSB-1 in Appendix A.1 of the SRP-LR, and that the program will adequately manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement for this aging management program and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

Therefore, on the basis of its review, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed by the Periodic Inspection of Components Subject to Moist Environments program so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.0.4 Quality Assurance for Aging Management Programs

Pursuant to 10 CFR 54.21(a)(3), a license renewal applicant is required to demonstrate that the effects of aging on structures and components subject to an Aging Management Review (AMR) will be adequately managed so that their intended functions will be maintained consistent with the CLB for the period of extended operation. NUREG-1800, Branch Technical Position RLSB-1, "Aging Management Review - Generic," describes ten attributes of an acceptable aging management program. Three of these ten attributes are associated with the quality assurance activities of corrective action, confirmation processes, and administrative controls. Table A.1-1, "Elements of an Aging Management Program for License Renewal," of Branch Technical Position RLSB-1 provides the following description of these quality attributes:

- corrective actions, including root cause determination and prevention of recurrence, should be timely
- the confirmation process should ensure that preventive actions are adequate and that appropriate corrective actions have been completed and are effective
- administrative controls should provide a formal review and approval process

NUREG-1800, Branch Technical Position IQMB-1, "Quality Assurance For Aging Management Programs," noted that those aspects of the aging management program that affect quality of safety-related structures, systems, and components are subject to the quality assurance (QA) requirements of 10 CFR Part 50 Appendix B. Additionally, for non-safety-related structures and components subject to an aging management review, the existing 10 CFR Part 50 Appendix B QA program may be used by the applicant to address the elements of corrective actions, the confirmation process, and administrative controls. Branch Technical Position IQMB-1 provides the following guidance with regard to the quality assurance attributes of aging management programs:

- Safety-related structures and components are subject to 10 CFR Part 50 Appendix B requirements, which are adequate to address all quality-related aspects of an aging management program consistent with the CLB of the facility for the period of extended operation.
- For non-safety-related structures and components that are subject to an AMR for license renewal, an applicant has an option to expand the scope of its 10 CFR Part 50 Appendix B program to include these structures and components to address corrective actions, the confirmation process, and administrative controls for aging management during the period of extended operation. In this case, the applicant should document such a commitment in the UFSAR supplement in accordance with 10 CFR 54.21(d).

3.0.4.1 Summary of Technical Information in the Application

Chapter 3.0, "Aging Management Review Results," of the LRA provides an AMR summary for each unique structure, component, or commodity group at the Dresden and Quad Cities Nuclear Power Stations determined to require aging management during the period of extended operation. This summary includes identification of aging effects requiring management and AMPs utilized to manage these aging effects. Appendix B to the LRA demonstrates how the identified programs manage aging effects using attributes consistent with the industry and NRC guidance. The applicant's programs and activities that are credited with managing the effects of aging can be divided into two types of programs: (1) aging management programs evaluated in NUREG-1801, and (2) plant-specific aging management programs. Aging management program evaluated in NUREG-1801 are described in Appendices A.1 and B.1 of the LRA while plant specific aging management programs are described in Appendices A.2 and B.2 of the LRA.

In Section A.2.1, "Corrective Action Program," of the LRA, the applicant describes the quality attributes of the plant specific aging management programs. The applicant stated that the 10 CFR Part 50, Appendix B program provides corrective actions, confirmation processes, and administrative controls for license renewal aging management programs. Additionally, prior to

the period of extended operation the scope of the program will be expanded to include non-safety-related structures and components that are subject to an aging management review for license renewal. The applicant stated that the corrective action program applies to all plant systems, structures and components (both safety-related and non-safety-related) within the scope of license renewal. Administrative controls are in place for existing aging management programs and activities. Administrative controls will also be applied to new and enhanced programs and activities as they are implemented.

In Section B.2.1, "Corrective Action Program," of the LRA, the applicant provided the following generic description of the quality attributes common to all the plant specific aging management programs:

- **Corrective Actions:** Corrective action is initiated following the identification of conditions adverse to quality, and is documented. The corrective action program is described in Chapter 16 of the QAP. The various components of the corrective action program provide for timely actions, including determination of the cause of the condition and corrective action taken to preclude recurrence for significant conditions adverse to quality. Condition reports are analyzed for adverse trends. Identified adverse trends are reported to the appropriate manager and documented on a condition report.
- **Confirmation Process:** Condition reports are reviewed by supervisors. Operations shift management is contacted as necessary to discuss potential operability or regulatory reportability of the condition. Items determined to be significant conditions adverse to quality are reported to the appropriate levels of management. An effectiveness review is completed for root cause analysis corrective actions to prevent recurrence.
- **Administrative Controls:** Activities affecting quality are prescribed by documented instructions, procedures, drawings, or specifications of a type appropriate to the circumstances and are accomplished in accordance with these instructions, procedures, drawings or specifications. They contain appropriate acceptance criteria and documentation requirements for determining whether important activities have been satisfactorily accomplished. The document control process is described in Chapter 6 of the QAP.

3.0.4.2 Staff Evaluation

The NRC staff reviewed the applicant's aging management programs described in Appendix A, "Updated Final Safety Analysis Report (UFSAR) Supplement," and Appendix B, "Aging Management Activities," of the Dresden and Quad Cities license renewal application. The purpose of this review was to assure that the aging management activities were consistent with the staff's guidance described in NUREG-1800, Section A.2, "Quality Assurance for Aging Management Programs (Branch Technical Position IQMB-1)," regarding quality assurance attributes of aging management programs. Based on the staff's evaluation, the descriptions and applicability of the plant-specific aging management programs and their associated quality attributes provided in Appendix A.2 and Appendix B.2 of the LRA are consistent with the staff's position regarding quality assurance for aging management. However, the applicant did not sufficiently describe the use of the quality assurance program and its associated attributes (corrective action, confirmation process, and administrative controls) in the discussions provided for aging management programs described in Appendix A.1 and Appendix B.1. In RAI 2.1-4, the staff requested that the applicant supplement the descriptions in the Appendix A, "Updated

Final Safety Analysis Report (UFSAR) Supplement,” and Appendix B, “Aging Management Activities” to include a description of the quality assurance program attributes, including references to pertinent implementing guidance as necessary, which are credited for the programs described in Appendix A.1 and Appendix B.1 of the LRA.

In their October 3, 2003, response to RAI 2.1-4, the applicant stated that the LRA Sections A.2.1 and B.2.1, “Corrective Action Program,” apply to all of the aging management programs and activities that are credited for license renewal and to all plant systems, structures and components within the scope of license renewal. Based on this response, the staff concluded that the applicant will apply the corrective action program, as described in LRA Sections A.2.1 and B.2.1, to all plant systems, structures and components (both safety-related and non-safety-related) within the scope of license renewal and subject to the AMPs described in Section A.1 and B.1 of the LRA. Therefore, RAI 2.1-4 is resolved.

3.0.4.3 Conclusions

The staff finds that the quality assurance attributes of the applicant’s AMPs are consistent with 10 CFR 54.21(a)(3) and the staff’s BTP IQMB-1. Specifically, the applicant described the quality attributes of the programs and activities for managing the effects of aging for both safety-related and non-safety-related SSCs within the scope of license renewal. The applicant further stated that the 10 CFR Part 50 Appendix B Quality Assurance Program provides corrective actions, confirmation processes, and administrative controls. The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.0.4.4 References

1. NUREG-1800, “Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants,” April 2001
2. NEI 95-10, Revision 3, “Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule,” August 2001
3. Letter from Exelon Generation Company, LLC, to US NRC, “Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3,” RS-03-178, dated October 3, 2003

3.0.5 Aging Management Review for Additional In-Scope Components

The staff’s evaluation of the mechanical systems included in the LRA is documented in SER Sections 3.1, 3.2, 3.3, and 3.4. Additional mechanical systems and components were added to the scope of license renewal during the closeout of Open Item 2.1-1. This open item relates to the applicant’s methodology utilized for scoping under 10 CFR 54.4(a)(2) of low to moderate energy systems in the vicinity of safety-related systems. The applicant’s original criterion was that spray or wetting from a non-safety-related moderate-energy system could only affect active, safety-related components located within 20 feet. In response to the open item, by letter dated May 18, 2004, the applicant revised the methodology and assumed that all safety-related components, active or passive, located in the same general area of the plant could be adversely

affected. As a result, additional systems and components were brought into the scope of license renewal. The applicant provided additional information by letter dated June 22, 2004.

The applicant stated that all of the aging management programs were evaluated for impact resulting from the scoping changes. The applicant determined that, because all of the scoping changes involved the addition of similar equipment in the same environments as those already included in the LRA, only one aging management program had to be revised. The Generator Stator Water Chemistry Activities AMP (B.2.7) had previously only applied to Quad Cities, but was revised to apply to Dresden also. The staff's review of the Generator Stator Water Chemistry Activities program is in Section 3.4.2.3.1 of this SER.

The staff's review of each system affected by the change in scoping is described below:

Reactor Recirculation System

Additional piping and components from the reactor recirculation system were added to the scope of license renewal at Quad Cities due to the potential for spatial interaction with safety related components. Specifically, the recirculation motor generator oil subsystem was added to the scope of license renewal at Quad Cities. The system did not require a boundary expansion at Dresden because the physical plant layout is different than Quad Cities. As a result of the scoping change, the applicant added component groups for pumps and tanks for spacial interaction (Quad Cities only) to LRA Table 2.3.3-1. The applicant also added three new (e.g., not previously in the LRA) AMR references to address the new component groups.

To address the general corrosion of the external surfaces of carbon steel and cast iron components, the applicant credits the Bolting Integrity AMP (B.1.12) or the Structures Monitoring AMP (B.1.30). These AMPs were evaluated in Sections 3.0.3.5 and 3.0.3.14 and found to be acceptable for managing this aging effect. To address the corrosion of cast iron and carbon steel components in lubricating oil (with contaminants and/or moisture), the applicant proposed to credit the One-Time Inspection AMP (B.1.23). Since the degradation of components in an oil environment depends upon the quality of the oil (contaminants and water), the staff asked about the applicant's controls on the quality of the oil. In its response, the applicant stated that the components would be included in the Lubricating Oil Monitoring Activities AMP (B.2.5), which is evaluated in Section 3.0.3.16 of this SER. Since there are adequate controls on the oil quality, the staff finds the proposed aging management acceptable. The staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the reactor recirculation system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Control Rod Drive Hydraulic System

The applicant expanded the system boundaries for the control rod drive hydraulic system at both Dresden and Quad Cities due to the potential for spatial interaction with safety related components. The resulting changes to the LRA Table 2.3.3-3 include four additional

component groups and one additional aging management reference for valves. The new component groups are filters/strainers, pumps, tubing, and restrictive orifices for spacial interaction for Quad Cities only. The same components at Dresden are already in scope with a pressure boundary intended function (which bounds the spacial interaction intended function).

The staff reviewed the AMR of the new component groups and the additional AMR references. All of the AMR references for the component groups in the expanded scope were already being used for the same combinations of materials and environments in the control rod drive hydraulic system, and had been previously reviewed by the staff, as discussed in SER Section 3.3.2.4.3. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the control rod hydraulic system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Reactor Water Clean up System

The applicant stated that additional piping and components from the reactor water clean up system were added to the scope of license renewal at Dresden due to the potential for spatial interaction with safety related equipment. The applicant further stated that this boundary expansion includes more of the same type of components already represented on Table 2.3.3-4 of the LRA. The applicant concluded that no changes to Table 2.3.3-4 were required.

Since there were no changes to Table 2.3.3-4 of the LRA, the finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the reactor water cleanup system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Diesel Generator Cooling Water System

For the diesel generator cooling water system, the system boundary was expanded to include additional components in the scope of license renewal. This resulting change to Table 2.3.3-12 of the LRA was the addition of two new component groups and one additional AMR reference for on existing component. The new component groups are piping and fittings, and tanks for spacial interaction.

The staff reviewed the AMR of the new component group and the additional AMR reference for existing component groups. The additional AMR references for the diesel generator cooling water system include appropriate aging effects and aging management programs necessary to manage those aging effects, where applicable. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging

management for the components in the expanded scope of the diesel generator cooling water system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Service Water System

For the service water system, the system boundary was expanded to include additional components in the scope of license renewal. The resulting changes to Table 2.3.3-16 of the LRA include in new component groups and additional AMR references for existing component groups. The new component groups include strainer bodies, tanks, and tubing for spacial interaction. The applicant clarified that the component group for piping and fittings includes heat exchanger shells.

The staff reviewed the AMR of the new component groups and the additional AMR references for existing component groups. All of the AMR references were already being used for the service water system and had been previously reviewed and approved by the staff for components in the service water system, as discussed in SER Section 3.3.2.4.16. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the service water system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Reactor Building Closed Cooling Water System

The applicant expanded the system boundaries for the reactor building closed cooling water system at both Dresden and Quad Cities. The resulting changes to Table 2.3.3-17 of the LRA include new component groups and a revision to existing component groups (to delete "Quad Cities only"). The new component groups include pumps, tubing, and tanks for spacial interaction.

The staff reviewed the AMR of the additional component groups and the additional AMR references for existing component groups. All of the AMR references for the component groups in the expanded scope were already being used for the same combinations of materials and environments in the reactor building closed cooling water system, and had been previously reviewed and approved by the staff, as discussed in SER Section 3.3.2.4.17. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the reactor building closed cooling water system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended

functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Turbine Building Closed Cooling Water System

For Dresden, the applicant stated that additional components were added to the scope of license renewal. At Dresden the added components include all of the turbine building closed cooling pumps, heat exchangers, piping, valves, surge tank, and other passive system components. For Quad Cities, where this system had previously been excluded from the scope of license renewal at Quad Cities, the system has been added. At Quad Cities the added components include all of the turbine building closed cooling pumps, heat exchangers, piping, valves, surge tank, and other passive system components.

The resulting changes to Table 2.3.3-18 of the LRA include the addition of four new component groups and two new aging management references. These new component groups include piping and fittings (includes heat exchanger shells), valves, pumps, and tanks for spacial interaction. The two new AMR reference numbers are 3.3.2.211 and 3.3.2.319.

The staff reviewed the AMR of the additional new component groups and the additional AMR references for existing component groups. Except for new (e.g., not previously used in the LRA) AMR references 3.3.2.211 and 3.3.2.319, all of the AMR references for the component groups in the expanded scope were already being used for the same combinations of materials and environments in the turbine building closed cooling water system, and had been previously reviewed by the staff, as discussed in SER Section 3.3.2.4.18. The combinations of material, environment, and aging effect addressed by new AMR reference 3.3.2.211 is adequately covered in SER Section 3.3.2.4.18. New AMR reference 3.3.2.319 addresses crack initiation and growth/SCC and IGSCC of cast iron components in chemically treated demineralized water, and credits the Closed-Cycle Cooling Water System AMP (B.1.14). The staff finds the Closed-Cycle Cooling Water System AMP appropriate and acceptable for this aging effect, as identified in SER Section 3.0.3.7. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the turbine building closed cooling water system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Demineralized Water Makeup System

For the demineralized water makeup system, additional piping and components were added to the scope of license renewal. This resulted one new component group and additional AMR references for existing component groups. The new component group is tubing for spacial interaction.

The staff reviewed the AMR of the new component group and the additional AMR references for existing component groups. The staff finds that the additional AMR references for the demineralized water makeup system include appropriate aging effects and aging management programs necessary to manage those aging effects, where applicable.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Residual Heat Removal Service Water System

Section 2.3.3.20 of the LRA describes the Residual Heat Removal (RHR) Service Water system (Quad Cities only) which was originally included within the scope of license renewal. The RHR service water pumps are contained in vaults that have non-safety related sumps. Using the revised scoping methodology, the applicant determined that the sump pumps and associated piping can spatially interact with the safety related RHR service water pumps. Therefore, the RHR service water system boundary was expanded to include additional components in the scope of license renewal. This resulted in new component groups and additional AMR references for existing component groups. The new component groups include NSR vents or drains, piping, valves and pumps for spacial interaction.

The staff reviewed the AMR of the new component groups and the additional AMR references for existing component groups. All of the AMR references were already being used for the RHR service water system and had been previously reviewed by the staff, as discussed in SER Section 3.3.2.4.20. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the RHR service water system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Fuel Pool Cooling and Filter Demineralizer System

The applicant stated that the revised scoping methodology affected the fuel pool cooling and filter demineralizer system at both Dresden and Quad Cities. At Dresden, additional piping and components were added to the scope of license renewal. At Quad Cities, the system was brought into scope.

The resulting changes to Table 2.3.3-23 of the LRA include the addition of one component group (pumps for spacial interaction) and several aging management references to existing component groups. The statements "Dresden only" were deleted from component groups that are also applicable to Quad Cities, due to the new scoping, and a clarification was added that piping and fittings includes heat exchanger shells.

The staff reviewed the AMR of the new component group and the additional AMR references for existing component groups. The staff finds that the additional AMR references for the fuel pool cooling and filter demineralizer system include appropriate aging effects and aging management programs necessary to manage those aging effects, where applicable.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended

functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Plant Heating System

For the plant heating system, additional piping and components were added to the scope of license renewal. The applicant stated that this boundary expansion includes more of the same type of components already represented on Table 2.3.3-24 of the LRA, such that no changes to Table 2.3.3-24 were required.

Since all of the AMR references for the component groups in the expanded scope were already being used for the same combinations of materials and environments in the plant heating system, and had been previously reviewed by the staff, as discussed in SER Section 3.3.2.4.24, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the expanded scope of the control rod hydraulic system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Circulating Water System

The circulating water system was added to the scope of license renewal due to the potential for a portion of the system to have spacial interactions with a safety-related system. For Quad Cities, only the Unit 1 circulating water system is in scope. For Dresden, the system is in scope for Units 2 and 3. Aging management of the passive, long-lived components is provided by new Table 2.3.3-29. The component groups include piping and fittings, valves, and pumps (pumps are for Dresden only) for spacial interaction.

For various materials (can include carbon steel, aluminum-bronze, brass, copper-nickel, and/or stainless steel) in raw water covered by the GALL (AMR Reference 3.3.1.15), the applicant uses the Open Cycle Cooling Water System AMP (B.1.13) to manage the loss of material due to general, pitting, crevice, and galvanic corrosion, MIC, biofouling, and buildup of deposit due to biofouling, which is consistent with the GALL recommendations. For the cast iron pumps in raw water, which are not addressed by GALL, the applicant uses the Open Cycle Cooling Water System AMP (B.1.13) and the Selective Leaching of Material AMP (B.1.24) to address the loss of material. For the external surfaces of carbon steel, low-alloy steel, or cast iron, the applicant credits the walkdowns and other activities in the Bolting Integrity AMP (B.1.12), Structures Monitoring AMP (B.1.30), or the Open Cycle Cooling Water System AMP (B.1.13) to manage the loss of material.

The staff reviewed the AMR of the new component groups. All of the AMR references were already being used for other auxiliary systems and had been previously reviewed by the staff, as discussed in SER Section 3.3. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the circulating water system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Laundry Treatment System (Dresden only)

The laundry treatment system at Dresden was brought into the scope of license renewal due to the potential for a portion of the system to have spacial interactions with a safety-related system. The discharge piping used to transfer water to the radwaste system is located in the same general areas as safety-related electrical switchgear. Aging management of the passive, long-lived components is provided by new Table 2.3.3-30. The only component group is piping and fittings for spacial interaction.

The AMR for the piping and fittings uses AMR Reference 3.3.2.130, which uses the One-Time Inspection AMP (B.1.23) to manage the loss of material of carbon steel, stainless steel, brass, or bronze in air, moisture, humidity, and leaking fluid. In RAI B.1.23-2.2, the staff asked for additional justification for the use of a one-time inspection for such items as carbon steel vents, drains, piping, and valves in moisture, humidity, and leaking fluid. By letter dated January 26, 2004, the applicant stated that the corrosion rates would be sufficiently slow because the components are attached to normally closed isolation valves and are not expected to contain moisture. The applicant also stated that the vents were periodically operated and monitored during operation, and any appreciable leakage or condensation would be identified and corrective actions initiated, if applicable. From this, the staff concurred that the rate of corrosion would be slow and that the rate would not change significantly over time. The staff asked how the above justification applied to the components in the laundry treatment system. By letter dated June 22, 2004, the applicant stated that the portion of laundry drain system that was brought into scope is infrequently operated (approximately quarterly) and has the same operating environment as the rest of the vents and drains. Based on the above, the staff agrees that the corrosion should be slow and relatively constant for this system, such that a one-time inspection is acceptable to manage the corrosion. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management for the components in the laundry treatment system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Zinc Injection System

The zinc injection system was added to the scope of license renewal due to the potential for spacial interactions with safety-related systems. The system is mounted on a skid near the reactor feedwater pumps. The system boundary includes the all associated piping, inline manual isolation globe valves, rupture discs, and strainers. Aging management of the passive, long-lived components is provided by new Table 2.3.3-31. The component groups include piping and fittings, tubing, and valves for spacial interaction.

For the external surfaces of carbon steel or low-alloy steel, the applicant credits walkdowns in the Bolting Integrity AMP (B.1.12) and Structures Monitoring AMP (B.1.30) to manage the loss of material. For carbon steel and stainless steel in treated water, the applicant credits the Water Chemistry AMP (B.1.2) and the One-Time Inspection AMP (B.1.23) to manage the loss of material. The applicant does not identify any AERMs for stainless steel in moist air.

The staff reviewed the AMR of the new component groups. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the zinc injection system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Main Steam System

For the main steam system, the system boundary was expanded to include additional components in the scope of license renewal. Through plant walkdowns, the applicant identified main steam instrumentation racks and (for Dresden) steam lines that feed the radwaste reboilers that are in the general areas containing safety-related components. This resulted in new component groups being brought into the scope of license renewal. The new component groups include piping and fittings, tubing, and valves for spacial interaction.

The staff reviewed the AMR of the new component groups. The staff questioned the use of AMR reference 3.4.1.2, which was not previously used for this system. For the expanded scope of the main steam system, this GALL reference is used for piping and valves in the steam lines to the radioactive waste reboilers. This reference is for corrosion of carbon steel and stainless steel in steam or treatate water environments, and the GALL recommends further evaluation of this aging effect. The applicant discussed its further evaluation in Section 3.4.1.1.2 of the LRA, which lists several plant locations where the one-time inspections will be performed. These are areas that are generally exposed to stagnant water that occasionally experience flow to replenish the oxygen supply, and the staff questioned how these locations were bounding for the main steam system.

By letter dated June 22, 2004, the applicant responded that the flow through the new components is intermittent and that the components use 2 AMR references, 3.4.1.2 and 3.4.1.4. Reference 3.4.1.2 addresses the general corrosion for the periods when the water is stagnant. Reference 3.4.1.4 (flow accelerated corrosion) addresses corrosion due to the flow of high moisture steam when the radioactive waste reboilers are operating. The applicant also stated that the locations identified in LRA Section 3.4.1.1.2 are the same materials, are exposed to the same fluids, and experience flow to replenish oxygen more frequently than the components in the main steam system. Based on the above, the staff concludes that the locations identified in LRA Section 3.4.1.1.2 are acceptable as leading indicators of corrosion due to stagnant conditions in the main steam system. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the main steam system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended

functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Feedwater System

For the feedwater system, the scope was expanded to include the entire feedwater system at both Dresden and Quad Cities, including the sample lines. This resulted in adding AMR references to existing component groups and adding new component groups. The new component groups are pumps and tubing for spacial interaction.

The staff reviewed the additional AMR references and the AMR of the new component groups. All of the AMR references had been previously used for the SPCS, as discussed in SER Section 3.4.2.4. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for components in the feedwater system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Condensate and Condensate Storage System

For the condensate and condensate storage system, the scope was expanded to include the condensate transfer pumps, condensate jockey pumps, and associated suction and discharge piping. As a result, almost the entire system is in the scope of license renewal. The exceptions are the condensate demineralizers, steam jet air ejectors, and gland seal condensers, all of which reside in their own rooms isolated from safety-related equipment, and the Dresden Unit 1 contaminated demineralized water storage tank, which is located outside away from other plant equipment. Additional AMR references were added to the piping and fittings component group, LRA Table 2.3.4-3 was revised to indicate that this component group also applies to Quad Cities, and clarifications were made regarding the components that are included in this group (such as strainers, flow elements, and heat exchanger shells). Also, the applicant added new component groups for pumps, tanks, tubing, and valves for spacial interaction.

The staff reviewed the AMR of the new component groups and the additional AMR references for existing component groups. All of the AMR references were already being used for the condensate and condensate storage systems and had been previously reviewed by the staff, as discussed in SER Section 3.4.2.4.3. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the condensate and condensate storage system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Main Condenser

The Main Condenser was originally included within the scope license renewal at both Dresden and Quad Cities because the main condenser provides for post accident containment holdup and plateout of main steam isolation valve bypass leakage. The main condenser at Quad Cities station is a non-safety related component that resides in the same general area as the discharge piping from the emergency diesel cooling water system. As such, the potential for spatial interaction could occur and an additional system component function and appropriate aging management has been assigned. This change only applies to Quad Cities as the same physical equipment configuration does not exist at Dresden.

The staff reviewed the AMR of the main condenser. The staff notes that all of the AMR references have previously been accepted for use for the main condenser, as discussed in SER Section 3.4.2.4.4. The material/environment is carbon steel in steam and treated water, which would be subject to loss of material due to various corrosion mechanisms; however, the applicant determined that there are no aging effects requiring management based on the intended function of containment, holdup, and plateout of iodine. The applicant demonstrated that the intended function was achieved by the physical presence of the main condenser, and that the ability of the main condenser to maintain vacuum during normal operation was sufficient to demonstrate that the intended function (physical presence) was met, so no additional aging management was needed. Similarly, by letter dated June 22, 2004, the applicant demonstrated that the ability of the condenser to maintain vacuum was sufficient to demonstrate that corrosion has not affected the leakage boundary function of the system. Therefore, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the main condenser.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Main Turbine and Auxiliaries

The applicant stated that the original scoping results described in Section 2.3.4.5 of the LRA included a portion of the main turbine electrohydraulic control (EHC) at both sites due to spatial interaction with some safety related components. However, portions of the EHC system were excluded from the scope of license renewal because of they were separated from safety related components by a distance greater than 20 feet. The change in scoping methodology has resulted in the addition of the entire system within the scope of license renewal at both sites. Additional components such as EHC pumps, coolers, strainers, filters, accumulators, and the EHC fluid reservoir were added to the scope of license renewal. The new component groups are filters/strainers, pump casings, and tanks for leakage boundary (spacial). The applicant clarified that the heat exchanger shell was evaluated with the filter/strainer component group.

The staff reviewed the AMR of the new component groups. AMR reference 3.4.2.11 for stainless steel in air had already been accepted for use in this system. The applicant added three new AMR references to the LRA to address aging management not previously addressed in the LRA. These AMR references address stainless steel in EHC oil, and rely on the Lube Oil Monitoring Activities AMP and the One-Time Inspection AMP to manage the potential for loss of material. This approach had already been found acceptable to the staff, as discussed in SER Section 3.4.3.4.5. On the basis of its review, the staff finds that the applicant has identified the

applicable aging effects and has proposed adequate aging management, for the components in the main turbine and auxiliary system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Turbine Oil System

The original scoping results described in Section 2.3.4.6 of the license renewal application only included a portion of the turbine oil system (hydrogen seal oil system), at Quad Cities. The change in scoping methodology resulted in the addition of the hydrogen seal oil system within the scope of license renewal at Dresden. The result is a clarification to the LRA that this system is applicable to both Dresden and Quad Cities. No new component groups or AMR references were added due to the change in scoping criteria; however, the applicant added components to the piping and fittings component group. Since all of the aging management for this system was previously approved by the staff, as described in SER Section 3.4.2.4.6, and since there are no changes to the aging management of this system, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the turbine oil system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Main Generator and Auxiliaries (Stator Water Cooling)

The original scoping results described in Section 2.3.4.7 of the LRA only included a portion of the main generator and auxiliaries, the stator water cooling, at Quad Cities. However, portions of the stator water cooling system were excluded from the scope of license renewal because of they were separated from a safety related component by a distance greater than 20 feet. The change in scoping methodology has resulted in the addition of the entire stator water cooling system within the scope of license renewal at both sites. The result is a clarification to the LRA that this system and the Generator Stator Water Chemistry Activities AMP (LRA Section B.2.7) are applicable to both Dresden and Quad Cities. No new component groups or AMR references were added due to the change in scoping criteria; however, the components were added to the housings component group. Since all of the aging management for this system was previously approved by the staff, as described in SER Section 3.4.2.4.7, and since there are no changes to the aging management of this system, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the main generator and auxiliary system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Extraction Steam System

As a result of the revised scoping methodology, the extraction steam system was added to the scope of license renewal at Quad Cities. Specifically, the entire extraction steam piping system was added to the scope of license renewal because the system could spatially interact with safety related pipe located in the feedwater heater area.

The purpose of the extraction steam system is to preheat feedwater as it passes through the feedwater heaters prior to being returned to the reactor vessel. Steam is extracted from various points on the main turbine and is routed along with water from the moisture separator drains to the feedwater heaters. This steam is added to heat the condensate and feedwater which flows through the tube side of the feedwater heaters. The component groups include piping and fittings, and valves for leakage boundary (spacial) for Quad Cities only.

For aging management, the applicant cites three GALL AMR references. AMR reference 3.4.1.2 addresses carbon steel and stainless steel in steam and water environments, and credits the Water Chemistry AMP (B.1.2) and the One-Tine Inspection AMP (B.1.23) to manage the loss of material due to general (carbon steel only), pitting, and crevice corrosion. For this AMR reference, the GALL recommends that the one-time inspections verify the effectiveness of the chemistry controls. The applicant's programs are consistent with the GALL recommendations. AMR reference 3.4.1.3 credits the Bolting Integrity AMP (B.1.12) or the Structures Monitoring AMP (B.1.30) to address the general corrosion of the external surfaces of carbon steel components. These AMPs were evaluated in Sections 3.0.3.5 and 3.0.3.14 and found to be acceptable for managing this aging effect. AMR reference 3.4.1.4 addresses the flow-accelerated corrosion of carbon steel components. For this the applicant credits the Flow Accelerated Corrosion AMP (B.1.11), which has been reviewed and found to be acceptable, as discussed in Section 3.0.3.4 of this SER. The staff questioned the applicant's choice of plant locations for the one-time inspections identified in AMR Reference 3.4.1.2. In its response dated June 22, 2004, the applicant clarified that the components that use AMR Reference 3.4.1.2 also use AMR Reference 3.4.1.4. The applicant also stated that the locations chosen for the one-time inspections had the same materials and fluids, but more severe conditions for corrosion due to the higher oxygen replenishment from the monthly flow test. Based on the above, the staff concurs that the aging management is appropriate. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the extraction steam system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Feedwater Heater Drains and Vents

As a result of the revised scoping methodology, the feedwater heater drains and vents system at Quad Cities was added to the scope of license renewal. The feedwater heater vents are included within this system but contain non-condensable gases that could not spatially interact (spray) with safety related pipe. As such, only drain piping and associated components from the heater drain system have been included within the scope of license renewal. The component

groups include piping and fittings, and valves for leakage boundary (spacial) for Quad Cities only.

For aging management, the applicant cites three GALL AMR references. AMR reference 3.4.1.2 addresses carbon steel and stainless steel in steam and water environments, and credits the Water Chemistry AMP (B.1.2) and the One-Time Inspection AMP (B.1.23) to manage the loss of material due to general (carbon steel only), pitting, and crevice corrosion. For this AMR reference, the GALL recommends that the one-time inspections verify the effectiveness of the chemistry controls. The applicant's programs are consistent with the GALL recommendations. AMR reference 3.4.1.3 credits the Bolting Integrity AMP (B.1.12) or the Structures Monitoring AMP (B.1.30) to address the general corrosion of the external surfaces of carbon steel components. These AMPs were evaluated in Sections 3.0.3.5 and 3.0.3.14 and found to be acceptable for managing this aging effect. AMR Reference 3.4.1.4 addresses the flow-accelerated corrosion of carbon steel components. For this the applicant credits the Flow Accelerated Corrosion AMP (B.1.11), which has been reviewed and found to be acceptable, as discussed in Section 3.0.3.4 of this SER. The staff questioned the applicant's choice of plant locations for the one-time inspections identified in AMR Reference 3.4.1.2. In its response dated June 22, 2004, the applicant clarified that the components that use AMR Reference 3.4.1.2 also use AMR Reference 3.4.1.4. The applicant also stated that the locations chosen for the one-time inspections had the same materials and fluids, but more severe conditions for corrosion due to the higher oxygen replenishment from the monthly flow test. Based on the above, the staff concurs that the aging management is appropriate. On the basis of its review, the staff finds that the applicant has identified the applicable aging effects and has proposed adequate aging management, for the components in the feedwater heater drains and vents system.

On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Conclusions

On the basis of its review of the aging management of the components that were brought into scope due to the revised scoping methodology, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1 Reactor Vessel, Internals, and Reactor Coolant System

As discussed in Section 3.0.1 of this SER, the components in each of the systems are rolled up into one of two LRA tables. LRA Table 3.1-1 consists of reactor vessel, internals, and reactor coolant system components that are evaluated in the GALL Report and LRA Table 3.1-2 consists of reactor system components that are not evaluated in the GALL Report.

3.1.1 Summary of Technical Information in the Application

In LRA Section 3.1, the applicant described its AMRs for the reactor vessel, internals, and reactor coolant system. The description of this system can be found in Section 2.3.1 of the LRA. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Tables 2.3.1-1 through 2.3.1-9.

The applicant's AMRs included an evaluation of plant-specific and industry operating experience. The plant-specific evaluation included reviews of condition reports and discussions with appropriate site personnel to identify aging effects that require management. These reviews concluded that the aging effects requiring management based on plant-specific operating experience were consistent with the aging effects identified in GALL.

The applicant's review of industry operating experience included a review of operating experience through 2002. The results of this review concluded that the aging effects requiring management based on industry operating experience were consistent with the aging effects identified in GALL. The applicant's ongoing review of plant-specific and industry-wide operating experience is conducted in accordance with the Exelon Operating Experience Program.

3.1.2 Staff Evaluation

In Section 3.1 of the LRA, the applicant described its AMR for the reactor vessel, internals, and reactor coolant system. The staff reviewed LRA Section 3.1 to determine whether the applicant had provided sufficient information to demonstrate that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB throughout the period of extended operation, in accordance with the requirements of 10 CFR 54.21(a)(3), for the reactor system components that are determined to be within the scope of license renewal and subject to an AMR.

The applicant referenced the GALL Report in its AMR. The staff has previously evaluated the adequacy of the aging management of reactor system components for license renewal as documented in the GALL Report. Thus, the staff did not repeat its review of the matters described in the GALL Report except to ensure that the material presented in the LRA was applicable, and to verify that the applicant had identified the appropriate programs as described and evaluated in the GALL Report. The staff evaluated those aging management issues recommended for further evaluation in the GALL Report; this evaluation is presented in Section 3.1.2.2 of this SER. The staff also evaluated aging management information submitted by the applicant that was different from that in the GALL Report or was not addressed in the GALL Report; this evaluation is presented in Section 3.1.2.4 of this SER. Finally, the staff reviewed the UFSAR Supplement to ensure that it provided an adequate description of the programs credited with managing aging for the reactor system components.

Table 3.1-1 below provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Section 3.1 that are addressed in the GALL Report.

Table 3.1-1. Summary of Aging Management Programs for Reactor Vessel, Internals, and Reactor Coolant System Evaluated in Chapter IV of the GALL Report

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Reactor coolant pressure boundary components	Cumulative fatigue damage	TLAA evaluated in accordance with 10 CFR 54.21(c)	Evaluated in accordance with 10 CFR 54.21(c)	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.1 below.)
Isolation condenser	Loss of material due to general, pitting, and crevice corrosion	Inservice Inspection; Water Chemistry	Inservice Inspection Program (Appendix B.1.1); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.2 below.)
Pressure vessel ferritic materials that have a neutron fluence greater than 10^{17} n/cm ² (E>1 MeV)	Loss of fracture toughness due to neutron irradiation embrittlement	TLAA, evaluated in accordance with Appendix G of 10 CFR Part 50 and RG 1.99	Evaluated in accordance with 10 CFR 54.21(c)(1)	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.3 below.)
Reactor vessel beltline shell and welds	Loss of fracture toughness due to neutron irradiation embrittlement	Reactor Vessel Surveillance	Reactor Vessel Surveillance Program (Appendix B.1.22)	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.3 below.)
Small-bore reactor coolant system and connected systems piping	Crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading	Inservice Inspection; Water Chemistry; One-Time Inspection	Inservice Inspection Program (Appendix B.1.1); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.4(1) below.)
Jet pump sensing line and reactor vessel flange leak detection line	Crack initiation and growth due to SCC, IGSCC, or cyclic loading	Plant specific	Plant specific	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.4(2) below.)
Isolation condenser	Crack initiation and growth due to SCC or cyclic loading	Inservice Inspection; Water Chemistry	Inservice Inspection Program (Appendix B.1.1); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801 which recommends further evaluation. (See Section 3.1.2.2.4(3) below.)
Reactor vessel closure studs and stud assembly	Crack initiation and growth due to SCC and/or IGSCC	Reactor Head Closure Studs	Reactor Head Closure Studs Program (Appendix B.1.3)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
CASS pump casing and valve body	Loss of fracture toughness due to thermal aging embrittlement	Inservice Inspection	Inservice Inspection program (Appendix B.1.1)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
CASS piping	Loss of fracture toughness due to thermal aging embrittlement	Thermal Aging Embrittlement of CASS	No AMP (CASS piping does not exist at D/QCNPS)	Not applicable
BWR piping and fittings; steam generator components	Wall thinning due to FAC	Flow-Accelerated Corrosion	Flow-Accelerated Corrosion Program (Appendix B.1.11)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
RCPB valve closure bolting, manway, and holding bolting, and closure bolting in high pressure and high temperature systems	Material loss due to wear; loss of preload due to stress relaxation; crack initiation and growth due to cyclic loading and/or SCC	Bolting Integrity	Bolting Integrity Program (Appendix B.1.12)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Feedwater and CRD return line nozzles	Crack initiation and growth due to cyclic loading	Feedwater Nozzle; CRD Return Line Nozzle	Feedwater Nozzle Program (Appendix B.1.5); Control Rod Drive Return Line Nozzle Program (Appendix B.1.6)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Vessel shell attachment welds	Crack initiation and growth due to SCC, IGSCC	BWR Vessel ID Attachment Welds; Water Chemistry	BWR Vessel ID Attachment Welds Program (Appendix B.1.4); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Nozzle safe ends, recirculation pump casing, connected systems piping and fittings, body and bonnet of valves	Crack initiation and growth due to SCC, IGSCC	BWR Stress Corrosion Cracking; Water Chemistry	BWR Stress Corrosion Cracking Program (Appendix B.1.7); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Penetrations	Crack initiation and growth due to SCC, IGSCC, cyclic loading	BWR Penetrations; Water Chemistry	BWR Penetrations Program (Appendix B.1.8); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Core shroud and core plate, support structure, top guide, core spray lines and spargers, jet pump assemblies, CRD housing, nuclear instrumentation guide tubes	Crack initiation and growth due to SCC, IGSCC, IASCC	BWR Vessel Internals; Water Chemistry	BWR Vessel Internals Program (Appendix B.1.9); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Core shroud and core plate access hole cover (welded and mechanical covers)	Crack initiation and growth due to SCC, IGSCC, IASCC	ASME Section XI Inservice Inspection; Water Chemistry	Inservice Inspection Program (Appendix B.1.1); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Jet pump assembly castings; orificed fuel support	Loss of fracture toughness due to thermal aging and neutron embrittlement	Thermal Aging and Neutron Irradiation Embrittlement	Thermal Aging and Neutron Irradiation Embrittlement Program (Appendix B.1.10)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)
Unclad top head and nozzles	Loss of material due to general, pitting, and crevice corrosion	Inservice Inspection; Water Chemistry	Inservice Inspection Program (Appendix B.1.1); Water Chemistry Program (Appendix B.1.2)	Consistent with NUREG-1801. (See Section 3.1.2.1 below.)

3.1.2.1 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL does not recommend further evaluation, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation. The staff also sampled component groups to determine whether the applicant had properly identified those component groups in GALL that were not applicable to its plants. The staff also identified several areas where additional information or clarification was needed.

On the basis of its review, the staff has verified the applicant's claim of consistency with the GALL report. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.2 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which GALL Recommends Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL recommends further evaluation, the staff reviewed the applicant's evaluation to determine whether it adequately addressed the issues for which GALL recommended further evaluation. In addition, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation.

The GALL Report indicates that further evaluation should be performed for the aging effects discussed in the following sections.

3.1.2.2.1 Cumulative Fatigue Damage (NUREG-1800, Section 3.1.2.2.1)

Fatigue is a time-limited aging analysis (TLAA) as defined in 10 CFR 54.3. TLAA's are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The staff reviewed the evaluation of this TLAA in Section 4.3 of this SER, following the guidance in Section 4.3 of the SRP-LR.

3.1.2.2.2 Loss of Material Due to Pitting and Crevice Corrosion (NUREG-1800, Section 3.1.2.2.2)

The GALL Report recommends augmented inspection to manage this aging effect. The staff review verifies that the applicant has proposed a program that will manage loss of material due to pitting and crevice corrosion by providing enhanced inspection and supplemental methods to detect loss of material and ensure that the component intended function would be maintained during the period of extended operation.

The applicant stated in LRA Table 3.1-1, Reference No. 3.1.1.2, that the program for managing this aging effect is consistent with NUREG-1801 with exceptions, as described in LRA Appendices B.1.1, "ASME Section XI Inservice Inspection Program," and B.1.2, "Water Chemistry Program." As discussed in Section 3.1.2.2.4(1) of this SER, these exceptions are acceptable. In addition, the applicant referred to LRA Sections 3.1.1.1.2 and 3.1.1.2.3 for further evaluation of loss of material due to general (carbon steel only), pitting, and crevice corrosion as an aging effect for the isolation condenser components at Dresden Units 2 and 3. LRA Section 3.1.1.1.2 states that LRA Appendix B.1.1, "ASME Section XI Inservice Inspection Program," will be augmented by a plant-specific AMPs described in LRA Appendix B.2.6, "Heat Exchanger Test and Inspection Activities." This plant-specific AMP includes temperature and radioactivity monitoring of the shell-side water and eddy current testing of the tubes as recommended by NUREG-1801. However, LRA Section 3.1.1.1.2 does not identify any augmented inspection to detect loss of material in the isolation condenser tubesheet, channel head, and shell as recommended by Item C1.4-b, Chapter IV.C1, of NUREG-1801. LRA Appendix B.1.1 requires VT-2 examinations of the reactor coolant pressure boundary of isolation condenser components during system pressure testing. This is not adequate for detecting loss of material in the isolation condenser components before their intended function (pressure boundary) is compromised. Therefore, the staff issued RAI 3.1-11 requesting the applicant to provide augmented inspection for detecting loss of material in the isolation condenser tubesheet, channel head, and shell.

In response to RAI 3.1-11, in a letter dated October 3, 2003, the applicant stated that the aging management activities identified in LRA Sections 3.1.1.1.2 and 3.1.1.1.7 are consistent with the augmented activities recommended by NUREG-1801, Items IV.C.1.4-a and b and implied that no additional inspection program is needed. The staff finds this response unacceptable because the activities identified in LRA Sections 3.1.1.1.2 and 3.1.1.1.7 do not include augmented inspections for detecting loss of material and cracking in the tubesheet, channel head, and shell of the isolation condenser as recommended by NUREG-1801, Items IV.C.1.4-a and b. Therefore, in Supplemental RAI 3.1-11, the staff requested the applicant to provide augmented inspection of the Dresden isolation condenser (i.e., VT or UT) to manage loss of material and crack initiation and growth in the isolation condenser tubesheet, channel head, and shell, as required by NUREG-1801.

In response to Supplemental RAI 3.1-11, in a letter dated November 21, 2003, the applicant stated that AMP B.2.6, "Heat Exchanger Test and Inspection Program," is a 10-element program that was developed to address heat exchangers within the scope of license renewal that are not inspected under other AMPs. The intent of AMP B.2.6, as originally developed and described in the LRA, is to require a visual inspection of the isolation condenser channel head, tubesheet, and shell, in addition to performing eddy current testing of the tubes and temperature and radiation monitoring of the shell-side water. These new activities will be implemented prior to the period of extended operation. This is Commitment #44 of Appendix A of this SER.

The applicant further stated that AMP B.2.6 did not clearly describe the visual inspection of the isolation condenser tubesheet, channel head, and shell in the description of the isolation condenser augmented activities. In addition to identifying the augmented isolation condenser inspection activities of temperature and radiation monitoring of the shell-side water and eddy current testing of the tubes, AMP B.2.6 provides for condition monitoring, inspection, and performance testing of heat exchangers in scope of license renewal that are not inspected under other AMPs, including the isolation condensers.

The applicant further stated that AMP B.2.6 requires the following two inspections of the isolation condenser by qualified inspectors:

- (a) In conjunction with the periodic eddy current testing of the tubes, a visual inspection to detect cracking and loss of material of the channel head and tubesheets will be performed on the tube side of the isolation condenser in accordance with the station's Heat Exchanger Inspection Program as an augmented inspection to manage loss of material and crack initiation and growth in the isolation condenser tubesheet and channel head.
- (b) Shell-side visual inspections are presently periodically performed to verify the integrity of shell-side internal structural components. These inspections will be expanded in accordance with the station's Heat Exchanger Inspection Program to visually inspect the shell to detect cracking and loss of material of the shell as an augmented inspection to manage loss of material and crack initiation and growth in the isolation condenser shell.

The staff finds the applicant's response to Supplemental RAI 3.1-11 acceptable because it ensures that the isolation condenser tubesheet, channel head, and shell will be visually inspected during the extended period of operation for detecting loss of material and crack initiation and growth, as recommended by NUREG-1801.

However the applicant's update to the UFSAR does not provide a complete description of the inspection program, including VT of the isolation condenser tubesheet, channel head, and shell. In a letter dated December 22, 2003, the applicant revised their response to RAI 3.1-11 to specify that the UFSAR Supplement, Section A.2.6 of the LRA includes visual inspections of the channel head, tube sheets and internal surfaces of the shell.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to pitting and crevice corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.2.3 Loss of Fracture Toughness Due to Neutron Irradiation Embrittlement (NUREG-1800, Section 3.1.2.2.3)

Certain aspects of neutron irradiation embrittlement are TLAAAs as defined in 10 CFR 54.3. TLAAAs are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The staff reviewed the evaluation of this TLAA separately following the guidance in Section 4.2 of the SRP-LR. The results of the staff's review can be found in Section 4.2 of this SER.

Loss of fracture toughness due to neutron irradiation embrittlement could occur in the reactor vessel. A reactor vessel materials surveillance program monitors neutron irradiation embrittlement of the reactor vessel. Reactor vessel surveillance programs are plant-specific, depending on matters such as the composition of limiting materials, availability of surveillance capsules, and projected fluence levels. In accordance with Appendix H to 10 CFR Part 50, an applicant is required to submit its proposed withdrawal schedule for approval prior to implementation. Thus, further staff evaluation is required for license renewal. The GALL Report recommends further evaluation of a plant's reactor vessel materials surveillance program for the period of extended operation. The staff verified that the applicant has proposed an adequate reactor vessel materials surveillance program for the period of extended operation.

D/QCNPS has an existing program, the Reactor Vessel Surveillance Program, described in LRA Appendix B.1.22, for managing loss of fracture toughness in reactor vessel beltline shell and welds due to neutron irradiation embrittlement. The applicant had submitted its license amendment to implement a program consistent with Boiling Water Reactor Vessel and Internals Project (BWRVIP)-78, "Integrated Surveillance Program," and BWRVIP-86, "BWR Integrated Surveillance Program Implementation Plan." The staff has reviewed the license amendment and approved it in SERs to John Skolds, Exelon, from the NRC, dated September 29, 2003, and August 28, 2003, for Dresden and Quad Cities, respectively. Therefore, the applicant has committed to and implemented the BWRVIP Integrated Surveillance Program, consistent with GALL Program XI.M31, "Reactor Vessel Surveillance," described in NUREG-1801. The evaluation of the enhanced program is presented in Section 3.1.2.3.8 of the SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of fracture toughness due to neutron irradiation embrittlement, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.2.4 Crack Initiation and Growth Due to Thermal and Mechanical Loading or Stress-Corrosion Cracking (NUREG-1800, Section 3.1.2.2.4)

Crack initiation and growth due to thermal and mechanical loading or SCC (including IGSCC) could occur in small-bore reactor coolant system and connected system piping less than nominal pipe size (NPS) 4. The existing program relies on ASME Section XI in-service inspection and on control of water chemistry to mitigate SCC. The GALL Report recommends that a plant-specific destructive examination or a nondestructive examination (NDE) that permits inspection of the inside surfaces of the piping be conducted to ensure that cracking has not occurred and the component intended function will be maintained during the extended period. The AMPs should be augmented by verifying that service-induced weld cracking is not occurring

in the small-bore piping less than NPS 4, including pipe, fittings, and branch connections. A one-time inspection of a sample of locations is an acceptable method to ensure that the aging effect is not occurring and that the component's intended function will be maintained during the period of extended operation. GALL Chapter XI.M32, "One-Time Inspection" contains an acceptable verification method.

The GALL Report recommends that the inspection include a representative sample of the system population, and, where practical and prudent, focus on the bounding or lead components most susceptible to aging due to time in service, severity of operating conditions, and lowest design margin. For small-bore piping, actual inspection locations should be based on physical accessibility, exposure levels, NDE examination techniques, and locations identified in IN 97-46, "Unisolable Crack in High-Pressure Injection Piping." Combinations of NDE, including visual, ultrasonic, and surface techniques, are performed by qualified personnel following procedures consistent with the ASME Code and 10 CFR Part 50, Appendix B. For small-bore piping less than NPS 4, including pipe, fittings, and branch connections, a plant-specific destructive examination or NDE that permits inspection of the inside surfaces of the piping should be conducted to ensure that cracking has not occurred. Follow up of unacceptable inspection findings should include expansion of the inspection sample size and locations. The inspection and test techniques prescribed by the program should verify any aging effects because these techniques, used by qualified personnel, have been proven effective and consistent with staff expectations. The staff's review confirms that the program includes measures to verify that unacceptable degradation is not occurring, thereby validating the effectiveness of existing programs, or confirming that there is no need to manage aging-related degradation for the period of extended operation. If an applicant proposes a one-time inspection of select components and susceptible locations to ensure that corrosion is not occurring, the reviewer verifies that the proposed inspection will be performed using techniques similar to ASME Code and ASTM standards, including visual, ultrasonic, and surface techniques, to ensure that the component's intended function will be maintained during the period of extended operation.

The applicant stated in LRA Table 3.1-1 that the program for managing this aging effect is consistent with NUREG-1801, with exceptions, as described in LRA Sections B.1.1 for the Inservice Inspection Program and B.1.2 for the Water Chemistry Program. These exceptions are described in the following paragraphs.

Inservice Inspection

NUREG-1801 indicates that the Inservice Inspection Program is to use the 1995 Edition through the 1996 Addenda of ASME Section XI. The applicant stated that the current code of record for Dresden and Quad Cities is the 1989 Edition of ASME Section XI. The applicant's program will be enhanced to be consistent with the requirements of the 1995 Edition through the 1996 Addenda of ASME Section XI. This enhancement is scheduled for implementation prior to the beginning of the period of extended operation. The evaluation of the Inservice Inspection Program is presented in Section 3.0.3.1 of this SER.

Water Chemistry

NUREG-1801 indicates that water chemistry control is in accordance with BWRVIP-29 for water chemistry in BWRs. BWRVIP-29 references the 1993 revision of EPRI TR-103515, "BWR

Water Chemistry Guidelines.” The D/QCNPS Water Chemistry Program is based on EPRI TR-103515-R2, which is the 2000 revision of “BWR Water Chemistry Guidelines.” As an enhancement to the applicant’s Water Chemistry Program, the applicant stated that procedures will be revised to provide for increased sampling to verify corrective actions taken to address abnormal chemistry conditions. The evaluation of the Water Chemistry Program is presented in Section 3.0.3.2 of this SER.

The staff finds the applicant’s exception to the GALL Inservice Inspection Program to be acceptable because the applicant has committed to meeting the requirements of the 1995 Edition through the 1996 Addenda of ASME Section XI, which the staff has endorsed in 10 CFR 50.55a, prior to the period of extended operation. This is Commitment #1 in Appendix A of this SER. The staff finds the applicant’s exceptions to the GALL water chemistry program to be acceptable because it is based on updated industry experience (EPRI TR-103515).

In LRA Section 3.1.1.1.5, the applicant stated that an inspection of small-bore reactor coolant piping is to be conducted in accordance with its One-Time Inspection Program to verify that service-induced weld cracking is not occurring in the small-bore piping less than 4 NPS, including pipe, fittings, and branch connections. The applicant’s One-Time Inspection Program is described in LRA Section B.1.23, and the applicant stated that it is consistent with NUREG-1801, Chapter XI.M32, “One-Time Inspection.” In Section 3.1.1.1.5 of the LRA, the applicant further stated that thermal stratification, thermal cycling and thermal stripping, thermal transients, and flow-accelerated corrosion are potential aging mechanisms for small-bore piping. The LRA also states that a review of the Dresden and Quad Cities risk informed inservice inspection (RI-ISI) evaluations on degradation mechanism assessment demonstrated that only Dresden had a high failure potential on a small-bore pipe due to thermal fatigue. Therefore, one-time inspection will consist of an ultrasonic exam on one of the 2-inch drain lines off the Dresden main steam header. These lines are Class 1 and within the scope of license renewal.

The staff issued RAI 3.1-9(a) requesting information related to one-time inspection of small diameter piping. In RAI 3.1-9(a)(1), the staff requested the applicant: to identify all Class 1, small-bore piping in all units (Dresden, Units 2 and 3, and Quad Cities, Units 1 and 2), including the pipe sizes, material, and type of weld (i.e., butt or socket). If there are no UT-inspectable full penetration butt welds within scope, then the applicant should destructively test the socket welds that are replaced due to modifications to confirm the effectiveness of the existing AMPs. This is consistent with NUREG-1801, Chapter XI.M32, which allows a plant-specific destructive examination of replaced piping in lieu of NDE that permits inspection of the inside surfaces of the piping. In response to RAI 3.1-9(a)(1), in a letter dated October 15, 2003, the applicant provided a listing of the ASME Class 1, NPS less than NPS 4 piping, including pipe sizes, material, and type of weld for Dresden Units 2 and 3 and Quad Cities Units 1 and 2. The applicant stated that no destructive examination will be performed of the socket welds because there are full penetration butt welds that can be UT-inspected at Dresden and Quad Cities. The staff agrees with the applicant that it does not have to perform destructive testing of the socket welds because Dresden and Quad Cities have UT-inspectable full penetration butt welds in the small diameter piping.

In RAI 3.1-9(a)(2), the staff provided the following comments to the applicant on the use of risk-informed inservice inspection and requests for additional information. As currently written, 10 CFR Part 54 does not allow the staff to accept the elimination of SSCs from aging management

based on risk-informed arguments. Therefore, RI-ISI evaluations can be used to select susceptible SSCs locations, but cannot eliminate SSCs from being inspected for a one-time inspection program. A sampling of butt welds from each unit should be developed that is consistent with the ASME Code and is sufficient to confirm the effectiveness of existing AMPs and/or to confirm that there is no need to manage aging-related degradation for the period of extended operation. Inspecting one weld in one unit is not a sufficient sample size. The applicant must provide a sampling plan with a suitable sample size and an explanation of the selection process. This plan should also include a discussion regarding expansion of the inspection sample size and locations for follow up of unacceptable inspection findings as required by NUREG-1801, Chapter XI.M32. This plan is to be reviewed by the staff on a plant-specific basis, as required by NUREG-1801, Chapter XI.M32.

In response to RAI 3.1-9(a)(2), in a letter dated October 15, 2003, the applicant stated that the butt welds identified in the response to RAI 3.1-9(a)(1) will be evaluated based on risk and placed into high, medium, and low risk categories consistent with the currently approved RI-ISI program. The applicant further stated that a sample of 10 percent of the high and medium risk butt welds from each of the four Dresden/Quad Cities units will be selected for volumetric examination. The sample expansion will be consistent with that described in Code Case N-578-1, Section 2430. This is part of Commitment #23 of Appendix A in this SER. The staff finds the sample size acceptable because it includes the most susceptible sites, and the sample expansion guideline acceptable because it follows the recommendation of NUREG-1801, Chapter XI.M32. Thus, the staff finds the sample size and sample expansion acceptable for the one-time inspection to verify that SCC is not occurring in the small-bore piping.

In RAI 3.1-9(a)(3), the staff noted that Section 3.1.1.1.5 of the LRA does not specify an inspection program for SCC as an aging mechanism in small-bore piping. Therefore, the staff requested the applicant to identify the AMPs that will be used for managing cracking due to SCC in small-bore piping. In response to RAI 3.1-9(a)(3), in a letter dated October 15, 2003, the applicant stated that the following two programs are credited with managing cracking due to SCC in small-bore piping—(1) LRA Section B.1.2, "Water Chemistry," and (2) LRA Section B.1.23, "One-Time Inspection," as amended in response to RAI 3.1-9(a)(2) above. The staff finds the response acceptable because the applicant has identified the One-Time Inspection Program for verifying the effectiveness of the Water Chemistry Program in mitigating cracking due to SCC.

As mentioned above, the applicant stated that the One-Time Inspection Program for small-bore Class 1 piping less than 4 inches will consist of a volumetric examination of 10 percent of high and medium risk butt welds from each of the four units. These lines were identified as part of a review of the Dresden and Quad Cities RI-ISI evaluations on degradation mechanism assessments on Class 1 piping. The aging mechanisms cited by the report for these lines are thermal stratification, cycling, and stripping (TASCS), thermal transients (TT), and flow-accelerated corrosion. Nuclear industry service experience, documented in several industry and NRC reports, has shown that the majority of reported piping leaks occur in small-bore piping less than 4-NPS. A significant number of these failures have been reported in the reactor coolant system, main steam system, feedwater system, and auxiliary systems in BWR plants. Also, a large portion of the reported Class 1 small-bore piping failures occurred in piping 1 NPS and less that were caused primarily by mechanical vibration, thermal fatigue/turbulent penetration, SCC, and erosion-corrosion aging mechanisms. Since Class 1 small-bore piping 1 NPS and less is exempt from NDE examinations in ASME Section XI, these lines will typically

receive only periodic VT-2 visual examination. In addition, many RI-ISI evaluations do not include Class 1 piping 1 NPS and less in their evaluation scope and specific degradation mechanism assessments are not performed for these lines. Therefore, it is not clear that the applicant's proposed One-Time Inspection Program for small-bore piping will be representative of all Class 1 piping 1 NPS and less with full penetration butt welds (socket welds are excluded).

In RAI 3.1-9(b), the applicant was requested to clarify whether the Dresden and Quad Cities RI-ISI degradation mechanism assessments included Class 1 piping 1 NPS and less with full penetration butt welds. The applicant is also requested to describe how the proposed One-Time Inspection Program will confirm that the aging mechanisms associated with the Class 1 small-bore piping 1 NPS and less with full penetration butt welds at Dresden and Quad Cities are either not occurring and/or there is no need to manage age-related degradation for the period of extended operation. In response to RAI 3.1-9(b), in a letter dated October 3, 2003, the applicant stated that neither Dresden nor Quad Cities have butt welds in ASME Class 1 piping 1 NPS and less. Therefore, the One-Time Inspection Program does not apply to the 1 NPS and less piping. The staff agrees with the applicant's response that the proposed One-Time Inspection Program does not apply to the piping 1 NPS and less because, at Dresden and Quad Cities, this piping does not include full penetration butt welds.

Crack initiation and growth due to thermal and mechanical loading or SCC (including IGSCC) could also occur in the BWR reactor vessel flange leak detection line and BWR jet pump sensing line. The GALL Report recommends that a plant-specific AMP be evaluated for the management of crack initiation and growth due to thermal and mechanical loading or SCC (including IGSCC) in the BWR reactor vessel flange leak detection line and BWR jet pump sensing line. The staff reviewed the applicant's proposed program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.

The applicant stated that the Dresden reactor vessel flange leak detection line is fabricated of carbon steel, rather than stainless steel or a nickel-based alloy, as given in NUREG-1801, and it is therefore evaluated as a non-NUREG-1801 item. The AMR results for the carbon steel leak detection line are presented in Section 3.1.2.4.5 of the SER.

In LRA Section 3.1.1.1.6, the applicant stated that the reactor vessel flange leak detection line at Quad Cities is a Class 2 stainless steel component, and is susceptible to cracking due to SCC. The Quad Cities ASME Section XI Inservice Inspection Program, Relief Request PR-02 (relief granted per SER dated September 15, 1995), provides for an alternate inspection of the reactor vessel flange leak detection line. This alternate examination utilizes a VT-2 visual examination on the line during vessel floodup during a refueling outage. Future relief requests may be submitted by the applicant in accordance with 10 CFR 50.55a. Otherwise, the applicant must comply with the appropriate requirements of ASME Section XI. The staff issued RAI 3.1-25 requesting the applicant to confirm that cracking of the reactor vessel flange leak detection line at Quad Cities will be managed in accordance with the requirements of ASME Section XI, Table IWC-2500-1, for license renewal. In response to RAI 3.1-25, in a letter dated October 3, 2003, the applicant confirmed that Quad Cities will manage the aging effects for the reactor vessel flange detection lines in accordance with the requirements of ASME Section XI, Table IWC-2500-1, as amended by NRC-approved relief requests in accordance with 10 CFR 50.55a. The staff finds this response acceptable because the applicant committed to follow the requirements of ASME Section XI, Table IWC-2500-1. This is Commitment #1 in Appendix A of this SER.

The applicant stated in its LRA that the jet pump sensing lines at Dresden and Quad Cities are not within the scope for license renewal, but provided no explanation. The staff issued RAI 2.3.1.2-5 requesting the applicant to provide a technical basis to support this determination. In response to RAI 2.3.1.2-5, in a letter dated October 3, 2003, the applicant submitted the following explanation. The main function of the jet pump sensing line is to monitor jet pump integrity. If a sensing line fails, the Dresden/Quad Cities Plant Technical Specifications require either a plant shut down or safety assessment to justify continued operation. Therefore, the applicant concluded that a sensing line failure has no adverse safety consequences and no inspection is required. The applicant supported its conclusion by pointing out that BWRVIP-41, "BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines," Section 2.3.12.7, also concludes that inspection of sensing lines is essentially occurring continuously by plant operations. The staff finds the applicant's decision of not including the jet pump sensing line within the scope of license renewal acceptable because plant operation essentially provides for continuous monitoring of the sensing line integrity and, if a line fails, Plant Technical Specifications require either a plant shut down or safety assessment to justify continued operation. Therefore, the failure of the sensing line has no adverse safety consequences and does not need to be included within the scope of license renewal.

Crack initiation and growth due to thermal and mechanical loading or SCC (including IGSCC) could also occur in BWR isolation condenser components. The existing program relies on control of reactor water chemistry to mitigate SCC and on ASME Section XI inservice inspection. However, the existing program should be augmented to detect cracking due to SCC or cyclic loading. The GALL Report recommends an augmented program to include temperature and radioactivity monitoring of the shell-side water and eddy current testing of tubes to ensure that the component's intended function will be maintained during the period of extended operation. The staff reviewed the applicant's proposed program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.

The applicant stated in LRA Table 3.1-1, Reference No. 3.1.1.7, that the program for managing this aging effect is consistent with NUREG-1801 with exceptions, as described in LRA Appendices B.1.1, "ASME Section XI Inservice Inspection Program," and B.1.2, "Water Chemistry Program." As discussed in Section 3.1.2.2.4.1 of this SER, these exceptions are acceptable. In addition, the applicant referred to LRA Sections 3.1.1.1.7 and 3.1.1.2.3 for further evaluation of crack initiation and growth due to SCC and cyclic loading as an aging effect for the isolation condenser components at Dresden Units 2 and 3. LRA Section 3.1.1.1.7 states that LRA Appendix B.1.1, "ASME Section XI Inservice Inspection Program," will be augmented by a plant-specific AMP described in LRA Appendix B.2.6, "Heat Exchanger Test and Inspection Activities." This plant-specific AMP includes temperature and radioactivity monitoring of the shell-side water and eddy current testing of the tubes, as recommended by NUREG-1801. However, LRA Section 3.1.1.1.7 does not identify any augmented inspection to detect crack initiation and growth in the isolation condenser tubesheet, channel head, and shell, as recommended by Item C1.4-a, Chapter IV.C1, of NUREG-1801. LRA Appendix B.1.1 requires VT-2 examinations of the reactor coolant pressure boundary during system pressure testing. This is not adequate for detecting crack initiation and growth in the isolation condenser components before their intended function (pressure boundary) is compromised. Therefore, the staff issued RAI 3.1-11 and Supplemental RAI 3.1-11 requesting the applicant to provide augmented inspection for detecting loss of material in the isolation condenser tubesheet, channel head, and shell. The staff's evaluation of the applicant's responses to RAI 3.1-11 and

Supplemental RAI 3.1-11 is presented in Section 3.1.2.2.2 of this SER. The staff finds the applicant's responses acceptable.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of crack initiation and growth due to thermal and mechanical loading or SCC, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.3 Aging Management Programs for Reactor Vessel, Internals, and Reactor Coolant System Components

The applicant credits 17 AMPs to manage the aging effects associated with components in the reactor coolant systems as listed below. Nine of the AMPs are credited to manage aging for components in other system groups (common AMPs) while eight AMPs are credited with managing aging only for reactor system components. The staff's evaluation of the common AMPs that are credited with managing aging in reactor system components are provided in Section 3.0.3 of this SER.

- ASME Section XI Inservice Inspection Program (B.1.1)
- Water Chemistry Program (B.1.2)
- Reactor Head Closure Studs Program (B.1.3)
- BWR Vessel Inner Diameter (ID) Attachment Welds Program (B.1.4)
- Feedwater Nozzle Program (B.1.5)
- Control Rod Drive Return Line Nozzle Program (B.1.6)
- BWR Stress Corrosion Cracking Program (B.1.7)
- BWR Penetrations Program (B.1.8)
- BWR Vessel Internals Program (B.1.9)
- Thermal Aging and Neutron Irradiation Embrittlement Program (B.1.10)
- Flow-Accelerated Corrosion Program (B.1.11)
- Bolting Integrity Program (B.1.12)
- Compressed Air Monitoring Program (B.1.16)
- Reactor Vessel Surveillance Program (B.1.22)
- One-Time Inspection Program (B.1.23)
- Structures Monitoring Program (B.1.30)
- Heat Exchanger Test and Inspection Activities Program (B.2.6)

The staff's evaluation of the eight AMPs for the reactor vessel, internals, and reactor coolant system is provided in the following sections.

3.1.2.3.1 Reactor Head Closure Studs Program

Summary of Technical Information in the Application. The applicant's Reactor Head Closure Studs Program is discussed in LRA Section B.1.3, "Reactor Head Closure Studs." The applicant stated that the program is consistent with GALL Program XI.M3, "Reactor Head Closure Studs" with two exceptions. These exceptions are with respect to the NUREG-1801 requirement that the inspections be carried out in accordance with the requirements of ASME

Section XI, Subsection IWB, Table IWB 2500-1. Table IWB 2500-1 specifies volumetric (radiographic, ultrasonic, or eddy current) inspection for studs in place and both surface (magnetic particle, liquid penetration, or eddy current) and volumetric examination of studs when removed. Instead of a surface examination, the Dresden and Quad Cities plants utilize a VT-1 visual inspection, as granted under relief requests CR-13 and CR-11, respectively. Likewise, instead of a volumetric examination with a conventional UT, the Dresden and Quad Cities reactor closure head studs are examined by end-shot UT, as approved in relief request CR-12.

The LRA also indicates that the current code of record for the Dresden and Quad Cities inspection programs is the 1989 Edition of ASME Section XI, rather than the 1995 Edition through the 1996 Addenda, as specified in NUREG-1801. The applicant stated that its inspection program will be revised to be consistent with these NUREG-1801 requirements prior to the period of extended operation.

This AMP is credited with managing aging-related cracking and loss of material in reactor head closure bolts. The applicant stated in the LRA that the Dresden and Quad Cities reactor head closure studs AMP activities have detected aging degradation and have implemented appropriate corrective actions to maintain system and component intended functions, including prompt repair or replacement of degraded components prior to failure.

The applicant concluded in its LRA that the Reactor Head Closure Studs Program provides reasonable assurance that loss of material and cracking aging effects in the reactor head closure studs are adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Appendix B.1.3, "Reactor Head Closure Studs," the applicant described its AMP to manage aging-related cracking and loss of material in the reactor head closure studs. The applicant stated that this AMP is consistent with GALL AMP XI.M3, "Reactor Head Closure Studs," with exceptions to the NUREG-1801 requirements regarding inspection for studs in place and when removed. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the deviations and their justifications to determine whether the AMP, with the deviations, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR Supplement to determine whether it provides an adequate description of the revised program. In addition, the staff determined whether the applicant properly applied the GALL program (NUREG-1801) to its facility.

The staff notes that NUREG-1801, in accordance with the requirements of ASME Section XI, Subsection IWB, Table IWB 2500-1, specifies volumetric inspection for studs in place and both surface and volumetric examination of studs when removed. The applicant stated in the LRA that, instead of a surface inspection, Dresden and Quad Cities employ a VT-1 visual inspection, as granted under relief requests CR-13 and CR-11, respectively. Likewise, instead of a volumetric examination, the Dresden and Quad Cities reactor closure head studs are examined by end-shot UT, as approved in relief request CR-12. Use of VT-1 visual inspection when the studs are removed is acceptable based on current revisions of the ASME Code. However, use of the end-shot UT inspection procedure was not approved per relief request CR-12 since it does not provide the required sensitivity (see Section 3.1.1.3 of the staff's safety evaluation (SE)

dated September 15, 1995). The staff's SE did approve the use of the bore probe inspection procedure through the third ISI interval.

Future relief requests may be submitted by the applicant in accordance with 10 CFR 50.55a. Otherwise, the applicant must comply with the requirements of ASME Section XI, Subsection IWB, Table IWB 2500-1, which specifies volumetric inspection for studs in place and both surface and volumetric examination of studs when removed. In RAI B.1.3-a, the staff requested the applicant to confirm that aging effects for the reactor closure head studs will be monitored/managed in accordance with the requirements of ASME Section XI, Subsection IWB, Table IWB 2500-1, during the period of extended operation. The applicant provided the following response to RAI B.1.3-a in a letter dated October 3, 2003. The applicant stated that since submittal of the LRA, Dresden and Quad Cities have updated their ISI programs to be consistent with the 1995 Edition through the 1996 Addenda of ASME Section XI. The applicant further stated that the requirements of ASME Section XI, Subsection IWB, Table IWB 2500-1, will be augmented by Code Case N-307-2, "Revised Ultrasonic Examination Volume for Class 1 Bolting, Table IWB-2500-1, Examination Category B-G-1, When the Examinations Are Conducted From the End of the Bolt or Stud or From the Center-Drilled Hole," as endorsed by NRC RG 1.147, Revision 13. Thus, with this update of its ISI programs as augmented by Code Case N-307-2, Dresden and Quad Cities removed the exception noted as Relief Request CR-12. The staff finds the response acceptable because the applicant has confirmed that cracking and loss of material in the reactor closure head studs will be managed during the license renewal period in accordance with ASME Section XI, Subsection IWB, Table IWB 2500-1, as augmented by Code Case N-307-2, as required by the staff in accordance with 10 CFR 50.55a.

In LRA Appendix B.1.3, "Reactor Head Closure Studs," the applicant stated that the Reactor Head Closure Studs Program provides for condition monitoring and preventive actions to manage stud cracking and loss of material. However, loss of material is not identified as an aging effect for reactor head closure studs in LRA Tables 3.1-1 or 3.1-2. In RAI B.1.3-c, the staff requested the applicant to clarify this discrepancy and discuss D/QCNPS operating experience with respect to loss of material for the reactor head closure studs. In response to RAI B.1.3-c, in a letter dated October 3, 2003, the applicant states that the loss of material was inadvertently added to LRA Appendix B.1.3, "Reactor Head Closure Studs," and should have been deleted. The applicant further stated that Dresden and Quad Cities do not have any operating experience that would indicate that loss of material is an applicable aging effect for reactor head closure studs. The staff finds the applicant's clarification acceptable because it is consistent with the operating experience of Dresden and Quad Cities and is consistent with NUREG-1801, Table IV.A1, Item A1.1-c.

The applicant stated in LRA Appendix B.1.3, "Reactor Head Closure Studs," that the reactor head studs at Dresden and Quad Cities are not metal-plated and have had manganese phosphate coatings applied. These preventative actions are consistent with those recommended in Chapter XI.M3 of NUREG-1801 which recommends use of manganese phosphate coatings for reducing SCC and IGSCC of closure studs. NUREG-1801 does not recommend use of metal-plated studs because metal plating can result in corrosion and hydrogen embrittlement. In RAI B.1.3-b, the staff requested the applicant to submit the operating experience with manganese phosphate coatings. Specifically, the staff requested the applicant to describe the experience related to any cracking of the reactor head closure studs since the application of the manganese phosphate coatings. In response to RAI B.1.3-b, in a letter dated October 3, 2003, the applicant stated that four studs at Dresden Unit 2 were found

to have cracking during refuel outages. These studs were replaced. The applicant further stated that no other recordable indications have been identified on the Dresden or Quad Cities reactor vessel closure head studs. The applicant has not identified the cause of cracking, when the cracking was found, and mitigation actions to prevent cracking. The applicant needs to provide this information. In a letter dated December 22, 2003, the applicant supplemented its response to RAI B.1.3(b). The response stated that the Reactor Head Closure Stud Program for Dresden and Quad Cities provides inspections in accordance with NUREG-1801, Program XI.M3 requirements, which has been proven effective in detecting the aging effects (cracking and loss of material). The four studs at Dresden, Unit 2 were found to have cracking during refueling outages D2R11 and D2R15 and were subsequently replaced. The cracking was the result of stress corrosion cracking (SCC) and the probable cause determined to be exposure of the studs to oxygenated water during outages while in the tensioned condition. No other recordable indications have been identified on the Dresden or Quad Cities reactor head closure studs. The reactor vessel studs normally remain in the reactor vessel flange during refueling activities and are exposed to water during reactor vessel flood up. Water collected in these small areas can not be removed following a refueling outage. As part of the re-assembly, studs are tensioned. The combination of oxygenated water and tensioning resulted in the SCC. Due to the nature of the installation, the only possible corrective actions are stud inspections and replacement. The staff finds this response acceptable because the operating experience demonstrates the ability of the AMP to identify and replace degraded studs prior to a loss of function, which is consistent with the aging effect of cracking managed by Reactor Head Closure Studs Program (LRA Appendix B.1.3).

The staff reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program. In RAI B.1.3-d, the staff requested the applicant to revise the UFSAR Supplement by mentioning the use of VT-1 visual and bore-probe UT inspection procedures for detecting cracking in the reactor head closure studs. In response to RAI B.1.3-d, in a letter dated October 3, 2003, the applicant stated that the UFSAR Supplement described in LRA Appendix A, Section A.1.3, provides a level of detail consistent with that provided in NUREG-1800, Table 3.1-2. The applicant further stated that identifying specific examinations required by ASME Section XI is redundant to the stated information and is not required. The staff finds the applicant's response unacceptable because, as stated in the response to RAI B.1.3-a, the applicant plans to augment the requirements of ASME Section XI by Code Case N-307-2, so that it can use end-shot UT and bore probe UT inspection procedures for detecting cracking in the reactor head closure studs. Therefore, in Supplemental RAI B.1.3(a), the staff requested the applicant to include ASME Section XI Code Case N-307-2 in the UFSAR Supplement for the Reactor Head Closure Studs Program. In response to Supplemental RAI B.1.3(a), in a letter dated November 21, 2003, the applicant stated that Exelon will update the UFSAR Supplement to indicate that the requirements of ASME Section XI will be implemented in accordance with 10 CFR 50.55a. The staff finds the response acceptable because 10 CFR 50.55a allows the use of ASME Section XI Code Cases, including Code Case N-307-2, that are accepted by the staff. These code cases are listed in RG 1.147, "Inservice Inspection Code Case Acceptability—ASME Section XI Division 1."

Conclusions. On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB

during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.2 BWR Vessel ID Attachment Welds Program

Summary of Technical Information in the Application. The applicant's BWR Vessel ID Attachment Welds Program is discussed in LRA Appendix B.1.4, "BWR Vessel ID Attachment Welds." The applicant stated that the program incorporates the inspection and evaluation recommendations of BWRVIP-48, "Vessel ID Attachment Weld Inspection and Evaluation Guidelines," as well as the water chemistry recommendations of EPRI TR-103515-R2, "BWR Water Chemistry Guidelines." The applicant further stated that because of the incorporation of these recommendations, the program is consistent with GALL Program XI.M4, "BWR Vessel ID Attachment Welds."

The applicant identified one exception to NUREG-1801. GALL Program XI.M4 indicates that the BWR water chemistry control is in accordance with BWRVIP-29, which references the 1993 revision of EPRI TR-103515, "BWR Water Chemistry Guidelines." However, the D/QCNPS Water Chemistry Programs are based on the 2000 revision of EPRI TR-103515-R2.

LRA Appendix B.1.4 also indicates that the current code of record for the D/QCNPS inspection programs is the 1989 Edition of ASME Section XI, rather than the 1995 Edition through the 1996 Addenda, as specified in NUREG-1801. The applicant stated that its inspection program will be revised to be consistent with these NUREG-1801 requirements prior to the period of extended operation.

This AMP is credited with managing crack initiation and growth due to SCC and IGSCC in the vessel ID attachment welds. The applicant stated that the D/QCNPS inspection and testing methodologies have not detected cracking in the attachment welds. The applicant concluded that the BWR Vessel ID Attachment Welds Program provides reasonable assurance that cracking aging effects in the ID attachment welds are adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Appendix B.1.4, "BWR Vessel ID Attachment Welds," the applicant described its AMP to manage crack initiation and growth in the vessel ID attachment welds due to SCC and IGSCC. The LRA stated that this AMP is consistent with GALL AMP XI.M4, "BWR Vessel ID Attachment Welds" with an exception regarding water chemistry. The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, for D/QCNPS, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program.

The staff finds the applicant's exception to the GALL water chemistry program to be acceptable because it is based on updated industry experience. The evaluation of the applicant's Water Chemistry Program (LRA Appendix B.1.2) is presented in Section 3.0.3.2 of this SER.

The applicant stated that the inspection guidelines for the BWR Vessel ID Attachment Welds Program (LRA Appendix B.1.4) are consistent with BWRVIP-48, which has been approved by

the NRC staff. The letter dated January 17, 2001, from C.I. Grimes, NRC, to C. Terry, BWRVIP Chairman, lists required license renewal applicant action items, in accordance with 10 CFR Part 54, when incorporating the BWRVIP-48 report in a renewal application. These license renewal applicant action items are also required for the other applicable BWRVIP reports, which are approved by the staff. These action items are listed below:

- The license renewal applicant is to verify that its plant is bounded by the report. Further, the renewal applicant is to commit to programs described as necessary in the BWRVIP reports to manage the effects of aging during the period of extended operation. Applicants for license renewal will be responsible for describing any such commitments and identifying how such commitments will be controlled. Any deviations from the AMPs within these BWRVIP reports described as necessary to manage the effects of aging during the period of extended operation and to maintain the functionality of the components or other information presented in the report, such as materials of construction, will have to be identified by the renewal applicant and evaluated on a plant-specific basis in accordance with 10 CFR 54.21(a)(3) and (c)(1).
- Section 54.21(d) of Title 10 of the *Code of Federal Regulations* requires that an FSAR Supplement for the facility contain a summary description of the programs and activities for managing the effects of aging and the evaluation of TLAA's for the period of extended operation. Those applicants for license renewal referencing the applicable BWRVIP report shall ensure that the programs and activities specified as necessary in the applicable BWRVIP reports are summarily described in the FSAR Supplement.
- As required by 10 CFR 54.22, each application for license renewal must include any technical specification changes (and the justification for the changes) or additions necessary to manage the effects of aging during the period of extended operation as part of the renewal application. The applicable BWRVIP reports may state that there are no generic changes or additions to technical specifications associated with the report as a result of its AMR, and that the applicant will provide the justification for plant-specific changes or additions. Those applicants for license renewal referencing the applicable BWRVIP reports shall ensure that the inspection strategy described in the reports does not conflict with or result in any changes to their technical specifications. If changes in technical specifications do result, then the applicant must ensure that those changes are included in its application for license renewal.
- If required by the applicable BWRVIP report, the applicant referencing a particular report for licensing renewal should identify and evaluate any potential TLAA issues and/or commitments to perform future inspections when inspection tooling is made available.

In RAI 4.2-BWRVIPs, the staff requested the applicant to submit the necessary commitments, information, and changes as described above for each of the following applicable BWRVIP reports:

- BWRVIP-05
- BWRVIP-18
- BWRVIP-25
- BWRVIP-26
- BWRVIP-27

- BWRVIP-38
- BWRVIP-41
- BWRVIP-42
- BWRVIP-47
- BWRVIP-48
- BWRVIP-49
- BWRVIP-74
- BWRVIP-75
- BWRVIP-76
- BWRVIP-78
- BWRVIP-86
- Other BWRVIP reports applicable to license renewal

In response to RAI 4.2-BWRVIPS, in a letter dated October 3, 2003, the applicant summarized the NRC's request for information in the seven elements listed below and presented its response to each of those elements.

(1) Verify that Dresden and Quad Cities are bounded by the conditions (materials configuration and inspection methodologies) specified in the applicable BWRVIP documents.

Response: The BWRVIP documents were assembled with participation from the NSSS supplier and a wide representation from the BWR Owners Group, providing a level of confidence in accuracy and bounding conditions of these documents. However, during a preliminary review when preparing this response, some material differences were noted. Exelon will perform a detailed review of the applicable BWRVIP documents and verify that Dresden and Quad Cities are bounded by the conditions specified or identify and evaluate any exceptions noted.

(2) Provide a commitment to implement programs consistent with the applicable BWRVIP documents or identify the applicable exceptions.

Response: At the completion of the review noted in item 1 above, Exelon will provide a list of commitments to the applicable BWRVIP documents or identify specific exceptions taken.

(3) Describe how the commitments will be tracked.

Response: The commitments, once identified, will be placed in the site implementing procedures with traceability back to the license renewal commitment being made.

(4) Summarize a program description of the applicable BWRVIP documents in the LRA Appendix A, UFSAR Supplement.

Response: Several of the BWRVIP programs are identified in the LRA Appendix A, such as BWRVIP-75, A.1.7; BWRVIP-27, A.1.8; BWRVIP-48, A.1.4; BWRVIP-49, A.1.8; BWRVIP-78, A.1.22; and BWRVIP-86, A.1.22. Once the comprehensive list of commitments is identified in item 2 above, Exelon will update the LRA Appendix A to provide a summary program description to address each applicable BWRVIP document.

(5) Verify that technical specification changes needed to support implementation of the applicable BWRVIP documents have been identified and processed.

Response: There are no additional technical specification changes anticipated. However, once the detailed review summarized in item 1 above is complete, Exelon will confirm that no technical specification changes are needed or identify the needed changes to be processed prior to the start of the extended term of operation.

(6) Identify and evaluate any potential TLAA issue identified by the applicable BWRVIP documents and/or commitments to perform future inspections when inspection tooling is made available.

Response: All applicable TLAAs are discussed in Section 4 of the LRA.

(7) Address items 1 through 6 above for the 16 specific BWRVIP documents listed in the RAI and identify and address other BWRVIP documents applicable to license renewal.

Response: Based on a preliminary review, there appears to be several other BWRVIP documents applicable to license renewal, such as BWRVIP-07 and BWRVIP-63 for core shroud repairs, and BWRVIP-26 for Water Chemistry. Once the detailed review is completed, Exelon will provide an amended response addressing items 1 through 6 for all BWRVIP documents applicable to license renewal.

The staff found the applicant's response incomplete. The response committed to perform a detailed review of the BWRVIP documents applicable to license renewal, prepare an amended response addressing items 1 through 7 for all of those documents applicable to license renewal, and submit it to the staff for review and approval. Therefore, this response was incomplete until an amended response was submitted and approved by the staff. This was identified as Confirmatory Item 3.1.2.3.2-1.

In a letter dated April 9, 2004, the applicant submitted the following amended response to RAI 4.2-BWRVIPs addressing the seven items, which were listed in the initial response to RAI 4.2-BWRVIPs, for all of the BWRVIP documents applicable to license renewal.

1. Verify that Dresden and Quad Cities are bounded by the conditions (materials, configuration and inspection methodologies) specified in the applicable BWRVIP documents.

Amended Response: The site-specific procedures at D/QCNPS implemented all of the inspection methodologies contained in the applicable BWRVIP documents. Additionally, the materials and configurations at D/QCNPS are similar to those specified in the BWRVIP documents with an exception related to the steam dryer hold-down bracket attachment weld addressed later in this section in response to Supplementary RAI B.1.4. Regarding inspection methodologies, the applicant has identified two exceptions related to BWRVIP-74: (1) use of risk-informed ISI to supplement the ISI and GL 88-01 programs for reactor pressure vessel nozzles and safe ends, and (2) use of an NRC-approved code case for the inspection of the reactor vessel leak detection line. The first exception is evaluated in SER Section 3.1.2.4.1 and the second one in SER Section 3.1.2.2.4.

2. Provide a commitment to implement programs consistent with the applicable BWRVIP documents or identify the applicable exceptions.

Amended Response: D/QCNPS provided a commitment for implementing the programs consistent with the applicable BWRVIP documents and identified several exceptions. These exceptions are associated with BWRVIP-38, BWRVIP-41, BWRIP-74, and BWRVIP-75 and are described in SER Sections 3.1.2.3.6 and 3.1.2.4 as appropriate. In addition, the applicant has committed to implement several BWRVIP reports that are being reviewed by the NRC, and will identify any exceptions associated with these reports after the staff's reviews are completed. See amended response 7 for the several BWRVIP reports being reviewed by the NRC. This is part of Commitment #9 in Appendix A of this SER.

3. Describe how the commitments will be tracked.

Amended Response: All license renewal commitments are controlled by the Exelon commitment management process described in LS-AA-110, Commitment Management. Commitment tracking files will be generated for each individual activity credited to implement the requirements of the AMP. In addition, steps in site procedures that implement the various activities specified in the BWRVIP documents are annotated as NRC commitments and are referenced to commitment tracking files that contain sufficient documentation describing the source of the commitment.

4. Summarize a program description of the applicable BWRVIP documents in the LRA Appendix A, UFSAR Supplement.

Amended Response: The FSAR Supplement (LRA Appendix A) Programs A.1.1, A.1.2, A.1.4, A.1.8, A.1.9, and A.1.22 have been updated to reflect the applicable BWRVIP documents, and exceptions as noted in response to Item 2 above. A revised FSAR supplement incorporating these changes was submitted to NRC in the attachment to Exelon transmittal letter dated March 5, 2004 as part of the annual update required by 10 CFR 54.21(b).

5. Verify that technical specification changes needed to support implementation of the applicable BWRVIP documents have been identified and processed.

Amended Response: The only Technical Specification change required for both sites involves revision to the site pressure temperature (P-T) curves. The existing P-T curves will be revised for 54 EFPY prior to the extended term of operation.

6. Evaluate any potential TLAA issue identified by the applicable BWRVIP documents and/or commitments to perform future inspections when inspection tooling is made available.

Amended Response: All applicable TLAA's were discussed in Section 4 of the LRA. The applicant also committed to perform future inspections, as recommended by the BWRVIP documents, when inspection tooling is made available. This commitment is discussed in SER Section 3.1.2.3.6.

7. Address Items 1 through 6 above for the 16 specific BWRVIP documents listed in the RAI and identify and address other BWRVIP documents applicable to license renewal.

Amended Response: In addition to the 16 specific BWRVIP documents listed in RAI 4.2-BWRVIPs, the applicant has identified four additional documents applicable to license renewal: BWRVIP-29, BWRVIP-79, BWRVIP-104, and BWRVIP-116. NRC has issued a safety

evaluation report for the first document (BWRVIP-29) but not for the remaining three. However, the applicant has provided an amended response in their letter dated April 9, 2004, addressing items 1 through 6 for all 20 BWRVIP documents applicable to license renewal and has committed to implement these 20 BWRVIP documents as discussed in the amended response to Item 2.

The staff found the responses to RAI 4.2-BWRVIPs acceptable because they addressed all the license renewal applicant action items as identified in the applicable BWRVIP reports, which are listed in the response. In addition, the exceptions identified by the applicant are approved by the staff. The staff has reviewed the updated FSAR Supplement programs and found that they include adequate summary descriptions of the applicable BWRVIP documents. Thus the responses are consistent with the BWRVIP reports applicable to license renewal. Therefore, Confirmatory Item 3.1.2.3.2-1 is closed.

The staff-approved version of BWRVIP-48 recommends enhanced VT-1 (EVT-1) for furnace-sensitized (from PWHT) welds, Alloy 182 welds, and the welds attaching certain components to the vessel. To facilitate its review, the staff issued RAI B.1.4 requesting the applicant to identify the D/QCNPS vessel ID attachment welds, weld materials, and the welds that are furnace sensitized. The staff also requested the applicant to identify the attachment welds that will be inspected with enhanced VT-1. In response to RAI B.1.4, in a letter dated October 3, 2003, the applicant identified the vessel ID attachment welds at the Dresden and Quad Cities plants. However, it did not include the steam dryer holddown bracket attachment welds at Dresden Unit 3. However, Table 2-2 in BWRVIP-48 states that Dresden Unit 3 does have these welds. The applicant has identified all other vessel ID attachment welds. Some of these welds are furnace sensitized, whereas others are not. None of these welds are Alloy 182 welds. The applicant examines all of these welds, except the surveillance sample holder attachment welds, by enhanced VT-1 examination, as recommended by BWRVIP-48. The surveillance sample holder attachment welds are non-safety-related welds, and the applicant examines them with VT-1 visual examination as part of its ASME Section XI program.

In Supplementary RAI B.1.4, the staff requested the applicant to confirm whether the steam dryer holddown bracket attachment weld at Dresden 3 is a furnace-sensitized weld that requires enhanced VT-1 in accordance with BWRVIP-48. In its response to Supplemental RAI B.1.4, in a letter dated December 12, 2003, the applicant stated that the steam dryer support brackets discussed in the response to RAI B.1.4 include the configuration for Dresden Unit 3. The applicant further stated that the steam dryer holddown bracket attachment weld described in Table 2-2 of BWRVIP-48 does not exist at Dresden Unit 3, and Dresden Unit 3 is the same configuration as Dresden Unit 2 and Quad Cities Units 1 and 2. The staff finds the response acceptable because the steam dryer holddown bracket attachment weld does not exist at Dresden Unit 3, and therefore, the applicant does not have to provide for its inspection. The applicant's response to RAI B.1.4 is acceptable because it is consistent with the recommendations of BWRVIP-48.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exception to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also

reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.3 BWR Feedwater Nozzle Program

Summary of Technical Information in the Application. The applicant's BWR Feedwater Nozzle Program is discussed in LRA Appendix B.1.5, "BWR Feedwater Nozzle." The applicant stated that the program is consistent with GALL Program XI.M5, "BWR Feedwater Nozzle" with no exceptions. The applicant also stated that the program enhances the inservice inspections specified in ASME Code Section XI with the recommendations of General Electric (GE) NE-523-A71-0594, "Alternate BWR Feedwater Nozzle Inspection Requirements."

This AMP is credited with managing aging-related cracking in reactor feedwater nozzles. The applicant stated in the LRA that the Dresden and Quad Cities BWR Feedwater Nozzle Program activities have detected indications of cracking due to cyclic loading on feedwater nozzles prior to loss of their intended function. The indications were repaired by grinding and reexamination or the thermal sleeve was replaced. The applicant also stated that the Dresden and Quad Cities feedwater nozzles have been modified to mitigate cracking by removing the stainless steel cladding.

The applicant concluded that the BWR Feedwater Nozzle Program provides reasonable assurance that cracking aging effects in the feedwater nozzles are adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.5, "BWR Feedwater Nozzle," the applicant described its AMP to manage crack initiation and growth in the feedwater nozzles due to cyclic loading. The LRA states that this AMP is consistent with GALL AMP XI.M5, "BWR Feedwater Nozzle," with no deviations. The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, for D/QCNPS, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program.

The applicant credited the GE report, GE-NE-523-A71-0594, "Alternate BWR Feedwater Nozzle Inspection Requirements," for managing crack initiation and growth in the feedwater nozzle. However, the report number does not imply a version of the report that is approved by the staff. The report number for the version of the report that is approved by the staff is GE-NE-523-A71-0594-A, Revision 1, published in May 2000; the designation "A" indicates the staff-accepted version. This report specifies UT of specific regions of the feedwater nozzle inner blend radius and bore, and provides guidelines for the UT examination techniques and personnel qualifications. In Supplemental RAI B.1.5, the staff requested the applicant to confirm whether it has implemented these guidelines as described in GE-NE-523-A71-0594-A, Revision 1. In response to Supplemental RAI B.1.5, in a letter dated November 21, 2003, the applicant stated that Exelon will implement the recommendations of Revision 1, Version A of the report (GE -NE-523-A71-0594-A, Revision 1), which was approved by the NRC staff. The staff finds the response acceptable because the applicant's commitment to implement the recommendations of the staff-approved version of the GE report would ensure that the feedwater nozzles will be inspected as recommended in NUREG-1801. This is Commitment #5 in Appendix A of this SER.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.4 BWR Control Rod Drive Return Line Nozzle Program

Summary of Technical Information in the Application. The applicant's BWR Control Rod Drive Return Line Nozzle Program is discussed in LRA Section B.1.5, "BWR Control Rod Drive Return Line Nozzle." The applicant stated that the program is consistent with GALL Program XI.M6, "BWR Control Rod Drive Return Line Nozzle," with one exception. This exception is related to the NUREG-1801 requirement that the program include enhanced inservice inspections in conformance with ASME Code Section XI, Subsection IWB, Table IWB 2500-1, and the recommendations of NUREG-0619, "BWR Feedwater Nozzle and Control Rod Return Line Nozzle Cracking." The applicant stated that because the Dresden and Quad Cities CRD return line nozzles are capped, the augmented inspections called out in NUREG-0619 are not required. Instead, the applicant's inspections are consistent with the ASME Section XI requirements.

The LRA also indicated that the current code of record for the Dresden and Quad Cities inspection programs is the 1989 Edition of ASME Section XI, rather than the 1995 Edition through the 1996 Addenda, as specified in NUREG-1801. The applicant stated that its inspection program will be revised to be consistent with these NUREG-1801 requirements prior to the period of extended operation.

This AMP is credited with managing aging-related cracking in the CRD return line nozzles. The applicant stated in the LRA that the Dresden and Quad Cities BWR Control Rod Drive Return Line Nozzle Program activities have detected indications of cracking aging effects on CRD return line nozzles prior to loss of their intended function. The indications were repaired by flaw removal or weld overlay.

The applicant concluded in its LRA that the BWR Control Rod Drive Return Line Nozzle Program provides reasonable assurance that cracking in the CRD return line nozzles is adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.5, "BWR Control Rod Drive Return Line Nozzle," the applicant described its AMP to manage cracking due to cyclic loading in the CRD return line nozzles. The LRA states that this AMP is consistent with GALL AMP XI.M6, "BWR Control Rod Drive Return Line Nozzle," with one exception concerning the implementation of augmented ISI procedures described in NUREG-0619. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the deviation and its justification to determine whether the AMP, with the deviation, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the UFSAR Supplement to determine whether it

provides an adequate description of the revised program. In addition, the staff determined whether the applicant properly applied the GALL program to its facility.

The applicant stated that because the Dresden and Quad Cities CRD return line nozzles are capped, the augmented inspections called out in NUREG-0619 are not required, and the applicant's inspections are instead consistent with the requirements of ASME Section XI, Subsection IWB, Table IWB 2500-1. The staff finds this exception acceptable because the capped CRD line nozzles are not subject to cyclic loads due to thermal stratification and striping, and, therefore, not susceptible to cracking due to cyclic loading. However, the capped end of a CRD line nozzle could experience cracking due to SCC and it is evaluated in Section 3.1.2.4.1 of this SER.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exception to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.5 BWR Penetrations Program

Summary of Technical Information in the Application. The applicant's BWR Penetrations Program is discussed in LRA Appendix B.1.8, "BWR Penetrations." The applicant stated that the program incorporates the inspection and evaluation recommendations of BWRVIP-27, "BWR Standby Liquid Control System/Core Plate) P/SLC Inspection and Flaw Evaluation Guidelines," and BWRVIP-49, "Instrument Penetration Inspection and Flaw Evaluation Guidelines." The program also incorporates the water chemistry recommendations of EPRI TR-103515-R2, "BWR Water Chemistry Guidelines." The applicant further stated that because of the incorporation of these recommendations, the program is consistent with GALL Program XI.M8, "BWR Penetrations."

The applicant identified one exception to NUREG-1801. GALL Program XI.M8 indicates that the BWR water chemistry control is in accordance with BWRVIP-29, which references the 1993 revision of EPRI TR-103515, "BWR Water Chemistry Guidelines," whereas the D/QCNPS Water Chemistry Programs are based on the 2000 revision of EPRI TR-103515-R2.

LRA Appendix B.1.8 also indicates that the current code of record for the D/QCNPS inspection programs is the 1989 Edition of ASME Section XI, rather than the 1995 Edition through the 1996 Addenda, as specified in NUREG-1801. The applicant stated that its inspection program will be revised to be consistent with these NUREG-1801 requirements prior to the period of extended operation.

The applicant stated that the program uses relief request ISI CR-01 that provides for inspection of the inner radius of the D/QCNPS standby liquid control system nozzles by a VT-2 examination, instead of the normal volumetric inspection required by the ASME Code.

This AMP is credited with managing crack initiation and growth due to SCC, including IGSCC, in the BWR instrument penetrations and standby liquid control nozzles. The applicant stated that the D/QCNPS inspection and testing methodologies have not detected cracking in these penetrations or nozzles.

The applicant concluded that the BWR Penetrations Program provides reasonable assurance that the aging effect of crack initiation and growth in the BWR penetrations are adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Appendix B.1.8, "BWR Penetrations," the applicant described its AMP to manage crack initiation and growth in the BWR penetrations due to SCC and IGSCC. The LRA stated that this AMP is consistent with GALL AMP XI.M8, "BWR Penetrations," with an exception regarding water chemistry. The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, for D/QCNPS, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program.

The staff finds the applicant's exception to the GALL Water Chemistry Program to be acceptable because it is based on updated industry experience. The evaluation of the applicant's Water Chemistry Program (LRA Appendix B.1.2) is presented in Section 3.0.3.2 of this SER.

Two memoranda dated July 8 and August 10, 1999, from W.H. Bateman, Division of Engineering (NRC), to C.I. Grimes, Division of Reactor Program Management (NRC), list several license renewal applicant action items to be addressed in the plant-specific LRA when incorporating, respectively, the BWRVIP-27 and BWRVIP-49 reports in a renewal application. The staff has issued a similar list of license renewal applicant action items for other BWRVIP reports. The staff has issued a generic RAI, RAI 4.2-BWRVIPS, requesting the applicant to submit the necessary commitments, information, and changes, as described in the license renewal applicant action items, including an item related to UFSAR Supplement, for each of the BWRVIP reports that are incorporated in the LRA. The details of the license renewal applicant's action items and applicant's response to RAI 4.2-BWRVIPS is presented in Section 3.1.2.3.2 of this SER. The staff finds the applicant's response acceptable, but incomplete. The response is acceptable, because it commits to perform a detailed review of the BWRVIP documents applicable to license renewal, prepare an amended response addressing all the items requested in the RAI for each of those documents, and submit it to the staff for review and approval.

The response to RAI 4.2-BWRVIPS is incomplete because it does not address the request for commitments to perform future inspections of currently inaccessible sites, such as the) P/SLC nozzle weld, when inspection tooling is made available. The) P/SLC nozzle at D/QCNPS is welded to a stainless steel safe end. The nozzle-to-safe-end weld is susceptible to cracking due to IGSCC. Therefore, though the ASME Code requires surface examination of this weld because the) P/SLC line is less than 4 inches in diameter, BWRVIP-27 recommends a more stringent inspection requirement (volumetric inspection) for this weld, if accessible, when inspection tooling is available. In Supplemental RAI 4.2-BWRVIPS, the staff requested the applicant to commit to perform future inspections when inspection tooling is made available.

The applicant's response to Supplemental RAI 4.2-BWRVIPs is evaluated in Section 3.1.2.3.2 of this SER. The staff has found the response to be acceptable.

According to BWRVIP-27, D/QCNPS have) P/SLC nozzles made of low-alloy steel instead of) P/SLC penetrations made of Alloy 600. BWRVIP-27 describes an inspection strategy for these nozzles that recommends the inspection requirements of ASME Section XI, IWB-2500, Category B–D, which essentially includes volumetric examination for the nozzle-to-shell weld and the nozzle inner blend radius at each inspection interval. NUREG-1801, Chapter XI.M8, also recommends the same inspection requirements for the) P/SLC nozzles. In Appendix B.1.8 of the LRA, the applicant stated that the Dresden and Quad Cities programs utilize relief request ISI CR-01 (relief granted per SER dated September 15, 1995) that provides for inspection of the inner blend radius by a VT-2 examination instead of the normal volumetric examination. Future relief requests may be submitted by the applicant in accordance with 10 CFR 50.55a. Otherwise, the applicant must comply with the appropriate requirements of the ASME Code. In RAI B.1.8, the staff requested the applicant to confirm that the aforementioned aging effects for the) P/SLC nozzles at D/QCNPS will be inspected in accordance with the requirements of ASME Section XI, Subsection IWB, for license renewal. In response to RAI B.1.8, in a letter dated October 3, 2003, the applicant stated that D/QCNPS will inspect the) P/SLC nozzles in accordance with the requirements of ASME Section XI, Subsection IWB, during the license renewal period, as part of the NRC-approved ISI plan in accordance with 10 CFR 50.55a. The staff finds the response acceptable because the applicant will follow the inspection of the) P/SLC nozzles according to ASME Section XI requirements as approved by the staff.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.6 BWR Vessel Internals Program

Summary of Technical Information in the Application. The applicant's BWR Vessel Internals Program is discussed in LRA Appendix B.1.9, "BWR Vessel Internals." The applicant stated that the program incorporates the inspection and evaluation recommendations of BWRVIP guidelines. The program also incorporates the water chemistry recommendations of EPRI TR-103515-R2, "BWR Water Chemistry Guidelines." The applicant further stated that because of the incorporation of these recommendations, the program is consistent with GALL Program XI.M9, "BWR Vessel Internals."

The applicant identified one exception to NUREG-1801. GALL Program XI.M9 indicates that the BWR water chemistry control is in accordance with BWRVIP-29, which references the 1993 revision of EPRI TR-103515, "BWR Water Chemistry Guidelines," whereas the D/QCNPS Water Chemistry Program is based on the 2000 revision of EPRI TR-103515-R2.

The LRA Appendix B.1.8 also indicates that the current code of record for the D/QCNPS inspection programs is the 1989 Edition of ASME Section XI, rather than the 1995 Edition

through the 1996 Addenda, as specified in NUREG-1801. The applicant stated that its inspection program will be revised to be consistent with these NUREG-1801 requirements prior to the period of extended operation.

This AMP is credited with managing crack initiation and growth due to SCC, including IGSCC, in the BWR vessel internals. The applicant stated that the BWR vessel internals aging management activities have detected cracking in several vessel internals including Quad Cities access hole covers and core spray piping at Dresden Unit 3. The applicant also reported that a jet pump beam assembly failed at Quad Cities Unit 1 in January 2002. All similar beams at D/QCNPS have been replaced with beams fabricated with an improved heat treatment in accordance with BWRVIP-41 to increase the resistance to IGSCC.

The applicant concluded that the BWR Vessel Internals Program provides reasonable assurance that the aging effect of crack initiation and growth in the BWR vessel internals are adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Appendix B.1.9, "BWR Vessel Internals," the applicant described its AMP to manage crack initiation and growth in the vessel internals due to SCC, including IGSCC. The applicant stated that this AMP is consistent with GALL AMP XI.M9, "BWR Vessel Internals" with an exception regarding water chemistry. The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, for D/QCNPS, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program.

The staff finds the applicant's exception to the GALL water chemistry program to be acceptable because it is based on updated industry experience. The evaluation of the applicant's Water Chemistry Program (LRA Appendix B.1.2) is presented in Section 3.0.3.2 of this SER.

The following letters from C.I. Grimes, NRC, to C. Terry, BWRVIP Chairman, identify several license renewal applicant action items to be addressed in the plant-specific LRA when incorporating the following BWRVIP reactor vessel internals guidelines in a renewal application; dates of the letters are given in parentheses—BWRVIP-18, BWRVIP-25, BWRVIP-26, BWRVIP-47 (December 7, 2000); BWRVIP-38 (March 1, 2001); and BWRVIP-41 (June 5, 2001). The staff has issued a generic RAI, RAI 4.2-BWRVIPS, requesting the applicant to submit the necessary commitments, information, and changes as described in the license renewal applicant action items, including an item related to the UFSAR Supplement for each of the BWRVIP reports that are incorporated in the LRA. The details of the license renewal applicant's action items and applicant's response to RAI 4.2-BWRVIPS is presented in Section 3.1.2.3.2 of this SER. The staff finds the applicant's response acceptable, but incomplete. The response is acceptable because it commits to perform a detailed review of the BWRVIP documents applicable to license renewal, prepare an amended response addressing all the items requested in the RAI for each of those documents, and submit it to the staff for review and approval.

The response to RAI 4.2-BWRVIPS is incomplete because it does not address the request for commitments to perform future inspections of sites with limited access when inspection tooling is made available. One such limited access site is in the BWR vessel internals. The D/QCNPS

shroud support consists of the shroud support plate with legs. It is difficult to inspect the welds on the legs which are in the vessel lower plenum where the access is limited. The staff FSER for BWRVIP-38, "BWR Vessel and Internals Project, BWR Shroud Support Inspection and Flaw Evaluation Guidelines," states that when the inspection tooling and methodologies are developed that allow the welds in the lower plenum to be accessible, these welds should be inspected with appropriate NDE methods. In Supplemental RAI 4.2-BWRVIPS, the staff requested the applicant to commit to perform future inspections when inspection tooling is made available. This is Commitment #9 in Appendix A of this SER. The applicant's response to Supplemental RAI 4.2-BWRVIPS is evaluated in Section 3.1.2.3.2.2 of this SER. The staff finds the response acceptable.

BWRVIP-26, "BWR Vessel and Internals Project, BWR Top Guide Inspection and Flaw Evaluation Guidelines," states that the projected minimum end-of-life fluence at the grid beam location after 48 EFPY of operation is approximately 6×10^{20} n/cm² (E > 1 MeV), which is higher than the IASCC threshold of 5×10^{20} n/cm² (E > 1 MeV). Therefore, according to the staff final SER for BWRVIP-26, one of the license renewal applicant action items is to identify and evaluate the projected accumulated neutron fluence as a potential TLAA issue. In RAI B.1.9(a), the staff requested the applicant to confirm whether D/QCNPS follows the BWRVIP-26 guidelines for managing cracking in the top guide due to IASCC. If so, then D/QCNPS needs to evaluate the projected accumulated neutron fluence as a potential TLAA issue. The applicant also needs to confirm that it will use EVT-1, as recommended by BWRVIP-26, to inspect the sites on the top guide that are likely to receive neutron fluence higher than the IASCC threshold before the end of extended operation.

In response to RAI B.1.9(a), in a letter dated October 3, 2003, the applicant stated that Dresden and Quad Cities are following the recommendations of BWRVIP-26, "BWR Vessel and Internals Project, BWR Top Guide Inspection and Flaw Evaluation Guidelines," including the enhanced visual inspection technique, EVT-1, of the top guide. IASCC of the reactor internals was evaluated as a potential TLAA and was determined not to be a TLAA. However, Dresden and Quad Cities agree to perform inspections of the top guide similar to the inspections of the control rod drive housing (CRDH) guide tube. The inspection of the CRDH guide tube is performed in accordance with BWRVIP-47, "BWR Lower Plenum Inspection and Flaw Evaluation Guidelines." The examination extent and frequency is a 10 percent sample of the total population within 12 years, one-half (5 percent) to be completed within 6 years. The method of examination is EVT-1. LRA Appendix B.1.9, "BWR Vessel Internals Program," will be enhanced to include inspection of the top guide with an examination extent and frequency similar to the CRDH guide tube. The program enhancements will be implemented prior to the end of the initial operating license term for Dresden and Quad Cities. The staff finds the applicant's response acceptable because the applicant has proposed an inspection plan that was previously accepted by the staff. The applicant, however, needs to describe how it will identify the sites that belong to the total population that it will consider for inspection. Specifically, the applicant needs to confirm that only those sites where the neutron fluence exceeds the IASCC threshold of 5×10^{20} n/cm² (E > 1 MeV) will be included in the total population. In Supplemental RAI B.1-9(a), the staff requested the applicant to identify the locations of the top guide, equivalent to Peach Bottom, that will be included in the total population, and confirm that their fluences exceed the IASCC threshold limit of BWRVIP-26.

In response to Supplemental RAI B.1-9(a), in a letter dated November 21, 2003, the applicant stated that Figures 2-1 and 2-3 of BWRVIP-26 identify 94 potential locations (total population) of

failure. The top guide grid beam locations selected for examination will be contingent on the CRDH guide tube locations selected for inspection per BWRVIP-47. This is not necessarily limited to the center or near the center of the core locations. However, the locations selected for examination will be in areas that have surpassed the fluence threshold for IASCC noted in BWRVIP-26. As stated in BWRVIP-26, Section 2.1.1, "based on estimates made in the late 1980's all BWR/2 through BWR/5's have reached or surpassed the fluence threshold for IASCC at the top guide grid beam locations." Dresden and Quad Cities (BWR/3 plants) are consistent with this evaluation. The staff finds the response acceptable because it defines the total population of IASCC-susceptible locations on the top guide, which is consistent with BWRVIP-26, and commits to select those locations for inspection that have reached or surpassed the fluence threshold for IASCC. This is Commitment #9 in Appendix A of this SER.

The rim hold-down bolts are susceptible to stress relaxation. Therefore, the license renewal action item for BWRVIP-25 recommends that the applicant for license renewal should identify and evaluate the projected stress relaxation as a potential TLAA issue if a plant-specific analysis satisfies the six criteria in 10 CFR 54.3 for a TLAA. The staff issued RAI B.1.9-b requesting the applicant to confirm whether D/QCNPS follows the BWRVIP-25 guidelines for managing aging of the rim hold-down bolts and, if so, to identify and evaluate whether the projected stress relaxation in the rim hold-down bolts is a TLAA issue. In response to RAI B.1.9-b, in a letter dated October 3, 2003, the applicant stated that D/QCNPS follows the BWRVIP-25 guidelines for management of the hold-down bolts. However, the D/QCNPS core plates had wedges installed along with the repair of their shrouds with tie rods. The applicant further stated that BWRVIP-25 does not recommend inspection of rim hold-down bolts if wedges are installed. The staff reviewed BWRVIP-25 and confirmed the accuracy of the applicant's statements made in this response. The staff finds the applicant's response acceptable because it follows the recommendations of BWRVIP-25, which is approved by the staff. However, the applicant did not identify whether stress relaxation in the rim hold-down bolts is a TLAA. The staff identified this issue as Confirmatory Item 3.1.2.3.6-1. In response, the applicant stated that the stress relaxation of the rim hold-down bolts is not a TLAA for Dresden or Quad Cities. Dresden and Quad Cities have installed wedge retainers, which structurally replace the lateral load resistance provided by the rim hold-down bolts. As such, the failure of the bolts due to stress relaxation is no longer a concern and inspection of the bolts is not required. Therefore the stress relaxation of the rim hold-down bolts does not meet the TLAA Criterion 5 - "involve conclusions or provide the basis for conclusion related to the capability of the core plate to perform its intended function." Additionally, neither the rim hold-down bolts, nor the wedges meets TLAA Criterion 3 - "time-limited assumptions defined by the current operating term." The staff finds this response acceptable because the rim hold-down bolts no longer provide structural load and do not meet the definition of a TLAA as defined in 10 CFR 54.3(a)(3) and (5). In a letter dated January 26, 2004, the applicant submitted the information described above. Therefore, Confirmatory Item 3.1.2.3.6-1 is closed.

The applicant stated that the BWR vessel internals aging management activities at D/QCNPS have detected cracking in several vessel internals, including core spray piping at Dresden Unit 3 and access hole covers at Quad Cities, Units 1 and 2. In RAI B.1.9-c, the staff requested the applicant to identify the specific BWRVIP guidelines upon which the BWR vessel internals aging management activities at D/QCNPS are based. The applicant was also requested to identify specific BWRVIP guidelines used to support the aging activities mentioned in LRA, Appendix B.1.9. In its response to RAI B.1.9-c, in a letter dated October 3, 2003, the applicant stated that the aging management activities associated with detecting these cracks in the core spray piping

were based on BWRVIP-18, "BWR Core Spray Internals Inspection and Evaluation Guidelines." The examination methods included EVT-1. The staff finds the applicant's use of the BWRVIP-18 recommendations acceptable for detecting cracks in the core spray piping because BWRVIP-18 has been reviewed and approved by the staff. With respect to the access hole covers, the applicant stated that the covers were inspected by VT-1 and VT-3 based on the recommendations of GE SIL 462 and Supplement 1, "Shroud Access Hole Cover Cracks." As a result of these inspections, cracks were found in the welded access hole covers for Dresden 2 and Quad Cities 1 and 2 and all access hole covers at these three units were subsequently replaced with mechanical bolted covers. The applicant further stated that future inspections of the Dresden 3 welded access hole covers will continue to be based on the SIL guidance (GE SIL 462, Revision 1), as discussed in its response to RAI 3.1-8, which is evaluated in Section 3.1.2.4.2.2 of this SER. The inspection requirements of GE SIL 462, Revision 1, include visual and ultrasonic examination of the welded access hole covers. The staff finds the applicant's use of GE SIL 462, Revision 1, for inspecting welded access hole covers acceptable because it is consistent with the recommendations of NUREG-1801, Item IV.B1.1.4.

In LRA Appendix B.1.9, the applicant reported that a jet pump beam assembly failed at Quad Cities Unit 1 in January 2002, and all similar beams have been replaced with ones with improved heat treatment. Section 2.3.2.4 of BWRVIP-41 details mitigation processes that include a specific heat treatment that improves on the old heat treatment of the jet pump beams. Section 2.3.2.7 of BWRVIP-41 also recommends, for the improved heat-treated beams along with reduced preload, inspections consisting of no inspection during the first 10 years of service and inspection of these beams every following 10-year period at the same frequency as the old heat-treated beams with reduced preload. The staff issued RAI B.1.9(d) requesting the applicant to submit information about how the new jet pump beams meet these BWRVIP-41 heat treatment guidelines and how they will be inspected accordingly. The RAI also requested the applicant to describe the beam assembly failure or provide a reference, and confirm whether all the beams at all four D/QCNPS units have been replaced with ones with improved heat treatment. In response to RAI B.1.9(d), in a letter dated October 3, 2003, the applicant stated that on January 9, 2002, jet pump beam 20 for Quad Cities Unit 1 failed due to an IGSCC crack in the transition area, which was a low stress area. The applicant referred to Quad Cities Licensee Event Report (LER) 1-02-001 for a more detailed explanation. Subsequent to this failure, Dresden and Quad Cities replaced all of the jet pump beams with ones having improved heat treatment. The new beams are inspected based on the guidelines in BWRVIP-03 and BWRVIP-41. The review of the referenced LER, LER 1-02-001, indicates that all of the original-style BWR/3 jet pump holddown beams were replaced with BWR/4 beams. The staff finds this corrective action acceptable because it follows the recommendations of BWRVIP-41 (Section 2.3.2). Further review of the LER has raised the following concern related to inspection of the jet pump beam.

LER 1-02-001 states that the crack was located in an area of the jet pump holddown beam (transition area of the beam) that is not covered by the inspection requirements of BWRVIP-41, "BWR Jet Pump Assembly Inspection and Flow Evaluation Guidelines." The applicant therefore stated that, although the Quad Cities Nuclear Power Station implemented the requirements of BWRVIP-41, including periodic inspections of the required areas of the jet pump holddown beams, the transition area of the beam was not required to be inspected and the crack was not identified prior to failure. However, a review of Table 3.3-1, "Matrix of Inspection Options," of BWRVIP-41 includes inspection requirements for the jet pump beam transition arm region. In

Supplemental RAI B.1.9(d), the staff requested the applicant to clarify this apparently conflicting information about inspection of the beam transition arm region.

In response to Supplemental RAI B.1.9(d), in a letter dated November 21, 2003, the applicant stated that the information it has provided is not contradictory and described the inspection of the holddown beam as recommended by BWRVIP-41. The inspections recommended in BWRVIP-41 are divided into both baseline and reinspection recommendations based on an inspection cycle of 6 years. Baseline inspection required UT or another NDE technique of all beams during the next inspection cycle. Fifty percent of the inspections were to be performed in the next refueling outage. Reinspection requirements are 50 percent per inspection cycle for the first 20 years of service and 100 percent per inspection cycle beyond 20 years of service.

The applicant further stated that both Dresden and Quad Cities have performed 100 percent UT inspections of area BB-1 (the area surrounding the bolt hole) and area BB-2 (the machined radius or ear) during each refueling outage since 1995, which exceeds BWRVIP-41 recommendations. The beam regions that are required to be inspected per BWRVIP-41 are location BB-1 and location BB-2, and not the transition area of the beam. However, the cracking occurred in the transition area of the beam, located between BB-1 (the area surrounding the bolt hole) and BB-2 (the machined radius or ear). The transition area is a low stress location, outside the area of interest specified by the BWRVIP-41.

As part of the corrective actions from the LER root cause investigation, Exelon has requested the BWRVIP committee to provide further evaluations of the adequacy of the examinations performed on the holddown beams. Exelon will continue to perform the inspections required by BWRVIP-41 (BB-1 and BB-2) and will incorporate the additional changes in inspection methodology when incorporated into BWRVIP-41. The staff finds the response acceptable because all of the jet pump beams have been replaced with beams fabricated with an improved heat treatment in accordance with BWRVIP-41. This heat treatment improves the resistance to SCC. Also, the applicant follows the BWRVIP-41 recommendations regarding inspection of the holddown beams and commits to perform any additional inspections, such as inspection of the transition area, when recommended by BWRVIP-41.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.7 Thermal Aging and Neutron Irradiation Embrittlement Program

Summary of Technical Information in the Application. The applicant's Thermal Aging and Neutron Irradiation Embrittlement Program is discussed in LRA Appendix B.1.10, "Thermal Aging and Neutron Irradiation Embrittlement." This is a new program for managing loss of fracture toughness in CASS reactor internals within the scope of license renewal. The program will be implemented prior to the period of extended operation.

The applicant stated that the program will include a component-specific evaluation of the loss of fracture toughness. For those components where loss of fracture toughness may affect function of the component, an inspection will be performed as part of the station ISI program. The applicant stated that this program, when implemented, will be consistent with GALL Program XI.M13, "Thermal Aging and Neutron Irradiation Embrittlement."

Staff Evaluation. In LRA Appendix B.1.10, "Thermal Aging and Neutron Irradiation Embrittlement," the applicant described its AMP to manage loss of fracture toughness in the CASS reactor internals due to thermal aging and neutron irradiation embrittlement. This is a new program and will be implemented prior to the period of extended operation. This is Commitment #10 in Appendix A of this SER. The applicant stated that this AMP, when implemented, will be consistent with GALL AMP XI.M13, "Thermal Aging and Neutron Irradiation Embrittlement." The staff reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program.

In LRA Appendix B.1.10, the applicant stated that the component-specific evaluation for loss of fracture toughness in CASS components will be performed. The applicant further stated that if loss of fracture toughness affects the function of a given component, that component will be inspected as part of the D/QCNPS ISI program. In RAI B.1.10, the staff requested the applicant to confirm that the criteria given in GALL AMP XI.M13 will be applied to determine whether loss of fracture toughness affects the function of the CASS vessel internals and that a supplemental inspection program, qualified for detecting the critical flaw size with adequate margin, will be provided for the CASS vessel internals whose function is affected.

In response to RAI B.1.10, in a letter dated October 3, 2003, the applicant submitted the following information. AMP B.1.10 has been developed to evaluate thermal aging/neutron embrittlement of CASS reactor internals components that are included within the scope of license renewal. When implemented, the AMP will be consistent with the program described in NUREG-1801, AMP XI.M13. For each component, the ferrite content will be determined based on Hull's equivalent factors (described in NUREG/CR-4513, Revision 1, "Estimation of Fracture Toughness of Cast Stainless Steels During Thermal Aging in LWR Systems," U.S. Nuclear Regulatory Commission). Molybdenum content will be obtained from certified material test reports. Based on these factors, the potentially susceptible components will be identified. For these components, a mechanical loading assessment will be performed to determine maximum tensile loading on the component during ASME Code Level A, B, C, and D conditions.

For components that do not satisfy the acceptance criteria, an inspection will be performed as part of the ISI program. If any criteria are not met, a condition report will be generated for engineering evaluation. The ISI program includes an enhanced visual inspection program for detecting critical flaw size and is in accordance with BWRVIP-03, which has the ability to achieve a 0.0005-in. resolution, as specified in NUREG-1801, AMP XI.M13. The staff finds the applicant's response acceptable because it will apply the acceptance criteria given in GALL AMP XI.M13 to determine whether loss of fracture toughness affects function of the CASS vessel internals, and will perform enhanced visual inspection (as recommended by GALL AMP XI.13) of components that do not satisfy these criteria.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the

applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.3.8 Reactor Vessel Surveillance Program

Summary of Technical Information in the Application. The applicant's Reactor Vessel Surveillance Program is discussed in LRA Appendix B.1.22, "Reactor Vessel Surveillance." The program is implemented through station procedures that conform to the requirements of 10 CFR Part 50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements." Neutron embrittlement for the period of extended operation is predicted using the chemistry tables and Position 1.3, "Limitations," as described in RG 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials."

The applicant has enhanced the program by making it consistent with BWRVIP-78, "BWR Vessel and Internals Project: BWR Integrated Surveillance Program Plan"; BWRVIP-86, "BWR Vessel and Internals Project: BWR Integrated Surveillance Program Implementation Plan;" and the corresponding NRC safety evaluation reports and the associated RAIs. The enhanced program provides for capsule testing consistent with BWRVIP-78 and BWRVIP-86 saving the withdrawn capsules for future reconstitution. Existing capsules not included in the integrated surveillance program will be maintained in the vessels as a contingency for the future. The applicant stated that the enhanced program will be consistent with GALL AMP XI.M31, "Reactor Vessel Surveillance."

The applicant indicated that the Reactor Vessel Surveillance Program provides that the aging effects of irradiation embrittlement for the D/QCNPS reactor vessel components are adequately managed so that their intended functions, consistent with the CLB, are maintained during the period of extended operation.

Staff Evaluation. In LRA Appendix B.1.22, "Reactor Vessel Surveillance," the applicant described its AMP to manage irradiation embrittlement of the reactor pressure vessel through testing that monitors reactor vessel beltline materials. The LRA states that the Reactor Vessel Surveillance Program will be enhanced by making it consistent with BWRVIP-78 and BWRVIP-86 prior to the period of extended operation. The LRA further states that the enhanced program will be consistent with GALL AMP XI.M31, "Reactor Vessel Surveillance," described in NUREG-1801. For this AMP, GALL recommends further evaluation. The staff confirmed the applicant's claim of consistency during the AMR inspection. The staff also reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program. Furthermore, the staff reviewed the applicant's evaluation to determine whether it addressed the additional issues recommended in the GALL Report, as well as in the final SERs for the related BWRVIP documents, and confirmed that the AMP would adequately address these issues. Finally, for D/QCNPS, the staff determined whether the applicant properly applied the GALL program to its facility.

The applicant had submitted its license amendment to implement a program consistent with BWRVIP-78, "Integrated Surveillance Program," and BWRVIP-86, "BWR Integrated Surveillance Program Implementation Plan." The staff has reviewed the license amendment

and approved it in SERs to John Skolds, Exelon, from the NRC, dated September 29, 2003, and August 28, 2003, for Dresden and Quad Cities, respectively. Therefore, the applicant has committed and implemented the BWRVIP Integrated Surveillance Program, consistent with the AMP XI.M31, "Reactor Vessel Surveillance," described in NUREG-1801 for the current license period of 40 years. The staff has concluded that the final proposed BWRVIP integrated surveillance program (ISP) was acceptable for BWR licensee implementation, provided that all participating licensees use one or more compatible neutron fluence methodologies acceptable to the NRC staff for determining surveillance capsule and RPV neutron fluences. The NRC acceptance of these reports for the current term is documented in the SER dated February 1, 2002, from Bill Bateman of the NRC to Carl Terry, BWRVIP Chairman. One of the provisions of the ISP is for surveillance capsule material withdrawal and testing during the license renewal period. In RAI B.1.22, the staff requested the applicant to commit that it will incorporate the Reactor Vessel Surveillance Program consistent with the staff-approved versions of the revised BWRVIP-78 and BWRVIP-86 documents and include this commitment in the UFSAR Supplement for this program. This is part of Commitment #22 in Appendix A of this SER.

In response to RAI B.1.22, in a letter dated October 3, 2003, the applicant mentioned that Section B.1.22 of the LRA states that the Exelon Reactor Vessel Surveillance Program will be enhanced to incorporate the reactor vessel surveillance program consistent with the staff-approved versions of BWRVIP-78 and BWRVIP-86. The applicant further stated that this commitment is already included in Section A.1.22 of the Dresden and Quad Cities UFSAR Supplement. The staff found the applicant's response not acceptable because it had not committed to the revised versions of BWRVIP-78 and BWRVIP-86 that are prepared for the period of extended operation. The staff also notes that the BWRVIP has combined these revised versions of BWRVIP-78 and BWRVIP-86 into BWRVIP-116 for the period of extended operation, which is being reviewed by the staff. The staff issued Supplemental RAI B.1.22 requesting from the applicant additional information about the Reactor Vessel Surveillance Program.

This RAI and the evaluation of the applicant's response to it are presented here in three parts. In Part 1 of Supplemental RAI B.1.22, the staff requested the applicant to commit to BWRVIP-116, "BWRVIP Integrated Surveillance Program Implementation for License Renewal," July 2003, upon approval by the staff. In response to Part 1 of Supplemental RAI B.1.22, in a letter dated November 21, 2003, the applicant stated that the Reactor Vessel Surveillance Program (LRA Appendix B.1.22) will be consistent with BWRVIP-116, "BWR Vessel and Internals Project, Integrated Surveillance Program (ISP) Implementation for License Renewal," upon approval by the NRC staff. This is part of Commitment #22 of Appendix A of this SER. The staff finds the applicant's response acceptable because it has committed to make its Reactor Vessel Surveillance Program (LRA Appendix B.1.22) consistent with BWRVIP-116, which includes recommendations for implementing ISPs during license renewal, upon approval by the staff.

In Part 2 of Supplemental RAI B.1.22, the staff requested the applicant to submit plant-specific reactor vessel surveillance programs for all four units of D/QCNPS, if the ISP program for license renewal as described in BWRVIP-116 is not approved by the NRC, or if it is modified such that D/QCNPS is not covered by the ISP. The staff also stated that these plant-specific programs, if needed, should include the following actions:

- Capsules must be removed periodically to determine the rate of embrittlement and at least one capsule with neutron fluence not less than once or greater than twice the peak beltline neutron fluence must be removed before the expiration of the license renewal period.
- Capsules must contain material to monitor the impact of irradiation on the limiting beltline materials and must contain dosimetry to monitor neutron fluence.
- If capsules are not being removed from Dresden and Quad Cities plants during the license renewal period, the applicant must supply operating restrictions (i.e., inlet temperature, neutron spectrum and flux) to ensure that the RPV is operating within the environment of the surveillance capsules, and must supply ex-vessel dosimetry for monitoring neutron fluence.

In response to Part 2 of Supplemental RAI B.1.22, in a letter dated November 21, 2003, the applicant stated that if the staff does not approve the proposed BWRVIP-116, Exelon will provide a plant-specific surveillance plan for the license renewal period in accordance with 10 CFR Part 50, Appendices G and H, prior to entering the renewed license period. This is part of Commitment #22 of Appendix A of this SER. The staff identified this issue as Confirmatory Item 3.1.2.3.8-1. The staff finds the response acceptable because the applicant commits to provide a plant-specific surveillance program for the license renewal period in accordance with 10 CFR Part 50, Appendices G and H, if the staff does not approve the proposed BWRVIP-116. In a letter dated April 9, 2004, the applicant concurred with Commitment #22. Therefore, Confirmatory Item 3.1.2.3.8-1 is closed.

The staff reviewed the UFSAR Supplement to determine whether it provides an adequate description of the program. In Part 3 of Supplemental RAI B.1.22, the staff requested the applicant to revise the UFSAR Supplement to reference the ISP for the license renewal period (proposed BWRVIP-116) when approved by the NRC staff. In response to Part 3 of Supplemental RAI B.1.22, in a letter dated November 21, 2003, the applicant revised the UFSAR Supplements for Dresden and Quad Cities (LRA Appendix A.1.22) by including its commitment that the Reactor Vessel Surveillance Program will be consistent with BWRVIP-116 upon approval by the NRC staff. This is part of Commitment #22 in Appendix A of this SER. The staff finds the response acceptable because the revised UFSAR Supplements include the applicant's commitment that the Reactor Vessel Surveillance Program will be consistent with BWRVIP-116 upon approval by the NRC staff.

10 CFR Part 50, Appendix H, requires that an ISP used as a basis for a licensee-implemented reactor vessel surveillance program be reviewed and approved by the NRC staff. The ISP to be used by the applicant is a program that was developed by the BWRVIP. As discussed above, as part of Commitment #22, the applicant will apply the BWRVIP ISP as the method by which the Dresden and Quad Cities units comply with the requirements of 10 CFR Part 50, Appendix H. The BWRVIP ISP identifies capsules that must be tested to monitor neutron radiation embrittlement for all licensees participating in the ISP, and identifies capsules that need not be tested (standby capsules). These untested capsules were originally part of the licensee's plant-specific surveillance program and have received significant amounts of neutron radiation.

In the most recent staff-approved version of the ISP, the RPV surveillance capsules from Dresden and 2 and Quad Cities, Units 1 and 2, have not been designated for removal and testing to support the ISP. However, as addressed in 10 CFR Part 50, Appendix H, Section III (C)(1)(d) and in the staff-approved BWRVIP ISP, maintaining adequate contingencies to support

potential changes to the program is an important part of any ISP. The staff plans to discuss with the BWRVIP the issue of maintenance of standby capsules for future use. Until there is more detailed guidance regarding the treatment of standby capsules, the staff has imposed the following license condition to ensure that any surveillance capsules removed from the Dresden or Quad Cities units, without the intent to test them, are maintained in a condition which would permit their future use, including the period of extended operation, if necessary:

The integrated surveillance program to be implemented will be the most recent revision of the staff-approved Boiling Water Reactor Vessel and Internals Project program. If any surveillance capsules are removed from the Dresden (Quad Cities) RPVs without the intent to test them, these capsules must be stored in manner which maintains them in a condition which would support re-insertion into the Dresden (Quad Cities) RPVs, if necessary."

The imposition of this license condition is consistent with actions that the staff has taken with other, recent license renewal applicants with respect to the control of "standby" RPV surveillance capsules.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d). Finally, the staff has included a license condition to ensure that standby capsules will be maintained in such a manner as to ensure their usefulness should they be needed in the future.

3.1.2.3.9 Metal Fatigue of Reactor Coolant Pressure Boundary

Summary of Technical Information in the Application. The applicant's aging management program (AMP) for metal fatigue of the reactor coolant pressure boundary is described in LRA section B.1.34, "Metal Fatigue of Reactor Coolant Pressure Boundary" (Metal Fatigue AMP). It provides means for monitoring fatigue stress cycles to ensure that the ASME Section III design fatigue cumulative usage factor (CUF) limit is not exceeded during the period of extended operation.

The applicant stated that, with enhancements, the program is consistent with the ten elements of the NUREG 1801 AMP X.M1, "Metal Fatigue of Reactor Coolant Pressure Boundary." The enhancements consist in the implementation of the EPRI-licensed "FatiguePro" cycle counting and fatigue usage factor tracking computer program. The computer program provides the capability for automated counting of fatigue stress cycles and automated calculation and tracking of fatigue CUFs at various locations. The program will permit calculating and tracking the cumulative usage factors for the reactor pressure vessel, Class 1 piping, the torus, torus vents, and torus attached piping and penetrations, at the monitoring locations stated in Sections 4.3 and 4.6 of the LRA. The program will also provide for tracking of fatigue stress cycles for the Dresden isolation condenser.

Under Element 10, "Operating Experience," of NUREG 1801 AMP X.M1, the applicant stated that the reactor vessel cycle counting programs have been revised to incorporate changes in

design basis analysis cycles, because certain types of events were found to be more frequent than anticipated in the original design, while others were found to be less frequent. The applicant stated that the FatiguePro computer program was developed by the industry as a result of NRC concerns that early-life operating cycles at some units had caused fatigue usage factors to increase at a greater rate than anticipated in the design analysis. The program is designed to ensure that the code limits are not exceeded for the remainder of each unit's licensed life and provides for incorporation of operating experience.

The applicant concludes that the aging management program for metal fatigue of reactor coolant pressure boundary provides reasonable assurance that the thermal and pressure transients aging effects are adequately managed so that the intended functions of pressure boundary components within the scope of license renewal that are covered by this program are maintained during the period of extended operation.

Staff Evaluation. In RAI B.1.34(a), the staff requested that the applicant explain how the "FatiguePro" program and the AMP will account for CUFs at the selected monitoring locations prior to the implementation for the period of extended operations. The applicant stated in his response that FatiguePro has the capability of estimating the fatigue usage in one of two ways: 1) stress-based fatigue (SBF) monitoring, in which a real time stress history is determined by the program at a given location on a given component. The program calculates the CUF at the location from the computed stress history using appropriate cycle counting techniques and appropriate ASME Code Section III fatigue analysis methodology. SBF monitoring duplicates the methodology in the ASME Section III stress report for the component in question, but uses actual transient severity in place of design transient severity. 2) Cycle-based fatigue (CBF) monitoring, which consists of automated cycle counting and CUF computation based on the counted cycles. The CUF is computed via a design-basis fatigue calculation where the design basis transient severity in the fatigue table from the governing stress report is used as a basis, but actual numbers of cycles are substituted for assumed design basis numbers of cycles. This is Commitment #34 of Appendix A of this SER. For the time period prior to the implementation of FatiguePro, the fatigue usage will be estimated in one of two ways. For the locations for which SBF is specified, the initial CUF will be determined based on a linear projection of the design basis CUF. For the locations for which CBF is specified, the initial CUF estimate will be determined based on the cycle counts to-date since initial startup and the design basis fatigue CUF calculation methodology. The staff finds these procedures acceptable since they conform with accepted industry practice.

In RAI B.1.34(b), the staff requested that the applicant verify that fatigue stress cycles will be tracked for both Dresden isolation condensers. The applicant stated that all thermal events that have a significant impact on fatigue of critical isolation condenser components will be monitored for both Dresden units. The staff finds this acceptable, since it states clearly that this enhancement of the Metal Fatigue AMP will be applicable to both Dresden units.

In RAI B.1.34(c), the staff requested that the applicant provide a list, or a reference in the Dresden/Quad Cities UFSARs, of the transients that will be monitored in the Metal Fatigue AMP. In its response, the applicant provided the requested list of transients, which includes the transients listed in Table 3.9-1 of the Dresden/Quad Cities UFSARs. The staff finds that this list is acceptable since it contains the transients listed in the UFSARs and other representative transients usually associated with BWR plant operation.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the component intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.1.2.4 Aging Management Review of Reactor Vessel, Vessel Internals, and Reactor Coolant System

In SER Sections 3.1.2.1 through 3.1.2.3, the staff determined that the applicant's AMPs will adequately manage component aging in the reactor systems. The staff then reviewed specific components in the reactor systems to ensure that they were properly evaluated in the applicant's AMR. This evaluation included systems and components (LRA Table 3.1-1) that are covered by GALL, as well as systems and components (LRA Table 3.1-2) not addressed by GALL.

To perform this evaluation, the staff reviewed the components listed in LRA Tables 2.3.1-1 through 2.3.1-9 to determine whether the applicant had properly identified the applicable AMRs and AMPs needed to adequately manage the aging effects for the components. This portion of the staff review involved identification of the aging effects for each component, ensuring that each aging effect was evaluated using the appropriate AMR in Section 3, and that management of the aging effect was captured in the appropriate AMP. The results of the staff's review are provided below. The staff also reviewed the UFSAR Supplements for the AMPs credited with managing aging in reactor system components to determine whether the program description adequately describes the program.

The following sections provide the results of the staff's evaluation of the adequacy of aging management for components in each of the reactor vessel, vessel internals, and the reactor coolant system.

3.1.2.4.1 Reactor Vessel

Summary of Technical Information in the Application. The description of the reactor pressure vessel can be found in Section 2.3.1.1 of this SER. The passive, long-lived components in this system that are subject to AMR are identified in LRA Table 2.3.1-1. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2.

Aging Effects

The applicant reviewed the industry experience (e.g., NRC information notices, generic letters, and bulletins) and the D/QCNPS operating experience (e.g., plant maintenance history, modifications, nonconformance reports, and licensee event reports) and identified the aging effects, component intended functions, environment, and materials for each group of components of the reactor pressure vessel in Tables 3.1-1 and 3.1-2 of the LRA.

The long-lived, passive pressure boundary components in this system that are subject to AMR are fabricated of low-alloy steel with stainless steel cladding (vessel bottom heads, vessel shells, top heads, nozzles); low-alloy steel without stainless steel cladding (top head enclosure head flanges); Alloy 600 (penetrations including CRD stub tubes penetrations); stainless steel (nozzle safe ends, penetrations, vessel shell attachment welds); Alloy 82/182 (nozzle safe ends); high-strength, low-alloy steel (top head enclosure studs and nuts, closure bolting); carbon steel (nozzle safe ends, penetrations); and low-alloy steel (support skirts and attachment welds).

The operating environments are reactor coolant water up to 288 °C (550 °F); steam at 288 °C (550 °F); leaking reactor coolant water and/or steam at 288 °C (550 °F); ambient air and humidity at metal temperatures up to 288 °C (550 °F); and containment nitrogen.

The LRA identified the following applicable aging effects for the reactor vessel:

- crack initiation and growth due to SCC, IGSSC, and cyclic loading
- cumulative fatigue damage
- loss of fracture toughness due to neutron embrittlement of beltline materials
- loss of material due to wear

In LRA Table 3.1-2 and Aging Management Review Aid Table 2.3.1-1, the applicant also listed the following reactor vessel system components for which no aging effect (except cumulative fatigue damage and loss of fracture toughness in the beltline region) is identified:

- external surfaces of carbon steel reactor vessel components exposed to containment nitrogen environment
- carbon steel drain line penetrations exposed to reactor coolant water up to 288 °C (550 °F)
- low-alloy steel nozzles, head flanges, and vessel shells with or without stainless steel cladding exposed to 288 °C (550 °F) steam
- Low-alloy steel nozzles, vessel shells and penetrations, and vessel bottom heads exposed to reactor coolant water at 288 °C (550 °F)

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the reactor vessel:

- Bolting Integrity Program
- Water Chemistry Program
- BWR Stress Corrosion Cracking Program
- Feedwater Nozzle Program
- Control Rod Drive Return Line Nozzle Program
- BWR Penetrations Program
- Reactor Head Closure Studs Program
- ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD
- BWR Vessel ID Attachment Welds Program

- Reactor Vessel Surveillance Program

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the reactor pressure vessel. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects for the reactor pressure vessel follow:

- crack initiation and growth due to SCC, IGSCC, and cyclic loading
- cumulative fatigue damage
- loss of fracture toughness due to neutron embrittlement of beltline materials
- loss of material due to wear

The applicant identified cracking due to SCC, IGSCC, and cyclic loading as an applicable aging effect for the closure bolting, reactor vessel nozzle safe ends, vessel penetrations including CRD stub tubes, feedwater nozzle, reactor head closure studs and nuts, and vessel shell attachment welds. This identification of cracking as an applicable aging effect is consistent with Sections IV.A1 and IV.C1 in NUREG-1801, as well as with the BWRVIP reports (BWRVIP-27, BWRVIP-48, BWRVIP-74, and BWRVIP-75).

LRA Table 3.1-1 (Reference Nos. 3.1.2.37 and 3.1.2.59) identifies cracking as an applicable aging effect for a vessel head enclosure clad with austenitic stainless steel, but NUREG-1801 does not. In RAI 3.1-1, the staff requested the applicant to submit industry-wide and plant-specific operating experience with the clad vessel head enclosures and identify the locations where cracking had occurred (cladding, weld metal, base metal). The staff also requested the applicant to describe the methodology for detecting cracking and monitoring crack growth and, if cracking is not planned to be repaired prior to the end of the current license, provide an analysis or inspection program that will monitor the crack and provide a basis for concluding that the ISI program will detect cracks. The staff further requested that the applicant evaluate the cracking of the vessel head enclosure in accordance with the 10 CFR Part 54.3, TLA criteria. In response to RAI 3.1-1, in a letter dated October 3, 2003, the applicant provided the following information:

- In 1990, Quad Cites Unit 2 visually detected defects (stain patches) at various points on the RPV head cladding. Dye penetrant and UT examinations were performed to determine the extent of the defects. The defects (cracks) were a maximum depth of approximately 6 mm in the base material. The cracking was attributed to IGSCC and possibly hot cracking. Subsequent examinations in 1990, 1992, and 1995, using ultrasonic through-wall sizing and VT-1 and VT-3 methods, have indicated no change (no evidence of growth, increased severity, or decrease in component integrity).
- In 1992, Vermont Yankee observed rust patches in the RPV head. This inspection was performed to address the Quad Cites Unit 2 operating experience. The indications were located primarily in the area of the flange, which had been clad by manual welding. There was no evidence of cracking in the base material. The indications were fine, branched cracks in the cladding, which is consistent with IGSCC.

The applicant further stated that Dresden and Quad Cities will continue to monitor the RPV head cladding using the VT methods (VT-3) described in ASME Section XI, IWB-2500-1, Item B13.10. Once cracking occurs in the cladding, the ferritic material under the cladding becomes exposed to the reactor water and steam environment and begins to oxidize or rust. The rust seeps back through the cracked surface providing a readily detectable stain. The visual examination required by ASME Section XI was the method used to detect the evidence of cracking (stain patches) at both Quad Cities and Vermont Yankee. The staff finds the use of the VT-3 method to detect cracking in the cladding acceptable because this method can easily detect stain patches resulting from rusting of ferritic material under the cracked cladding, which allows the reactor water and steam environment to penetrate to the ferritic base metal and oxidize it. However, the VT-3 method cannot monitor the growth of the existing cracks. Therefore, the applicant needs to provide a method for sizing the flaws identified in the vessel head enclosure clad with stainless steel during the period of license renewal. This program must satisfy the 10 elements of Branch Technical Position RLSB-1, and include, at a minimum, the frequency, acceptance criteria, and qualifications of the inspection method. In response to Supplemental RAI 3.1-1 in a letter dated December 17, 2003, the applicant stated that one additional ultrasonic examination of the Quad Cities, Unit 2 reactor vessel head cladding will be performed in 2018 (plus or minus 2 years), to verify that the relevant indication has remained essentially unchanged. This is Commitment #7 in Appendix A of this SER. Previously, the cracking was inspected using Ultrasonic-Through-Wall Sizing, with the last inspection completed in 2000. The initial indication, 1990, was evaluated in accordance with ASME Code, Section XI, IWB-3142, which allows "Acceptance by Analytical Evaluation," proved subsequent examinations of IWB 2420(b) and (c) were performed. IWB-2420(c) states that if the reexaminations required by IWB-2420(b) reveal that the relevant indication remains essentially unchanged for the three consecutive examinations, the component examination schedule may revert to the original schedule for successive examinations. Since the three successive examinations confirmed that the indication remained essentially unchanged, the original VT-3 examination in accordance with ASME Code, Section XI was rescheduled for successive examinations. This one time volumetric inspection, in addition to the scheduled VT-3 examinations, is acceptable because IGSSC of the low alloy steel head is not considered a significant aging effect, the design is robust, and operating experience is benign as previous years have shown. Therefore, this is a confirmatory inspection (Confirmatory Item #7), and the one time inspection is considered to be acceptable and appropriate to confirm that the cracking is not growing.

The applicant evaluated cracking as a potential TLAA in accordance with 10 CFR Part 54.3 and concluded that this was not a TLAA because the analysis did not involve time-limited assumptions defined by the current operating term at Dresden. In addition, the analysis was not contained or incorporated by reference in the CLB at Quad Cities. The staff accepts the applicant's conclusion that the cracking of RPV head cladding is not a TLAA because it does not satisfy the definition of a TLAA according to 10 CFR 54.3.

The applicant stated that the CRD return line nozzles at D/QCNPS are capped, and therefore, are not susceptible to cracking due to cyclic loading. The staff finds this acceptable because the capped nozzle will not be subjected to cyclic loading due to thermal stratification and striping. However, the cap and applicable weld may experience cracking due to SCC and the applicant must provide a program to manage this cracking. The staff needed the following information from the applicant so that it can evaluate the aging management of the capped CRD

nozzles—(1) description of the configuration and location of the capped nozzle including the existing base material for the nozzle, piping (if piping remnants exist) and cap material, and any welds and material type (i.e., 82/182), (2) description of how these welds and caps are managed (e.g., the applicability of the BWRVIP-75 inspection requirements); and (3) discussion on whether the event at Pilgrim (leaking weld at capped nozzle, September 30, 2003) is applicable to Dresden and Quad Cities. A description of the Pilgrim event is discussed in LER 2003-006-00, dated November 24, 2003, which states that the cracking was in an 82/182 weld metal that was repaired extensively. The applicant also needs to include in the discussion the past inspection techniques applied, the results obtained, mitigative strategies followed, weld repairs carried out, and any other relevant information. The staff identified this issue as Confirmatory Item 2.3.4.2-3.

In the applicant's letters dated January 26, 2004, and April 9, 2004, the applicant responded to supplementary RAI 2.3.4.2-3. In the applicant's letters, the applicant provided information related to configuration and locations of the capped nozzles for each plant and described how they are managed. At Dresden and Quad Cities, the configuration consists of 304L and 316L SS caps and safe-ends welded to the original carbon steel nozzles. Aging management for these components includes examination in accordance with Section XI of the ASME Code for the nozzle as stated in AMP B.1.6, "CRD Return Line Nozzle," and one-time inspection in accordance with AMP B.1.23, "One-Time Inspections" for the remaining portion (safe-end, cap and welds). AMP B.1.2, "Water Chemistry" is also credited for these components.

In addition, the applicant stated that the Pilgrim event does not apply to Dresden and Quad Cities because (1) Pilgrim used an Alloy 600 cap welded directly to the nozzle whereas D/QCNPS used a SS cap and installed a SS safe-end between the cap and the nozzle, (2) Pilgrim used Alloy 82/182 welds whereas D/QCNPS used 308L and 309L SS welds, and (3) Pilgrim had initial weld defects (lack of fusion) that required repair, whereas D/QCNPS welds were completed without requiring any repair. D/QCNPS further stated that their nozzles and caps had radiographic and penetrant testing performed during installation, and had subsequent ultrasonic inspection of the nozzle-to-safe end welds and safe end-to-cap welds in response to the Pilgrim event with no reportable indications. Also, per the D/QCNPS ISI programs, penetrant testing had been performed on these welds with no recordable indications. In addition, Dresden and Quad Cities have placed their capped lines (small bore piping-less than 4 inches) in the One-Time Inspection Program, B.1.23. The staff finds the applicant's response acceptable because it uses low carbon stress corrosion resistant stainless steel safe-ends, caps, and weld material in lieu of Alloy 600, which has been known to be susceptible to stress corrosion cracking based on operating experience. In addition, the caps were welded using low carbon stainless steel weld metal (308L and 309L) with no weld repairs or recordable defects. Pilgrim used Inconel 82/182 and had initial weld defects that required weld repairs, which may have contributed to the cracking. Therefore, Dresden and Quad Cities capped return line nozzle configuration is not similar to Pilgrim and the use of AMPs B.1.2, B.1.6 and B.1.23 is acceptable for managing the aging of these components. Therefore, Confirmatory Item 2.3.4.2-3 is closed.

In LRA Table 3.1-1, the applicant identified cumulative fatigue damage as an applicable aging effect for nozzles and their safe ends, vessel penetrations, support skirts and attachment welds, top head flanges, vessel flanges, vessel shells, including upper shell, intermediate nozzle shell, intermediate beltline shell, and lower shell, and vessel bottom heads. However, it is not clear whether this identification of cumulative fatigue damage as an aging effect applies to all four

units (Dresden Units 2 and 3 and Quad Cities Units 1 and 2). Table 2.3.1-1 of the Aging Management Review Aid provided by the applicant identifies cumulative fatigue damage as an aging effect for support skirts exposed to ambient temperature air, but not for the ones exposed to containment nitrogen. In RAI 3.1-2, the staff requested the applicant to confirm whether the identification of cumulative fatigue damage as an aging effect applies to all four units. If not, the applicant was requested to provide a technical explanation. The staff also requested the applicant to identify the containment environment in each unit. In response to RAI 3.1-2, in a letter dated October 3, 2003, the applicant stated that the aging effect of cumulative fatigue damage does apply to all four units (Dresden Units 2 and 3 and Quad Cities Units 1 and 2). The applicant further stated that at all four units, the primary containment (drywell and suppression pool) atmosphere is made inert with nitrogen to render the primary containment atmosphere nonflammable by maintaining the oxygen content below 4 percent by volume during normal operation. The drywell has an average temperature of 57 °C (135 °F) during normal operations. The relative humidity in the drywell ranges between 20 percent and 90 percent. The staff finds the applicant's identification of cumulative fatigue damage as an applicable aging effect for the vessel components at all four D/QCNPS units acceptable because it is consistent with NUREG-1801, Chapter IV.A1, as well as with BWRVIP-74.

The applicant, however, did not identify cumulative fatigue damage as an applicable aging effect for stabilizer brackets, the external attachment weld between reactor pressure vessel and refueling bellows, and the reactor vessel closure studs, although BWRVIP-74 does identify such aging effects. In addition, the applicant does not identify cumulative fatigue damage as an applicable aging effect for closure bolting, but NUREG-1801 (Item C1.2-f, Chapter IV.C1) does. In RAI 3.1-3, the staff requested the applicant to submit an explanation of why cumulative fatigue damage is not identified as an applicable aging effect for stabilizer brackets, the external attachment weld between reactor pressure vessel and refueling bellows, the reactor vessel closure studs, and closure bolting. The staff further requested the applicant to provide an appropriate program for managing cumulative fatigue damage, if this effect is identified as an applicable aging effect for these components.

In response to RAI 3.1-3, in a letter dated October 3, 2003, the applicant stated that for Dresden and Quad Cities there are no CLB TLAA's that evaluate cumulative fatigue of the RPV stabilizer brackets or of the external attachment weld between reactor pressure vessel and refueling bellows. The applicant provided the following additional explanation about the weld between the reactor pressure vessel and refueling bellows. The refueling bellows attached to the reactor pressure vessel prevent leakage from the flooded reactor cavity into the drywell during refueling operations. However, the function of preventing leakage into the drywell during refueling operations is not a safety-related function and failure of the vessel-to-bellows weld cannot cause failure of a safety-related function. Therefore, the refueling bellows are not within the scope of license renewal. Consequently, the external attachment weld between the reactor pressure vessel and the refueling bellows is not within the scope of license renewal. The staff finds the applicant's explanation for not identifying cumulative fatigue damage as an aging effect for the RPV stabilizer brackets and the external attachment weld between the RPV and refueling bellows acceptable because they are not in scope of license renewal.

Regarding the reactor vessel closure studs, the applicant stated that LRA Table 2.3.1-1, "Component Groups Requiring Aging Management Review —Reactor Vessel," should have included Aging Management Reference 3.1.1.1 in the Top Head Enclosure (Closure Studs and Nuts) line. The applicant further pointed out that LRA Section 4.3.1, "Reactor Fatigue Analysis,"

identifies the reactor vessel closure studs as components that may experience cumulative fatigue damage. The reactor vessel closure studs are included in the Fatigue Monitoring Program that is described in Section 4.3.1 of the LRA. The staff finds the applicant's response acceptable because LRA Section 4.3.1 does identify the RPV studs as components that experience cumulative fatigue damage. This evaluation is presented in Section 4.3.1 of this SER.

Regarding closure bolting, the applicant stated that Item C1.2-f, Chapter IV.C1, of NUREG-1801 is the closure bolting for the recirculation pump. The aging effect of cumulative fatigue for the recirculation pumps' closure bolting is shown in LRA Table 3.1-1, Aging Management Reference 3.1.1.1, which links to the Closure Bolting line of LRA Table 2.3.1-5, "Component Groups Requiring Aging Management Review—Recirculation System." The staff finds the applicant's response acceptable because the LRA does identify cumulative fatigue damage as an applicable aging effect for closure bolting.

The applicant identified loss of fracture toughness as an applicable aging effect for the reactor pressure vessel flange, intermediate beltline shell, beltline welds, intermediate nozzle shell, lower shell, and upper shell. NUREG-1801, however, identifies this aging effect only for the intermediate beltline shell and beltline welds. In RAI 3.1-4, the staff requested the applicant to identify the components that are expected to have neutron fluence greater than 10^{17} n/cm² (E>1 MeV) by the end of the extended period of operation. In response to RAI 3.1-4, in a letter dated October 3, 2003, the applicant identified the following four components that are expected to have a neutron fluence greater than 10^{17} n/cm² (E>1 MeV) by the end of the extended period of operation—lower shell, intermediate beltline shell, axial welds in these two shells, and girth weld between these two shells. The applicant identified LRA Appendix B.1.22, "Reactor Vessel Surveillance," as an AMP for managing loss of fracture toughness in these components. The staff finds the response acceptable because the identification of an AMP to manage loss of fracture toughness is consistent with NUREG-1801. However, it is not clear to the staff whether the applicant has taken into account the increased fluence on the RPV wall due to power uprates that have been implemented at D/QCNPS. In Supplemental RAI 3.1-4, the staff requested the applicant to clarify whether the fluence calculations for the reactor vessel included the effects of power uprates when determining which components are susceptible to loss of fracture toughness. In response to Supplemental RAI 3.1-4, in a letter dated November 21, 2003, the applicant stated that the fluence calculations for the reactor vessel did include the effects of power uprates when determining the components that are susceptible to loss of fracture toughness. The staff finds the response acceptable because it facilitates the proper identification of reactor vessel beltline shell and welds that are susceptible to loss of fracture toughness due to neutron irradiation embrittlement.

The applicant identified loss of material due to wear as an applicable aging effect for closure bolting. This is consistent with NUREG-1801 Chapter IV.C1. However, the applicant did not identify loss of preload as an aging effect for closure bolting in the reactor vessel system. In LRA Section 3.1.1.2.2, the applicant referred to EPRI 1003056, Revision 3, which states that loss of preload mechanisms are typically addressed during installation and subsequent maintenance of closure bolting. The EPRI report further states that as the loss of preload is a design driven effect, it is not an applicable aging effect and does not require aging management. Loss of preload, however, may take place during operation when closure bolting is subject to stress relaxation, cyclic loads, and differential thermal expansion. NUREG-1801, Chapter XI.M18, "Bolting Integrity," requires this program to include periodic inspection of

closure bolting for indication of loss of preload. In RAI 3.1-13, the staff requested the applicant to explain why periodic inspection of the closure bolting for indication of loss of preload due to the aforementioned mechanisms is not required. The staff further requested the applicant, if periodic inspection is required, to reference the appropriate AMP and include the appropriate inspection in the AMP.

In response to RAI 3.1-13, in a letter dated October 3, 2003, the applicant stated that Exelon will manage the loss of preload for closure bolting in the reactor vessel system and other systems, such as recirculation pumps, reactor recirculation valves, and reactor vessel head vent valves, and the reactor pressure boundary portion of all other systems. This is part of Commitment #12 of Appendix A in this SER. The applicant further stated that AMP, LRA Appendix B.1.12, "Bolting Integrity," will be enhanced to include periodic inspections of the closure bolting in accordance with the ASME Code Section XI requirements. This part of Commitment #12 of Appendix A in this SER. Closure bolting will be periodically inspected for signs of leakage. The enhanced Bolting Integrity Program will be comprised of periodic ISI and piping and component preventive maintenance inspections. These activities will detect early leakage and material degradation of closure bolting (that may be caused by loss of material or cracking) prior to loss of system or component intended functions.

The staff finds the applicant's response not to be completely acceptable because LRA Section 3.1.1.2.1 does not address loss of preload as an aging effect, and states that loss of preload mechanisms is typically addressed during installation and subsequent maintenance of closure bolting. However, the applicant's response to RAI 3.1-13 stated that loss of preload will be managed, and that the enhanced Bolting Integrity Program will be comprised of periodic ISI and piping and components preventive maintenance inspections.

In Supplemental RAI 3.1-13, the staff requested the applicant to describe the maintenance program activities that are performed on the bolts so that loss of preload is significantly reduced or eliminated, and to identify whether retorquing of the bolts to the design preload values is performed after the component is reassembled. In response to Supplemental RAI 3.1-13, in a letter dated November 21, 2003, the applicant stated that the Exelon procedure governing "Torquing and Tightening of Bolted Connections" requires the inspection and documentation of closure bolting connections prior to disassembly for signs of leakage; missing, cracked, degraded or loose bolts or nuts; misalignment of connection; gasket condition; and corrosion. When closure bolting connections are disassembled for maintenance, bolts are loosened in two increments using a crossing sequence to prevent distortion of the mating surfaces. Bolts, studs, and washers are cleaned of corrosion, grit, and dried lubricant. They are also inspected for galling of threads or nut facing, dings and dents in threads, cracks, pits, erosion, corrosion, bent bolts, dished or galled washers, and elongation. If damaged bolts, studs, nuts or washers are found, they are replaced or repaired. Prior to reassembly, the correct torque value is determined from history that has been validated by successful performance, design drawings, vendor prints, plant design specification, or procedures. When required by design drawings, vendor prints, plant design specifications, or procedures, approved lubricant is applied to the bolts, studs, and nuts. Bolts or nuts are first hand tightened using a crossing sequence and then torque tightened using a diametrically opposed pattern in three passes (for as low as reasonably achievable (ALARA) areas) or four passes (non-ALARA areas). This is part of Commitment #12 of Appendix A of this SER.

Conditions that involve leakage, insufficient gasket compression, or other situations that require torque values to be increased require engineering review. All torque values are documented. The staff finds the applicant's response acceptable because the applicant's procedure governing torquing and tightening of bolted connections ensures that the loss of preload will be eliminated or reduced when the bolted connections are reassembled.

The staff finds that the applicant's identification of no aging effect (except cumulative fatigue damage and loss of fracture toughness in the beltline region) for the low-alloy steel vessel shells, nozzles, and flanges internally exposed to 288 °C (550 °F) steam or reactor coolant water is acceptable because it is supported by industry operating experience and it is consistent with GALL. However, the applicant's identification of no aging effect for the external surface of carbon steel reactor vessel components exposed to a containment nitrogen environment is not acceptable because the BWR containment environment typically has high humidity. The carbon steel components exposed to this environment may experience loss of material due to corrosion. In RAI 3.1-5, the staff requested the applicant to explain why loss of material is not identified as an aging effect for these components, or provide a program for managing that effect. In response to RAI 3.1-5, in a letter dated October 3, 2003, the applicant first described the environment of the drywell and then explained why loss of material is not an applicable aging effect for the carbon steel RPV components exposed to the containment environment. The drywell is made inert with nitrogen to render the primary containment atmosphere nonflammable by maintaining the oxygen content below 4 percent by volume during normal operation. The drywell has an average temperature of 135 °F during normal operations. The relative humidity in the drywell ranges between 20 percent and 90 percent.

According to EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," loss of material due to corrosion is not considered a credible aging effect for carbon steel components in a containment nitrogen environment because of the negligible amounts of free oxygen (less than 4 percent). Both oxygen and moisture must be present for general corrosion to occur because oxygen alone or water free of dissolved oxygen (high humidity in a nitrogen atmosphere) does not corrode carbon steel to any practical extent. The staff finds the applicant's identification of no loss of material for the carbon steel components exposed to a containment nitrogen environment acceptable because, with the negligible amounts of free oxygen, anodic reactions do not take place and the corrosion cell does not form. Therefore, no loss of material due to corrosion takes place.

The applicant's identification of no aging effect for the carbon steel drain line penetrations exposed to reactor coolant water up to 288 °C (550 °F) is not acceptable because the drain line is likely to experience loss of material due to corrosion. This assessment is consistent with Item D2.1-a, Chapter V.D2, of NUREG-1801. In RAI 3.1-6, the staff requested the applicant to explain why loss of material is not an applicable aging effect for the drain line, or provide a program for managing such effect. In response to RAI 3.1-6, in a letter dated October 3, 2003, the applicant states that the drain line penetration is an unclad hole drilled into the reactor vessel bottom head with an unclad carbon steel nozzle welded to the outside of the vessel bottom head. The applicant further stated that Aging Management Reference 3.1.2.58 should have shown loss of material/general, pitting, and crevice corrosion as an applicable aging effect. The applicant identified the ASME Section XI Inservice Inspection (LRA Appendix B.1.1) and Water Chemistry (LRA Appendix B.1.2) Programs for managing this aging effect. The staff finds the response acceptable because the applicant has identified loss of material as an applicable aging effect and provided the AMPs that are consistent with GALL to manage it.

The aging effects identified in the LRA for the reactor vessel are consistent with industry operating experience for the materials and environments listed. The staff finds that all the applicant identified all plausible aging effects, and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credits the following programs for managing aging in the reactor pressure vessels. The staff reviewed these programs in the sections of the SER listed in the parentheses.

- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program(Section 3.0.3.3)
- Bolting Integrity Program (Section 3.0.3.5)
- Reactor Head Closure Studs Program (Section 3.1.2.3.1)
- BWR Vessel ID Attachment Welds Program (Section 3.1.2.3.2)
- Feedwater Nozzle Program (Section 3.1.2.3.3)
- Control Rod Drive Return Line Nozzle Program (Section 3.1.2.3.4)
- BWR Penetrations Program (Section 3.1.2.3.5)
- Reactor Vessel Surveillance Program (Section 3.1.2.3.8)

The first four AMPs (ASME Section XI Inservice Inspection, Water Chemistry, BWR Stress Corrosion Cracking, and Bolting Integrity) are credited with managing the aging effects in several components in various different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for reactor pressure vessels. The staff's evaluation of these AMPs is documented in Section 3.0 of this SER. The remaining six AMPs are credited with managing aging effects only in reactor pressure vessels and the staff's evaluation of those AMPs is documented in Section 3.1.2.3 of this SER.

The applicant credited the BWR Stress Corrosion Cracking (LRA Appendix B.1.7) and Water Chemistry (LRA Appendix B.1.2) Programs for managing cracking due to IGSCC in reactor vessel safe ends. The BWR Stress Corrosion Cracking Program is based on BWRVIP-75, "Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules." In RAI B.1.7-a, the staff requested the applicant to submit information about its plant-specific experience related to IGSCC cracking of the reactor vessel safe ends and reactor coolant pressure boundary piping, mitigative actions taken, and the revised inspection schedules following the BWRVIP-75 guidelines. The staff also requested the applicant to submit information about whether hydrogen water chemistry (HWC) and noble metal chemical application (NMCA) are implemented at D/QCNPS and how this implementation has affected monitoring of water chemistry parameters. The applicant's response to this RAI is evaluated in Section 3.1.2.4.3 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor vessel will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be

maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.4.2 Reactor Vessel Internals (Including Fuel Assemblies and Control Blades)

Summary of Technical Information in the Application. The description of the reactor pressure vessel internals can be found in Section 2.3.1.2 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.1-2. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2.

The long-lived, passive reactor internals that are subject to an AMR are fabricated of Alloy 600 and Alloy 82/182 weld metal (welded and mechanical access hole covers, shroud support structures); cast austenitic steel (jet pump assemblies, orificed fuel structural supports); Alloy X750 (jet pump holddown beams); and stainless steel (CRD tubes and housing, core plates and bolts, core shrouds, core spray lines and spargers, incore instrumentation dry tubes and guide tubes, jet pump assemblies, orificed fuel support pieces, orificed fuel structural supports, reactor internal modifications/repair hardware/structural support, top guides). The operating environments are high-purity water at 288 °C (550 °F) and reactor coolant water up to 288 °C (550 °F).

The description of the fuel assemblies and control blades can also be found in Sections 2.3.1.2 of this SER. The applicant stated that fuel assemblies and control blades do not require AMR because they are short-lived.

Aging Effects

The LRA identified the following applicable aging effects for the reactor vessel internals:

- crack initiation and growth due to SCC, IGSCC, and IASCC
- cumulative fatigue damage
- loss of fracture toughness due to thermal aging and neutron irradiation embrittlement

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the reactor vessel internals:

- ASME Section XI Inservice Inspection Program
- Water Chemistry Program
- BWR Vessel Internals Program
- Thermal Aging and Neutron Irradiation Embrittlement Program

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in reactor vessel internals. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

The staff accepts the applicant's determination that the D/QCNPS fuel assemblies and control blades do not require aging management because these components are short-lived.

Aging Effects

The aging effects for the reactor vessel internals are as follows:

- crack initiation and growth due to SCC, IGSCC, and IASCC
- cumulative fatigue damage
- loss of fracture toughness due to thermal aging and neutron irradiation embrittlement

The applicant identified cracking due to SCC, IGSCC, and IASCC for all the vessel internals except orificed fuel support pieces. This is consistent with Chapter IV.B1 of NUREG-1801. However, some additional information is needed. The applicant has identified core spray line and spargers and jet pump assemblies as two of the vessel internals. The applicant needs to confirm whether the following subcomponents, which are identified in Appendix C of BWRVIP-18, are included as part of the core spray line and spargers for aging management—junction or tee box connections at the vessel nozzle or shroud penetration, sparger spray nozzle, support bracket, and thermal sleeve. Since the staff needed similar confirmation for the vessel internals addressed by other BWRVIP documents that the applicant has referenced in the LRA, the staff issued a generic request for information, RAI 4.2-BWRVIPS, requesting the applicant to verify that D/QCNPS is bounded by the BWRVIP documents referenced in the LRA. The applicant's response to Confirmatory Item 3.1.2.3.2-1 is evaluated in SER Section 3.1.2.3.2. The staff finds the response acceptable because it is consistent with the BWRVIP reports applicable to license renewal.

In RAI 2.3.1.2-5, the staff requested the applicant to identify all the components included in component group, "Jet Pump Assemblies," and explain why jet pump sensing lines are not within the scope of license renewal. In response to RAI 2.3.1.2-5, in a letter dated December 22, 2003, the applicant identified the following components that are included in the jet pump assemblies—thermal sleeve, inlet header, riser brace arm, hold-down beams, inlet elbow, mixing assemblies, and diffuser. The staff compared the applicant's response to the list of BWR jet pump assembly components that are within the scope of license renewal as identified in Appendix A (Section A.2) of BWRVIP-41. The staff finds that the applicant has not identified the transition piece, riser pipe, adapter, and restrainer bracket as within scope. The applicant needs to provide an explanation for not including these four components in component group, "Jet Pump Assemblies." In response to Supplemental RAI 2.3.1.2-5, the applicant stated that the transition piece, riser pipe, adapter, and restrainer bracket are included in the Component Group "Jet Pump Assemblies." The previous response considered the transition piece and riser pipe to be part of the inlet header and the adapter as part of the part of the diffuser. The restrainer bracket was not specifically identified, but is part of the assembly. The staff finds the applicant's response acceptable because it identifies all of the required components addressed in BWRVIP-41. The applicant's explanation for not including jet pump sensing lines within the scope of license renewal is evaluated in Section 3.1.2.2.4(2) of this SER and is found acceptable.

D/QCNPS have used extended power uprates to increase the power output of each of the four units by about 17 to 18 percent (NRC Fact Sheet on Power Uprates for Nuclear Plants, February 2002). Such increase in power may increase the fluence on vessel internals, and the sites on some of the components that were not susceptible to IASCC may become susceptible. The final license renewal SER for BWRVIP-26 states that the threshold fluence level for IASCC is 5×10^{20} n/cm² (E > 1 MeV). In RAI 3.1-7(a), the staff requested the applicant to explain

whether this increase in power has been accounted for in performing AMR of vessel internals. The staff also requested the applicant to identify the vessel internals whose fluence at the end of the extended period of operation may exceed the threshold level and become susceptible to cracking due to IASCC. In response to RAI 3.1-7(a), in a letter dated October 3, 2003, the applicant stated that the fluence calculations prepared specifically for the Dresden and Quad Cities LRA included the effects of extended power uprate. The top guide, shroud, and the incore instrumentation guide tubes and dry tubes may exceed the threshold fluence value of 5×10^{20} n/cm² (E > 1 MeV) by the end of the period of extended operation. As such, these components will require aging management. The AMPs used to manage the IASCC aging effect are LRA Appendices B.1.2, "Water Chemistry," and B.1.9, "BWR Vessel Internals." The staff finds the response acceptable because LRA Appendix B.1.9 indicates that the applicant will follow the recommendations of the related BWRVIP documents, and the applicant's inspection program considers the effects of IASCC as discussed in this section and Section 3.1.2.3.6.

The applicant identified cumulative fatigue damage as an applicable aging effect for core plates; core spray line and spargers; jet pump assemblies; orificed fuel supports; top guides; and incore instrumentation dry tubes and guide tubes. This identification of the aging effect is consistent with Chapter IV.B1 of NUREG-1801.

The applicant identified loss of fracture toughness due to thermal aging and neutron irradiation embrittlement as an applicable aging effect for castings in jet pump assemblies and CASS orificed fuel supports. This identification of the aging effect is consistent with Items B1.4-c and B1.5-b, Chapter IV.B1, of NUREG-1801.

The aging effects identified in the LRA for the reactor vessel internals are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs to manage the aging effects described above for the reactor vessel internals. The staff reviewed these programs in the sections of the SER listed in parentheses:

- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Vessel Internals Program (Section 3.1.2.3.6)
- Thermal Aging and Neutron Irradiation Embrittlement Program (Section 3.1.2.3.7)

The first two AMPs (ASME Section XI Inservice Inspection and Water Chemistry) are credited with managing the aging effects in several components in various different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them acceptable for managing the aging effects identified for the reactor vessel internals. The staff's evaluation of these AMPs is documented in Section 3.0 of the SER. The remaining two AMPs are credited with managing aging effects only in the reactor vessel internals and the staff's evaluation of those AMPs is documented in Section 3.1.2.3.6 and 3.1.2.3.7 of the SER.

The reactor vessel internals that may receive neutron fluence greater than the threshold fluence for IASCC (5×10^{20} n/cm² [E > 1 MeV]) by the end of the extended period of operation are susceptible to cracking due to IASCC. Per license renewal SER for BWRVIP-26, the accumulated neutron fluence is a TLAA issue for these vessel internals. The SER for BWRVIP-26 further states that the applicant must identify and evaluate this TLAA issue. In RAI 3.1-7b, the staff requested the applicant to submit identification and evaluation of the accumulated neutron fluence received by the D/QCNPS vessel internals at the end of license period as a TLAA issue.

In response to RAI 3.1-7b, in a letter dated October 3, 2003, the applicant stated that as mentioned in the response to RAI 3.1-7a above, fluence calculations were prepared for the reactor vessel and internals, including the effects of extended power uprate. Three components have been identified as being susceptible to IASCC for the period of extended operation—(1) top guide, (2) shroud, and (3) incore instrumentation dry tubes and guide tubes. As such, these components will require aging management as discussed above.

However, contrary to the direction contained in the SER for BWRVIP-26, this technical issue does not qualify as a TLAA. Specifically, the analysis is not contained or incorporated by reference in the CLB for either site. As such, it does not satisfy Criterion (6) of 10 CFR 54.3, “Definitions, Time Limited Aging Analyses.” Dresden and Quad Cities stations will implement the BWRVIP recommendations and manage the effects of aging of IASCC through AMPs B.1.2 (Water Chemistry) and B.1.9 (BWR Vessel Internals). Therefore, the staff agrees that 10 CFR 54.21(c)(1)(iii) allows the applicant to manage the effects of aging on the intended functions for the period of extended operation in lieu of performing a TLAA evaluation. The response to RAI 3.1.7b states that Dresden and Quad Cities will implement the BWRVIP recommendations and manage the effects of aging of IASCC through AMPs B.1.2 (Water Chemistry) and B.1.9 (BWR Vessel Internals). AMP B.1.9 is consistent with NUREG-1801 which references the use of BWRVIP-26 for the inspection of the reactor vessel internals, including the top guide, and BWRVIP-76 for the inspection of the shroud. However, according to Table 2-1 of BWRVIP-76, when fluences exceed 5×10^{20} n/cm², a plant-specific analysis is required to be submitted to the NRC. The staff identified this issue as Confirmatory Item 3.1.2.4.2-1. In response to Confirmatory Item 3.1.2.4.2-1, in a letter dated April 9, 2004, the applicant states that Table 2-1 of BWRVIP-76 provides inspection guidance for welds in un-repaired core shrouds. Note 4 of Table 2-1 indicates that for plants where fluence at the shroud exceeds 5×10^{20} n/cm², a plant-specific analysis is required to be submitted to the NRC. However, this analysis is only for un-repaired core shrouds. Since the core shrouds at Dresden and Quad Cities have been repaired and the repairs structurally replace the horizontal welds, the plant-specific analysis suggested by Table 2-1 is not applicable to these shrouds. The applicant further states that the inspection frequencies for the D/QCNPS shrouds are determined using the guidance contained in Section 3 of BWRVIP-76. The applicant inspects the vertical core shroud welds in accordance with BWRVIP-76, Section 3. The staff finds the response consistent with BWRVIP-76. Since the applicant has committed to implement BWRVIP-76 when the staff SER is issued, this completes our review of this issue. Therefore, Confirmatory Item 3.1.2.4.2-1 is closed.

BWRVIP-47, which was approved by the staff in an SER dated December 7, 2000, does not require inspections of the incore instrumentation dry tubes and guide tubes because of the service history and minimal safety consequence of the tube failure. However, by letter dated December 22, 2003, the applicant stated that the program is enhanced by inspecting the incore

instrumentation dry tubes every outage in accordance with GE SIL-409, Revision 1, for this specific GE dry tube model. SIL 409 recommends that dry tubes with detected cracks be replaced. Inspection of the source range monitor (SRM) and IRM dry tubes/guide tubes to detect the aging effects of IASCC are included in Exelon's AMP B.1.9, BWR Vessel Internals. Inspection of the dry tubes that have not been replaced are performed in accordance with the recommendations of SIL-409 during each refueling outage. Exelon has replaced incore dry tubes during refueling outages. When a dry tube is replaced, the inspection interval for the replacement dry tube is extended to 20 years as recommended by SIL-409. After the 20 year inspection has been completed, additional inspections are performed once every 4 years. The staff finds that the applicant exceeds the inspection requirements of NUREG-1801 for the incore instrumentation dry tubes. Inspection of the top guide is discussed in Section 3.1.2.3.6. Therefore, the staff finds that the applicant is managing the IASCC aging effect by inspection programs, in lieu of performing a TLAA evaluation, in accordance with the requirements of 10 CFR 54.21(c)(1)(iii).

The applicant credited ASME Section XI Inservice Inspection Program for managing cracking in the welded access hole covers due to SCC. This program requires visual inspection for detecting cracking. However, a crevice may be present near the weld and visual inspection is not adequate for detecting cracking initiated in the crevice region. Therefore, in RAI 3.1-8, the staff requested the applicant to provide a justification for why an augmented inspection technique that includes UT or another demonstrated acceptable inspection method for the welded access hole cover is not required, or to provide augmented inspection as specified in NUREG-1801, Item IV.B1.1.4. In response to RAI 3.1-8, in a letter dated October 3, 2003, the applicant stated that the augmented inspection technique discussed in NUREG-1801, Item IV.B1.1.4, is applicable to welded access hole covers. Since Dresden Unit 2 and Quad Cities Units 1 and 2 have replaced the welded access hole covers with mechanical covers, the augmented inspections are not required on these units. The Dresden Unit 3 welded access hole covers are inspected visually and augmented by ultrasonic examination consistent with the requirements of GE SIL 462, "Shroud Access Cover Cracking and Radial Cracking," Revision 1, as specified in NUREG-1801, Item IV.B1.1.4. This inspection is specified in LRA Table 3.1-1, Reference No.3.1.1.18. This response is acceptable to the staff because the applicant is inspecting the welded access hole covers with ultrasonic examination as recommended by GE SIL 462, Revision 1, and NUREG-1801, Item IV.B1.1.4.

In RAI 4.2-Flaw Evaluation, the staff requested the applicant to confirm whether there have been any flaws that were left in service based on ASME Code Section XI analysis techniques. If so, the staff requested the applicant to confirm whether it considered such analyses as potential TLAA's. In response to RAI 4.2-Flaw Evaluation, in a letter dated October 3, 2003, the applicant confirmed that flaws have been left in service based on ASME Code Section XI analysis techniques. The applicant further confirmed that the analyses associated with such flaws were reviewed and considered as potential TLAA's. However, none of these flaw analyses were determined to be TLAA's because the analyses did not satisfy Criterion (3) of 10 CFR 54.3, "Definitions, Time Limited Aging Analyses"; that is, the analyses did not involve time-limited assumptions defined by the current operating term.

The staff agrees that this is not a TLAA issue because the VIP program allows flaws to be left in service and defines an inspection interval based on the size and amount of flaws left in service in lieu of a 40-year analysis. For example, BWRVIP-76 defines the inspection interval by percent cracking and does not include an analysis for 40 years. Since there is no 40-year

evaluation on the flaw, a TLAA evaluation is not required. The staff finds the response acceptable because the applicant has submitted the requested information. The staff accepts the applicant's determination that the analyses of the flaws left in service are not TLAAs because those analyses do not satisfy the definition of TLAA and are managed by an AMP in accordance with the requirements of 10 CFR 54.21(c)(1)(iii).

On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor vessel internals will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.4.3 Reactor Coolant System—Recirculation System

Summary of Technical Information in the Application. The description of the reactor recirculation system, recirculation flow control, and motor/generator (M/G) sets can be found in Section 2.3.1.3 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.1-5 and are discussed in LRA Section 3.1, "Aging Management of Reactor Vessel, Internals, and Reactor Coolant System." The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2. LRA Table 2.3.1-5 also identifies the intended functions for the components listed and provides aging management reference links to LRA Tables 3.1-1 and 3.1-2. In a letter, dated February 7, 2003, from P.R. Simpson, Exelon, to NRC, D/QCNPS sent corrections to LRA Table 2.3.1-5. The corrections included deletion of aging management reference links that do not apply to certain component groups of the reactor recirculation system and the addition of a few aging management reference links that were found missing for some component groups.

Aging Effects

The system consists of all recirculation piping connected to the reactor vessel, along with associated valves, branch lines, and instrumentation. Also included are the recirculation flow control instrumentation and the recirculation M/G sets, fluid drive couplers, and the M/G set lubrication oil piping subsystem and oil coolers and their associated electrical controls. The system does not include the jet pumps or associated piping and instrument sensing lines that are inside the reactor vessel.

The long-lived, passive components in the recirculation system that are subject to an AMR are fabricated of stainless steel, CASS, low-alloy steel, carbon steel, brass, bronze, or glass (for sight glasses). The operating environments are reactor coolant water or steam at 288 °C (550 °F), oxygenated or demineralized water at temperatures up to 288 °C (550 °F), treated water, lubricating oil with contaminants, ambient air and humidity at metal temperatures up to 288 °C (550 °F), wet gas, saturated air, and containment nitrogen.

The applicant reviewed the industry experience (e.g., NRC information notices, generic letters, and bulletins) and the D/QCNPS operating experience (e.g., plant maintenance history, modifications, nonconformance reports, and licensee event reports) and identified the following

aging effects in Tables 3.1-1 and 3.1-2 for the reactor recirculation system components subject to an AMR:

- cumulative fatigue damage
- crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion
- loss of fracture toughness due to thermal aging embrittlement

In LRA Tables 2.3.1-5 and 3.1-2, the applicant also listed the following reactor recirculation system components for which no aging effect is identified:

- external surfaces of sight glasses exposed to air, moisture, and humidity (Table 3.1-2, Reference No. 3.1.2.5)
- external surfaces of stainless steel piping and fittings, dampeners, tubing, and valves exposed to air, moisture, and humidity (Table 3.1-2, Reference No. 3.1.2.7)
- external surfaces of stainless steel piping and fittings, flow element pumps, tanks, tubing, restricting orifices, thermowells, and valves exposed to containment nitrogen (Table 3.1-2, Reference No. 3.1.2.8)
- sight glasses exposed to water (Table 3.1-2, Reference No. 3.1.2.30)
- sight glasses exposed to lubricating oil (Table 3.1-2, Reference No. 3.1.2.31)
- sight glasses exposed to wet gas (Table 3.1-2, Reference No. 3.1.2.32)

Aging Management Programs

In LRA Tables 3.1-1 and 3.1-2, the applicant identified the following seven AMPs to manage the aging effects associated with the reactor recirculation system components:

- ASME Section XI Inservice Inspection Program
- Water Chemistry Program
- One-Time Inspection Program
- Bolting Integrity Program
- BWR Stress Corrosion Cracking Program
- Structures Monitoring Program
- Compressed Air Monitoring Program

Staff Evaluation. The applicant described its AMR for the reactor recirculation system in Section 3.1 of the LRA. The staff reviewed this section to determine whether the applicant identified all the applicable aging effects for components in these systems and demonstrated that the effects of aging on the components will be adequately managed during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the applicable UFSAR supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The applicant identified the following aging effects for the reactor recirculation system:

- cumulative fatigue damage (discussed below and in Section 4.3 of this SER)
- crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion
- loss of fracture toughness due to thermal aging embrittlement

The applicant identified cumulative fatigue damage as an applicable aging effect for the recirculation system closure bolting, piping and fittings, recirculation pumps, and valves. The staff notes that this assessment is consistent with NUREG-1801. Cumulative fatigue damage is further evaluated in Section 4.3, "Metal Fatigue," in Chapter 4 of this SER.

The applicant identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for the recirculation system austenitic stainless steel components (piping and fittings, tubing, valve bodies, flow elements, thermowells, restricting orifices, and dampeners) and for the high-strength, low-alloy steel primary pressure closure bolting exposed to reactor coolant water. The applicant also identified this aging effect for cast stainless steel components exposed to reactor coolant water. The applicant identified crack initiation and growth due to thermal and mechanical loading as an applicable aging effect for small-bore stainless steel piping and fittings and low-alloy steel pressure boundary closure bolting in the reactor recirculation system. The staff notes that this assessment is consistent with NUREG-1801.

In LRA Section 3.1.1.1.5, the applicant stated that an inspection of small-bore reactor coolant piping is to be conducted in accordance with its One-Time Inspection Program to verify that service-induced weld cracking is not occurring in the small-bore piping less than 4 inches, including pipe, fittings, and branch connections. The applicant's One-Time Inspection Program is described in LRA Section B.1.23, and the applicant stated that it is consistent with NUREG-1801, Chapter XI.M32, "One-Time Inspection."

In Section 3.1.1.1.5 of the LRA, the applicant further stated that thermal stratification, thermal cycling and thermal stripping, thermal transients, and flow-accelerated corrosion are potential aging mechanisms for small-bore piping. The LRA also stated that a review of the Dresden and Quad Cities RI-ISI evaluations on degradation mechanism assessment demonstrated that only Dresden had a high failure potential on a small-bore pipe due to thermal fatigue. Therefore, one-time inspection will consist of an ultrasonic exam on one of the 2-inch drain lines off the Dresden main steam header. These lines are Class 1 and within the scope of license renewal.

The staff issued RAI 3.1-9(a) requesting the applicant to identify all Class 1 small-bore piping, describe a sampling plan based on RI-ISI evaluations, and specify AMPs for managing cracking in this piping due to SCC. This RAI and the staff's evaluation of the applicant's response are presented in Section 3.1.2.2.4 of this SER. The staff found the applicant's response acceptable because the applicant had identified all Class 1 small-bore piping, presented an adequate sampling plan for inspection sites, and provided appropriate AMPs to manage cracking due to SCC.

The applicant identified loss of material due to wear as an aging effect for the reactor recirculation system high-strength, low-alloy steel bolting exposed to air with metal temperatures up to 288 °C (550 °F) and low-alloy steel bolting exposed to containment nitrogen. The staff notes that this assessment is consistent with NUREG-1801.

In LRA Table 3.1-2, the applicant identified loss of material due to various forms of corrosion as an aging effect for several reactor recirculation system components. The AMR results for these components are not presented in NUREG-1801, Chapter IV.C1, "Reactor Coolant Pressure Boundary (BWR)." However, AMR results for components with similar materials and environments can be found in other chapters of NUREG-1801 and are used here to evaluate the AMR results presented in LRA Table 3.1-2.

The applicant identified loss of material due to general corrosion as an applicable aging effect for the recirculation system carbon steel components exposed to moist air and humidity. The staff finds that this identification is consistent with Item E.2-a, Chapter V.E, of NUREG-1801.

The applicant identified loss of material due to general, crevice, pitting, and galvanic corrosion as an applicable aging effect for the recirculation system carbon steel components (piping, fittings, valves, filters/strainers, and restricting orifices) exposed to lubricating oil with contaminants and/or moisture. The staff finds that this identification is consistent with Item G.7-a, Chapter VII.G, of NUREG-1801.

The applicant identified loss of material due to general (carbon steel only), pitting, and crevice corrosion as an applicable aging effect for carbon steel exposed to treated water. The staff finds that this identification is consistent with Item C2.3-a, Chapter VII.C2, of NUREG-1801.

In LRA Table 3.1-2, the applicant identified loss of material due to general, pitting, and crevice corrosion as an applicable aging effect for stainless steel valves and carbon steel piping, fittings, and valves exposed to wet gas. In RAI 3.1-12, the staff requested that the applicant submit a description of the wet gas environment so that the staff can evaluate this aging effect. In response to RAI 3.1-12, in a letter dated October 3, 2003, the applicant stated that the wet gas environment is an air environment that contains moisture. The applicant referenced EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," in identifying the role of moisture in promoting various forms of corrosive attack, including loss of material due to general, pitting, and crevice corrosion. The staff finds the applicant's response acceptable because it provides a description of the wet gas environment. The staff also verified that the reference cited by the applicant identifies the role of moisture in promoting loss of material due to general, pitting, and crevice corrosion.

The applicant identified loss of material due to pitting and crevice corrosion as an applicable aging effect for carbon steel valves and stainless steel tanks, tubing, restricting orifices, and piping and fittings exposed to reactor coolant water or oxygenated water with temperatures up to 288 °C (550 °F). The staff finds this identification of loss of material as an applicable aging effect, acceptable because pitting and crevice corrosion of carbon steel and stainless steel is possible due to a small amount of chloride generally present in the BWR water and saturated air environments.

The applicant identified loss of material due to corrosion as an applicable aging effect for stainless steel, bronze, and brass components exposed to air, moisture, humidity, and leaking

fluid. The staff finds this identification of loss of material as an applicable aging effect, acceptable because trace levels of corrosive species (e.g., chlorides) are generally present in moist environments and leaking fluid.

The applicant identified the loss of fracture toughness due to thermal aging embrittlement as an applicable aging effect for CASS pump casings and valve bodies. The staff notes that this assessment is consistent with NUREG-1801. In LRA Table 3.1.1.10, Reference No. 3.1.1.10, the applicant stated that CASS piping does not exist at Dresden or Quad Cities and, therefore, the piping does not experience loss of fracture toughness due to thermal aging. However, fittings (e.g., elbows and tees) in the austenitic stainless steel piping in the BWR recirculation system are typically made of CASS. In NRC Aging Management Inspection Information Request AMI-11, the staff requested the applicant to identify the material for the fittings in the recirculation piping, and if it is CASS, to provide an AMP for managing loss of fracture toughness in those fittings. In response to AMI-11, the applicant stated that as identified on the Reactor Recirculation Piping Design Table (PDT) A of License Renewal Boundary Diagrams LR-DRE-M-26-2 and LR-QDC-M35-2, the fittings in recirculation piping are made of wrought and forged austenitic stainless steel, rather than of CASS. The staff finds the applicant's response acceptable because its review of Piping Design Table A confirmed that none of the fittings in Dresden and Quad Cities recirculation piping are made of CASS.

The applicant did not identify loss of preload as an aging effect for recirculation pump closure bolting and valve closure bolting in the reactor recirculation system. In LRA Section 3.1.1.2.2, the applicant referred to EPRI 1003056, Revision 3, which states that loss of preload mechanisms is typically addressed during installation and subsequent maintenance of closure bolting. In RAI 3.1-13, the staff requested the applicant to explain why periodic inspection of the closure bolting for indication of loss of preload due to the aforementioned mechanisms is not required. The staff further requested the applicant, if periodic inspection is required, to reference the appropriate AMP and include the appropriate inspection in the AMP. The response to RAI 3.1-13 is evaluated in Section 3.1.2.4.1 of this SER. The staff found the response not completely acceptable for the following reason. LRA Section 3.1.1.2.1 does not address loss of preload as an aging effect, and states that loss of preload mechanisms are typically addressed during installation and subsequent maintenance of closure bolting. However, the applicant's response to RAI 3.1-13 states that loss of preload will be managed and that the enhanced Bolting Integrity Program will be comprised of periodic ISIs and piping and components preventative maintenance inspections. In Supplemental RAI 3.1-13, the staff requested the applicant to describe the maintenance program activities that are performed on the bolts so that loss of preload is significantly reduced or eliminated, and identify whether retorquing of the bolts to the design preload values is performed after the component is reassembled. The applicant's response to Supplemental RAI 3.1-13 is evaluated in Section 3.1.2.4.1 of this SER. The staff has found the response acceptable.

The applicant identified no applicable aging effect for sight glasses exposed to air, moisture, and humidity; water; lubricating oil; and wet gas. This is acceptable because sight glass is resistant to loss of material, and the environments to which it is exposed are not aggressive. The applicant identified no applicable aging effect for the external surfaces of stainless steel components exposed to containment nitrogen or air, moisture, and humidity. The staff finds this identification of no applicable aging effect acceptable because stainless steel is resistant to loss of material and cracking at low temperatures when the environments it is exposed to are not aggressive.

The aging effects identified in the LRA for the reactor recirculation system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following programs for managing aging in the reactor recirculation system. These programs, all of which are common AMPs, are reviewed in the different sections of this SER, as indicated in parentheses:

- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- One-Time Inspection Program (Section 3.0.3.10)
- Bolting Integrity Program (Section 3.0.3.5)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Structures Monitoring Program (Section 3.0.3.14)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- Periodic Inspection of Components Subject to Moist Environments (3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

The applicant credited LRA Appendix B.1.1, ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD, for managing loss of fracture toughness due to thermal aging embrittlement in reactor recirculation and reactor water cleanup valve bodies and reactor recirculation pump casings made of CASS. The Inservice Inspection Program includes visual inspection for detecting surface-breaking cracks in the CASS valve bodies and pump casings. Inspection for cracking is acceptable for managing loss of fracture toughness in CASS valve and pump bodies because loss of fracture toughness in CASS components becomes a concern only if cracks are present. In RAI 3.1-14, the staff requested the applicant to explain how the proposed visual inspection technique is qualified for detecting IGSCC cracks in the CASS valve bodies and pump casings and to confirm whether Code Case N-481, "Alternative Examination Requirements for Cast Austenitic Pump Casings," has been used to supplement the ISI requirements of ASME Code Section XI for these pump casings. The staff further requested the applicant to confirm whether a flaw evaluation was performed for this aging effect while implementing this code case, and if not, to present evaluation of this as a TLAA in accordance with 10 CFR 54.3.

In response to RAI 3.1-14, in a letter dated October 3, 2003, the applicant stated that NUREG-1801 was relied on as an approved topical report in the preparation of the LRA. As such, the recommendations from NUREG-1801, Items IV.C1.2-c and IV.C1.3-b, were considered. These NUREG-1801 items state, "For pump casings (and valve bodies), screening for susceptibility to thermal aging is not required. The ASME Section XI inspection requirements are sufficient for

managing the effects of loss of fracture toughness due to thermal aging embrittlement of CASS valve bodies.” Therefore, no additional inspections are required. The applicant further stated that Code Case N-481, “Alternative Examination Requirements for Cast Austenitic Pump Casings.” does not supplement the Dresden or Quad Cities ISI requirements. The staff finds the applicant’s response acceptable because it is consistent with the NUREG-1801 position that the Section XI inspection requirements are sufficient for managing the effects of loss of fracture toughness due to thermal aging embrittlement of CASS.

The applicant credited LRA Appendix B.1.7, “BWR Stress Corrosion Cracking Program,” for managing crack initiation and growth due to SCC in austenitic stainless steel recirculation system piping and related reactor coolant pressure boundary components. The applicant stated that the BWR Stress Corrosion Cracking Program is based on BWRVIP-75, “Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules.” In Inspection Question 3.1.2.4.3-6, the staff requested the NRC Inspection Team to verify that the resolutions to the open items of NRC letter to Terry (BWRVIP), dated May 14, 2002, have been implemented in the program. Inspection Reports 05000237/2003010 (DRS); 05000249/2003010 (DRS); 05000254/2003014 (DRS); and 05000265/2003014 (DRS), dated December 5, 2003, stated that the ISI Program at Dresden and Quad Cities have incorporated BWRVIP-75, “Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules,” including the resolutions to the open items of NRC letter to the industry BWRVIP group, dated May 14, 2002.

In RAI B.1.7-a, the staff requested the applicant to submit information about its plant-specific experience related to IGSCC cracking of the reactor vessel safe ends and reactor coolant pressure boundary piping, mitigative actions taken, and the revised inspection schedules following the BWRVIP-75 guidelines. The staff also requested the applicant to submit information about whether HWC and NMCA are implemented at D/QCNPS and how this implementation has affected monitoring of water chemistry parameters. In RAI 3.1-24, the staff requested the applicant to provide similar information for the reactor coolant pressure boundary systems other than reactor vessel safe ends and reactor recirculation piping. However, in its response to RAI 3.1-24, the applicant addressed reactor recirculation piping, including reactor vessel safe ends. As a result, the applicant has submitted similar responses to RAIs B.1.7-a and RAI 3.1-24 in a letter dated October 3, 2003. Therefore, since the response to RAI 3.1-24 submitted in a letter dated October 3, 2003, provides all of the necessary information for the applicable systems/components, the staff evaluated this response which is presented in four parts as discussed below.

In RAI 3.1-24a, the staff requested that the applicant submit information about its plant-specific experience related to IGSCC cracking of the stainless steel components in the following reactor coolant pressure boundary systems—HPCI, core spray, RCIC, RHR, LPCI, SBLC, SDC, RWCU, MS, and FW systems and the isolation condenser. In response to RAI 3.1-24a, in a letter dated October 3, 2003, the applicant stated that it had reviewed the Dresden and Quad Cities operating experience related to IGSCC of stainless steel components in the systems specified, as well as in the reactor recirculation system. Reactor coolant pressure boundary piping was identified to have flaw indications, such as indications on the reactor vessel safe ends, and IGSCC on recirculation piping. However, there were no flaw indications (IGSCC) identified that affected the component intended function for any components in the above-mentioned systems. The applicant then listed representative examples of IGSCC operating experience related to reactor coolant pressure boundary piping. These examples were intended to demonstrate the effectiveness of the applicant’s AMP. The applicant further noted that the

evaluation of the effectiveness of IHSI treatment for susceptible welds resulted in an adjustment of the inspection plan to change all Quad Cities Unit 1 28-in. IHSI treated Category C (non-resistant material, stress improvement after 2 years of unit operation) welds to Category D (non-resistant material, no stress improvement). The staff finds the applicant's response acceptable because the operating experience demonstrates that AMP B.1.7 has been successful in identifying aging effects. The program has been successful in identifying cracking so that the intended function of the components will be maintained consistent with the CLB through the extended operation, as required by 10 CFR 54.21(a)(3).

In RAI 3.1-24b, the staff requested that the applicant submit information about mitigation actions taken at D/QCNPS with respect to selection of materials that are resistant to sensitization, use of special processes that reduce residual tensile stress, and monitoring of water chemistry as specified by NUREG-1801, Chapter XI.M7. In response to RAI 3.1-24b, in a letter dated October 3, 2003, the applicant listed mitigation actions taken with respect to material selection, use of special process, and monitoring of water chemistry. These included the replacement of stainless steel piping with more resistant grades, the use of IHSI to minimize tensile stresses in weldments, use of noble metal chemical injection systems, and implementation of HWC. As noted in the response to RAI 3.1-24b, the IHSI treatment of the susceptible welds was not effective in mitigating IGSCC. The applicant also stated that no information is yet available on the effectiveness of noble metal chemical injections on IGSCC mitigation, but the use of HWC appears to provide a beneficial effect. The staff finds the applicant's response to be acceptable because it provides the requested information to evaluate whether the inspections are consistent with the ASME Code and/or BWRVIP-75 with the applicable water chemistry, as discussed below.

In RAI 3.1-24c, the staff requested that the applicant confirm whether HWC and NMCA are implemented at D/QCNPS. If so, the staff requested the applicant to explain how this implementation has affected monitoring of water chemistry parameters. In response to RAI 3.1-24c, in a letter dated October 3, 2003, the applicant stated that both Dresden and Quad Cities have implemented HWC and NMCA. As part of the implementation of HWC and NMCA, monitoring of electrochemical corrosion potential (ECP) was added. ECP data and HWC index results are used to calculate crack growth rate factors of improvement. The applicant further stated that the BWRVIP model for BWR crack growth indicates decreasing crack growth rate with decreasing ECP. The staff finds the applicant's response to RAI 3.1-24c acceptable because it is consistent with the recommendations of BWRVIP-62. "BWR Vessel and Internals Project: Technical Basis for Inspection Relief for BWR Internal Components with Hydrogen Injection," however, the meaning of the term "HWC index" is not clear. The applicant is requested to clarify how the "HWC index" is used to determine factor of improvement, and confirm whether this term means the availability of HWC at a certain ECP value.

In response to Supplemental RAI 3.1-24d(iv) in a letter dated December 22, 2003, the applicant confirmed that the term is the availability (in percent) of HWC at a certain Electrochemical Corrosion Potential (ECP) value. The availability is calculated as the percentage of time the feedwater hydrogen concentration is sufficient to achieve an ECP value of less than or equal to -230mV when the water temperature exceeds 200 °F. Factors of Improvement (FOI) can be determined using this information. However, Dresden and Quad Cities do not use the FOI approach identified in BWRVIP-75 to determine the effectiveness of HWC. The staff finds this response acceptable, because the applicant is following the requirements of the NRC letter dated May 14, 2002, such as monitoring the ECP, in lieu of using the FOI.

In RAI 3.1-24d, the staff requested that the applicant submit information on the inspection frequency (based on whether HWS and/or NMCA are used) and the corresponding number of welds to be inspected following the BWRVIP-75 guidelines. The applicant submitted its response to RAI 3.1-24d in a letter dated October 3, 2003. In its response, the applicant stated that at Quad Cities, Category C through E welds (Quad Cities currently has no Category B welds) are still being inspected at the frequency specified in BWRVIP-75, "BWR Vessel and Internal Project Technical Basis for Revisions of Generic Letter 88-01 Inspection Schedules," guidelines for normal water chemistry. However, the NRC SER of EPRI Report TR-113932 (BWRVIP-75) dated May 14, 2002, expanded on the guidelines and inspection frequencies for Category C welds to include plants that comply with BWRVIP-61, as well as those plants that do not comply with BWRVIP-61. Therefore, the staff requested the applicant to confirm whether or not the D/QCNPS plants are complying with BWRVIP-61 and that the appropriate inspection frequencies based on the NRC SER are used. The staff also requested the applicant to identify the number of welds in each category of weld that are credited for the use of IHSI, HWC, NMCA, or a combination of these methods, and corresponding inspection frequency. The staff further requested the applicant to provide the number of Category C through E welds and the frequency of their inspections for Quad Cities 1 and 2. In response to Supplemental RAI 3.1-24d(i) in a letter dated December 22, 2003, the applicant confirmed that D/QCNPS do not use IHSI, and therefore BWRVIP-61, "BWR Vessel and Internals Induction Heating Stress Improvement (IHSI) Effectiveness on Crack Growth in Operating Plants" does not apply to D/QCNPS. However, D/QCNPS does meet the conditions of BWRVIP-75 that permit reductions in the frequencies for inspection of Category C welds (non-resistant material with stress improvement after 2 years of operation). The NRC SER of EPRI Report TR-113932 (BWRVIP-75) dated May 14, 2002, imposed restrictions on reduction in inspection frequencies for plants with Category C welds that had been treated with IHSI, but did not fully comply with BWRVIP-61. However, the category C welds at Dresden and Quad Cities were stress improved by the Mechanical Stress Improvement method (MSIP). This process was accepted by the SER on BWRVIP-75 without restrictions. Dresden and Quad Cities are in compliance with the requirements of BWRVIP-75, and therefore apply the reduced inspection frequencies for the Category C welds. The applicant also provided the number of welds in each category of weld that are credited for the use of MSIP, HWC, NMCA or a combination of these methods, and corresponding inspection frequency as requested. The staff confirmed that the inspection frequencies for both Dresden and Quad Cities are in compliance with the requirements of BWRVIP-75 and therefore finds the applicant's response acceptable.

In further response to RAI 3.1-24d, the applicant stated that HWC/NMCA inspection frequencies for Categories C through E welds were reduced for Dresden Unit 2 and only applied to those weld locations where the improved water chemistry is effective. The staff requested the applicant to explain how these locations were identified. The staff further requested the applicant to explain the two different categories for C, D, and E that are identified in the response, and why two different inspection frequencies are listed in the response for each Category C, D, and E welds at Dresden Unit 2. In addition, the staff asked the applicant to confirm whether the information provided meets the requirements of BWRVIP-75, as approved by the NRC SER of EPRI Report TR-113932 (BWRVIP-75), dated May 14, 2002 (i.e., the RAI response states that Category D-HWC welds with a population of 24 received 10 percent inspection every 6 years, whereas BWRVIP-75 requires 100 percent inspection every 10 years for HWC). In response to Supplemental RAI 3.1-24d(ii) in a letter dated December 22, 2003, the applicant stated that there were a number of typographical errors in the Dresden, Unit 2 weld information provided in the original response to RAI 3.1.24-d. These errors resulted in a

perception that different frequencies were provided for each weld category and/or that inappropriate frequencies were used. The applicant provided revised information, which are in compliance with the requirements of BWRVIP-75, as approved by NRC SER of EPRI Report TR-113932 (BWRVIP-75), dated May 14, 2002. The locations for which Dresden, Unit 2 Category C through E weld inspection frequencies were reduced are those areas in the reactor coolant flowpath. These portions of piping are continually exposed to circulating reactor coolant and receive the benefits of IGSCC mitigation due to HWC/NMCA. The staff finds the applicant's response acceptable because the inspection frequencies for Category C through E welds meet the requirements of BWRVIP-75, and that reduced weld inspection for Dresden, Unit 2 is consistent with BWRVIP-75 for the locations in the reactor coolant flowpath, that are continually exposed to circulating reactor coolant with HWC/NMCA.

In response to RAI 3.1-24d, the applicant further stated that Category A welds at D/QCNPS are inspected per the RI-ISI guidelines. The staff requested the applicant to confirm that Category A welds at D/QCNPS are inspected to BWRVIP-75 as modified and approved by the NRC SER of EPRI Report TR-113932 (BWRVIP-75) dated May 14, 2002. In response to Supplemental RAI 3.1-24d(iii) in a letter dated December 22, 2003, the applicant stated that IGSCC Category A welds are subsumed under the EPRI Risk-Informed Inservice Inspection (RI-ISI) program. This is consistent with the methodology of EPRI Report TR-112657, Revision B-A, Risk-Informed Inservice Inspection Evaluation Procedure. The staff finds the applicant's response acceptable because it is consistent with the methodology of EPRI Report TR-112657, Revision B-A, as approved by NRC SERs for RI-ISI dated September 5, 2001, and February 5, 2002 for Dresden and Quad Cities, respectively.

The applicant credited LRA Appendix B.1.23, "One-Time Inspection," for managing loss of material due to corrosion in recirculation system carbon steel and stainless steel components. The applicant stated that the One-time Inspection Program is consistent with Chapter XI.M32, "One-Time Inspection," specified in NUREG-1801. The staff finds the use of the One-Time Inspection Program appropriate for managing loss of material in these components because it will identify any loss of material at the inner surface of the component inspected.

However, the applicant credited only LRA Appendix B.1.2, "Water Chemistry," for managing cracking in recirculation system stainless steel components. The AMR for these components is presented in Table 3.1-2, Reference Nos. 3.1.2.23, 3.1.2.24, 3.1.2.26, 3.1.2.29, 3.1.2.40, 3.1.2.49, and 3.1.2.52. In RAI 3.1-15, the staff requested the applicant to explain why it credits the One-Time Inspection Program for managing loss of material, but not cracking. In response to RAI 3.1-15, in a letter dated October 3, 2003, the applicant stated that these piping components do not require a one-time inspection because they are small-bore (2" and under), socket welded components, downstream of the excess flow check valves and located outside primary containment. The normal operating temperature is less than 60 °C (140 °F), the minimum temperature needed to initiate IGSCC. Therefore, the aging management references should have reported an environment of "Reactor Coolant Water (less than 60 °C or 140 °F);" Aging Effect/Mechanism as "None," and the AMP as "None."

The applicant also noted that this environment is neither part of the original LRA, nor is it contained in the response provided to RAI 3.0-1 submitted to the NRC on June 11, 2003. This piping was originally considered to be in the 288 °C (550 °F) reactor water coolant environment, similar to the piping to which it is attached. However, the actual normal operating environment is less than 60 °C (140 °F). The applicant additionally noted that LRA Table 2.3.1-5,

“Components Requiring Aging Management Review —Reactor Recirculation System,” component group, “NSR Vents and Drains, Piping and Valves (attached support),” should not have indicated Dresden only. The staff finds the applicant’s response to be acceptable because SCC is not anticipated in stainless steel components operating at temperatures below 60 °C (140 °F).

All of the AMPs listed above are credited for managing the aging effects of several components in various different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff’s evaluation of these AMPs is documented in Section 3.0 of this SER. On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor recirculation system components will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.2(a)(3).

3.1.2.4.4 Reactor Vessel Head Vent System

Summary of Technical Information in the Application. The description of the reactor vessel head vent system can be found in Section 2.3.1 of this SER. The passive, long-lived components in this system that are subject to an AMR are discussed in LRA Section 3.1, “Aging Management of Reactor Vessel, Internals, and Reactor Coolant System,” and are identified in LRA Table 2.3.1-6. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2. In a letter, dated February 7, 2003, from P R. Simpson, Exelon, to NRC, D/QCNPS sent a correction to LRA Table 2.3.1-6. The correction included a deletion of an aging management reference link that does not apply to certain component groups of the reactor vessel head vent system.

Aging Effects

The applicant reviewed the industry experience (e.g., NRC information notices, generic letters, and bulletins) and the Dresden and Quad Cities operating experience (e.g., plant maintenance history, modifications, nonconformance reports, and licensee event reports) and identified the components, aging effects, and AMPs in LRA Tables 3.1-1 and 3.1-2.

The long-lived, passive components in the reactor vessel head vent system that are subject to an AMR are fabricated of stainless steel (tubing and valve components), CASS (valve bodies), low-alloy steel (closure bolting), carbon steel (vents, drains, and piping), brass or bronze (vents/drains), and glass (sight glasses). The operating environments are reactor coolant water or steam at 288 °C (550 °F), ambient air and humidity at metal temperatures up to 288 °C (550 °F), wet gas, saturated air, and containment nitrogen.

In Tables 3.1-1 and 3.1-2, the applicant identified the following aging effects for the reactor vessel head vent system components subject to an AMR:

- cumulative fatigue damage
- crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading

- crack initiation and growth due to cyclic loading
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion
- wall thinning due to flow-accelerated corrosion

In LRA Tables 2.3.1-6 and 3.1-2, the applicant also listed the following reactor vessel head vent system components for which no aging effect is identified:

- external surfaces of carbon steel piping, fittings, and valves exposed to containment nitrogen (Table 3.1-2, Reference No. 3.1.2.4)
- external surfaces of stainless steel tubing and valves exposed to containment nitrogen (Table 3.1-2, Reference No. 3.1.2.8)
- sight glasses exposed to wet gas (Table 3.1-2, Reference No. 3.1.2.32)

Aging Management Programs

In LRA Tables 3.1-1 and 3.1-2, the applicant identified the following eight AMPs to manage the aging effects associated with the reactor vessel head vent system components:

- ASME Section XI Inservice Inspection Program
- Water Chemistry Program
- One-Time Inspection Program
- Bolting Integrity Program
- BWR Stress Corrosion Cracking Program
- Flow-Accelerated Corrosion Program
- Compressed Air Monitoring Program

Staff Evaluation. The applicant described its AMR for the reactor vessel head vent system in Section 3.1 of the LRA. The staff reviewed this section to determine whether the applicant identified all the applicable aging effects for components in these systems and demonstrated that the effects of aging on the components will be adequately managed during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified by the applicant for the reactor vessel head vent system are as follows:

- cumulative fatigue damage (discussed below and in Section 4.3 of this SER)
- crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading
- crack initiation and growth due to cyclic loading
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion
- wall thinning due to flow-accelerated corrosion

The applicant identified cumulative fatigue damage as an applicable aging effect only for the reactor head vent system valves. The staff notes that this assessment is consistent with NUREG-1801, Item C1.3-d, Chapter IV.C1) However, in RAI 3.1-16, the staff requested the applicant to explain why cumulative fatigue damage was not identified as an applicable aging effect for the piping and fittings of the reactor vessel head vents. Cumulative fatigue damage is further discussed in Section 4.3 of this SER. In response to RAI 3.1-16, in a letter dated October 3, 2003, the applicant stated that cumulative fatigue damage is an applicable aging effect for the reactor head vent piping and fittings. The applicant stated that LRA Table 2.3.1-6 should have included Aging Management Reference 3.1.1.1 for the component group, "Piping and Fittings." The staff finds the applicant's response to be acceptable because it is consistent with the GALL position on the applicability of cumulative fatigue damage as an aging effect for the reactor pressure boundary piping and fittings, including those associated with the reactor vessel head vents.

According to the Aging Management Review Aid for the reactor vessel head vent system (Table 2.3.1-6), the applicant identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for the reactor head vent system austenitic stainless steel valve bodies exposed to reactor coolant water. However, the staff notes that the applicant does not identify crack initiation and growth as an applicable aging effect for the reactor head vent system CASS valve bodies exposed to reactor coolant water. In RAI 3.1-17, the staff requested the applicant to explain why cracking is not an applicable aging effect for CASS valve bodies in the reactor vessel head vent system. In response to RAI 3.1-17, in a letter dated October 3, 2003, the applicant states that neither Dresden nor Quad Cities have CASS valves installed in the reactor vessel head vent system. The applicant further stated that the material for the line in Table 2.3.1-6 of the Aging Management Review Aid that shows valves with material of "Carbon Steel, Cast Austenitic Stainless Steel, Stainless Steel" should have read "Carbon Steel, Stainless Steel." Cast austenitic stainless steel should have been removed from the list of materials. The staff finds the applicant's response to be acceptable because the embrittlement aging effect is applicable only to CASS components.

The applicant does not identify the loss of fracture toughness due to thermal aging embrittlement as an applicable aging effect for CASS valve bodies in the reactor vessel head vent system. In RAI 3.1-19, the staff requested that the applicant explain why loss of fracture toughness due to thermal aging embrittlement is not an applicable aging effect for the CASS valve bodies. If loss of fracture toughness is identified as an applicable aging effect, then the applicant needs to provide a program for managing that effect. In response to RAI 3.1-19, in a letter dated October 3, 2003, the applicant stated that as explained in the response to RAI 3.1-17, Dresden and Quad Cities do not have CASS valves installed in the reactor vessel head vent system. The staff finds the applicant's response to be acceptable because the embrittlement aging effect of concern here is applicable only to CASS components.

The applicant identified crack initiation and growth due to thermal and mechanical loading as an applicable aging effect for small-bore carbon steel piping and fittings. These AMR results are evaluated in Section 3.1.2.2.4 of this SER and are consistent with NUREG-1801.

The applicant identified crack initiation and growth due to cyclic loading as an applicable aging effect for the low-alloy steel reactor vessel head vent system pressure boundary low-alloy steel closure bolting exposed to containment nitrogen. This AMR result is consistent with Item I.2-b, Chapter VII.I, in NUREG-1801.

The applicant identified loss of material due to wear as an aging effect for the reactor vessel head vent system low-alloy and high-strength, low-alloy steel closure bolting exposed to an air or containment nitrogen environment with metal temperatures up to 288 °C (550 °F). The staff notes that this assessment is consistent with NUREG-1801.

In LRA Table 3.1-2, the applicant identified loss of material due to various forms of corrosion as an aging effect for the reactor vessel head vent system stainless steel tubing exposed to saturated air; for carbon steel, stainless steel, brass or bronze vents/drains, piping, and valves exposed to moist air and leaking fluid; and for stainless steel valve components exposed to saturated air. The AMR results for these components are not presented in NUREG-1801, Chapter IV.C1, "Reactor Coolant Pressure Boundary (BWR)." However, AMR results for components with similar materials and environments can be found in other chapters of NUREG-1801 and are used here to evaluate the AMR results presented in LRA Table 3.1-2.

The applicant identified loss of material due to general corrosion as an aging effect for carbon steel, stainless steel, brass or bronze vents or drains, piping, and valves exposed to air, moisture, humidity, and leaking fluid. The staff finds that the identification of the carbon steel components is consistent with Item E.2-a, Chapter V.E, of NUREG-1801. For the stainless steel, brass, or bronze components, the staff agrees that these components are subject to this aging effect in these environments, since trace levels of corrosive species are generally present in moist environments.

The applicant identified loss of material due to pitting and crevice corrosion as an applicable aging effect for stainless steel tubing and valve components exposed to a saturated air environment. The staff agrees that these components are subject to this aging effect in this environment, since trace levels of corrosive species (e.g., chlorides) commonly present on the component surfaces can interact with moisture and condensation from saturated air. The aging management results for managing flow-accelerated corrosion of the carbon steel components in the reactor vessel head vent system are provided in LRA Table 3.1-1, Aging Management Reference 3.1.1.11, which refers to LRA Section 3.1.1.2.2 for exceptions to flow-accelerated corrosion.

The applicant identified wall thinning due to flow-accelerated corrosion as an applicable aging effect for carbon steel piping and fittings in the reactor vessel head vent system exposed to flowing reactor coolant water at temperatures up to 225 °C (437 °F). However, in LRA Section 3.1.1.2.2, the applicant stated that the carbon steel components in the reactor vessel head vent system are not susceptible to flow-accelerated corrosion and do not require aging management for this effect. This determination is based on the fact that these components operate less than 2 percent of the plant operating time or at flow rates less than 1.8 m/s (6 ft/s). The applicant referenced the EPRI reports NSAC-202L-R2 and TR-114882 as the bases for these criteria. However, Chapter XI.M17, "Flow-Accelerated Corrosion," of NUREG-1801 only relies on EPRI report NSAC-202L-R2 for an effective flow-accelerated corrosion program. In RAI 3.1-18, the staff asked the applicant whether EPRI report NSAC-202L-R2 states that carbon steel components are not susceptible to flow-accelerated corrosion, and do not require aging management when these components are operated at flow rates less than 1.8m/s (6ft/s). If not, the applicant needs to specify the applicable AMP, as required by NUREG-1801.

In response to RAI 3.1-18, in a letter dated October 3, 2003, the applicant stated that it has reevaluated the use of EPRI TR-114882 and NSAC-202L-R2 and has decided not to take an

exception to NUREG-1801 for aging management of the reactor vessel head vent system. As a result, the applicant stated that the reactor vessel head vent system will be included in the Dresden and Quad Cities Flow Accelerated Corrosion Program, and LRA Section 3.1.1.2.2 should not have included the reactor vessel head vent system in the exception described in Section 3.1.1.2.2 of the LRA.

The applicant stated that LRA Section 3.1.1.2.2 should have read as follows:

Flow-accelerated corrosion is an applicable aging mechanism for the main steam lines, feedwater lines, reactor vessel head vent lines, and reactor vessel bottom head drain lines (evaluated with the nuclear boiler instrumentation system). However, carbon steel components in the core spray, shutdown cooling (Dresden only), HPCI, RCIC (Quad Cities only), and nuclear boiler instrumentation (except for the reactor vessel bottom head drain lines) are not susceptible to flow-accelerated corrosion and do not require aging management. This exception is based on the following:

- EPRI NSAC-202L-R2, "Recommendations for an Effective Flow-Accelerated Corrosion Program," allows an exclusion from flow-accelerated corrosion for systems with no flow or those that operate less than 2 percent of plant operating time.
- NUREG-1557, "Summary of Technical Information and Agreements from Nuclear Management and Resources Council Industry Reports Addressing License Renewal," states that erosion/corrosion in HPCI and RCIC turbine steam supply piping is nonsignificant due to the low flow range.
- Dresden and Quad Cities operate these systems less than 2 percent of plant operating time. Additionally, plant experience has not revealed flow-accelerated corrosion in these lines.

The staff finds the applicant's response to be acceptable because the applicant's AMP for managing wall thinning due to flow-accelerated corrosion for carbon steel piping and fittings in the reactor vessel head vent system exposed to flowing reactor coolant water at temperatures up to 225 °C (437 °F) is now consistent with GALL.

The applicant does not identify loss of preload as an aging effect for high-strength, low-alloy steel closure bolting in reactor vessel head vent system. In LRA Section 3.1.1.2.2, the applicant refers to EPRI 1003056, Revision 3, which states that loss of preload mechanisms are typically addressed during installation and subsequent maintenance of closure bolting. In RAI 3.1-13, the staff requested the applicant to explain why periodic inspection of the closure bolting for indication of loss of preload due to the aforementioned mechanisms is not required. The staff further requested the applicant, if periodic inspection is required, to reference the appropriate AMP and include the appropriate inspection in the AMP. The response to RAI 3.1-13 is evaluated in Section 3.1.2.4.1 of this SER.

The staff finds the response not completely acceptable for the following reason. LRA Section 3.1.1.2.1 does not address loss of preload as an aging effect, and states that loss of preload mechanisms are typically addressed during installation and subsequent maintenance of closure bolting. However, the applicant's response to RAI 3.1-13 stated that loss of preload will be managed, and that the enhanced Bolting Integrity Program will be comprised of periodic ISIs and piping and components preventative maintenance inspections. In Supplemental RAI 3.1-13, the staff requested the applicant to describe the maintenance program activities that are performed on the bolts so that loss of preload is significantly reduced or eliminated, and to identify whether retorquing of the bolts to the design preload values is performed after the

component is reassembled. The applicant's response to Supplemental RAI 3.1-13 is evaluated in Section 3.1.2.4.1 of this SER. The staff has found the response acceptable.

The applicant identified no applicable aging effect for external surfaces of carbon steel piping, fittings, and valves exposed to a containment nitrogen environment. This identification of no aging effect is not acceptable because the environment in BWR containment is likely to have high humidity, which can cause corrosion of the external surface of carbon steel components. In RAI 3.1-5, the staff requested the applicant to explain why loss of material is not identified as an aging effect for these components, or provide a program for managing that aging effect. The staff evaluates the response to this RAI in Section 3.1.2.4.1.2 of this SER and finds it acceptable. The staff agrees with the applicant that there are no applicable aging effects for external surfaces of carbon components exposed to a containment nitrogen environment because the low oxygen level present in the primary containment atmosphere precludes loss of material due to corrosion as a credible aging effect for the external surface of carbon steel components exposed to containment environment.

The applicant identified no applicable aging effect for external surfaces of stainless steel tubing and valves exposed to containment nitrogen and sight glasses exposed to wet gas. This identification of no aging effect is acceptable because these environments are not aggressive.

The aging effects identified in the LRA for the reactor vessel head vent system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The AMPs for the reactor vessel head vent system are identified in Section 3.1.2.4.4 of this SER. These programs are common AMPs, and are reviewed in different sections of this SER, as indicated in parentheses.

- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- One-Time Inspection Program (Section 3.0.3.10)
- Bolting Integrity Program (Section 3.0.3.5)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Structures Monitoring Program (Section 3.0.3.14)
- Compressed Air Monitoring (Section 3.0.3.8)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)

All of the AMPs listed above are credited for managing the aging effects of several components in various structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Section 3.0 of this SER. On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor vessel head vent system components will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.4.5 Nuclear Boiler Instrumentation System

Summary of Technical Information in the Application. The description of the nuclear boiler instrumentation system can be found in Section 2.3.1 of this SER. The passive, long-lived components in this system that are subject to an AMR are discussed in LRA Section 3.1, "Aging Management of Reactor Vessel, Internals, and Reactor Coolant System," and are identified in LRA Table 2.3.1-7. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2. In a letter, dated February 7, 2003, from Mr. P.R. Simpson, Exelon, to the NRC, D/QCNPS sent corrections to LRA Table 2.3.1-7. The corrections included deletion of aging management reference links that do not apply to certain component groups of the nuclear boiler instrumentation system and addition of an aging management reference link that was missing for a component group.

Aging Effects

The applicant reviewed the industry experience (e.g., NRC information notices, generic letters, and bulletins) and the D/QCNPS operating experience (e.g., plant maintenance history, modifications, nonconformance reports, and licensee event reports) and identified the components, aging effects, and AMPs in LRA Tables 3.1-1 and 3.1-2.

The nuclear boiler instrumentation system monitors the reactor vessel temperature, reactor vessel pressure, reactor vessel water level, reactor internal differential pressure, and reactor vessel flange leakage. The long-lived, passive components in the system that are subject to an AMR consist of piping and fittings, tubing, valves, tanks, thermowells, vents, drains, filters/strainers, dampeners (Quad Cities only), and closure bolting. These components are fabricated of stainless steel, CASS, low-alloy steel, carbon steel, brass, or bronze. The operating environments are reactor coolant water or steam at 288 °C (550 °F); oxygenated or demineralized water at temperatures up to 288 °C; ambient air at metal temperatures up to 288 °C (550 °F); air, moisture, humidity, and leaking fluid; and containment nitrogen.

In Tables 3.1-1 and 3.1-2, the applicant identified the following aging effects for the nuclear boiler instrumentation system components subject to an AMR:

- crack initiation and growth due to SCC, IGSCC, thermal and mechanical loading, and cyclic loading
- wall thinning due to flow-accelerated corrosion
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion

In LRA Tables 2.3.1-7 and 3.1-2, the applicant also listed the following nuclear boiler instrumentation system components for which no aging effect is identified:

- external surfaces of carbon steel piping, fittings, tubing, and valves exposed to containment air (Table 3.1-2, Reference No. 3.1.2.4)
- external surfaces of stainless steel piping and fittings, dampeners, filters and strainers, valves and tubing exposed to air, moisture, and humidity (Table 3.1-2, Reference No. 3.1.2.7)
- external surfaces of stainless steel piping and fittings, tubing, tanks, thermowells, and valves exposed to containment nitrogen (Table 3.1-2, Reference No. 3.1.2.8)

Aging Management Programs

In LRA Tables 3.1-1 and 3.1-2, the applicant identified the following six AMPs to manage the aging effects associated with the nuclear boiler instrumentation system components:

- ASME Section XI Inservice Inspection Program
- Water Chemistry Program
- One-Time Inspection Program
- Bolting Integrity Program
- BWR Stress Corrosion Cracking Program
- Flow-Accelerated Corrosion Program

Staff Evaluation. The applicant described its AMR for the nuclear boiler instrumentation system in Section 3.1 of the LRA. The staff reviewed this section to determine whether the applicant identified all the applicable aging effects for components in these systems and demonstrated that the effects of aging on the components will be adequately managed during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified by the applicant for the nuclear boiler instrumentation system are as follows:

- crack initiation and growth due to SCC, IGSCC, thermal and mechanical loading, and cyclic loading
- wall thinning due to flow-accelerated corrosion
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion

The applicant identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for nuclear instrumentation system stainless steel dampeners, vessel flange leak detection line, piping and fittings (Quad Cities only), thermowells, tanks, tubing, and valves exposed to reactor coolant water or steam at 288 °C (550 °F) or containment nitrogen. This identification is consistent with Chapter IV.C1 of NUREG-1801. In addition, the applicant

identified crack initiation and growth due to SCC and IGSCC and mechanical loading as an applicable aging effect for nuclear instrumentation system carbon and stainless steel small-bore piping and fittings exposed to reactor coolant water at 288 °C (550 °F). The staff notes that the identification of this aging effect for these components is consistent with Item C1.1-l of NUREG-1801.

The applicant also identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for non-safety-related nuclear instrumentation system stainless steel filters and strainers exposed to reactor coolant water or steam at 288 °C (550 °F), stainless steel piping and fittings exposed to oxygenated water at temperatures up to 288 °C (550 °F), and stainless steel tubing exposed to demineralized water at temperatures up to 288 °C (550 °F). The staff notes that the AMR of these non-safety-related components is not presented in NUREG-1801, but similar combinations of materials and environments are evaluated in NUREG-1801. The applicant's identification of cracking as an aging effect for non-safety-related stainless steel components is consistent with Item D2.1-c, Chapter V.D2, and Item C1.1-f, Chapter IV.C1, of NUREG-1801.

Reference No. 3.1.2.7, LRA Table 3.1-2, states that there is no applicable aging effect for nuclear boiler instrumentation system stainless steel component external surfaces exposed to air, moisture, and humidity at temperatures less than 100 °C (212 °F) or containment nitrogen. The staff accepts this identification of no aging effect because stainless steel is not susceptible to crack initiation and growth due to SCC and IGSCC at these low temperatures or to loss of material due to different corrosion mechanisms because the environment is not aggressive and stainless steel is resistant to corrosion.

Finally, the applicant identified crack initiation and growth due to thermal and mechanical loading as an applicable aging effect for small-bore carbon steel piping and fittings in the nuclear boiler instrumentation system. The staff notes that this assessment is consistent with Item C.1.1-i, Chapter IV.C1, of NUREG-1801.

The applicant identified crack initiation and growth due to cyclic loading as an applicable aging effect for the low-alloy steel nuclear boiler instrumentation system pressure boundary closure bolting. This identification of cracking as an applicable aging effect is consistent with Item I.2-b, Chapter VII.I, of NUREG-1801.

In LRA Section 3.1.1.2.2, the applicant identified wall thinning due to flow-accelerated corrosion as an aging effect for the carbon steel nuclear boiler instrumentation system piping and fittings exposed to 288 °C (550 °F) steam. However, the applicant stated that the carbon steel components in the nuclear boiler instrumentation system are not susceptible to flow-accelerated corrosion and do not require aging management for this effect. This determination is based on the fact that these components operate less than 2 percent of the plant operating time or at flow rates less than 1.8 m/s (6 ft/s). The applicant references EPRI reports NSAC-202L-R2 and TR-114882, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," as the bases for these criteria. In RAI 3.1-18, the staff notes that Section XI.M17, "Flow-Accelerated Corrosion," of NUREG-1801 only relies on EPRI report NSAC-202L-R2 for an effective flow-accelerated corrosion program. The staff requested the applicant to confirm whether EPRI report NSAC-202L-R2 states that carbon steel components are not susceptible to flow-accelerated corrosion when subject to flow rates less than 1.8 m/s (6 ft/s) when these

components are operated, and, therefore, do not require aging management. If not, the applicant must specify the applicable AMP as required by NUREG-1801.

In response to RAI 3.1-18, in a letter dated October 3, 2003, the applicant stated that the reactor vessel bottom head drain lines are included in the Dresden and Quad Cities Flow Accelerated Corrosion Program. Except for the reactor vessel bottom head drain lines, all components in the nuclear boiler instrumentation system are made of stainless steel, experience no flow, or operate less than 2 percent of plant operating time. Therefore, the reactor vessel bottom head drain lines are the only components in the nuclear boiler instrumentation system that are susceptible to flow-accelerated corrosion. In addition, the applicant stated that in LRA Table 2.3.1-7, "Component Groups Requiring Aging Management Review Nuclear Boiler Instrumentation," "Quad Cities only" should have been removed from the Piping and Fittings line. The staff finds the applicant's response to be acceptable because the applicant does not use a flow velocity less than 1.8 m/s as one of the criteria for determining whether a component is susceptible to flow-accelerated corrosion.

The applicant identified loss of material due to wear as an aging effect for the nuclear boiler instrumentation system low-alloy and high-strength, low-alloy steel closure bolting exposed to air with metal temperatures up to 288 °C (550 °F). The staff notes that this assessment is consistent with NUREG-1801. The applicant also identified this aging mechanism for these components in a containment nitrogen environment. The staff agrees that these components are subject to loss of material due to wear.

In LRA Table 3.1-2, the applicant identified loss of material due to various forms of corrosion as an aging effect for the nuclear boiler instrumentation system stainless steel tubing exposed to saturated air; and for carbon and stainless steel piping, fittings, and valve bodies in contact with reactor coolant and oxygenated water at temperatures up to 288 °C (550 °F). This aging effect is also identified for stainless steel tubing in contact with warm, moist air. The AMR results for these components are not presented in Chapter IV.C1, "Reactor Coolant Pressure Boundary (BWR)," of NUREG-1801. However, AMR results for components with similar materials and environments can be found in other chapters of NUREG-1801 and are used here to evaluate the AMR results presented in LRA Table 3.1-2.

The applicant identified loss of material due to general corrosion as an aging effect for carbon steel, stainless steel, and brass or bronze vents or drains, piping, and valves exposed to air, moisture, humidity, and leaking fluid. The staff finds that the identification of loss of material as an applicable aging effect for the carbon steel components is consistent with Item E.2-a, Chapter V.E, of NUREG-1801. For the stainless steel, brass, or bronze components, the staff agrees that these components are subject to this aging effect in these environments, since trace levels of corrosive species are generally present in moist environments.

The applicant identified loss of material due to pitting and crevice corrosion as an aging effect for carbon and stainless steel piping and fittings, stainless steel tubing, and carbon and stainless steel valve components operating in contact with leaking reactor coolant water, oxygenated water, steam, or warm moist air at temperatures up to 288 °C (550 °F). The staff finds that, for the carbon and stainless steel components in oxygenated water, this identification is consistent with Items A4.1-a and A4.3-a, Chapter VII.A, of NUREG-1801. For the remaining environments, the staff agrees that these components are subject to loss of material, since

trace levels of corrosive species commonly present in the reactor coolant, oxygenated water, or on the component surfaces can interact with moisture and condensation from moist air.

The applicant did not identify loss of material due to corrosion as an aging effect for closure bolting in the nuclear boiler instrumentation system. This is acceptable because closure bolting is made of low-alloy steel which is resistant to corrosion.

In LRA Section 3.1.1.1, the applicant did not identify the loss of fracture toughness due to thermal aging embrittlement as an applicable aging effect for CASS CRD valve bodies located around CRD housings in the nuclear boiler instrumentation system. In RAI 3.1-20a, the staff requested the applicant to explain why loss of fracture toughness is not an applicable aging effect for these valve bodies. If loss of fracture toughness is identified as an applicable aging effect, then the applicant needs to provide a program for managing that effect. In response to RAI 3.1-20a, in a letter dated October 3, 2003, the applicant stated that in GALL AMP XI.M12, "Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)," the "Scope of Program" element states, "The screening criteria are applicable to all primary pressure boundary and reactor vessel internal components constructed from SA-351 Grades CF3, CF3A, CF8, CF8A, CF3M, CF3MA, CF8M, with service conditions above 250 °C (482 °F)".

The valves associated with the nuclear boiler instrumentation system are located outside the drywell and are not insulated. The reactor coolant temperature through these valves is below 250 °C (482 °F). Additionally, the material for these valves is ASTM 182, not ASTM A351. The valves associated with the CRD hydraulic system are continuously supplied with cooling water less than 38 °C (100 °F) from the cooling water header of the control rod drive hydraulic system. This maintains the control rod drives and all associated valve temperatures to less than 121 °C (250 °F). For these reasons, the applicant concluded that loss of fracture toughness is not an applicable aging effect. The staff finds the applicant's response to be acceptable because the use of forged stainless steel (ASTM 182) as the material of construction and the operating temperatures less than 121 °C (250 °F) preclude thermal embrittlement as an applicable aging effect for the components in question.

In LRA Section 3.1.1.1, the applicant identified no applicable aging effect for external surfaces of carbon steel piping, fittings, tubing, and valves exposed to a containment nitrogen environment. In RAI 3.1-5, the staff states that this identification of no aging effect is not acceptable because the air in BWR containment is likely to have high humidity, and this humid environment can cause corrosion of the external surface of carbon steel components. The staff requested the applicant to provide technical justification for not identifying loss of material as an applicable aging effect for the external surface of carbon steel components exposed to a containment environment. The staff evaluated the response to this RAI in Section 3.1.2.4.1 of this SER and found it acceptable. The staff agreed with the applicant that there are no applicable aging effects for external surfaces of carbon components exposed to a containment nitrogen environment because the low oxygen level present in the primary containment atmosphere precludes loss of material due to corrosion as a credible aging effect for the external surface of carbon steel components exposed to the containment environment.

The applicant identified no applicable aging effect for stainless steel components externally exposed to air, moisture, humidity, and containment nitrogen. This is acceptable because the environments to which the stainless steel components are exposed are not aggressive.

The aging effects identified in the LRA for the nuclear boiler instrumentation system components are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The AMPs for the nuclear boiler instrumentation system are identified in Section 3.1.2.4.5.1 of this SER. These programs, all of which are common AMPs, are reviewed in the following sections of this SER:

- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- One-Time Inspection Program (Section 3.0.3.10)
- Bolting Integrity Program (Section 3.0.3.5)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Periodic Inspection of Components Subject to Moist Environments (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

The applicant credited LRA Appendices B.1.2, "Water Chemistry," and B.1.23, "One-Time Inspection," for managing loss of material due to corrosion in nuclear boiler instrumentation system carbon steel and stainless steel components. The applicant stated that the One-Time Inspection Program is consistent with Chapter XI.M32, "One-Time Inspection," specified in NUREG-1801. The staff finds the use of the One-Time Inspection Program appropriate for managing loss of material in these components because it will identify the presence of any loss of material at the inner surface of the component inspected and verify the effectiveness of water chemistry.

However, in RAI 3.1-15, the staff noted that the applicant credited only LRA Appendix B.1.2, "Water Chemistry," for managing cracking in the nuclear boiler instrumentation system stainless steel components. The AMR for these components is presented in Table 3.1-2, Reference Nos. 3.1.2.13, 3.1.2.23, 3.1.2.24, 3.1.2.26, 3.1.2.38, 3.1.2.49, and 3.1.2.52. In RAI 3.1-15, the staff requested that the applicant explain why it credited the One-Time Inspection Program for managing loss of material, but not cracking. The applicant needs to credit the One-Time Inspection Program to assess whether cracking is taking place in these stainless steel components. In response to RAI 3.1-15, in a letter dated October 3, 2003, the applicant stated that these piping components do not require a one-time inspection because they are small-bore (2 in. and under) socket welded components, downstream of the excess flow check valves and located outside primary containment. The normal operating temperature is less than 60 °C (140 °F), the minimum temperature needed to initiate IGSCC. Therefore, the aging

management references should have reported an environment of “Reactor Coolant Water (less than 60 °C or 140 °F)”; aging Effect/mechanism as “None,” and the AMP as “None.”

The applicant also noted that this environment is neither part of the original LRA, nor is it contained in the response provided to RAI 3.0-1, submitted to the NRC on June 11, 2003. This piping was originally considered to be in the 288 °C (550 °F) reactor water coolant environment, similar to the piping to which it is attached. However, the actual normal operating environment is less than 60 °C (140 °F). The applicant additionally noted that LRA Table 2.3.1-5, “Components Requiring Aging Management Review —Reactor Recirculation System,” component group, “NSR Vents and Drains, Piping and Valves (attached support),” should not have indicated Dresden only. The staff finds the applicant’s response to be acceptable because SCC is not anticipated in stainless steel components operating at temperatures below 60 °C (140 °F).

All of the AMPs listed above are credited for managing the aging effects of several components in various different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff’s evaluation of these AMPs is documented in Section 3.0 of this SER. On the basis of its review, the staff finds that the AMPs credited in the LRA for the nuclear boiler instrumentation system components will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.4.6 Head Spray System

Summary of Technical Information in the Application. The description of the head spray system (Dresden only) can be found in Section 2.3.1 of this SER. The passive, long-lived components in this system that are subject to an AMR are discussed in LRA Section 3.1, “Aging Management of Reactor Vessel, Internals, and Reactor Coolant System.” and are identified in LRA Table 2.3.1-8. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2.

Aging Effects

The applicant reviewed the industry experience (e.g., NRC information notices, generic letters, and bulletins) and the Dresden operating experience (e.g., plant maintenance history, modifications, nonconformance reports, and licensee event reports) and identified the components, aging effects, and AMPs in LRA Tables 3.1-1 and 3.1-2.

The head spray system is found only in Dresden Units 2 and 3 and is used to collapse the steam bubble during vessel flooding, to cool the reactor vessel head, and to collapse the steam in the vessel while the reactor is in the shutdown mode of operation. The head spray system consists of the head spray line, which interfaces with the CRD hydraulic piping, and the associated valves. The long-lived, passive components in the system that are subject to an AMR consist of piping and fittings, valves, vents, drains, flow elements, and closure bolting.

These components are fabricated of stainless steel, low-alloy steel, carbon steel, brass, or bronze. The operating environments are reactor coolant water or steam at 288 °C (550 °F), demineralized water at temperatures up to 288 °C (550 °F), ambient air at metal temperatures up to 288 °C (550 °F), and containment nitrogen.

In Tables 3.1-1 and 3.1-2, the applicant identified the following aging effects for the head spray system components subject to an AMR:

- crack initiation and growth due to SCC, IGSCC, thermal and mechanical loading, and cyclic loading
- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion

In LRA Tables 2.3.1-8 and 3.1-2, the applicant also listed the following reactor vessel head spray system components for which no aging effect is identified:

- external surfaces of stainless steel filters/strainers, piping and fittings, dampeners, tubing, and valves exposed to air, moisture, and humidity (Table 3.1-2, Reference No. 3.1.2.7)
- external surfaces of stainless steel tubing and valves exposed to containment nitrogen (Table 3.1-2, Reference No. 3.1.2.8)

Aging Management Programs

In LRA Tables 3.1-1 and 3.1-2, the applicant identified the following five AMPs to manage the aging effects associated with the head spray system components:

- ASME Section XI Inservice Inspection Program
- Water Chemistry Program
- One-Time Inspection Program
- Bolting Integrity Program
- BWR Stress Corrosion Cracking Program

Staff Evaluation. The applicant described its AMR for the head spray system in Section 3.1 of the LRA. The staff reviewed this section to determine whether the applicant identified all the applicable aging effects for components in the system and demonstrated that the effects of aging on the components will be adequately managed during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the applicable UFSAR supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified by the applicant for the head spray system are as follows:

- crack initiation and growth due to SCC, IGSCC, thermal and mechanical loading, and cyclic loading

- loss of material due to wear
- loss of material due to general, galvanic, pitting, and crevice corrosion

The applicant identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for the head spray system austenitic stainless steel components (piping, fittings, and valve bodies) exposed to reactor coolant water and steam and demineralized water at temperatures up to 288 °C (550 °F). The applicant also identified crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading as an applicable aging effect for small-bore stainless steel piping and fittings in the head spray system. The staff notes that these assessments are consistent with Chapter IV.C1 of NUREG-1801.

The applicant identified crack initiation and growth due to cyclic loading as an applicable aging effect for the low-alloy steel head spray system pressure boundary closure bolting. This identification of crack initiation and growth as an applicable aging effect is similar to Item I.2-b, Chapter VII.I, of NUREG-1801.

The applicant identified loss of material due to wear as an aging effect for the head spray system low-alloy and high-strength, low-alloy steel closure bolting exposed to air and containment nitrogen environment with metal temperatures up to 288 °C (550 °F). The staff notes that this assessment is consistent with Item C1.2-d, Chapter IV.C1, of NUREG-1801.

The applicant identified loss of material due to general, pitting, and crevice corrosion as an aging effect for the carbon steel piping, fittings, flow elements, and valve bodies in contact with demineralized water at temperatures up to 288 °C (550 °F) and for stainless steel, carbon steel, and bronze or brass vents, drains, piping, and valves in contact with air, moisture, humidity, and leaking fluid. The AMR results for these components are not presented in Chapter IV.C1, "Reactor Coolant Pressure Boundary (BWR)," of NUREG-1801. However, AMR results for components with similar materials and environments can be found in other chapters of NUREG-1801 and are used here to evaluate the AMR results presented in LRA Table 3.1-2.

The applicant identified loss of material due to general corrosion as an aging effect for stainless steel, carbon steel, and bronze or brass vents, drains, piping, and valves in contact with air, moisture, humidity, and leaking fluid. The staff finds that the identification of the carbon steel components is consistent with Item E.2-a, Chapter V.E, of NUREG-1801. For the stainless steel, brass, or bronze components, the staff agrees that these components are subject to this aging effect in these environments, since trace levels of corrosive species are generally present in moist environments.

The applicant identified loss of material due to general, pitting, and crevice corrosion as an applicable aging effect for the carbon steel piping, fittings, flow elements, and valve bodies in contact with demineralized water at temperatures up to 288 °C (550 °F). The staff finds that this identification is consistent with Item D2.1-a, Chapter V.D2, of NUREG-1801.

The applicant did not identify loss of material due to corrosion as an aging effect for closure bolting in the head spray system. This is acceptable because closure bolting is made of low-alloy steel.

The applicant identified no applicable aging effect for stainless steel components externally exposed to air, moisture, and humidity and containment nitrogen. This is acceptable because the environments to which the stainless steel components are exposed are not aggressive.

The aging effects identified in the LRA for the head spray system components are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The AMPs for the head spray system are identified in Section 3.1.2.4.6 of this SER. These programs, all of which are common AMPs, are reviewed in the following sections of this SER:

- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- One-Time Inspection Program (Section 3.0.3.10)
- Bolting Integrity Program (Section 3.0.3.5)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)

All of the AMPs listed above are credited for managing the aging effects of several components in various different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Section 3.0 of this SER. On the basis of its review, the staff finds that the AMPs credited in the LRA for the head spray system components will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.1.2.4.7 Reactor Coolant Pressure Boundary Components in Other Systems

Summary of Technical Information in the Application. The description of all reactor coolant pressure boundary components in other systems can be found in Section 2.3.2, 2.3.3, and 2.3.4 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1 and 3.1-2. The passive, long-lived components subject to AMR are identified within the following 12 systems. The appropriate LRA system tables are identified in parentheses

- High Pressure Coolant Injection (HPCI) System (LRA Table 2.3.2.1)
- Core Spray System (LRA Table 2.3.2.2)
- Reactor Core Isolation Cooling (RCIC) System (Quad Cities only) (LRA Table 2.3.2.4)
- Isolation Condenser (Dresden only) (LRA Table 2.3.2.5)
- Residual Heat Removal (RHR) System (Quad Cities only) (LRA Table 2.3.2.6)
- Low Pressure Coolant Injection (LPCI) System (Dresden only) (LRA Table 2.3.2.7)
- Standby Liquid Control (SBLC) System (LRA Table 2.3.2.8)
- Shutdown Cooling System (SDC) (Dresden only) (LRA Table 2.3.3.2)

- Control Rod Drive (CRD) Hydraulic System (LRA Table 2.3.3.3)
- Reactor Water Cleanup (RWCU) System (LRA Table 2.3.3.4)
- Main Steam (MS) System (LRA Table 2.3.4.1)
- Feedwater (FW) System (LRA Table 2.3.4.2)

Aging Effects

The applicant reviewed the industry experience (e.g., NRC information notices, generic letters, and bulletins) and the Dresden and Quad Cities operating experience (e.g., plant maintenance history, modifications, nonconformance reports, and licensee event reports) and identified the aging effects, component intended functions, environment, and materials for each group of reactor coolant pressure boundary components in the above 12 systems in Tables 3.1-1 and Table 3.1-2 of the LRA.

The long-lived, passive pressure boundary components in these 12 systems that are subject to an AMR are fabricated of stainless steel (piping and fittings, tubing, valves, dampeners, flow elements, tubesheet, channel head), CASS (piping and fittings, filters/strainers, and valves), low-alloy steel (closure bolting), and carbon steel (piping and fittings, valves, filters/strainers, flow elements, tubesheet, channel head, shell). The operating environments are reactor coolant water or steam at 288 °C (550 °F), oxygenated water up to 288 °C (550 °F), reactor coolant water up to 225 °C (437 °F), ambient air and humidity at metal temperatures up to 288 °C (550 °F), warm moist air, steam on the tube side and demineralized water on the shell side of isolation condensers, and containment nitrogen.

The applicant identified the following general aging effects for the reactor coolant pressure boundary components in the ESF and the auxiliary and steam and power conversion (SPC) systems:

- build up of deposit/fouling
- crack initiation and growth due to SCC, IGSCC, thermal and mechanical loading, and cyclic loading
- cumulative fatigue damage
- loss of fracture toughness due to thermal aging embrittlement
- loss of material due to general, pitting, and crevice corrosion
- loss of material due to wear
- wall thinning due to flow-accelerated corrosion

Aging Management Programs

In LRA Tables 3.1-1 and 3.1-2, the applicant identified the following seven AMPs for the reactor coolant pressure boundary components in the ESF and the auxiliary and SPC systems:

- Bolting Integrity Program

- BWR Stress Corrosion Cracking Program
- Flow-Accelerated Corrosion Program
- Heat Exchanger Test and Inspection Activities Program
- ASME Section XI Inservice Inspection Program
- One-Time Inspection Program
- Water Chemistry Program

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in the reactor coolant pressure boundary components in the ESF and the auxiliary and SPC systems. The staff also reviewed the applicable UFSAR supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The applicant identified the following aging effects for the reactor coolant pressure boundary components in the ESF and the auxiliary and SPC systems.

- build up of deposit/fouling
- crack initiation and growth due to SCC, IGSCC, thermal and mechanical loading, and cyclic loading
- cumulative fatigue damage
- loss of fracture toughness due to thermal aging embrittlement
- loss of material due to general, pitting, and crevice corrosion
- loss of material due to wear
- wall thinning due to flow-accelerated corrosion

In LRA Table 3.1-2, the applicant identified build up of deposit due to fouling as an applicable aging effect for the stainless steel tubes in the isolation condenser heat exchangers (Dresden only) exposed to steam on the tube side and demineralized water on the shell side. The applicant refers to an "EPRI/SANDIA" report that identifies fouling as an applicable effect due to construction and operating conditions. In the LRA Table 3.1-2, Reference No. 3.1.2.15, the applicant pointed out that NUREG-1801 does not identify fouling as an applicable aging effect.

In RAI B.2.6-e, the staff requested that the applicant provide a full reference to the EPRI/SANDIA report referred to in the LRA and summarize the industry and plant-specific experience related to fouling of the isolation condenser heat exchangers in demineralized water. In response to RAI B.2.6-e, in a letter dated October 3, 2003, the applicant stated that the EPRI/SANDIA reports identified in Aging Management Reference 3.1.2.15 of LRA Table 3.1-2 are EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Appendix G, Heat Exchangers," and Sandia National Laboratory Report SAND93-7070 UC-523, "Aging Management Guideline for Commercial Nuclear Power Plants—Heat Exchangers." The applicant further stated that no Dresden-specific operating experience involving fouling of the

isolation condenser tubing in the demineralized water environment was identified. However, EPRI TR-1003056 identifies fouling as an applicable aging effect for stainless steel tubing in treated water and primary water environments. The staff finds the applicant's response to be acceptable because the staff verified that the EPRI and Sandia reports referenced by the applicant discuss fouling of heat exchangers in nuclear plants and provide credible evidence that fouling of the isolation condenser heat exchangers can occur in primary and secondary water environments.

The applicant identified crack initiation and growth due to cyclic loading as an applicable aging effect for the low-alloy steel standby liquid control system pressure boundary closure bolting exposed to containment nitrogen. The applicant pointed out (LRA Table 3.1-2, Reference No. 3.1.2.1) that NUREG-1801 does not address closure bolting in a containment nitrogen environment. However, it is the cyclic loading, and not the nitrogen environment, that is causing crack initiation and growth. The staff concludes that this identification of crack initiation and growth as an applicable effect for low-alloy steel bolting is acceptable because it is consistent with Item I.2-b in Chapter VII.I of NUREG-1801.

In LRA Table 3.1-2 (Reference Nos. 3.1.2.11, 3.1.2.26, 3.1.2.35, and 3.1.2.52), the applicant identified crack initiation and growth due to SCC as an applicable aging effect for "stainless steel casting" filters/strainers and valves, and stainless steel tanks, and piping and fittings in the control rod drive hydraulic system exposed to oxygenated water up to 288 °C (550 °F). These components serve as a reactor coolant pressure boundary, are located around CRD housing, and are exposed to condensate storage tank (CST) water. Therefore, the staff concludes that this identification of crack initiation and growth due to SCC is acceptable. However, the staff noted in RAI 3.1-21a that NUREG-1801 does not address aging management of these CRD components. The staff requested that the applicant submit industry experience and plant-specific experience related to aging degradation of these CRD components. Based on this experience, the applicant was requested to provide justification for not requiring inspection (Item 3.1.2.11 requires water chemistry).

In response to RAI 3.1-21a, in a letter dated October 3, 2003, the applicant stated that no incidents of crack initiation and growth due to SCC in the control rod drive system were identified at Dresden or Quad Cities. A review of industry experience, including Dresden and Quad Cities, noted problems with degradation of the surface plating on CRD hydraulic accumulator interior surfaces resulting in some corrosion and pitting of the plated carbon steel. However, this degradation is not associated with SCC. In addition, the applicant stated that cracking was discovered in the control rod drive hydraulic control system return line near its connection to the reactor. The CRD return line to the reactor has been removed for both Dresden and Quad Cities, thereby eliminating this concern for SCC in the CRD system. Except for the return line to the reactor, the review of operating experience did not produce any indications of SCC in the control rod drive system. SCC has not occurred in the control rod drive system at Dresden or Quad Cities, and the Dresden and Quad Cities CRD systems have been modified to remove the components where SCC has occurred at other BWRs. The Dresden and Quad Cities experience base, together with the control rod drive systems' modification, supports a conclusion that properly controlled water chemistry is adequate to eliminate the potential for SCC, and inspection for occurrence of SCC in the control rod drive system is not required.

The staff does not find the applicant's response to RAI 3.1-21a to be completely satisfactory since the applicant relies upon the Water Chemistry Program alone to manage possible SCC in the control rod drive system. The applicant should perform a one-time inspection of the system components to verify that the Water Chemistry Program is providing adequate protection against SCC. The applicant needs to provide documentation for a one-time inspection. In response to Supplemental RAI 3.1-21a in a letter dated December 22, 2003, the applicant stated that the process fluid temperature in the CRD hydraulic system is less than 100 °F, and the typical flow conditions are either low flow (in the cooling water line) or stagnant flow (in the charging water and drive water lines). With process temperatures below 140 °F, EPRI TR 1003056, "Mechanical Tools Appendix A" states that cracking due to SSC is very unlikely to occur. In addition, the applicant believes that water chemistry controls sufficient to prevent loss of material due to pitting and crevice corrosion in the CRD hydraulic system are also sufficient to prevent stress corrosion cracking in that system. Nonetheless, the applicant will include inspection for stress corrosion cracking as part of its one-time inspection to validate the effectiveness of the Water Chemistry Program (LRA Appendix B.1.2) in managing the aging of stainless steel components in the CRD hydraulic system. The staff finds the applicant's response acceptable because the one-time inspection to validate the effectiveness of the water chemistry is adequate for managing possible SCC in the CRD system. This is part of Commitment #23 of Appendix A of this SER.

The applicant identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for stainless steel reactor coolant pressure boundary components in the HPCI, core spray, RCIC, RHR, LPCI, SBLC, SDC, RWCU, MS, and FW systems and the isolation condenser exposed to 288 °C (550 °F) reactor coolant water or steam. Although some of these components are not evaluated in NUREG-1801, similar combinations of materials and environments are evaluated. The identification of crack initiation and growth in the stainless steel components exposed to 288 °C (550 °F) reactor coolant water or steam is consistent with Item C1.1-f, Chapter IV.C1, of NUREG-1801.

The applicant identified crack initiation and growth due to SCC and IGSCC as an applicable aging effect for the CASS reactor water cleanup system valves. This is acceptable because CASS components are susceptible to cracking due to SCC and IGSCC if the CASS ferrite content is less than 7.5 percent by volume and carbon is greater than 0.03 percent by weight.

The applicant identified crack initiation and growth due to SCC, IGSCC, and thermal and mechanical loading as an applicable aging effect for stainless steel small-bore piping and fittings in the reactor coolant pressure boundary components for the HPCI, core spray, RCIC, and RWCU systems and the isolation condenser. The applicant also identified crack initiation and growth due to thermal and mechanical loading as an applicable aging effect for carbon steel small-bore piping and fittings in the main steam and feedwater systems exposed to 288 °C (550 °F) reactor coolant water or steam. This identification of the aging effect is consistent with Item C1.1-i, Chapter IV.C1, of NUREG-1801.

The applicant identified crack initiation and growth due to SCC or cyclic loading as an applicable aging effect for the reactor coolant pressure boundary components in the isolation condenser (stainless steel tubes, carbon steel or stainless steel tubesheet and channel head, and carbon steel shell) exposed to steam on the tube side and demineralized water on the shell side. This identification of the aging effect is consistent with Item C1.4-a, Chapter IV.C1, of NUREG-1801.

The applicant identified cumulative fatigue damage as an applicable aging effect for the high-strength, low-alloy steel closure bolting in the HPCI, core spray, RCIC, RHR, LPCI, SBLC, RWCU, main steam, and feedwater systems and the isolation condenser externally exposed to air with metal temperatures up to 288 °C (550 °F). This identification is consistent with Item C1.3-g, Chapter IV.C1, in NUREG-1801.

In LRA Table 3.1-2, Reference Nos. 3.1.2.1 and 3.1.2.2, the applicant identified crack initiation and growth due to cyclic loading and loss of material due to wear as applicable aging effects for closure bolting in the reactor coolant pressure boundary portion of all the other systems and credited LRA Appendix B.1.12, "Bolting Integrity," for managing these aging effects. This identification of aging effects is consistent with NUREG-1801 as mentioned earlier. However, the applicant did not identify loss of preload as an aging effect for this closure bolting. In LRA Appendix B.1.12, the applicant stated that loss of preload in a mechanical joint is a design driven process and, therefore, is not an aging effect. The staff noted that loss of preload, however, might take place during operation when closure bolting is subject to high temperatures, cyclic loads, differential thermal expansion, and vibrations. In RAI 3.1-13, the staff requested the applicant to explain why periodic inspection of the closure bolting for indication of loss of preload due to the aforementioned mechanisms is not required. The staff further requested the applicant, if periodic inspection is required, to reference the appropriate AMP and include the appropriate inspection in the AMP.

The applicant's response to this RAI is evaluated in Section 3.1.2.4.1.2 of this SER. The staff did not find the response completely acceptable for the following reason. LRA Section 3.1.1.2.1 does not address loss of preload as an aging effect, and states that loss of preload mechanisms are typically addressed during installation and subsequent maintenance of closure bolting. However, the applicant's response to RAI 3.1-13 stated that loss of preload will be managed, and that the enhanced Bolting Integrity Program will be comprised of periodic ISIs and piping and components preventive maintenance inspections. In Supplemental RAI 3.1-13, the staff requested the applicant to describe the maintenance program activities that are performed on the bolts so that loss of preload is significantly reduced or eliminated, and to identify whether retorquing of the bolts to the design preload values is performed after the component is reassembled. The applicant's response to Supplemental RAI 3.1-13 is evaluated in Section 3.1.2.4.1 of this SER. The staff finds the response acceptable.

The applicant identified cumulative fatigue damage as an applicable aging effect for reactor coolant pressure boundary components (carbon steel, stainless steel, and CASS piping, fittings, and valve bodies) in the HPCI, core spray, RCIC, RHR, LPCI, SBLC, RWCU, MS, and FW systems, and the isolation condenser internally exposed to 288 °C (550 °F) reactor coolant water or steam. The identification of cumulative fatigue damage as an applicable aging effect is consistent with Items C1.1-h and C1.3-d, Chapter IV.C1, of NUREG-1801.

The applicant identified loss of fracture toughness due to thermal aging embrittlement as an applicable aging effect for CASS valve bodies in the reactor water cleanup system, but not in the control rod drive hydraulic systems. Both of these systems are internally exposed to 288 °C (550 °F) reactor coolant water. In RAI 3.1-20b, the staff requested that the applicant explain why loss of fracture toughness is not an applicable aging effect for CASS valve bodies in the control rod drive hydraulic system. In addition, the staff requested that the applicant confirm whether there are any other reactor coolant pressure boundary components in the other

systems that are made of CASS. If there are, then the applicant needs to submit AMR results for these components.

In response to RAI 3.1-20b, in a letter dated October 3, 2003, the applicant stated, as explained in its response to RAI 3.2-20a, that valves in the control rod drive hydraulic system are not exposed to temperatures of 250 °C (482 °F) or greater. Only the reactor water cleanup system and the reactor recirculation system include stainless steel valves in this category. All other stainless steel valves, with an operating temperature of less than 250 °C (482 °F), are assigned material types of stainless steel casting or stainless steel with the only aging effect being crack initiation and growth. The aging management results for CASS valves in the reactor water cleanup system and in the reactor recirculation system are provided in LRA Table 3.1-1, Aging Management References 3.1.1.9 and 3.1.1.15. The staff finds the applicant's response to be acceptable because the embrittlement aging effect of concern here is applicable only to CASS components exposed for extended periods of time to temperatures of 250 °C (482 °F) or greater.

The applicant identified loss of material due to general (carbon steel only), pitting, and crevice corrosion as an applicable aging effect for reactor coolant pressure boundary components in the isolation condenser (stainless steel tubes, carbon steel or stainless steel tubesheet and channel head, carbon steel shell) exposed to steam on the tube side and demineralized water on the shell side. This identification of the aging effect is consistent with Item C1.4-b, Chapter IV.C1, of NUREG-1801.

The applicant identified loss of material due to pitting and crevice corrosion as an applicable aging effect for the "stainless steel casting" filter/strainers and valves, and stainless steel piping and fittings, and tanks in the control rod drive hydraulic system exposed to oxygenated water up to 288 °C (550 °F). NUREG-1801 does not include AMR results for these control rod drive hydraulic system components. However, the applicant's identification of loss of material due to pitting and crevice corrosion as an aging effect for stainless steel components exposed to oxygenated water up to 288 °C (550 °F) is consistent with the NUREG-1801 evaluation for a similar combination of material and environment (see Item D2.1-e, Chapter V.D2, in NUREG-1801). The identification of loss of material in "stainless steel casting" components in the control rod drive hydraulic system is acceptable because the oxygenated water may contain some low levels of contaminants such as chlorides.

The applicant also identified loss of material due to pitting and crevice corrosion as an applicable aging effect for stainless steel tubing support in the main steam system externally exposed to warm, moist air. This identification of loss of material due to pitting and crevice corrosion of stainless steel supports exposed to warm, moist air is acceptable because the BWR moist environment is likely to carry corrosive contaminants, such as chlorides, which can, under certain circumstances, corrode stainless steel components.

The applicant identified loss of material due to wear as an applicable aging effect for closure bolting in the SBLC system, but not in the HPCI, core spray, RCIC, RHR, LPCI, RWCU, MS, and FW systems, and the isolation condenser externally exposed to air with metal temperatures up to 288 °C (550 °F). The staff requested in RAI 3.1-22 that the applicant provide the technical basis for not identifying loss of material due to wear as an applicable aging effect for all the closure bolting in the reactor coolant pressure boundary portion of all the other systems.

In response to RAI 3.1-22, in a letter dated October 3, 2003, the applicant stated that the LRA does, in fact, identify loss of material due to wear as an applicable aging effect for closure bolting in the HPCI, core spray, RCIC, RHR, and LPCI systems and in the isolation condenser. Loss of material due to wear is identified for closure bolting in several LRA Chapter 2.3 tables and is managed by the Bolting Integrity Program. The applicant further stated that loss of material due to wear and crack initiation and growth due to cyclic loading should have been identified for closure bolting in systems RWCU, MS, and FW and will also be managed with the Bolting Integrity Program. The environment for closure bolting Aging Management References 3.1.2.1, 3.1.2.2, 3.2.2.1, and 3.2.2.4 should have read, "Air with metal temperature up to 288 °C (550 °F). This environment description is consistent with the environment used in NUREG-1801, Chapter IV, Items C1.3-e and C1.3-f.

The applicant also stated that LRA Tables 2.3.3-4, 2.3.4-1, and 2.3.4-2 for RWCU, MS, and FW should have included closure bolting. In addition, the applicant described changes to LRA Tables 3.1-2 and 3.2-2 that specifically include closure bolting as a component subject to aging effects and the applicant's Bolting Integrity Program as the applicable AMP. The staff finds the applicant's response to be acceptable because the applicant identified loss of material due to wear as an applicable aging effect for closure bolting in all of the systems in question. The applicant further provided an AMP for dealing with this aging effect that is consistent with GALL.

In LRA Section 3.1.1.2.2, the applicant identified wall thinning due to flow-accelerated corrosion as an applicable aging effect for reactor coolant pressure boundary carbon steel components (valves, piping and fittings, and flow elements) in the feedwater and main steam systems exposed to 288 °C (550 °F) reactor coolant water or steam. This identification of wall thinning due to flow-accelerated corrosion as an applicable aging effect is consistent with Items C1.1-a and C1.1-c, Chapter IV.C1, of NUREG-1801. The applicant stated that wall thinning due to flow-accelerated corrosion is not an applicable aging effect for carbon steel components in the HPCI, core spray, RCIC, or SDC systems because D/QCNPS operates these systems for less than 2 percent of plant operating time or at flow rates less than 6 ft/sec. Under these operating conditions, according to EPRI NSAC-202L-R2 and EPRI TR-114882, the carbon steel components are not susceptible to wall thinning due to flow-accelerated corrosion.

The staff noted in RAI 3.1-23 that DC/QCNPS has now implemented extended power uprates to increase the power output of each of the four units. Such uprates are often accompanied by increases in, for example, main steam and feedwater flows in BWRs. The staff, therefore, requested the applicant to explain how the effects of extended power uprates are taken into account in identifying components susceptible to wall thinning due to flow-accelerated corrosion.

In response to RAI 3.1-23, in a letter dated October 3, 2003, the applicant listed the steam flow and the feedwater flow at Dresden and Quad Cities both before and after the power uprates and noted that both flow rates increased by about 20 percent as a result of the uprates. The applicant further stated that these increases in steam flow and feedwater have been considered and appropriately incorporated into the Flow-Accelerated Corrosion programs at Dresden and at Quad Cities. The predictive analysis, CHECWORKS, has been updated to reflect uprate design conditions such as mass flow, temperature, and steam quality. Where appropriate, inspection intervals have been moved forward to address increased wear rates. The staff finds the applicant's response to be acceptable because the CHECWORKS code provides an acceptable

approach for managing possible flow-accelerated corrosion in reactor coolant pressure boundary carbon steel components.

The aging effects identified in the LRA for the reactor coolant pressure boundary components in other systems are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following seven common AMPs for managing aging in the reactor coolant pressure boundary components in the ESF, auxiliary, and SPC systems. These programs are reviewed by the staff in the SER sections listed below in parentheses:

- Bolting Integrity Program (Section 3.0.3.5)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.16)
- ASME Section XI Inservice Inspection Program (Section 3.0.3.1)
- One-Time Inspection Program (Section 3.0.3.10)
- Water Chemistry Program (Section 3.0.3.2)

The applicant credited the BWR Stress Corrosion Cracking (LRA Appendix B.1.7) and Water Chemistry (LRA Appendix B.1.2) Programs for managing crack initiation and growth due to SCC and IGSCC in stainless steel components in the HPIC, core spray, RCIC, RHR, LPCI, SBLC, SDC, RWCU, MS, and FW systems and the isolation condenser. The applicant also stated that the BWR Stress Corrosion Cracking Program is based on BWRVIP-75, "Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (NUREG-0313)."

In RAI 3.1-24, the staff made the following four requests to the applicant:

- (1) Submit information about D/QCNPS plant-specific experience related to IGSCC cracking of the stainless steel components in the HPIC, core spray, RCIC, RHR, LPCI, SBLC, SDC, RWCU, MS, and FW systems and the isolation condenser.
- (2) Submit information about mitigation actions taken at D/QCNPS with respect to selection of materials that are resistant to sensitization, use of special processes that reduce residual tensile stress, and monitoring of water chemistry as specified by NUREG-1801, Section XI.M7.
- (3) Confirm whether HWC and NMCA are implemented at D/QCNPS, and if so, explain how this implementation has affected monitoring of water chemistry parameters.
- (4) Submit information on the inspection frequency (based on whether HWC and/or NMCA are used) and the corresponding number of welds to be inspected following the BWRVIP-75 guidelines.

The staff's evaluation of RAI 3.1-24 is presented in Section 3.1.2.4.3 of this SER. In that evaluation, the staff concludes that the responses to RAIs 3.1-24(a) through (d) are acceptable.

The applicant credited LRA Appendix B.1.1, "ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD," for managing loss of fracture toughness due to thermal aging embrittlement in reactor water cleanup valve bodies made of CASS. The Inservice Inspection Program includes visual inspection for detecting surface-breaking cracks in the CASS valve bodies. Inspection for cracking is acceptable for managing loss of fracture toughness in CASS valve bodies because loss of fracture toughness in CASS components becomes a concern only if cracks are present. The use of visual inspection is acceptable because the cracks are likely to be surface cracks caused by SCC or IGSCC. However, the staff noted in RAI 3.1-14 that the applicant needs to provide the technical basis showing how the proposed visual inspection technique is qualified for detecting IGSCC cracks in the CASS valve bodies. In addition, ASME Code, Section XI, Subsection IWB, provides little guidance as to how flaws detected in CASS components should be evaluated to determine acceptability for continued service. Therefore, the applicant should submit a procedure describing how the detected flaws in D/QCNPS CASS valve bodies will be evaluated.

The applicant's response to this RAI is evaluated in Section 3.1.2.4.3.2 of this SER. The staff finds the applicant's response acceptable because it is consistent with the GALL position that the Section XI inspection requirements are sufficient for managing the effects of loss of fracture toughness due to thermal aging embrittlement of CASS.

The applicant credited LRA Appendix B1.2, "Water Chemistry Program," alone, for managing crack initiation and growth due to SCC for "stainless steel casting" valves, filters/strainers, and stainless steel tanks and piping and fittings in the control rod drive hydraulic system exposed to oxygenated water up to 288 °C (550 °F). The applicant pointed out in the LRA that NUREG-1801 does not address this environment for these CRD components located around CRD housing containing CST water and that this also serves as a reactor coolant pressure boundary. However, the staff notes in RAI 3.1-21b that Appendix B1.2 is just a mitigation program and not a condition monitoring program, and therefore, requested the applicant to submit a program to verify the effectiveness of the Water Chemistry Program and to assure that degradation is not occurring. In response to RAI 3.1-21b, in a letter dated October 3, 2003, the applicant stated that SCC occurs through the combination of high stress (both applied and residual tensile stresses), a corrosive environment, and a susceptible material. Elimination or reduction in any of these three factors will decrease the likelihood of SCC occurring. The control rod drive system water is supplied by the CST. The water in the CST is monitored and controlled to keep known detrimental contaminants below the system-specific limits indicated in the EPRI water chemistry guidelines (TR-103515) to mitigate corrosion.

The applicant asserted that the Water Chemistry Program is generally effective in removing impurities from intermediate and high flow areas. NUREG-1801 identifies circumstances in which the water chemistry program is to be augmented to manage the effects of aging for license renewal. For example, control of CST chemistry in accordance with EPRI guidelines does not preclude loss of material of stainless steel at locations of stagnant flow conditions. Accordingly, in those cases, verification of the effectiveness of the CST Chemistry Control Program is undertaken to ensure that significant degradation is not occurring and the component intended function will be maintained during the period of extended operation. As discussed in NUREG-1801, an acceptable verification program is a one-time inspection of

selected components at susceptible locations in the system. The GALL AMP B.1.23, "One-Time Inspection," requires an inspection of components exposed to CST water. An inspection is to be conducted of stainless steel CRD components exposed to CST water to verify the effectiveness of CST chemistry and confirm the absence of loss of material in stagnant flow areas, as required by NUREG 1801. The references for these inspections are in LRA Table 3.1-2, Aging Management References 3.1.2.10, 3.1.2.25, 3.1.2.34, and 3.1.2.53. The applicant asserted that the water chemistry controls that are sufficiently effective to prevent loss of material at stagnant flow locations are also expected to be effective at preventing SCC.

The staff does not agree with the applicant that a one-time inspection for loss of material would cover the need for a one-time inspection for cracking due to SCC because the locations susceptible to loss of material are generally different than the locations susceptible to cracking due to SCC. Therefore, in Supplemental RAI 3.1-21(b), the staff requested the applicant to provide a one-time inspection for cracking due to SCC at the susceptible locations.

In response to Supplemental RAI 3.1-21(b), in a letter dated November 21, 2003, the applicant stated that the process fluid temperature in the control rod drive hydraulic system is less than 100 °F, and the typical flow conditions are either low flow (in the cooling water line) or stagnant flow (in the charging water and drive water lines). Under these conditions, it is expected that the stagnant flow locations that are susceptible to loss of material due to pitting and crevice corrosion are also the locations that may be susceptible to cracking due to SCC. In the piping system for the control rod drive hydraulic system, where the same water chemistry applies to all parts of the system, Exelon believes that water chemistry controls sufficient to prevent loss of material due to pitting and crevice corrosion are also sufficient to prevent SCC. In addition, with process temperatures below 140 °F, EPRI TR-1003056, "Mechanical Tools, Appendix A," states that cracking due to SSC is very unlikely to occur in the control rod drive hydraulic system. Nonetheless, the applicant will include inspection for SCC as part of its one-time inspection to validate the effectiveness of the Water Chemistry Program (LRA Appendix B.1.2) in managing the aging of stainless steel components in the control rod drive hydraulic system. This is part of Commitment #23 of Appendix A of this SER. The staff finds the response acceptable because the control rod drive hydraulic system piping is not susceptible to cracking due to SCC because it is exposed to a fluid temperature of 100 °F, which is less than the temperature 140 °F at which stainless steel becomes susceptible to SCC. In addition, the applicant has committed to perform a one-time inspection to validate the effectiveness of the Water Chemistry Program. This is part of Commitment #23 of Appendix A of this SER.

The staff reviewed the UFSAR Supplement in Appendix A of the LRA for each of the above seven AMPs to ensure that the program descriptions adequately describe the AMPs. No inconsistencies were found on the basis of the above analyses as related to the pressure boundary components in the ESF and the auxiliary and SPC systems.

All of the AMPs listed above are credited for managing the aging effects of several components in various different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Section 3.0 of this SER. On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor coolant pressure boundary components in other systems will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2 Engineered Safety Features Systems

This section addresses the aging management of the components of the engineered safety features (ESF) systems. The systems are described in the following SER sections:

- high pressure coolant injection system (Section 2.3.2.1)
- core spray system (Section 2.3.2.2)
- containment isolation components and primary containment piping system (Section 2.3.2.3)
- reactor core isolation cooling system (Quad Cities only) (Section 2.3.2.4)
- isolation condenser (Dresden only) (Section 2.3.2.5)
- residual heat removal system (Quad Cities only) (Section 2.3.2.6)
- low pressure coolant injection system (Dresden only) (Section 2.3.2.7)
- standby liquid control system (Section 2.3.2.8)
- standby gas treatment system (Section 2.3.2.9)
- automatic depressurization system (Section 2.3.2.10)
- anticipated transient without scram system (Section 2.3.2.11)

The applicant noted in LRA Section 2.3.2 that the ATWS system is not classified in the Dresden or Quad Cities UFSARs as an ESF. However, the ATWS system is evaluated in this section because of its similarity to other systems that are characterized as ESF systems.

As discussed in Section 3.0.1 of this SER, the components in each of these ESF systems are rolled up into one of two LRA tables. LRA Table 3.2-1 consists of ESF system components that are evaluated in the GALL Report, and LRA Table 3.2-2 consists of ESF system components that are not evaluated in the GALL Report.

3.2.1 Summary of Technical Information in the Application

In LRA Section 3.2, the applicant described its AMRs for the ESF systems.

The description of the systems that comprise the ESF systems can be found in Section 2.3.2 of the LRA.

The passive, long-lived components in these systems that are subject to an AMR are identified in LRA Tables 2.3.2-1 through 2.3.2-11.

The applicant's AMRs included an evaluation of plant-specific and industry operating experience. The plant-specific evaluation included reviews of condition reports and discussions with appropriate site personnel to identify aging effects that require management. These reviews concluded that the aging effects requiring management based on plant-specific operating experience were consistent with aging effects identified in GALL.

The applicant's review of industry operating experience included a review of operating experience through 2002. The results of this review concluded that aging effects requiring

management based on industry operating experience were consistent with aging effects identified in GALL.

The applicant's on-going review of plant-specific and industry-wide operating experience is conducted in accordance with the Exelon's Operating Experience Program.

3.2.2 Staff Evaluation

In Section 3.2 of the LRA, the applicant described its AMR for the ESF systems. The staff reviewed LRA Section 3.2 to determine whether the applicant has provided sufficient information to demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB throughout the period of extended operation, in accordance with the requirements of 10 CFR 54.21(a)(3), for the ESF system components that are determined to be within the scope of license renewal and subject to an AMR.

The applicant referenced the GALL Report in its AMR. The staff has previously evaluated the adequacy of the aging management of ESF system components for license renewal as documented in the GALL Report. Thus, the staff did not repeat its review of the matters described in the GALL Report, except to ensure that the material presented in the LRA was applicable, and to verify that the applicant had identified the appropriate programs as described and evaluated in the GALL Report. The staff evaluated those aging management issues recommended for further evaluation in the GALL Report. The staff also reviewed aging management information submitted by the applicant that was different from that in the GALL Report or was not addressed in the GALL Report. Finally, the staff reviewed the UFSAR Supplement to ensure that it provided an adequate description of the programs credited with managing aging for the ESF system components.

In LRA Section 3.2, the applicant provided brief descriptions of the ESF systems and summarized the results of its AMR of the ESF systems.

Table 3.2-1 below provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Section 3.2 that are addressed in the GALL Report.

Table 3.2-1 Staff Evaluation for Dresden and Quad Cities Engineered Safety Features System Components in the GALL Report

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Piping, fittings, and valves in emergency core cooling system	Cumulative fatigue damage	TLAA, evaluated in accordance with 10 CFR 54.21(c)	TLAA	Consistent with GALL. GALL recommends further evaluation. (See Section 3.2.2.2.1 below.)

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Piping, fittings, pumps, and valves in emergency core cooling system	Loss of material due to general corrosion	Water Chemistry and One-Time Inspection	Water Chemistry and One-Time Inspection Programs	Consistent with GALL, with exception. GALL recommends further evaluation. (See Sections 3.0.3.2 and 3.2.2.2.2.)
Components in containment spray (PWR only), standby gas treatment (BWR only), containment isolation, and emergency core cooling systems	Loss of material due to general corrosion	Plant specific	Water Chemistry, One-Time Inspection, Bolting Integrity, and Structural Monitoring Programs	Consistent with GALL, with exception. GALL recommends further evaluation. (See Sections 3.0.3.2, 3.0.3.5, and 3.2.2.2.2.)
Piping, fittings, pumps, and valves in emergency core cooling system	Loss of material due to pitting and crevice corrosion	Water Chemistry and One-Time Inspection	Water Chemistry, One-Time Inspection, Compressed Air Monitoring, Bolting Integrity, and Structural Monitoring Programs	Consistent with GALL, with exception. GALL recommends further evaluation. (See Sections 3.0.3.2, 3.0.3.5, and 3.2.2.2.3.)
Components in containment spray (PWR only), standby gas treatment (BWR only), containment isolation, and emergency core cooling systems	Loss of material due to pitting and crevice corrosion	Plant specific	Water Chemistry, One-Time Inspection, Compressed Air Monitoring, Bolting Integrity, and Structural Monitoring Programs	Consistent with GALL, with exception. GALL recommends further evaluation. (See Sections 3.0.3.2, 3.0.3.5, and 3.2.2.2.3.)
Containment isolation valves and associated piping	Loss of material due to microbiologically influenced corrosion	Plant specific	Heat Exchanger Test and Inspection Activities, Water Chemistry, Selective Leaching of Materials, and Lube Oil Monitoring Activities Programs	Consistent with GALL, with exception. GALL recommends further evaluation. (See Sections 3.0.3.2 and 3.2.2.2.4.)
Seals in standby gas treatment system	Changes in properties due to elastomer degradation	Plant specific	Periodic Inspection of Ventilation System Elastomers Programs	Consistent with GALL. GALL recommends further evaluation. (See Section 3.2.2.2.5.)
Drywell and suppression chamber spray system nozzles and flow orifices	Plugging of nozzles and flow orifices due to general corrosion	Plant specific	Periodic Testing of Drywell and Torus Spray Nozzles Programs	Materials used are inconsistent with GALL. GALL recommends further evaluation. (See Section 3.2.2.2.6.)

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Piping and fittings of CASS in emergency core cooling system	Loss of fracture toughness due to thermal aging embrittlement	Thermal Aging Embrittlement CASS	N/A	CASS material does not exist at Dresden and Quad Cities.
Components serviced by open-cycle cooling system	Local loss of material due to corrosion and/or buildup of deposit due to biofouling	Open-Cycle Cooling Water System	Open-Cycle Cooling Water System Program	Materials used are inconsistent with GALL.
Components serviced by closed-cycle cooling system	Loss of material due to general, pitting, and crevice corrosion	Closed-Cycle Cooling Water System	Closed-Cycle Cooling Water System Program	Materials used are inconsistent with GALL.
Emergency core cooling system valves and lines to and from HPCI and RCIC pump turbines	Wall thinning due to flow-accelerated corrosion	Flow-Accelerated Corrosion	Flow-Accelerated Corrosion Program	Consistent with GALL, with exception. (See Section 3.2.2.2.7.)
Pumps, valves, piping, and fittings in emergency core cooling systems	Crack initiation and growth due to SCC and IGSCC	Water Chemistry and BWR Stress Corrosion Cracking	Water Chemistry and BWR Stress Corrosion Cracking Programs	Consistent with GALL, with exception. (See Sections 3.0.3.2, 3.2.2.1, and 3.2.2.8.)
Closure bolting in high pressure or high temperature systems	Loss of material due to general corrosion, loss of preload due to stress relaxation, and crack initiation and growth due to cyclic loading or SCC	Bolting Integrity	Bolting Integrity programs	Consistent with GALL, with exception. (See Sections 3.0.3.5 and 3.2.2.1.)

3.2.2.1 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL does not recommend further evaluation, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation. The staff also sampled component groups to determine whether the applicant had properly identified those component groups in GALL that were not applicable to its plants. The staff also identified several areas where additional information or clarification was needed.

On the basis of its review, the staff verified the applicant's claim of consistency with the GALL report. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.2 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which GALL Recommends Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL recommends further evaluation, the staff reviewed the applicant's evaluation to determine whether it adequately addressed the issues for which GALL recommended further evaluation. In addition, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation.

The GALL Report indicates that further evaluation should be performed for the aging effects discussed in the following sections.

3.2.2.2.1 Cumulative Fatigue Damage

Fatigue is a TLAA as defined in 10 CFR 54.3. TLAAs are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The staff reviewed the evaluation of this TLAA in Section 4.3 of this SER, following the guidance in Section 4.3 of the SRP-LR.

The applicant indicated that all TLAAs, including those for the Class 1 components of the ESF systems, were evaluated in the RCS section of the LRA. The ESF systems involved in the TLAA are high pressure coolant injection, core spray, reactor core isolation cooling, isolation condenser, residual heat removal, low pressure coolant injection, standby liquid control, and automatic depressurization systems. The applicant discussed the TLAA in Section 4.3 of the LRA, "Metal Fatigue of the Reactor Vessel, Internals, and Reactor Coolant Pressure Boundary Piping and Components." This TLAA is evaluated in Section 4.3 of this SER.

3.2.2.2.2 Loss of Material Due to General Corrosion

Loss of material due to general corrosion could occur in the pumps, valves, piping, and fittings associated with the BWR emergency core cooling systems (ECCS) and with lines to the suppression chamber and to the drywell and suppression chamber spray system. Since control of primary water chemistry does not preclude loss of material due to general corrosion at locations of stagnant flow conditions, the GALL Report recommends further evaluation of programs to manage loss of material due to general corrosion to verify the effectiveness of the Chemistry Control Program. A one-time inspection of select components at susceptible locations is considered an acceptable method to determine whether an aging effect is not occurring or an aging effect is progressing very slowly. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place for the management of general corrosion of these components.

The applicant stated in LRA Section 3.2.1.1.2 that an inspection of selected components exposed to a stagnant flow water environment will be conducted in accordance with the One-Time Inspection Program (B.1.23.). The inspection of selected components will verify the effectiveness of the Chemistry Control Program to manage loss of material due to general corrosion in low flow or stagnant flow areas by ensuring that significant degradation is not occurring and the component intended function will be maintained during the extended period of operation. The applicant stated that representative HPCI components, such as carbon steel HPCI torus suction check valves and the HPCI booster pumps, were selected to provide typical

samples of the aging effects seen in the ESF systems. Each will undergo a visual examination. The staff finds the applicant's One-Time Inspection Program fulfills its purpose of verifying the effectiveness of the Chemistry Control Program, and is acceptable. The staff's evaluation of the Water Chemistry Program (B.1.2), including its exception to the GALL program, and One-Time Inspection Program is provided in Sections 3.0.3.2 and 3.0.3.10, respectively, of this SER.

Loss of material due to general corrosion could also occur in the drywell and suppression chamber spray systems header and spray nozzle components, standby gas treatment system components, containment isolation valves and associated piping, the automatic depressurization system piping and fittings, ECCS header piping and fittings and spray nozzles, and the external surfaces of BWR carbon steel components. The GALL Report recommends further evaluation on a plant-specific basis to ensure that the aging effect is adequately managed. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place for the management of general corrosion of these components.

The applicant stated in LRA Section 3.2.1.1.3 that an inspection in accordance with the One-Time Inspection Program (B.1.23) of SGTS ducts and components will be performed. This One-Time Inspection Program will provide assurance that penetrating corrosion of SGTS components is not occurring at an unacceptable rate. The inspection will consist of VT-3 visual inspections for the presence of general corrosion in selected standby gas treatment components.

The applicant stated that a one-time inspection will be performed for carbon steel piping most likely to experience a loss of material in the Dresden and Quad Cities safety relief discharge piping, Dresden and Quad Cities HPCI systems, Dresden LPCI (spray piping) system, Quad Cities RHR (spray piping), and the Quad Cities RCIC system. The examination will consist of four ultrasonic tests for the safety relief discharge piping and HPCI piping at the water-line area where general, pitting, and crevice corrosion are more susceptible because of repeated wetting and drying. An evaluation of the inspection results will be performed to determine that there is no unacceptable loss of material for the above ECCS piping exposed to a containment atmosphere environment (wet gas). The applicant also stated that containment isolation barriers (penetration piping and isolation valves) will be inspected per the requirements of AMP 10 CFR Part 50, Appendix J Inspection Program (B.1.28), to verify the pressure retaining integrity of individual penetrations.

Carbon steel components are generally susceptible to aging effects in a moisture environment, and may thus require an AMP that requires periodic monitoring, rather than a one-time inspection. In RAI 3.2-1(a), the staff requested the applicant to justify the use of the One-Time Inspection Program alone to manage the aging effects for the components covered in LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5. In RAI 3.2-1(b), the staff also requested the applicant to provide the basis for the determination of the sample size and location for inspection, and to explain why the proposed one-time inspection of the HPCI and SR discharge piping will be adequate to ensure that the effects of aging to the RCIC piping will be adequately managed during the period of extended operation.

By letter dated October 3, 2003, the applicant responded to RAI 3.2-1(a) by stating the following.

The one-time inspection ten-element programs associated with LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5, contain allowances for implementing further condition monitoring contingent upon the

results of the initial inspections. For the HPCI turbine exhaust piping inspection, engineering will determine the thickness measurement acceptance criteria prior to conducting the examinations. Results of the examinations will be evaluated by engineering to determine a) if loss of material aging is occurring and, if so, b) the rate at which the material is being lost. Engineering evaluations of the test results will also c) determine the need for follow-up examinations to monitor the progression of aging degradation, and (d) identify appropriate corrective actions to mitigate any excessive rates of loss of material discovered. Corrective actions, if necessary, would expand to include other components.

For the safety relief valve discharge piping inspection, any ultrasonic examinations that reveal material loss will be documented and evaluated. The inspection results will determine the amount and rate of corrosion at the waterline. Given the corrosion rate, the remaining life of the piping will be calculated to determine if it is adequate for the extended period of operation. If the projected life of the piping is insufficient for the extended period of operation, engineering will determine if there is a need for altering the water chemistry, replacing the piping, or whether an aging management activity is required to be put in place to manage loss of material in piping during the license renewal period.

The inspection of the ventilation system ductwork and components will determine if penetrating corrosion indicating a loss of material aging degradation is occurring. Results of the examinations will be evaluated by engineering to determine a) if penetrating corrosion indicating a loss of material aging is occurring and, if so, b) the rate at which the material is being lost. Engineering evaluations of the examination results will also c) determine the need for follow-up examinations to monitor the progression of aging degradation, and d) to identify appropriate corrective actions to mitigate any excessive rates of loss of material discovered. Corrective actions, if necessary, would expand to include other components.

Evaluations are performed for test or inspection results that do not satisfy established criteria and a condition report is initiated to document the concern in accordance with the corrective actions program. The corrective actions program ensures that the conditions adverse to quality are promptly corrected. If the deficiency is assessed to be significantly adverse to quality, the cause of the condition is determined and an action plan is developed to preclude recurrence.

The staff has reviewed the applicant's response dated October 3, 2003, and finds that the applicant has adequately clarified all the issues raised in RAI 3.2-1(a) regarding the use of the One-Time Inspection Program for the carbon steel components covered by LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5. Based on the fact that the One-Time Inspection Program is pertinent to the components and environments addressed in LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5, and that sufficient inspections will be conducted, as needed, based on initial component test and evaluation, the staff considers the applicant's response to be acceptable.

To respond to RAI 3.2-1(b), the applicant stated the following.

An ultrasonic examination will be conducted on the steel safety relief valve discharge piping around the torus waterline. . . . The water level in the torus fluctuates approximately four inches between high and low water level, subjecting the section of steel safety relief valve discharge piping at the waterline to repeated wetting and drying. That action makes the piping more susceptible to general pitting and crevice corrosion. The number of pipes within the total sample population for each unit is small (five pipes per unit). Each line contains a carbon steel thermowell and two carbon steel vacuum breakers. The sample locations chosen is representative of the material and environmental conditions that this piping and components experience.

Dresden and Quad Cities will perform an inspection of selected components in the Dresden and Quad Cities HPCI piping systems, Quad Cities RCIC piping systems, LPCI system (Dresden only) (drywell and torus spray piping and components subject to a containment atmosphere environment), and RHR system (Quad Cities only) (drywell and torus spray piping and components subject to a containment atmosphere environment). The inspection will consist of an examination of a representative sample of carbon steel piping system components, including piping and fittings,

within the scope of License Renewal that are exposed to a wet gas or air environment to verify that there is no unacceptable loss of material.

The population to be sampled includes: 1) carbon steel piping in the drywell and suppression chamber spray headers from the closed motor-operated spray valves, up to but not including the spray nozzles. . . . , 2) HPCI and RCIC (Quad Cities only) turbine exhaust piping, 3) suppression chamber level gauge upper stop valve. Note that there should have been references in Table 2.3.2-1, HPCI system, and Table 2.3.2-4, RCIC system, in the Piping and Fittings Component Group, to Aging Management References 3.2.1.3 and 3.2.1.5.

The suppression chamber level normally fluctuates approximately four inches. Within the sample population, the HPCI and RCIC turbine exhaust piping are most likely to experience a loss of material aging effect within this zone of fluctuation due to differential aeration. Therefore, the inspection shall be conducted on a HPCI turbine exhaust line as a representative sample that is the bounding loss of material condition for all piping within the systems. The containment piping and components that are located above the waterline are subjected to a humid wetted air environment that is less corrosive than the selected sample location. The number of pipes within this total bounding sample population is small and the sample location chosen is representative of the material and environmental conditions that all remaining pipes experience. The applicant stated that the approach to this one-time inspection is similar to the approach approved in NUREG-1769, "Peach Bottom SER, Related to the License Renewal of Peach Bottom Atomic Power Station, Units 2 and 3," Section 3.0.3.21.1.

The staff has reviewed the applicant's responses in the above letter and finds that the applicant has adequately addressed all the issues raised in RAI 3.2-1(b). Specifically, the staff finds the sample location determination methodology, as described in the applicant's response, to adequately bound the systems and components to which Items 3.2.1.3 and 3.2.1.5 pertain. Industry experience has indicated that environmental conditions existing at the defined sample test locations, should result in higher rates of material loss than less severe piping environments. The question of piping samples on the HPCI piping adequately reflecting material loss in the RCIC system has been addressed by the applicant's response which states that the RCIC system piping at Quad Cities will be included within the population to be sampled. This additional information clarifies the staff's concerns over the applicant's basis for the determination of the sample size and location for inspection and justifies why the proposed one-time inspection of the HPCI and safety relief valve discharge piping will be adequate to ensure that the effects of aging to the RCIC piping will be adequately managed during the extended period of operation.

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for selected stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to general corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.2.3 Local Loss of Material Due to Pitting and Crevice Corrosion

Local loss of material due to pitting and crevice corrosion could occur in pumps, valves, piping, and fittings associated with BWR ECCS piping and fittings and with lines to the suppression chamber and to the drywell and suppression chamber spray system. Since control of primary water chemistry does not preclude loss of material due to crevice and pitting corrosion at locations of stagnant flow conditions, the GALL Report recommends further evaluation of programs to manage loss of material due to crevice and pitting corrosion to verify the effectiveness of the Chemistry Control Program. A one-time inspection of select components at susceptible locations is considered an acceptable method to determine whether an aging effect is not occurring or an aging effect is progressing very slowly. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place for the management of general corrosion of these components.

The applicant stated in LRA Section 3.2.1.1.4 that an inspection of selected components exposed to a stagnant flow water environment will be conducted in accordance with the One-Time Inspection Program (B.1.23.). The inspection of selected components will verify the effectiveness of the Chemistry Control Program in low flow or stagnant flow areas. The inspections ensure that significant degradation due to pitting and crevice corrosion is not occurring and the component intended function will be maintained during the extended period of operation. Examinations will be conducted on components in areas where typically stagnant flow is present but occasionally there is flow, which will cause replenishment of the oxygen supply. Inspections will be conducted on the HPCI torus suction check valves, the HPCI booster pumps, and the control rod drive (CRD) scram valves, which were selected to provide typical samples of the aging effects seen in the ESF systems. The HPCI torus suction check valves are exposed to torus water, while the carbon steel HPCI booster pumps and the stainless steel CRD scram valves are exposed to condensate storage tank water. Each will undergo a visual examination. The staff finds the applicant's One-Time Inspection Program fulfills its purpose of verifying the effectiveness of the Chemistry Control Program, and is acceptable. The staff's evaluation of the Water Chemistry Program (B.1.2), including its exception to the GALL program, and the One-Time Inspection Program is provided in Section 3.0.3.2 and Section 3.0.3.10, respectively, of this SER.

Local loss of material from pitting and crevice corrosion could also occur in the containment isolation valves and associated piping, and automatic depressurization system piping and fittings. The GALL Report recommends further evaluation to ensure that the aging effect is adequately managed. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place for the management of local loss of material due to pitting and crevice corrosion of these components.

The applicant stated in LRA Section 3.2.1.1.5 that an inspection, in accordance with the One-Time Inspection Program (B.1.23), will be performed for carbon steel piping most likely to experience a loss of material in the Dresden and Quad Cities safety relief discharge piping, Dresden and Quad Cities HPCI systems, Dresden LPCI (spray piping) system, Quad Cities RHR (spray piping), and the Quad Cities RCIC system that are exposed to a containment atmosphere environment (wet gas). The safety relief discharge piping at Dresden and Quad Cities is carbon steel. The water level in the suppression chamber fluctuates, subjecting the section of safety relief discharge piping, HPCI piping, and RCIC piping at the water line to repeated wetting and drying, and therefore making it more susceptible to general, pitting, and

crevice corrosion in that area. The examination will consist of four ultrasonic tests to detect reduction in wall thickness due to loss of material on the inside of the safety relief discharge and HPCI piping at the water line. An evaluation of the inspection results will be performed to determine that there is no unacceptable loss of material for the selected piping in the above ECCS piping and components exposed to a containment atmosphere environment (wet gas). In addition, containment isolation barriers (penetration piping and isolation valves) will be inspected per the requirements of AMP 10 CFR Part 50, Appendix J (B.1.28), to verify the pressure retaining integrity of individual penetrations.

Carbon steel components are generally susceptible to aging effects in a moist environment, and may thus require an AMP that requires periodic monitoring, rather than a one-time inspection. The staff's request for additional information was provided in RAI 3.2-1(a) for the applicant to justify the use of the One-Time Inspection Program alone to manage the aging effects for the components covered in LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5. The staff's request for additional information was also provided in RAI 3.2-1(b) for the applicant to provide the basis for the determination of the sample size and location for inspection, and to explain why the proposed one-time inspection of the HPCI and safety relief valve discharge piping will be adequate to ensure that the effects of aging to the RCIC piping will be adequately managed during the extended operation. The staff's discussion of these RAIs and their resolution by the applicant are provided in Section 3.2.2.2.2 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to pitting and crevice corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.2.4 Local Loss of Material Due to Microbiologically Influenced Corrosion

Local loss of material due to microbiologically influenced corrosion (MIC) could occur in BWR containment isolation valves and associated piping in systems that are not addressed in other chapters of the GALL Report. The GALL Report recommends further evaluation to ensure that the aging effect is adequately managed. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place for the management of local loss of material due to MIC of the containment isolation barriers.

The applicant stated in LRA Section 3.2.1.1.6 that management of aging due to local loss of material resulting from MIC in the drywell equipment drain sump and drywell floor drain sump containment isolation barriers is performed in accordance with AMP 10 CFR Part 50, Appendix J (B.1.28). No other containment isolation barriers are subject to loss of material due to MIC or biofouling. The staff's evaluation of this AMP is provided in Section 3.0.3.13 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of local loss of material due to MIC, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.2.5 Changes in Properties Due to Elastomer Degradation

Changes in properties due to elastomer degradation could occur in seals associated with the SGTS ductwork and filters. The GALL Report recommends further evaluation to ensure that the aging effect is adequately managed. The staff reviewed the applicant's proposed program to ensure that an adequate program will be in place for the management of changes in properties due to elastomer degradation.

The applicant stated in LRA Section 3.2.1.1.7 that aging management of SGTS elastomers will be performed by the periodic inspection of ventilation system elastomers in accordance with the plant-specific AMP, Periodic Inspection of Ventilation System Elastomers Program (B.2.3). The staff's evaluation of this AMP is provided in Section 3.0.3.17 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of changes in properties due to elastomer degradation, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.2.6 Buildup of Deposits Due to Corrosion

The plugging of components due to general corrosion could occur in the spray nozzles and flow orifices of the drywell and suppression chamber spray system. This aging mechanism and effect will apply since the spray nozzles and flow orifices are occasionally wetted, even though the majority of the time this system is on standby. The wetting and drying of these components can aid in the acceleration of this particular corrosion. The GALL Report recommends further evaluation to ensure that the aging effect is adequately managed. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place to manage this aging effect.

The GALL Report specifies carbon steel material for the drywell and suppression chamber spray system nozzles and flow orifices. In LRA Table 3.2-1, Item 3.2.1.8, the applicant stated that Dresden and Quad Cities have brass/bronze spray nozzles, without providing the plant-specific AMR results for the components. In RAI 3.2-4, the staff requested the applicant to identify the requested AMR links for the components. By letter dated October 3, 2003, the applicant stated that neither drywell nor suppression chamber spray loops contain flow orifices. As such, the material and environment combination specified in Item 3.2.1.8 could not be credited. The applicant also stated that non-NUREG-1801 AMR links in LRA Table 3.2-2, Items 3.2.2.12 and 3.2.2.78, were created for the external and internal environments of the Dresden and Quad Cities brass/bronze spray nozzles.

The applicant further stated that the spray nozzles are included in LRA Table 2.3.2-6, for the RHR system, under the component group "spray nozzles (Quad Cities only)," and in Table 2.3.2-7, for LPCI system, under component group "spray nozzles (Dresden only)." Both tables provide AMR links, Items 3.2.2.12 and 3.2.2.78, for the line items with a "pressure boundary" component intended function, and an AMR link of 3.2.2.78 for line items with a "spray" component intended function. Based on the additional information provided above in the letter of October 3, 2003, the staff found that no aging effect was identified for the external

environment of the spray nozzles because the containment nitrogen environment is not conducive to promoting aging degradation. For the internal environment, the applicant will use the plant-specific Periodic Testing of Drywell and Torus Spray Nozzles Program (B.2.4) to manage the plugging general corrosion of spray nozzles. The staff finds the applicant's response adequately addresses the staff's concerns on the AMR of the Dresden/Quad Cities spray nozzles, and is acceptable. The staff evaluation of the plant-specific Periodic Testing of Drywell and Torus Spray Nozzles Program is provided in Section 3.2.2.3.1 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of buildup of deposits due to corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.2.7 Exception to GALL for Wall Thinning Due to Flow-Accelerated Corrosion

The applicant stated in LRA Section 3.2.1.2.1 that flow-accelerated corrosion is an applicable aging mechanism for the Quad Cities HPCI steam line drains. However, carbon steel components in the ATWS, isolation condenser, core spray, LPCI (Dresden only), RHR (Quad Cities only), primary containment and suppression pool piping, HPCI (except as previously noted), and RCIC (Quad Cities only) systems are not susceptible to flow-accelerated corrosion and do not require aging management. This exception is based on the following.

- EPRI NSAC-202L-R2, "Recommendations for an Effective Flow-Accelerated Corrosion Program," allows an exclusion from flow-accelerated corrosion for systems that operate less than 2 percent of plant operating time.
- EPRI TR-114882, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," states that flow rates less than 6 ft/sec do not need to be considered for flow accelerated corrosion.
- NUREG-1557, "Summary of Technical Information and Agreements from Nuclear Management and Resources Council Industry Reports Addressing License Renewal," states that erosion/corrosion in HPCI and the RCIC turbine steam supply piping is nonsignificant due to the low flow range.
- Dresden and Quad Cities operate these systems less than 2 percent of plant operating time or at flow rates of less than 6 ft/sec. Additionally, plant experience has not revealed flow-accelerated corrosion in these lines.

On the basis of its review, the staff finds that the applicant has presented adequate bases for excluding consideration of flow-accelerated corrosion, as an aging mechanism, for the above-mentioned ESF carbon steel components. This conclusion is based on the industry guidance on the material erosion/corrosion for piping under the conditions of infrequent and slow rates of flow. It is also based on the fact that Dresden and Quad Cities operate these systems at less than 2 percent of plant operating time or at flow rates of less than 6 ft/sec, both bounded by the industry guidelines. In addition, plant-specific operating experience has not revealed flow-

accelerated corrosion in these lines. Based on the above, the exception to GALL flow-accelerated corrosion for the identified ESF lines is acceptable.

3.2.2.2.8 Exception to GALL for Crack Initiation and Growth Due to Stress Corrosion Cracking and Intergranular Stress Corrosion Cracking

In LRA Section 3.2.1.2.2, the applicant stated that GALL AMP XI.M7, "BWR Stress Corrosion Cracking," does not apply to the segments of ECCS systems which are stainless steel and contain torus water. EPRI TR-1003056, "Mechanical Tools," Appendix A, states that cracking due to SCC and IGSCC is not likely in a high purity environment below 200 °F. NUREG-1801 Program XI.M7 applies to piping that contains reactor coolant at a temperature above 200 °F. The ECCS piping that contains torus water does not reach this level of temperature. Therefore, XI.M7 does not apply. The applicant stated that the Water Chemistry Program alone will manage aging due to cracking by controlling chloride and sulfate contaminants. The staff finds the applicant's basis of taking exception to the GALL program to be acceptable for the above ECCS piping since it is in accordance with the general industry practice.

On the basis of its review, the staff finds that the applicant has presented adequate bases for excluding consideration of crack initiation and growth due to SCC and ISCC, as an aging mechanism, for the above-mentioned ECCS stainless steel components. This conclusion is based on the industry guidance on the material cracking for piping under the conditions of a high purity environment below 200 °F. Based on the above, the exception to GALL crack initiation and growth for the identified ECCS system segments is acceptable.

3.2.2.3 Aging Management Programs for ESF System Components

In SER Section 3.2.2.1, the staff evaluated the applicant's conformance with the aging management recommended by GALL for ESF system components. In SER Section 3.2.2.2, the staff reviewed the applicant's evaluation of the issues for which GALL recommends further evaluation. In this SER section, the staff presents its evaluation of the programs used by the applicant to manage the aging of the component groups within the ESF systems.

The applicant credits 17 AMPs to manage the aging effects associated with components in the ESF systems. All but one AMP are credited to manage aging for components in other system groups (common AMPs). The staff's evaluation of the common AMPs credited with managing aging effects in ESF system components are provided in Section 3.0.3 of this SER. The common AMPs are listed as follows:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)

- 10 CFR Part 50, Appendix J Inspection Program (Section 3.0.3.13)
- Structures Monitoring Program (Section 3.0.3.14)
- Heat Exchanger Test and Inspection Activities (Section 3.0.3.15)
- Lubricating Oil Monitoring Activities (Section 3.0.3.16)
- Periodic Inspection of Ventilation Elastomers Program (Section 3.0.3.17)

The staff's evaluation of the ESF system-specific AMP, the Periodic Testing of Drywell and Torus Spray Nozzles Program, is provided below.

3.2.2.3.1 Periodic Testing of Drywell and Torus Spray Nozzles Program

Summary of Technical Information in the Application. The applicant described its Periodic Testing of Drywell and Torus Spray Nozzles program in Section B.2.4 of Appendix B to the Application. The applicant stated that the program is not consistent with a GALL report program; therefore, the applicant summarized the program in terms of the 10-element program as described in Branch Technical Position, Appendix A of the SRP-LR.

The applicant stated that the program addresses a NUREG-1801 Section V.D2.5 concern that flow orifices and spray nozzles in the drywell and torus spray subsystems are subject to plugging by rust from carbon steel piping components. The Dresden and Quad Cities drywell and torus spray nozzles are made of bronze. There are no carbon steel flow orifices in the system piping, within the scope of license renewal. However, upstream carbon steel piping is subject to possible general corrosion. These periodic tests use approved plant procedures to verify that the drywell and torus spray nozzles are free from plugging that could result from corrosion product buildup from upstream sources.

The applicant concluded that the periodic drywell and torus spray nozzle flow tests effectively manage drywell and torus spray header and spray nozzle plugging by corrosion products and that the program provides reasonable assurance that intended functions are maintained consistent with the current licensing basis during the period of extended operation.

Staff Evaluation. In LRA Section B.2.4, "Periodic Testing of Drywell and Torus Spray Nozzles," the applicant described its AMP to verify that the drywell and torus spray nozzles are free from plugging that could result from corrosion product buildup from upstream sources. The staff reviewed this program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls are part of the site-controlled Quality Assurance Program. The staff's evaluation of the Quality Assurance Program is provided separately in Section 3.0.4 of this SER. The remaining seven elements are discussed below. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

[Program Scope] The applicant stated that the scope of testing include the drywell and torus spray nozzles. Although there are no carbon steel flow orifices in the system piping which are within the scope of license renewal, upstream carbon steel piping is subject to possible general corrosion. These periodic tests, therefore, use approved plant procedures to verify that the

drywell and torus spray nozzles are free from plugging that could result from corrosion product buildup from upstream sources. The staff considers the scope of the AMR activity covered by the program to be clearly defined, and therefore, acceptable.

[Preventive Actions] The applicant stated that the spray nozzle tests do not provide any preventive actions. The spray nozzle tests provide condition monitoring to detect the degradation prior to a loss of function.

[Parameters Monitored/Inspected] The applicant stated that the flow tests demonstrate that the drywell and torus spray nozzles are not blocked by debris or corrosion products, and thereby demonstrate that the nozzles are available to provide the drywell and torus steam quenching functions. Drywell nozzles are tested with compressed air; torus nozzles are tested with water. Test procedures require that flow be demonstrated through each individual nozzle. The staff finds the parameters used to potentially detect material degradation of the nozzles are consistent with general industry experience, and are acceptable.

[Detection of Aging Effects] The applicant stated that the periodic drywell and torus spray nozzle flow tests detect plugging by corrosion products from the degradation of carbon steel piping and fittings. In LRA Section B.2.4, the applicant stated that drywell nozzles are tested with compressed air, and torus nozzles are tested with water to verify that the drywell and torus spray nozzles are free from plugging that could result from corrosion product buildup from upstream carbon steel piping. In RAI B.2.4(c), the staff requested the applicant to explain how the flow tests will reveal the degree of component degradation due to general corrosion, and how general corrosion for the upstream carbon steel piping will be adequately managed. By letter dated October 3, 2003, the applicant stated that the flow tests will not reveal the degree of spray nozzle degradation due to general corrosion of the nozzles since the nozzle material is not related to the aging effect of plugging. Repeated wetting and drying of carbon steel spray header piping upstream can, however, result in corrosion buildup (crud) that may break free from the pipe wall and lodge in a nozzle. The applicant stated that the AMR link, Item 3.2.2.78, is used as the AMR reference for the spray nozzles, and that Item 3.2.2.78 should have listed an aging effect/mechanism of "Plugging of Spray Nozzles/Crud." The applicant also stated that the aging effect of loss of material due to general corrosion for the upstream carbon steel piping is addressed in LRA Table 3.2-1, Item 3.2.1.3. The staff finds that the applicant's responses address the staff's concerns regarding detection of material degradation by the proposed flow tests, and the management of upstream carbon steel piping. These are acceptable to the staff.

[Monitoring and Trending] The applicant stated that the results of the spray nozzle tests are monitored but are not trended. If flow to a nozzle is blocked or restricted, the degraded condition is evaluated and corrective actions are taken to restore normal flow. The applicant did not specify in LRA Section B.2.4 the frequency of the testing and/or monitoring. In RAI B.2.4(a), the staff requested that the applicant provide this additional information. By letter dated October 3, 2003, the applicant stated that both the Quad Cities and Dresden Technical Specification Surveillance Requirement SR 3.6.2.4.2 requires that the suppression pool spray nozzles be verified as unobstructed every 10 years. Both the Quad Cities and Dresden Technical Requirements Manual Surveillance Requirement TSR 3.6.a.2 requires that each drywell spray nozzle be verified as unobstructed every 10 years. The staff considers the above-stated frequency of testing to be acceptable in detecting degradation in performance due to the passive nozzle design and due to the fact that it has been shown to be acceptable through operating experience.

[Acceptance Criteria] The applicant stated that the test procedures contain acceptance criteria that require that flow be observed from and through each individual drywell and torus spray nozzle. This test procedure is to provide assurance that flow to the drywell and torus spray headers and spray nozzles is not blocked or restricted. The applicant did not provide sufficient details for the acceptance criteria in LRA Section B.2.4. In RAI B.2.4(b), the staff requested the applicant to elaborate on the acceptance criteria, including the definition of an acceptable flow. By letter dated October 3, 2003, the applicant stated its acceptance criteria as described in Dresden procedure DOS 1500-14, "LPCI Torus Spray Test," such that "water flow is detectable from each individual suppression pool spray nozzle." QCTS 0320-02, "Suppression Chamber Spray Header and Nozzle Water Spray Test," acceptance criteria is that "adequate flow is observed from all spray nozzles in RHR A and RHR B loops." The Quad Cities and Dresden technical specification surveillance requirement will also be used to verify that each suppression pool spray nozzle is unobstructed.

For the drywell spray nozzles, the applicant stated that Dresden procedure DTS 1500-3, "LPCI Containment Spray Test," acceptance criteria is that "air flow is detectable from each individual drywell spray nozzle." QCTS 0320-03, "Drywell Spray Header and Nozzle Air Test," acceptance criteria is that there is "sufficient flow through all spray header nozzles." The Quad Cities and Dresden technical requirements manual surveillance requirement will also be used to verify that each drywell spray nozzle is unobstructed by performance of an air or smoke flow test of the drywell spray nozzles. The applicant further stated that both DTS 1500-03 and QCTS 0320-03 specify the use of a remote sensing device, such as a smoke tube, to verify air flow from all spray nozzles.

The staff finds that the applicant has a documented description of the acceptance criteria in place, which are found to be sufficient in defining what constitutes an acceptable nozzle test. This is acceptable to the staff.

[Operating Experience] The applicant stated that Dresden has not detected any degradation of the drywell and torus spray headers or spray nozzles. Quad Cities has experienced two events in which foreign material was found in the spray nozzles. In 1998, small amounts of rust were found in some nozzles after a flow test. However, the small amounts of rust found did not pose a blockage problem. In 2000, a 1" x 3" block of wood was found lodged in a spray nozzle subsequent to a spray test, but this was a foreign material exclusion problem unrelated to aging. No rust was found in the spray nozzles during the 2000 test. In RAI B.2.4(d), the staff requested the applicant to discuss corrective actions that have been taken (i.e., procedural controls) to avoid the recurrence of the above event. By letter dated October 3, 2003, the applicant stated that in Condition Report Q2000-00355, the cause was determined to be improper past foreign material exclusion (FME) controls. The applicant stated that this event, along with several others, was reviewed at a Mechanical Maintenance Department weekly meeting. In addition, an evaluation of past operability was performed that concluded that operability was not impacted by the material that was discovered in the nozzle.

Based on the actions taken by the applicant to prevent recurrence of the event, the staff finds the Dresden and Quad Cities operating experience demonstrates that the periodic flow tests effectively manage drywell and torus spray header and spray nozzle plugging by corrosion products, so that the intended function of providing a quenching spray will be maintained during the period of extended operation.

The applicant provided its UFSAR Supplement for the Periodic Testing of Drywell and Torus Spray Nozzles Program in Section A.2.4 of the LRA. The staff reviewed the UFSAR Supplement and finds that the summary description contains a sufficient level of information to satisfy 10 CFR 54.21(d), and is acceptable.

Conclusions. On the basis of its review of the applicant's program, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.2.2.4 Aging Management Review of Plant-Specific Engineered Safety Features Systems Components

In this section of the SER, the staff presents its review of the applicant's AMR for the specific components within the ESF systems. To perform its evaluation, the staff reviewed the components listed in LRA Tables 2.3.2-1 through 2.3.2-11 to determine whether the applicant had properly identified the applicable aging effects and the AMPs needed to adequately manage these aging effects. This portion of the staff's review involved identification of the aging effects for each ESF component, ensuring that each aging effect was evaluated in the appropriate LRA AMR table in Section 3, and that management of the aging effect was captured in the appropriate AMP. The results of the staff's review are provided below.

3.2.2.4.1 High-Pressure Coolant Injection System

Summary of Technical Information in the Application. The description of the HPCI system can be found in Section 2.3.2.1 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-1. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the HPCI system are described in LRA Section 2.3.2.1 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-1 of the LRA lists individual components of the system including closure bolting, dampeners, filters/strainers, NSR vents or drains, piping and fittings, pumps, restricting orifices, sight glasses, thermowells, tubing, valves, diffusers, flexible hoses, flow orifices, heat exchangers, rupture disc, tanks, traps, and turbine casings.

Low-alloy steel components exposed to containment nitrogen are identified as being subject to crack initiation and growth from cyclic loading and loss of material due to wear. Low-alloy steel components exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking. Low-alloy steel components exposed to outdoor ambient conditions are identified as being subject to loss of material due to general corrosion and wear.

Stainless steel, carbon steel, brass, bronze exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to corrosion.

Carbon steel components exposed to 25–288 °C (77–550 °F) demineralized water, air or 288 °C (550 °F) steam, or air and steam up to 320 °C (608 °F) (primarily steam) are identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel components exposed to 288 °C (550 °F) reactor coolant water, or 320 °C (608 °F) steam are identified as being subject to wall thinning due to flow-accelerated corrosion. Carbon steel components exposed to lubricating oil (with contaminants and/or moisture) or air are identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion.

Carbon steel casting exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to wall thinning due to flow-accelerated corrosion. Carbon steel casting and carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Stainless steel components exposed to 25–288 °C (77–550 °F) demineralized water, 288 °C (550 °F) reactor coolant water, or air and steam up to 320 °C (608 °F) (primarily steam) are identified as being subject to crack initiation and growth due to stress corrosion cracking and intergranular stress-corrosion cracking. Stainless steel components exposed to air and saturated air, air and steam up to 320 °C (608 °F) (primarily air), or lubricating oil (with contaminants and/or moisture) are identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel components exposed to air and steam up to 320 °C (608 °F) are identified as being subject to loss of material due to pitting and crevice corrosion.

Stainless steel casting and stainless steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to crack initiation and growth due to stress-corrosion cracking.

Aluminum exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to loss of material due to pitting and crevice corrosion.

Steel chrome moly exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to loss of material due to pitting.

Alloy steel casting exposed to air and steam up to 320 °C (608 °F) is identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Brass, bronze, and cast iron exposed to lubricating oil (with contaminants and/or moisture) are identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion.

Elastomers, neoprene, and similar material exposed to lubricating oil (with contaminants and/or moisture) or moist air are identified as being subject to hardening and loss of strength due to elastomer degradation.

Admiralty brass tubes, brass tube sheets, carbon steel channel heads, and carbon steel shells exposed to condensate (demineralized water) on the tube side and lubricating oil on the shell side are identified as being subject to loss of material due to general corrosion, galvanic corrosion, MIC, erosion or FAC, wear, and selective leaching, as well as cracking due to mechanical fatigue and SCC. Admiralty brass tubes, carbon steel tube sheets, carbon steel channel heads, and carbon steel shells exposed to condensate (demineralized water) on the

tube side and reactor coolant water and warm moist air on the shell side are identified as being subject to loss of material due to general corrosion, galvanic corrosion, MIC, erosion or FAC, wear, selective leaching, pitting corrosion, and crevice corrosion, as well as cracking due to mechanical fatigue and SCC. Admiralty brass exposed to condensate (demineralized water) on the tube side and lubricating oil on the shell side, or condensate (demineralized water) on the tube side and reactor coolant water and warm moist air on the shell side, are identified as being subject to buildup of deposit due to fouling.

No aging effects are identified for glass exposed to 25–288 °C (77–550 °F) demineralized water, or air and steam up to 320 °C (608 °F).

Aging Management Programs

The following AMPs are utilized to manage aging effects in the HPCI system:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)
- Structures Monitoring Program (Section 3.0.3.14)
- Heat Exchanger Test and Inspection Activities (Section 3.0.3.15)
- Lube Oil Monitoring Program (Section 3.0.3.16)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the HPCI system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. Aging Effects: The staff reviewed the information in LRA Tables 2.3.2-1, 3.2-1, and 3.2-2 for the HPCI system. During its review, the staff determined that additional information was needed to complete its review.

The applicant identified in LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5, loss of material due to general corrosion and pitting/crevice corrosion, respectively, for components in standby gas treatment, containment isolation, and emergency core cooling systems. LRA Table 2.3.2-1, for HPCI system, and Table 2.3.2-4, for RCIC system (Quad Cities only), however, does not provide Items 3.2.1.3 and 3.2.1.5 as the AMR links for components in the two systems. In RAI 3.2-2, the staff requested the applicant to explain why Items 3.2.1.3 and 3.2.1.5 are not included in Tables 2.3.2-1 and 2.3.2-4 as the AMR links.

By letter dated October 3, 2003, the applicant stated the following.

LRA Table 3.2-1, Aging Management References 3.2.1.3 and 3.2.1.5, are not included in LRA Tables 2.3.2-1 and 2.3.2-4 as aging management references because NUREG-1801, Chapter V, does not address HPCI and RCIC carbon steel piping and fittings with an “air and steam up to 320 °C (608 °F) (primarily air)” environment and with a loss of material aging effect due to general,

pitting, and crevice corrosion. As such, a non-NUREG-1801 aging management reference was utilized. Table 2.3.2-1 (component group of "Piping and Fittings (includes thermowells)") and Table 2.3.2-4 (component group of "Piping and Fittings (Quad Cities only) (includes rupture discs)") refer to Aging Management Reference 3.2.2.126 for a loss of material due to pitting and crevice corrosion. Aging Management Reference 3.2.2.126 should also have included the aging mechanism of general corrosion.

The staff noted a contradiction in the above applicant's response. It pertains to the exclusion of AMR links, Items 3.2.1.3 and 3.2.1.5, from LRA Tables 2.3.2-1 and 2.3.2-4, respectively, for HPCI and RCIC carbon steel components. LRA Sections 3.2.1.1.3 and 3.2.1.1.5, which are referenced by Items 3.2.1.3 and 3.2.1.5, respectively, provide direct references to HPCI (covered in Table 2.3.2-1) and RCIC (covered in Table 2.3.2-4) piping and components addressed in NUREG-1801. In addition, the applicant's response also contradicts the response to RAI 3.2-1(b), which specifically stated that AMR links, Items 3.2.1.3 and 3.2.1.5, should have been provided in Tables 2.3.2-1 and 2.3.2.4, under the piping and fittings component group. The staff requested the applicant to clarify the above inconsistencies found in its responses to RAIs 3.2-1(b) and 3.2-2. By letter dated December 12, 2003, the applicant stated that it acknowledged the inconsistency found in its response to RAI 3.2-2, and the inconsistency between responses to RAIs 3.2-1(b) and 3.2-2. The applicant stated that these deficiencies will be resolved by revising LRA Tables 2.3.2-1 and 2.3.2-4 to include AMR links, Items 3.2.1.3 and 3.2.1.5, for HPCI and RCIC piping and fittings. The staff finds the applicant's response to be acceptable and concludes that RAI 3.2-2 is closed.

The aging effects identified in the LRA for the HPCI system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified..

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the HPCI system:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)
- Structures Monitoring Program (Section 3.0.3.14)
- Heat Exchanger Test and Inspection Activities (Section 3.0.3.15)
- Lube Oil Monitoring Program (Section 3.0.3.16)
- Periodic Inspection of Components Subject to Moist Environments (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper,

and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system.

After evaluating the applicant's AMR for each of the components in the HPCI system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

In LRA Table 3.2-2, Items 3.2.2.40 and 3.2.2.42, the applicant identified loss of material from galvanic corrosion as an aging effect/mechanism for heat exchangers. The Water Chemistry Program (B.1.2) and Heat Exchanger Test and Inspection Activities (B.2.6) were credited to manage this component grouping, in lieu of an AMP specifically developed for the galvanic corrosion. In RAI 3.2-3, the staff requested the applicant to provide the basis for concluding the adequacy of the specified AMPs to manage aging effects for the HPCI heat exchangers due to galvanic corrosion.

By letter dated October 3, 2003, the applicant stated the following.

The two Dresden and Quad Cities HPCI heat exchangers that are in scope of license renewal are the HPCI Turbine Gland Seal Condensers and the HPCI Lubrication Oil Coolers. Aging Management Reference 3.2.2.40 addresses the HPCI Lubrication Oil Coolers, and Aging Management Reference 3.2.2.42 addresses the HPCI Turbine Gland Seal Condensers. LRA Appendix B, B.1.2, "Water Chemistry" and B.2.6, "Heat Exchanger Test and Inspection Activities," are credited with managing the loss of material aging effect due to galvanic corrosion.

Sandia National Laboratory Report SAND93-7070 UC-523, "Aging Management Guideline for Commercial Nuclear Power Plants - Heat Exchangers," identifies that galvanic corrosion is not a significant aging mechanism for the primary water (shell) side of the HPCI Turbine Gland Seal Condensers and for the oil (shell) side of the HPCI Lubrication Oil Coolers. SAND93-7070 states that galvanic corrosion can be significant for the tube side of both heat exchangers, which are cooled by treated (demineralized) water. EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Revision 3, Section 3.1.3, states that control of galvanic corrosion in treated water systems is possible by following the EPRI Chemistry Guidelines for treated water systems. LRA Appendix B, B.1.2, "Water Chemistry," is based on EPRI Report TR-103515, "BWR Water Chemistry Guidelines."

SAND93-7070 identifies such activities as inspection, eddy current testing, and performance testing as being effective for the detection and mitigation of galvanic corrosion. LRA Appendix B, B.2.6, "Heat Exchanger Test and Inspection Activities," provides for performance monitoring of the HPCI system and visual inspection and eddy current testing of the HPCI Turbine Gland Seal Condensers and the HPCI Lubrication Oil Coolers.

SAND93-7070 identifies that only about 1% of the total number of aging failures of heat exchangers was attributed to galvanic corrosion, because heat exchanger design specifications require that materials of construction be compatible and that galvanic couples between adjacent

materials be minimized. The Dresden and Quad Cities HPCI Turbine Gland Seal Condensers and the HPCI Lubrication Oil Coolers have been previously visually inspected and eddy current tested. No failures due to galvanic corrosion were detected.

The staff has reviewed the applicant's responses provided in the letter of October 3, 2003, and finds that the applicant has adequately addressed all the issues raised in RAI 3.2-3. This is based on the fact that (1) necessary techniques and evaluations are inclusive of the AMPs utilized, (2) stringent design specifications have been required of the heat exchangers, and (3) the plant-specific operating history has shown no failure on the heat exchangers. Therefore, the staff finds the two accredited AMPs, Water Chemistry Program and Heat Exchanger Test and Inspection Activities, to be adequate in managing galvanic corrosion for the heat exchangers.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the core spray system, or to provide an accompanying program to monitor and/or prevent aging. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

In reference to the 10 CFR 54.4(a)(2) components ((a)(2) components) (i.e., non-safety-related affecting safety-related), the applicant stated that a one-time, internal, visual inspection will be performed for possible general, crevice, galvanic, and pitting corrosion. In RAI B.1.23-1, the staff requested the applicant to clarify (1) if aging of (a)(2) components is managed only by the One-Time Inspection Program or is the One-Time Inspection Program used to augment other AMPs for these components, and (2) if any (a)(2) components are managed only by the One-Time Inspection Program, describe the aging effects and justify the use of the program alone to manage these aging effects. By letter dated October 3, 2003, the applicant stated the following.

For most 10 CFR 54.4(a)(2) components that have intended functions of "Leakage Boundary (spatial)" or "Structural Integrity (attached)," the One-Time Inspection Program does not augment other AMPs. However, as discussed in the response to RAI B.1.23-2, an additional aging management program is applicable for 10 CFR 54.4(a)(2) components with an environment of Lubricating Oil in the Reactor Core Cooling Isolation System and the High Pressure Coolant Injection System, or For (a)(2) components where aging is managed only by a one-time inspection, Exelon will perform a one-time inspection of selected (a)(2) components to determine whether degradation, if any, caused by loss of material due to general, crevice, or pitting corrosion is proceeding at an acceptably slow rate to ensure that the intended function(s) of the components is maintained during the extended period of operation. The one-time inspection will be performed near the end of the current operating term and before the period of extended operation.

This is part of Commitment #23 of Appendix A of this SER. The staff finds the applicant's response to RAI B.1.23-1(1) to be acceptable, based on the staff's acceptance of the applicant's response to RAI B.1.23-2(a).

The applicant stated that based on the material-environment combinations associated with the 10 CFR 54.4(a)(2) components, aging, if any, is expected to progress very slowly. The visual inspections will check for indications of general, crevice, and pitting corrosion. For material-environment combinations with corrosion rates such that loss of intended function due to excessive corrosion might occur during the extended period of operation, corrective actions, such as replacement and/or implementation of additional aging management activities, will be taken. The staff finds the applicant's response to RAI B.1.23-1(2) to be acceptable, based on the staff's acceptance of the applicant's response to RAI B.1.23-2(b).

In response to the staff's concern, expressed in RAI 2.1-2, regarding the extent of the boundary of the non-safety-related piping attached to the safety-related piping, the applicant has since included additional piping to the scope of license renewal. The applicant stated that while additional components have been added to the scope of license renewal for each system, the components are comprised of the same materials and experience the same environments as other components within the system. As such, there are no new AMPs required. For the ESF systems, only LRA Table 2.3.2-1, for HPCI system, needed revision to include additional AMR references. No other ESF scoping and screening tables are affected. The staff has reviewed the revised Table 2.3.2-1, and verified that the added piping and valves to the scope of license renewal are included in the same AMPs already applied to other components within the system. Based on the above, the staff concluded that the applicant's response to RAI 2.1-2 is acceptable for the ESF systems.

Based on its review of the information provided in the LRA and the applicant's responses to the above RAIs, the staff concludes that the above-identified AMPs will effectively manage the aging effects for the components of the HPCI system and that the intended functions of the system will remain consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3).

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.2 Core Spray System

Summary of Technical Information in the Application. The description of the core spray system can be found in Section 2.3.2.2 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-2. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1, and 3.2-2.

Aging Effects

Components of the core spray system are described in LRA Section 2.3.2.2 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-2 of the LRA lists individual components of the system including closure bolting, flow elements, NSR vents or drains, piping and fittings, pumps, restricting orifices, sight glasses, thermowells, tubing, and valves.

Low-alloy steel exposed to containment nitrogen is identified as being subject to crack initiation and growth from cyclic loading and loss of material due to wear. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel exposed to 25–288 °C (77–550 °F) demineralized water or wet gas is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed up to 225 °C (437 °F) reactor coolant

water and carbon steel casting exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to wall thinning due to flow-accelerated corrosion.

Carbon steel casting and carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Stainless steel and stainless steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to crack initiation and growth due to stress-corrosion cracking. Stainless steel exposed to 25–288 °C (77–550 °F) demineralized water and 288 °C (550 °F) reactor coolant water or steam are identified as being subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to saturated air is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to corrosion.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the core spray system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the core spray system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-2, 3.2-1, and 3.2-2 for the core spray system. On the basis of its review, the staff finds the applicant has identified the appropriate aging effects for the materials and environments associated with the system.

The aging effects identified in the LRA for the core spray system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects for the core spray system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.9.3.14)
- Periodic Inspection of Components Subject to Moist Environments (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system.

After evaluating the applicant's AMR for each of the components in the core spray system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verifies that the applicant credited an AMP that is appropriate for the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the core spray system, or to provide an accompanying program to monitor and/or prevent aging. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the core spray system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.3 Containment Isolation Components and Primary Containment Piping System

Summary of Technical Information in the Application. The description of the containment isolation components and primary containment piping system can be found in Section 2.3.2.3 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-3. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the containment isolation components and primary containment piping system are described in LRA Section 2.3.2.3 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-3 of the LRA lists individual components of the system including closure bolting, flow elements, NSR vents or drains, piping and fittings, restricting orifices, thermowells, tubing, valves, flexible hoses, isolation barriers, and tanks.

Low-alloy steel exposed to containment nitrogen is identified as being subject to crack initiation and growth from cyclic loading and loss of material due to wear. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel occasionally exposed to moist air on the inside surface and ambient air on the outside surface is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to treated water or raw water on the inside surface and ambient air on the outside surface is identified as being subject to loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling. Carbon steel exposed to moist atmosphere (air/nitrogen), steam, or demineralized water is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to 25–288 °C (77–550 °F) demineralized water, or saturated air, warm moist air, or wet gas is identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Carbon steel casting exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to wall thinning due to flow-accelerated corrosion. Carbon steel casting and carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Stainless steel casting and stainless steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to crack initiation and growth due to stress-corrosion cracking.

Stainless steel exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to crack initiation and growth due to stress corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to warm moist air and saturated air is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to corrosion. Brass and bronze exposed to saturated air are identified as being subject to loss of material due to pitting and crevice corrosion.

Elastomers neoprene and similar material exposed to saturated air are identified as being subject to hardening and loss of strength due to elastomer degradation.

Copper exposed to saturated air or warm, moist air is identified as being subject to loss of material due to pitting and crevice corrosion.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects for the containment isolation components and primary containment piping system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- 10 CFR Part 50, Appendix J Inspection Program (Section 3.0.3.13)

A description of these AMPs is provided in Appendix B of the LRA. The applicant states that the effects of aging associated with the components of the containment isolation components and primary containment piping system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-3, 3.2-1, and 3.2-2 for the containment isolation components and primary containment piping system. On the basis of its review, the staff finds the applicant has identified the appropriate aging effects for the materials and environments associated with the system.

The aging effects identified in the LRA for the containment isolation components and primary containment piping system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the containment isolation components and primary containment piping system:

- Water Chemistry Program (Section 3.0.3.2)

- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section (3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- 10 CFR Part 50, Appendix J Inspection Program (Section 3..0.3.13)
- Periodic Inspection of Components Subject to Moist Environments (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system.

After evaluating the applicant's AMR for each of the components in the containment isolation components and primary containment piping system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the containment isolation components and primary containment piping, or to provide an accompanying program to monitor and/or prevent aging. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the containment isolation components and primary containment piping system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.4 Reactor Core Isolation Cooling System—Quad Cities Only

Summary of Technical Information in the Application. The description of the RCIC system can be found in Section 2.3.2.4 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-4. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the RCIC system are described in LRA Section 2.3.2.4 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-4 of the LRA lists individual components of the system including closure bolting, dampeners, filters/strainers, NSR vents or drains, piping and fittings, pumps, restricting orifices, sight glasses, tubing, valves, flexible hoses, tanks, traps, and turbine casings.

Low-alloy steel exposed to containment nitrogen is identified as being subject to crack initiation and growth from cyclic loading and loss of material due to wear. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to air and steam up to 320 °C (608 °F) (primarily air) or air and steam up to 320 °C (608 °F) (primarily steam) is identified as being subject to loss of material due to pitting and crevice corrosion. Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel exposed to 25–288 °C (77–550 °F) demineralized water or air, or 288 °C (550 °F) steam, or air and steam up to 320 °C (608 °F) (primarily steam), or air and steam up to 320 °C (608 °F) experiences loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to 288 °C (608 °F) steam is identified as experiencing wall thinning due to flow-accelerated corrosion. Carbon steel exposed to lubricating oil (with contaminants and/or moisture) or air is subject to loss of material due to general, galvanic, pitting, and crevice corrosion.

Carbon steel casting or carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water is subject to wall thinning due to flow-accelerated corrosion, as well as loss of material due to general, pitting, and crevice corrosion.

Stainless steel casting and stainless steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to crack initiation and growth due to stress-corrosion cracking.

Stainless steel exposed to 25–288 °C (77–550 °F) demineralized water and 288 °C (550 °F) reactor coolant water, or air and steam up to 320 °C (608 °F) (primarily steam), is identified as being subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to saturated air, or air and steam up to 320 °C (608 °F) (primarily air), or lubricating oil (with contaminants and/or moisture) is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Stainless steel exposed to air and steam up to 320 °C (608 °F) is identified as being subject to loss of material due to pitting and crevice corrosion.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to corrosion.

Steel chrome moly exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to loss of material due to pitting. No aging effects are identified for steel chrome moly exposed to air, moisture, and humidity <100 °C (212 °F).

Cast iron exposed to lubricating oil (with contaminants and/or moisture) is identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion. Cast iron exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to loss of material due to selective leaching. Cast iron exposed to air, moisture, and humidity <100 °C (212 °F) is identified as being subject to loss of material due to pitting and crevice corrosion.

Alloy steel casting exposed to air and steam up to 320 °C (608 °F) is identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Elastomers, neoprene, and similar materials subjected to moist containment atmosphere (air/nitrogen), steam, or demineralized water are identified as being subject to hardening and loss of strength due to elastomer degradation.

No aging effects are identified for glass exposed to lubricating oil (with contaminants and/or moisture), air, moisture, and humidity <100 °C (212 °F).

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects for the RCIC system:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Structures Monitoring Program (Section 3.0.3.14)

A description of these AMPs is provided in Appendix B of the LRA. The applicant states that the effects of aging associated with the components of the RCIC system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-4, 3.2-1, and 3.2-2 for the RCIC system. During its review, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI 3.2-1(a) for the applicant to justify the use of the One-Time Inspection Program alone to manage the aging effects for the components covered in LRA Table 3.2-1, Items 3.2.1.3 and 3.2.1.5. The staff's request for additional information was also provided in RAI 3.2-1(b) for the applicant to provide the basis for the determination of the sample size and location for inspection, and to explain why the proposed one-time inspection of the HPCI and SR discharge piping will be adequate to ensure that the effects of aging to the RCIC piping will be adequately managed during the extended operation. The staff's discussion of these RAIs and their resolution by the applicant are provided in Section 3.2.2.2.2 of this SER.

The staff's request for additional information was provided in RAI 3.2-2 for the applicant to explain why the AMR links, Items 3.2.1.3. and 3.2.1.5, are not included in LRA Tables 2.3.2-1 and 2.3.2-4. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.2.2.4.1.2 of this SER.

The aging effects identified in the LRA for the RCIC system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the RCIC system:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Structures Monitoring Program (Section 3.0.3.14)
- Lubricating Oil Monitoring Program (Section 3.0.3.16)
- Periodic Inspection of Components Subject to Moist Environments Program (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for the RCIC system.

After evaluating the applicant's AMR for each of the components in the RCIC system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the RCIC system, or to provide an accompanying program to monitor and/or prevent aging. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

The staff's request for additional information was provided in RAI B.1.23-1 for the applicant to clarify and justify the use of the One-Time Inspection Program for managing the age-related degradation of 10 CFR 54.4(a)(2) components. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.2.2.4.1.2 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the RCIC system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.5 Isolation Condenser—Dresden Only

Summary of Technical Information in the Application. The description of the isolation condenser can be found in Section 2.3.2.5 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-5. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the isolation condenser are described in LRA Section 2.3.2.5 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-5 of the LRA lists individual components of the system including closure bolting, flow elements, NSR vents or drains, piping and fittings, pumps, sight glasses, thermowells, tubing, valves, isolation condensers, and tanks.

Low-alloy steel exposed to containment nitrogen is identified as being subject to crack initiation and growth from cyclic loading and loss of material due to wear. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking. Low-alloy steel exposed to outdoor ambient conditions is identified as being subject to loss of material due to general corrosion and wear.

Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel exposed to 25–288 °C (77–550 °F) demineralized water, outdoor ambient conditions, or treated water is identified as being subject to loss of material due to general, pitting, and crevice corrosion. No aging effects are identified for carbon steel exposed to containment nitrogen.

Carbon steel casting and carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Stainless steel casting exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to crack initiation and growth due to stress-corrosion cracking.

Stainless steel exposed to 25–288 °C (77–550 °F) demineralized water and 288 °C (550 °F) reactor coolant water is identified as being subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to 288 °C (550 °F) reactor coolant water is subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking due to thermal and mechanical loading. Stainless steel exposed to saturated air is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to corrosion.

Aluminum exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to loss of material due to pitting and crevice corrosion. Aluminum exposed to outdoor ambient conditions is identified as being subject to loss of material due to pitting.

Stainless steel tubes, carbon steel tube sheets, stainless and carbon steel channel heads, and carbon steel shells exposed to steam on the tube side and demineralized water on the shell side are identified as being subject to loss of material due to general pitting and crevice corrosion, as well as crack initiation and growth due to stress corrosion cracking and cyclic loading. Stainless steel tubes exposed to steam on the tube side and demineralized water on the shell side are identified as being subject to deposit buildup due to fouling.

No aging effects are identified for glass exposed to 25–288 °C (77–550 °F) demineralized water or saturated air.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the isolation condenser:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)

- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.15)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the isolation condenser system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-5, 3.2-1, and 3.2-2 for the isolation condenser. On the basis of its review, the staff finds the applicant has identified the appropriate aging effects for the materials and environments associated with the isolation condenser.

The aging effects identified in the LRA for the isolation condenser are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the isolation condenser:

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.15)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for the isolation condenser.

After evaluating the applicant's AMR for each of the components in the isolation condenser, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the isolation condenser. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the isolation condenser will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.6 Residual Heat Removal System—Quad Cities Only

Summary of Technical Information in the Application. The description of the residual heat removal (RHR) system can be found in Section 2.3.2.6 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-6. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the RHR system are described in LRA Section 2.3.2.6 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-6 of the LRA lists individual components of the system including closure bolting, dampeners, ECCS suction headers, filters/strainers, flow elements, NSR vents or drains, piping and valves, piping and fittings, pumps, restricting orifices, sight glasses, spray nozzles, thermowells, tubing, and valves.

Alloy steel exposed to containment nitrogen is identified as being subject to crack initiation and growth from cyclic loading and loss of material due to wear. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel exposed to 25–288 °C (77–550 °F) demineralized water or air is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to air, moisture, and humidity <100 °C (212 °F) is identified as being subject to loss of material due to general corrosion. Carbon steel exposed to air or saturated air is identified as being subject to loss of material due to general and pitting corrosion. Carbon steel exposed to air and steam up to 320 °C (608 °F) is identified as being subject to wall thinning due to accelerated corrosion.

Carbon steel casting exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to wall thinning due to flow-accelerated corrosion.

Stainless steel exposed to 25–288 °C (77–550 °F) demineralized water and 288 °C (550 °F) reactor coolant water is identified as being subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to air

and saturated air is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. No aging effects are identified for stainless steel exposed to air, moisture, and humidity where the surface is >100 °C (212 °F), containment nitrogen, or air, moisture, and humidity <100 °C (212 °F).

Stainless steel forging exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to crack initiation and growth due to stress-corrosion cracking.

Brass or bronze exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Brass and bronze exposed to air are identified as being subject to plugging of flow orifices and spray nozzles due to general corrosion.

No aging effects are identified for brass, bronze, and carbon steel exposed to containment nitrogen.

No aging effects are identified for glass exposed to 25–288 °C (77–550 °F) demineralized water and air, moisture, and humidity <100 °C (212 °F).

Aging Management Programs

The following AMPs are utilized to manage aging effects in the RHR system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Testing of Drywell and Torus Spray Nozzles (Section 3.2.2.3.1)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the RHR system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-6, 3.2-1, and 3.2-2 for the RHR system. During its review, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI 3.2-4 for the applicant to clarify the information provided in LRA Table 3.2-1, Item 3.2.1.1, regarding the AMR of drywell and suppression chamber spray system nozzles and flow orifices. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.2.2.6 of this SER.

In LRA Table 2.3.2-6, Items 3.2.2.22, 3.2.2.23, and 3.2.2.30 were identified as AMR links for RHR dampers (Quad Cities only), all made of stainless steel. Items 3.2.2.22 and 3.2.2.23 identify air, moisture, and humidity (<212 and >212 °F, respectively) as the external environment, whereas air is identified as the environment for Item 3.2.2.30. In RAI 3.2-5, the staff requested the applicant to explain the effects of the two different temperature environments on the AMR for the dampers. The staff also requested the applicant to provide the basis for not identifying an aging effect for Items 3.2.2.22 and 3.2.2.23, while loss of material was identified for Item 3.2.2.30. By letter dated October 3, 2003, the applicant stated the following.

LRA Table 3.2-2, Aging Management References 3.2.2.22 and 3.2.2.23 pertain to dampener (pulsation dampener) external surfaces. For Aging Management Reference 3.2.2.23, with an environment of "Air, moisture and humidity > 100 °C (212 °F)," the external surfaces of the associated components are normally in excess of 212 °F. EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Revision 3, Appendix E, considers 212 °F as a "threshold temperature" for all materials in an external environment since moisture must be present (in contact with the material) for corrosion to occur. Therefore, components whose external surface temperatures are >212 °F do not require aging management of their external surfaces.

For Aging Management Reference 3.2.2.22, the applicant stated that for Item 3.2.2.22, the external surfaces of the associated components are in contact with the NUREG 1801 "Air, moisture, and humidity <212 °F" environment. These general plant environmental conditions were assumed for the majority of the NUREG 1801 and non-NUREG 1801 system piping and component external surfaces. System piping and component materials under 212 °F exposed to moisture and humidity were evaluated separately for their susceptibility to corrosion degradation. EPRI 1003056, Appendix E, concludes that for an indoor (air, moisture, and humidity <212 °F) ambient environment, stainless steel that is not subjected to frequent moisture can be excluded from further consideration.

Aging Management Reference 3.2.2.30 pertains to dampers (pulsation dampener) internal surfaces. The "air" environment is ambient plant air with humidity to 100% and a temperature less than 212 °F. EPRI 1003056, Appendix D, concludes that pitting and crevice corrosion is a concern for stainless steel in an environment with a potential for concentrating contaminants and when the material is susceptible to becoming wetted.

The staff finds the applicant's response to be acceptable because it has provided adequate detail related to the differences in the dampener's internal and external environmental conditions, and the expected aging effects. Also, the explanation and supporting references provided by the applicant related to the differences in potential aging effects, below and above external temperatures of 212 °F, are found to be acceptable to the staff.

In LRA Table 2.3.2-6, the AMR link, 3.2.2.14, is specified for the external surfaces of carbon steel piping and fittings (Quad Cities only), for which no aging effect was identified in a containment nitrogen environment. In RAI 3.2-6, the staff requested the applicant to provide justification for the determination that a containment nitrogen environment is not conducive to promoting aging degradation. By letter dated October 3, 2003, the applicant stated the following.

The containment nitrogen environment exists inside the drywell and in the suppression chamber air space. These areas are made inert with nitrogen to render the primary containment atmosphere non-flammable by maintaining the oxygen content below 4% by volume during normal station operation. For loss of material corrosion degradation to occur, both moisture and oxygen must be present. For containment nitrogen component external surfaces that are not in contact with an

aqueous environment, Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, EPRI 1003056, Appendix D, does not consider corrosion to be a concern.

The staff finds the applicant's response to be acceptable because external environmental conditions, as stated in the applicant's response relating to the minimal oxygen and moisture level, would not be conducive to the promotion of known aging effects. This is supported adequately by EPRI 1003056, Appendix D, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools," Revision 3.

The aging effects identified in the LRA for the RHR system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the RHR system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Testing of Drywell and Torus Spray Nozzles Program (Section 3.2.2.3.1)
- Periodic Inspection of Components Subject to Moist Environments Program (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

With the exception of Periodic Testing of Drywell and Torus Spray Nozzles Program, these AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system.

After evaluating the applicant's AMR for each of the components in the RHR system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for

the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the RHR system, or to provide an accompanying program to monitor and/or prevent aging. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the RHR system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.7 Low-Pressure Coolant Injection System—Dresden Only

Summary of Technical Information in the Application. The description of the LPCI system can be found in Section 2.3.2.7 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-7. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the LPCI system are described in LRA Section 2.3.2.7 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-7 of the LRA lists individual components of the system including closure bolting, ECCS suction headers, filters/strainers, flow elements, NSR vents or drains, piping and valves, piping and fittings, pumps, restricting orifices, sight glasses, spray nozzles, thermowells, tubing, and valves.

Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking. Low-alloy steel exposed to containment nitrogen is identified as being subject to loss of material due to wear, as well as crack initiation and growth from cyclic loading.

Carbon steel exposed to air, moisture, humidity <100 °C (212 °F), and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel exposed to air and steam up to 320 °C (608 °F) is identified as being subject to wall thinning due to flow-accelerated corrosion. Carbon steel exposed to 25–288 °C (77–550 °F) demineralized water, wet gas, or warm moist air is identified as being subject to loss of material due to general, pitting, and crevice corrosion.

Carbon steel casting exposed to air and steam up to 320 °C (608 °F) is identified as being subject to wall thinning due to flow-accelerated corrosion.

Stainless steel exposed to 25–288 °C (77–550 °F) demineralized water or 288 °C (550 °F) reactor coolant water is identified as being subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress corrosion. Stainless steel exposed to saturated air and warm, moist air is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. No aging effects are identified for stainless steel exposed to air, moisture, and humidity <100 °C (212 °F) and containment nitrogen.

Stainless steel forging exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to crack initiation and growth due to stress-corrosion cracking.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Brass and bronze exposed to air are identified as being subject to plugging of flow orifices and spray nozzles due to general corrosion. No aging effects are identified for brass exposed to containment air.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the LPCI system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Testing of Drywell and Torus Spray Nozzles Program (Section 3.2.2.3.1)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the LPCI system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-7, 3.2-1, and 3.2-2 for the LPCI system. During its review, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI 3.2-4 for the applicant to clarify the information provided in LRA Table 3.2-1, Item 3.2.1.1, regarding the AMR of drywell and suppression chamber spray system nozzles and flow orifices. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.2.2.6 of this SER.

The aging effects identified in the LRA for the LPCI system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the

plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the LPCI system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Testing of Drywell and Torus Spray Nozzles Program (Section 3.2.2.3.1)
- Periodic Inspection of Components Subject to Moist Environments Program (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

With the exception of the Periodic Testing of Drywell and Torus Spray Nozzles Program, these AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system.

After evaluating the applicant's AMR for each of the components in the LPCI system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effect. During its review of Table 3.2-2, the staff determined that additional information was needed to complete its review.

The staff's request for additional information was provided in RAI B.1.23-2 for the applicant to justify the use of the One-Time Inspection Program alone to manage the age-related degradation associated with components in the LPCI system. The staff's discussion of this RAI and its resolution by the applicant are provided in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the LPCI system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.8 Standby Liquid Control System

Summary of Technical Information in the Application. The description of the standby liquid control (SLC) system can be found in Section 2.3.2.8 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-8. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the SLC system are described in LRA Section 2.3.2.8 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-8 of the LRA lists individual components of the system including accumulators, closure bolting, dampeners, NSR vents or drains, piping and valves, piping and fittings, pumps, sight glasses, tanks, thermowells, tubing, and valves.

Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress-corrosion cracking. Low-alloy steel exposed to containment nitrogen is identified as being subject to loss of material due to wear, as well as crack initiation and growth from cyclic loading.

Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion. Carbon steel exposed to sodium pentaborate solution at 21–32 °C (70–90 °F) (24,500 ppm boron) or lubricating oil (with contaminants and/or moisture) is identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion. Carbon steel exposed to treated water or oxygenated water, up to 288 °C (550 °F) is identified as being subject to loss of material due to general pitting and crevice corrosion.

Stainless steel exposed to saturated air or sodium pentaborate solution at 21–32 °C (70–90 °F) (24,500 ppm boron), or saturated air or oxygenated water, up to 288 °C (550 °F) is identified as being subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to 288 °C (550 °F) reactor coolant water or steam is identified as being subject to crack initiation and growth due to stress-corrosion cracking intergranular stress-corrosion cracking. Stainless steel or stainless steel casting exposed to sodium pentaborate solution at 21–32 °C (70–90 °F) (24,500 ppm boron) or oxygenated water, up to 288 °C (550 °F) is identified as being subject to crack initiation and growth due to stress-corrosion cracking. Stainless steel exposed to air, moisture, humidity, and leaking fluids is identified as being subject to loss of material due to corrosion. No aging effects are identified for stainless steel exposed to containment nitrogen.

Brass and bronze exposed to air, moisture, humidity, and leaking fluids are identified as being subject to loss of material due to corrosion.

No aging effects are identified for glass exposed to air, moisture, and humidity <100 °C (212 °F) or sodium pentaborate solution at 21–32 °C (70–90 °F) (24,500 ppm boron).

Aging Management Programs

The following AMPs are utilized to manage aging effects in the SLC system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the SLC system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-8, 3.2-1, and 3.2-2 for the SLC system. On the basis of its review, the staff finds the applicant has identified the appropriate aging effects for the materials and environments associated with the SLC system.

The aging effects identified in the LRA for the SLC system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the SLC system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for the SLC system.

After evaluating the applicant's AMR for each of the components in the SLC system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effect.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the SLC system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.9 Standby Gas Treatment System

Summary of Technical Information in the Application. The description of the standby gas treatment (SBGT) system can be found in Section 2.3.2.9 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-9. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the SBGT system are described in LRA Section 2.3.2.9 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-9 of the LRA lists individual components of the system including closure bolting, duct, doors, closure bolts, equipment frames, fan housing, filters/strainers, flex collars, damper seals, housing and supports, manifolds, NSR vents or drains, piping and valves, seals, tubing, and valves.

Low-alloy steel exposed to outdoor ambient air and air, moisture, and humidity <100 °C (212 °F) is subject to loss of material due to general corrosion and wear.

Carbon steel exposed to air, moisture, humidity, and leaking fluids is identified as being subject to loss of material due to corrosion. Carbon steel exposed to air and steam up to 320 °C (608 °F) is identified as being subject to wall thinning due to flow-accelerated corrosion. Carbon steel exposed internally to moist air and externally to ambient plant air environment is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to outdoor ambient air conditions is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to soil and ground water is identified as being subject to loss of material due to general, pitting, crevice, and MIC.

Stainless steel exposed internally to moist air and externally to ambient plant air environment is identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid is identified as being subject to loss of material due to corrosion

Cast iron exposed internally to moist air and externally to ambient plant air environment is identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion.

Brass and bronze exposed internally to moist air and externally to ambient plant air environment is identified as being subject to loss of material due to general, galvanic, pitting, and crevice corrosion. Brass and bronze exposed to air, moisture, humidity, and leaking fluid are identified as being subject to loss of material due to corrosion. Brass and bronze exposed to saturated air are identified as being subject to loss of material due to pitting and crevice corrosion.

Elastomers, neoprene, and similar materials exposed internally to moist air and externally to ambient plant air environment or moist air is identified as being subject to hardening and loss of strength.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the SBGT system:

- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the SBGT system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-9, 3.2-1, and 3.2-2 for the SBGT system. On the basis of its review, the staff finds the applicant has identified the appropriate aging effects for the materials and environments associated with the SBGT system.

The aging effects identified in the LRA for the SBGT system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the SBGT system:

- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for the SBGT system.

After evaluating the applicant's AMR for each of the components in the SBGT system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified

in LRA Table 3.2-2, the staff verifies that the applicant credited an AMP that is appropriate for the identified aging effect.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the SBT system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.10 Automatic Depressurization System

Summary of Technical Information in the Application. The description of the automatic depressurization system (ADS) can be found in Section 2.3.2.10 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.2-10. The applicant stated that Dresden and Quad Cities design-basis documents treat the ADS relief valves and associated piping, solenoids, pressure controllers, and position switches as components of the main steam system. The components, aging effects, and AMPs are, therefore, provided in LRA Tables 2.3.4-1, 3.4-1, and 3.4-2.

Aging Effects

Components of the ADS are described in LRA Sections 2.3.2.10 and 2.3.4.1 as being within the scope of license renewal and subject to an AMR. The aging effects associated with these mechanical components of the ADS are provided in Section 3.4.2.4.1.1 of this SER.

Aging Management Programs

The AMPs utilized to manage the identified aging effects for the ADS are provided in Section 3.4.2.4.1.1 of this SER.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-10, 2.3.4-1, 3.4-1, and 3.4-2 for the ADS. During its review, the staff determined that additional information was needed to complete its review.

In LRA Table 3.4-2, Item 3.4.2.51, under Discussion, the applicant stated that NUREG-1801 does not address crevice and pitting corrosion of stainless steel valves in a treated water environment. Under Aging Effect/Mechanism of Item 3.4.2.51, however, crack initiation and growth/stress-corrosion cracking and intergranular stress-corrosion cracking are identified as aging effects/mechanisms requiring management in a 288 °C steam environment. In RAI 3.2-8, the staff requested that the applicant clarify whether these valves, identified in Item 3.4.2.51, apply to the ADS system. The staff also requested the applicant to explain the above discrepancies found and to provide the correct AMR review results.

By letter dated October 3, 2003, the applicant stated the following.

The valves in LRA Table 3.4-2, Item 3.4.2.51, are main steam system valves in applications such as main steam line drains, pressure switch and pressure transmitter isolation, and pressure control valve bypass. There are no valves in this component group that apply to the ADS system. Since the ADS system utilizes valves and other components from the main steam system, the Aging Management References for them can be found in Table 2.3.4-1, under the Component Group of "Valves." The specific reference for each particular valve will depend on its materials of construction and internal environment. For example, a main steam line PORV has an internal environment of "288 °C (550 °F) steam" and an Aging Management Reference of 3.1.1.11. The pressure controller shutoff valve for the same PORV has an internal environment of "288 °C (550 °F) reactor coolant water," and an Aging Management Reference of 3.1.1.15. The drywell pneumatic air shutoff valve for the same PORV has an internal environment of "saturated air," and an Aging Management Reference of 3.4.2.53.

The aging effect/mechanism of "crack initiation and growth/stress corrosion cracking and intergranular stress corrosion cracking" and the environment of "288 °C (550 °F) steam" are correct as stated. The text in the "Discussion" column of the Aging Management Reference 3.4.2.51, was intended to explain why this line is a non-NUREG-1801 item, but is inappropriate for the attributes listed. The text should have read, "NUREG-1801, Chapter VIII, does not address stainless steel components in a 550 °F steam environment.

The staff has reviewed the above aging management references provided by the applicant for the ADS valves, and finds them acceptable because they provided adequate detail to explain how the AMR of the ADS components is performed. The staff also finds the applicant's response provided adequate detail to clarify the clerical error made in Aging Management Reference 3.4.2.51, and is, therefore, acceptable.

The aging effects identified in the LRA for the ADS are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The staff's evaluation of the AMPs utilized to manage the aging effects for the ADS are provided in Section 3.4.2.4.1.2 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the ADS will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.2.2.4.11 Anticipated Transient Without Scram System

Summary of Technical Information in the Application. The description of the anticipated transient without scram (ATWS) system can be found in Section 2.3.2.11 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA

Table 2.3.2-11. The components, aging effects, and AMPs are provided in LRA Tables 3.2-1 and 3.2-2.

Aging Effects

Components of the ATWS system are described in LRA Section 2.3.2.11 as being within the scope of license renewal and subject to an AMR. Table 2.3.2-11 of the LRA lists individual components of the system including closure bolting, piping and fittings, and valves.

Low-alloy steel exposed to air, moisture, humidity, and leaking fluids is identified as being subject to loss of material due to general corrosion, as well as crack initiation and growth due to cyclic loading stress corrosion cracking.

Carbon steel exposed to air, moisture, and humidity <100 °C (212 °F) is identified as being subject to loss of material due to general corrosion.

Carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel forging exposed to 25–288 °C (77–550 °F) demineralized water is identified as being subject to wall thinning due to flow-accelerated corrosion.

Stainless steel and stainless steel casting exposed to 25–288 °C (77–550 °F) demineralized water are identified as being subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. No aging effects are identified for stainless steel exposed to air, moisture, and humidity <100 °C (212 °F).

Aging Management Programs

The following AMPs are utilized to manage aging effects in the ATWS system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)

A description of these AMPs is provided in Appendix B of the LRA. The applicant stated that the effects of aging associated with the components of the ATWS system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in LRA Tables 2.3.2-11, 3.2-1, and 3.2-2 for the ATWS system. During its review, the staff determined that additional information was needed to complete its review.

In LRA Table 2.3.2-11, Item 3.2.1.12 is identified as an AMR link for valves in the ATWS system. The aging effect/mechanism identified for Item 3.2.1.12 is wall thinning due to flow-accelerated corrosion, with Flow-Accelerated Corrosion (B.1.11) identified as an AMP. The applicant identified exceptions to flow-accelerated corrosion in LRA Section 3.2.1.2.1, where it states the following.

Flow accelerated corrosion is an applicable aging mechanism for the Quad Cities HPCI steam line drains. However, carbon steel components in the ATWS, isolation condenser, core spray, LPCI (Dresden only), RHR (Quad Cities only), primary containment and suppression pool piping, HPCI (except as previously noted) and RCIC (Quad Cities only) systems are not susceptible to flow accelerated corrosion and do not require aging management.

In RAI 3.2-9, the staff requested that the applicant clarify the above discrepancy for the AMR of valves in the ATWS system, and verify that the aging effect/mechanism of wall thinning due to flow-accelerated corrosion, as addressed in Item 3.2.1.12, is applicable to the ATWS system.

By letter dated October 3, 2003, the applicant stated the following.

All of the ATWS system valves are installed in piping associated with reactor vessel pressure and level process instrumentation. The valves are used to isolate, vent, drain, calibrate, and pre-pressurize these instruments. There is no flow in the process lines associated with these instruments; therefore, wall thinning due to flow-accelerated corrosion is not an applicable aging effect/mechanism for the ATWS system valves. This was not a discrepancy in the LRA. The ATWS system valves are emergency core cooling system valves that have the same component group-material-environment as in NUREG-1801, V.D2.3-a. NUREG-1801, V.D2.3-a identifies an aging effect/mechanism of "Wall thinning/Flow-accelerated corrosion." The ATWS valves were included in the SRP line for V.D2.3-a to be in alignment with NUREG-1801, but, since there is no flow in the process lines associated with them, an exception was taken.

The staff finds the applicant has provided adequate information and detail related to the type, location, and function of the ATWS system valves identified in LRA Table 2.3.2-11, Item 3.2.1.12, and has adequately explained why the conditions necessary to promote flow-accelerated corrosion do not exist at the pertinent valve locations. This is acceptable to the staff. For more information on the exception taken by Dresden and Quad Cities on flow-accelerated corrosion, reference is made to the discussion provided in Section 3.2.2.2.7 of this SER.

The aging effects identified in the LRA for the ATWS system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the ATWS system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for the ATWS system. These AMPs are evaluated in Sections 3.0.3.2, 3.0.3.3, 3.0.3.4, 3.0.3.5, and 3.0.3.10, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the ATWS system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in LRA Table 3.2-1, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.2-2, the staff verifies that the applicant credited an AMP that is appropriate for the identified aging effect.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the ATWS system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3 Auxiliary Systems

This section addresses the aging management of the components of the auxiliary systems group. The following systems make up the auxiliary systems group and are described in this section:

- Refueling equipment system
- Shutdown cooling system (Dresden only)
- Control rod drive hydraulic system
- Reactor water cleanup system
- Fire protection system
- Emergency diesel generator and auxiliaries system
- HVAC—Main Control Room
- HVAC—Reactor Building
- Emergency core cooling system corner room HVAC
- Station blackout building HVAC
- Station blackout system (diesels and auxiliaries)
- Diesel generator cooling water system
- Diesel fuel oil system
- Process sampling system
- Carbon dioxide system
- Service water system
- Reactor building closed cooling water system
- Turbine building closed cooling water system
- Demineralized water makeup system
- Residual heat removal service water system (Quad Cities only)
- Containment cooling service water system (Dresden only)
- Ultimate heat sink

- Fuel pool cooling and filter demineralizer system (Dresden only)
- Plant heating system
- Containment atmosphere monitoring system
- Nitrogen containment atmosphere dilution system
- Drywell nitrogen inerting system
- Safe shutdown makeup pump system (Quad Cities only)

As discussed in Section 3.0.1 of this SER, the components in each of the systems are described in the LRA tables. LRA Table 3.3-1 consists of auxiliary system components that are evaluated in the GALL Report. LRA Table 3.3-2-X lists all of the components in each system, regardless of whether they are addressed in the GALL Report. For those system components that are addressed in the GALL Report, LRA Table 3.3-2-X refers to LRA Table 3.3-1 for additional information.

3.3.1 Summary of Technical Information in the Application

In LRA Section 3.3, the applicant described its AMRs for the auxiliary systems group. The description of the systems that comprise the auxiliary systems group can be found in LRA Section 2.3.3. The passive, long-lived components in these systems that are subject to an AMR are identified in LRA Tables 2.3.3-1 through 2.3.3-28.

The applicant's AMRs included an evaluation of plant-specific and industry operating experience. The plant-specific evaluation included reviews of condition reports and discussions with appropriate site personnel to identify aging effects that require management. These reviews concluded that the aging effects requiring management, based on plant-specific operating experience, were consistent with the aging effects identified in GALL.

The applicant's review of industry operating experience included a review of operating experience through 2002. The results of this review concluded that the aging effects requiring management, based on industry operating experience, were consistent with the aging effects identified in GALL.

The applicant's ongoing review of plant-specific and industry-wide operating experience is conducted in accordance with the Exelon Operating Experience Program.

3.3.2 Staff Evaluation

In Section 3.3 of the LRA, the applicant described its AMR for the auxiliary systems at Exelon. The staff reviewed LRA Section 3.3 to determine whether the applicant had provided sufficient information to demonstrate that the effects of aging will be adequately managed so that the component intended functions will be maintained consistent with the CLB throughout the period of extended operation, in accordance with the requirements of 10 CFR 54.21(a)(3), for the auxiliary system components that are determined to be within the scope of license renewal and subject to an AMR.

The applicant referenced the GALL Report in its AMR. The staff has previously evaluated the adequacy of the aging management of auxiliary system components for license renewal, as documented in the GALL Report. Thus, the staff did not repeat its review of the matters described in the GALL Report, except to ensure that the material presented in the LRA was

applicable, and to verify that the applicant had identified the appropriate programs as described and evaluated in the GALL Report. The staff evaluated those aging management issues recommended for further evaluation in the GALL Report. The staff also reviewed aging management information submitted by the applicant that was different from that in the GALL Report or was not addressed in the GALL Report. Finally, the staff reviewed the USAR Supplement to ensure that it provided an adequate description of the programs credited with managing aging for the auxiliary system components.

Table 3.3-1 below provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Section 3.3 that are addressed in the GALL Report.

Table 3.3-1. Summary of Aging Management for Auxiliary Systems Evaluated in Chapter VII of the GALL Report

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Components in spent fuel pool cooling and cleanup	Loss of material due to general, pitting, and crevice corrosion	Water Chemistry; One-Time Inspection	Water Chemistry Program; One-Time Inspection Program	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.3.2.2.1 below).
Linings in spent fuel pool cooling and cleanup system; seals and collars in ventilation systems	Hardening, cracking, and loss of strength due to elastomer degradation; loss of material due to wear	Plant specific	Periodic Inspection of Ventilation System Elastomers Program	Consistent with GALL. GALL recommends further evaluation (see Section 3.3.2.2.2 below).
Components in load handling, chemical and volume control system (PWR); reactor water cleanup and shutdown cooling systems (older BWR)	Cumulative fatigue damage	TLAA, evaluated in accordance with 10 CFR 54.21(c)	TLAA	GALL recommends further evaluation (see Section 3.3.2.2.3 below).
Heat exchangers in reactor water cleanup system (BWR); high pressure pumps in chemical and volume control system (PWR)	Crack initiation and growth due to SCC or cracking	Plant specific	None	Applicant has determined that heat exchangers in reactor water cleanup system (BWR) are not in scope of license renewal (see Section 3.3.2.2.4 below).
Components in ventilation systems, diesel fuel oil system, and emergency diesel generator systems; external surfaces of carbon steel components	Loss of material due to general, pitting, and crevice corrosion and MIC	Plant specific	Bolting Integrity Program; Open-Cycle Cooling Water System Program; Fire Protection Program; Buried Piping and Tanks Inspections Program	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.3.2.2.5 below).
Components in reactor coolant pump oil collection system	Loss of material due to galvanic, general, pitting, and crevice corrosion	One-Time Inspection	Not applicable.	Not applicable.

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Diesel fuel oil tanks in diesel fuel oil system; emergency diesel generator system	Loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling	Fuel Oil Chemistry; One-Time Inspection	Fuel Oil Chemistry Program; One-Time Inspection Program	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.3.2.2.7 below).
Piping, pump casing, and valve body and bonnets in shutdown cooling system (older BWR)	Loss of material due to pitting and crevice corrosion	Water Chemistry; One-Time Inspection	Water Chemistry Program; One-Time Inspection Program	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.3.2.2.1 below).
Neutron absorbing sheets in spent fuel storage racks	Reduction of neutron absorbing capacity and loss of material due to general corrosion (Boral, boron steel)	Plant specific	Water Chemistry Program	These components are scoped under structures and are addressed in Section 3.5.2.4.2.2 of this SER.
New fuel rack assembly	Loss of material due to general, pitting, and crevice corrosion	Structures Monitoring	Structures Monitoring Program	These components are scoped under structures and are addressed in Section 3.5.2.4.2.2 of this SER.
Spent fuel storage rack and valves in spent fuel pool cooling and cleanup	Crack initiation and growth due to SCC	Water Chemistry	Water Chemistry Program	Consistent with GALL (see Section 3.3.2.1 below).
Neutron absorbing sheets in spent fuel storage racks	Reduction of neutron absorbing capacity due to Boraflex degradation	Boraflex Monitoring	Boraflex Monitoring Program	These components are scoped under structures and are addressed in Section 3.5.2.4.2.2 of this SER.
Closure bolting and external surfaces of carbon steel and low-alloy steel components	Loss of material due to boric acid corrosion	Boric Acid Corrosion	Not applicable	The environment identified in GALL is not applicable.
Components in or serviced by closed-cycle cooling water system	Loss of material due to general, pitting, and crevice corrosion and MIC	Closed-Cycle Cooling Water System	Closed-Cycle Cooling Water System Program	Consistent with GALL (see Section 3.3.2.1 below).
Cranes, including bridge and trolleys, and rail system in load handling system	Loss of material due to general corrosion and wear	Overhead Heavy Load and Light Load Handling Systems	Inspection of Overhead Heavy Load and Light Load (related to refueling) Handling Systems Program	Consistent with GALL, with exception (see Section 3.3.2.1 below).
Components in or serviced by open-cycle cooling water systems	Loss of material due to general, pitting, crevice, and galvanic corrosion, MIC, and biofouling; buildup of deposit due to biofouling	Open-Cycle Cooling Water System	Open-Cycle Cooling Water System Program	Consistent with GALL with exceptions (see Section 3.3.2.1 below).
Buried piping and fittings	Loss of material due to general, pitting, and crevice corrosion and MIC	Buried Piping and Tanks Surveillance or Buried Piping and Tanks Inspection	Buried Piping and Tanks Inspection Program	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.3.2.2.10 below).
Components in compressed air system	Loss of material due to general and pitting corrosion	Compressed Air Monitoring	Compressed Air Monitoring Program	Consistent with GALL (see Section 3.3.2.1 below).

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Components (doors and barrier penetration seals) and concrete structures in fire protection system	Loss of material due to wear; hardening and shrinkage due to weathering	Fire Protection	Fire Protection Program	Exceptions taken to GALL on fire door at a frequency of every operating cycle under the CLB rather than the bi-monthly frequency recommended in GALL (see Section 3.3.2.3.3 below).
Components in water-based fire protection system	Loss of material due to general, pitting, crevice, and galvanic corrosion, MIC, and biofouling	Fire Water System	Fire Water System	Consistent with GALL/ISG (see Section 3.3.2.3.4 below).
Components in diesel fire pump fuel system	Loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling	Fire Protection	Fire Protection Program	Exception taken to GALL on trending of test results (see Section 3.3.2.3.3 below).
Tanks in diesel fuel oil system	Loss of material due to general, pitting, and crevice corrosion	Aboveground Carbon Steel Tanks	None	There are no above-ground carbon steel tanks in the diesel fuel oil system.
Closure bolting	Loss of material due to general corrosion; crack initiation and growth due to cyclic loading and SCC	Bolting Integrity	Bolting Integrity Program	Consistent with GALL with exceptions (see Section 3.3.2.1 below).
Components in contact with sodium pentaborate solution in standby liquid control system (BWR)	Crack initiation and growth due to SCC	Water Chemistry	Water Chemistry Program	These components are scoped under ESF and are addressed in Section 3.2.4.8.2 of this SER.
Components in reactor water cleanup system	Crack initiation and growth due to SCC and IGSCC	Reactor Water Cleanup System Inspection	BWR Reactor Water Cleanup System Program	Consistent with GALL with exceptions (see Section 3.3.2.1 below).
Components in shutdown cooling system (older BWR)	Crack initiation and growth due to SCC	BWR Stress Corrosion Cracking; Water Chemistry	BWR Stress Corrosion Cracking Program; Water Chemistry Program	Consistent with GALL with exceptions (see Section 3.3.2.1 below).
Components in shutdown cooling system (older BWR)	Loss of material due to pitting and crevice corrosion and MIC	Closed-Cycle Cooling Water System	Closed-Cycle Cooling Water System Program; Flow-Accelerated Corrosion Program	Consistent with GALL (see Section 3.3.2.1 below).
Components (aluminum bronze, brass, cast iron, cast steel) in open-cycle and closed-cycle cooling water systems; ultimate heat sink	Loss of material due to selective leaching	Selective Leaching of Materials	Selective Leaching of Materials Program	Consistent with GALL with exceptions (see Section 3.3.2.1 below).

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Fire barriers, walls, ceilings, and floors in fire protection system	Concrete cracking and spalling due to freeze-thaw, aggressive chemical attack, and reaction with aggregates; loss of material due to corrosion of embedded steel	Fire Protection; Structures Monitoring	Fire Protection Program; Structures Monitoring Program	These components are scoped under structures and are addressed in Sections 3.5.2.4.1 and 3.5.2.4.2 of this SER. Exceptions taken to GALL on concrete fire barrier inspection frequency of every five years under ACI 349.3R-96 concrete structures (see Section 3.3.2.3.3 below).

The staff's review of the auxiliary systems for the Dresden and Quad Cities LRA is contained within four sections of this SER. Section 3.3.2.1 is the staff review of components in the auxiliary systems that the applicant indicated are consistent with GALL and do not require further evaluation. Section 3.3.2.2 is the staff review of components in the auxiliary systems that the applicant indicated are consistent with GALL and for which GALL recommends further evaluation. Section 3.3.2.3 is the staff evaluation of AMPs that are specific to the auxiliary systems group. Section 3.3.2.4 contains an evaluation of the adequacy of aging management for components in each system in the auxiliary systems group and includes an evaluation of components in the auxiliary systems that the applicant indicated are not in GALL.

3.3.2.1 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL does not recommend further evaluation, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation. The staff also sampled component groups to determine whether the applicant had properly identified those component groups in GALL that were not applicable to its plants. The staff also identified several areas where additional information or clarification was needed.

On the basis of its review, the staff has verified the applicant's claim of consistency with the GALL report. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, For Which GALL Recommends Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL recommends further evaluation, the staff reviewed the applicant's evaluation to determine whether it adequately addressed the issues for which GALL recommended further evaluation. In addition, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation.

The GALL Report indicates that further evaluation should be performed for the aging effects discussed in the following sections.

3.3.2.2.1 Loss of Material Due to General, Pitting, and Crevice Corrosion

Loss of material due to pitting and crevice corrosion could occur in the piping, filter housing, valve bodies, and shell and nozzles of the ion exchanger in the spent fuel pool cooling and cleanup system (BWR) and in the piping/fitting, pump casing, and valves, and their related components, in the shutdown cooling system (older BWR). The Water Chemistry Program relies on monitoring and control of reactor water chemistry, based on the EPRI guidelines outlined in BWRVIP-29 (TR-103515) for water chemistry in BWRs, to manage the effect of loss of material from pitting or crevice corrosion. However, high concentrations of impurities at crevices and locations of stagnant flow conditions could cause pitting or crevice corrosion. Therefore, verification of the effectiveness of the Chemistry Control Program should be performed to ensure that corrosion is not occurring. The GALL Report recommends further evaluation of programs to manage loss of material from pitting and crevice corrosion to verify the effectiveness of the Water Chemistry Program. A one-time inspection of select components at susceptible locations is an acceptable method to ensure that corrosion is not occurring and that the component intended functions will be maintained during the period of extended operation.

The staff reviewed the applicant's proposed program to ensure that corrosion is not occurring and that the component intended functions will be maintained during the period of extended operation. If the applicant proposed a one-time inspection of select components at susceptible locations to ensure that corrosion is not occurring, the staff verified that the applicant's selection of susceptible locations was based on the severity of conditions, time of service, and lowest design margin. The staff also verified that the proposed inspection would be performed using techniques similar to ASME Code and ASTM standards, including visual, ultrasonic, and surface techniques.

In Section 3.3.1.1.1 of the LRA, the applicant stated that the One-Time Inspection Program (B.1.23) will be used to perform inspection of the Dresden fuel pool cooling and filter demineralizer system to confirm the effectiveness of the Water Chemistry Program (B.1.2). The one-time inspection will be either a visual or ultrasonic examination of a stainless steel component or piping for general, pitting, and crevice corrosion. The Water Chemistry Program and the One-Time Inspection Program are evaluated in Sections 3.0.3.2 and 3.0.3.5, respectively, of this SER.

The applicant also stated, in Section 3.3.1.1.2 of the LRA, that an inspection of selected components exposed to a stagnant flow water environment will be conducted in accordance with the One-Time Inspection Program (B.1.23). The inspection of selected components will verify the effectiveness of the Chemistry Control Program to manage loss of material due to general, pitting, and crevice corrosion in low flow or stagnant flow areas by ensuring that significant degradation is not occurring and that the component intended function will be maintained during the extended period of operation. Examinations will be conducted on carbon and stainless steel components in areas where stagnant flow is typically present, but flow occasionally occurs. Such flow will replenish the oxygen supply. Inspections will be conducted on the HPCI torus suction check valves, the HPCI booster pumps, and the CRD scram valves. These components were selected to provide representative samples of the aging effects seen in

the shutdown cooling system. The carbon steel HPCI torus suction check valves are exposed to torus water, while the carbon steel HPCI booster pumps and the stainless steel CRD scram valves are exposed to CST water. Both will undergo a visual exam. This inspection is also credited for those components exposed to reactor coolant, which are outside NUREG-1801, Chapter IV.C1.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to pitting and crevice corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2.2 Hardening and Cracking or Loss of Strength Due to Elastomer Degradation or Loss of Material Due to Wear

The GALL Report recommends further evaluation of programs to manage the hardening and cracking due to elastomer degradation of valves in the spent fuel pool cooling and cleanup system. The GALL Report also recommends further evaluation of programs to manage the hardening and loss of strength due to elastomer degradation of the collars and seals of the duct and the elastomer seals of the filters in the control room area, auxiliary and radwaste areas, and primary containment heating and ventilation systems, as well as the collars and seals of the duct in the diesel generator building ventilation system. The GALL Report also recommends further evaluation of programs to manage the loss of material due to wear of the collars and seals of the duct in the ventilation system. The staff reviewed the applicant's proposed programs to ensure that an adequate program will be in place for the management of these aging effects.

In Section 3.3.1.1.5 of the LRA, the applicant credited the Periodic Inspection of Ventilation System Elastomers Program (B.2.3) for managing hardening and cracking or loss of strength due to elastomer degradation or loss of material due to wear for components in the control room, emergency diesel generator building, station blackout diesel generator building, and reactor building (using the requirements of the containment ventilation) ventilation system elastomers. The Periodic Inspection of Ventilation System Elastomers Programs is evaluated in Section 3.0.3.17 of this SER.

The applicant indicated, in item 3.3.1.2 of Table 3.3-1, that the elastomer linings of the valves in the fuel pool cooling and demineralizer system evaluated in NUREG-1801, Chapter VII.A4, are not within the scope of license renewal.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of hardening and cracking or loss of strength due to elastomer degradation or loss of material due to wear, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2.3 Cumulative Fatigue Damage

Fatigue is a TLAA, as defined in 10 CFR 54.3. TLAA's are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The staff reviewed the evaluation of this TLAA in Section 4.3 of this SER, following the guidance in Section 4.3 of the SRP-LR.

Cumulative fatigue damage of auxiliary system piping and load handling cranes is a TLAA, as defined in 10 CFR 54.3. The applicant stated that the RWCU pumps identified by NUREG-1801, Chapters VII E3.2-b and VII E3.2-c are not in the scope of license renewal and are not evaluated as a TLAA. The applicant further stated that cumulative fatigue damage of auxiliary system piping and load handling cranes is required to be evaluated in accordance with 10 CFR 54.21(c)(1). The staff's evaluation of the TLAA for auxiliary system piping outside the RCPB is addressed in Section 4.3.3.2 of this SER. The staff's evaluation of the TLAA for load handling cranes is addressed in Section 4.7.1 of this SER.

3.3.2.2.4 Crack Initiation and Growth Due to Cracking or Stress-Corrosion Cracking

The GALL Report recommends further evaluation of programs to manage crack initiation and growth due to SCC that could occur in the regenerative and nonregenerative heat exchanger components in the reactor water cleanup system (BWR). The applicant stated that heat exchangers in the reactor water cleanup system are not in scope of license renewal. The staff verified that this is the case. On the basis of its review, the staff finds that the applicant has adequately evaluated the management of crack initiation and growth due to cracking or SCC for components in the auxiliary systems, as recommended in the GALL Report.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of crack initiation and growth due to SCC, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2.5 Loss of Material Due to General, Microbiologically Influenced, Pitting, and Crevice Corrosion

The GALL Report recommends further evaluation of programs to manage the loss of material due to general, pitting, and crevice corrosion of the piping and filter housing and supports in the control room area, the auxiliary and radwaste areas, and the primary containment heating and ventilation systems; the piping of the diesel generator building ventilation system; and the aboveground piping and fittings, valves, and pumps in the diesel fuel oil system and the diesel engine starting air, combustion air intake, and combustion air exhaust subsystems in the emergency diesel generator system. The GALL Report also recommends further evaluation of programs to manage the loss of material due to general, pitting, and crevice corrosion and MIC of the duct fittings, access doors, and closure bolts, equipment frames, and housing of the duct; pitting and crevice corrosion of the heating/cooling coils of the air handler heating/cooling; and general corrosion of the external surfaces of all carbon steel structures and components, including bolting exposed to operating temperatures less than 100 °C (212 °F) in the ventilation systems. The staff reviewed the applicant's proposed programs to ensure that they will be adequate for the management of these aging effects.

The applicant has identified loss of material due to general, pitting, and crevice corrosion and MIC as an AERM for many of the above GALL items and numerous components that are not addressed in GALL. The applicant uses the following AMPs to manage this AERM:

- Structures Monitoring Program (B.1.30)
- Bolting Integrity Program (B.1.12)
- One-Time Inspection—Compressed Gas Program (B.1.23)
- Heat Exchanger Testing and Inspection Program (B.2.6)
- One-Time Inspection—Ventilation System (B.2.6)
- Open-Cycle Cooling Water System Program (B.1.13)
- Buried Piping and Tanks Inspection Program (B.1.25)
- Fire Protection Program (B.1.18)
- One-Time Inspection—NSR/SR Inspection Program (B.1.23)

These AMPs are reviewed in Sections 3.0.3.5, 3.0.3.6, 3.0.3.10, 3.0.3.12, 3.0.3.14, 3.0.3.16, and 3.3.2.3.3, respectively, of this SER. In its October 3, 2003, response to RAI 3.3-7, the applicant provided additional information related to how these AMPs are used to manage the loss of material. This additional information is discussed in Section 3.3.2.5.7 of the SER and in the above SER sections related to the AMPs.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to general, pitting, and crevice corrosion and MIC, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2.6 Loss of Material Due to General, Galvanic, Pitting, and Crevice Corrosion

The GALL Report recommends further evaluation of programs to manage the loss of material due to general, galvanic, pitting, and crevice corrosion of tanks, piping, valve bodies, and tubing in the reactor coolant pump oil collection system within the Fire Protection Program. This is not applicable to either Dresden or Quad Cities.

3.3.2.2.7 Loss of Material Due to General, Pitting, Crevice, and Microbiologically Influenced Corrosion and Biofouling

The GALL Report recommends further evaluation of programs to manage loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling of the internal surface of tanks in the diesel fuel oil system and due to general, pitting, and crevice corrosion and MIC of the tanks of the diesel engine fuel oil system in the emergency diesel generator system. The GALL's Fuel Oil Chemistry Program relies on monitoring and control of fuel oil contamination in accordance with the guidelines of ASTM Standards D4057, D1796, D2709, and D2276 concerning loss of material due to corrosion or biofouling. Corrosion or biofouling may occur at locations where contaminants accumulate. Verification of the effectiveness of the Fuel Oil Chemistry Program should be performed to ensure that corrosion/biofouling is not occurring and that the component intended function will be maintained during the period of extended operation.

The applicant stated that an inspection will be performed in accordance with the One-Time Inspection Program (B.1.23) to verify the effectiveness of the Fuel Oil Chemistry Program (B.1.21) to prevent loss of material. A UT examination of the lower portion of one carbon steel underground fuel oil storage tank and one day tank at each facility will be performed. The applicant clarified that the Quad Cities Unit I underground fuel oil storage tank is constructed of fiberglass; aging management for loss of material is discussed separately as a non-GALL item.

The applicant further stated that activities to prevent biofouling of the fuel oil systems are performed in accordance with the Fuel Oil Chemistry Program (B.1.21). Preventive activities under that program include routine sampling to provide assurance that contaminant levels, including water, are kept at acceptable levels for fuel oil system components, and the addition of a biocide to the underground fuel oil storage tanks with each new fuel delivery. The Fuel Oil Chemistry and One-Time Inspection Programs are evaluated in Sections 3.0.3.10 and 3.0.3.11, respectively, of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2.8 Reduction of Neutron-Absorbing Capacity and Loss of Material Due to General Corrosion

Reduction of neutron-absorbing capacity and loss of material due to general corrosion could occur in the neutron-absorbing sheets of the spent fuel storage rack in the spent fuel storage system. The GALL Report recommends further evaluation of programs to manage these aging effects. The staff reviewed the applicant's proposed program to ensure that an adequate program will be in place for the management of these aging effects.

In the LRA, these components are scoped under the structures. The staff's evaluation of other Class 1 structures is documented in Section 3.5.2.4.2.2 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of reduction of neutron-absorbing capacity and loss of material due to general corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.2.9 Loss of Material Due to General, Pitting, Crevice, and Microbiologically Influenced Corrosion

Loss of material due to general, pitting, and crevice corrosion and MIC could occur in the underground piping and fittings in the open-cycle cooling water system (service water system) and in the diesel fuel oil system. The GALL's Buried Piping and Tanks Inspection Program

relies on industry practice, frequency of pipe excavation, and operating experience to manage the effects of loss of material from general, pitting, and crevice corrosion and MIC. The staff reviews the effectiveness of the Buried Piping and Tanks Inspection Program, including its inspection frequency and operating experience, to ensure that loss of material is not occurring and that the component intended function will be maintained during the period of extended operation.

Section 3.3.1.1.4 of the LRA states that the applicant's Buried Piping and Tanks Inspection Program (B.1.25) relies on industry practice, frequency of pipe excavations, and operating experience to manage the aging of buried components. The applicant stated that since Dresden and Quad Cities infrequently expose buried components during yard excavation activities, additional testing and inspection activities are credited. The applicant stated that with the identified exceptions and enhancements, the AMP is consistent with GALL. The evaluation of the Buried Piping and Tanks Inspection Program (B.1.25) is documented in Section 3.0.3.12 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to general, pitting, and crevice corrosion and MIC, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.3 Aging Management Programs for Auxiliary System Components

The applicant credits 23 AMPs (listed below) to manage the aging effects associated with components in the auxiliary systems. Seventeen of the AMPs are credited to manage aging for components in other system groups (common AMPs), while six AMPs are credited to manage aging only for auxiliary system components. The staff's evaluation of the common AMPs credited with managing aging for the auxiliary system components is provided in Section 3.0.3 of this SER. These common AMPs are listed below, along with their section numbers.

- Inservice Inspection Program (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- Aboveground Carbon Steel Tanks Program (Section 3.0.3.9)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)
- 10 CFR Part 50, Appendix J Inspection Program (Section 3.0.3.13)
- Structures Monitoring Program (Section 3.0.3.14)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.15)
- Lube Oil Monitoring Program (Section 3.0.3.16)

- Periodic Inspection of Ventilation System Elastomers Program (Section 3.0.3.17)

The staff's evaluation of the seven auxiliary system AMPs is provided in the following sections.

3.3.2.3.1 Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems (B.1.15)

Summary of Technical Information in the Application. The applicant's overhead load handling systems inspection program is discussed in LRA Section B.1.15, "Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems." The applicant states that, with enhancements, the program is consistent with the GALL program XI.M23, "Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems" with the exception that the applicant does not provide for tracking the magnitude and number of lifts because administrative controls are implemented to ensure that only allowable loads are handled and fatigue of structural elements is not expected. The applicant also states that the enhancements will provide for specific inspections for rail wear and proper crane travel on rails, and the program will provide for specific inspections for corrosion of crane structural components.

The AMP is credited with managing aging due to the loss of material of bridge and trolley crane components for the refueling systems.

The applicant claims the operating experience indicates that the program has been successful in managing aging of structural components of overhead heavy load and light load (related to refueling) handling systems so that intended functions have been maintained.

In its LRA, the applicant concludes that the of overhead heavy load and light load (related to refueling) handling systems aging management program provides reasonable assurance that loss of material aging effects are adequately managed so that the intended functions of crane structural components within the scope of license renewal are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.15, "Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems," the applicant described its AMP to manage aging in bridge and trolley cranes structural components. The LRA stated that this AMP, with enhancements, is consistent with the GALL AMP, XI.M23, "Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems" with an exception regarding a provision for tracking the magnitude and number of lifts because administrative controls are implemented to ensure that only allowable loads are handled and fatigue of structural elements is not expected. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the exception and its justification to determine whether the AMP, remains adequate to manage the aging effects for which it is credited. The staff reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. In addition, the staff determined whether the applicant properly applied the GALL program to its facility.

LRA Table 3.3-1, Ref No 3.3.1.14 identifies the Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems (B.1.15) as the applicable aging management program to manage loss of material due to general corrosion and wear in the refueling system cranes

during the period of extended operation. This AMP, with enhancements, claims consistency with the Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems program, XI.M23 in NUREG-1801 with the exception that it does not review the number and magnitude of lifts as in element 3 of the GALL report AMP XI.M23. The LRA states the reason for the exception is because administrative controls assure "... that only allowable loads are handled and fatigue failure of structural elements is not expected." The AMP also states that a time-limited aging analysis concludes that there are no fatigue concerns for the period of extended operation. By letter dated August 4, 2003, the staff requested, in RAI B.1.15, the applicant to provide justifications to demonstrate how the administrative control is adequate in lieu of tracking of the number and magnitude of lifts as in element 3 of GALL report AMP XI.M23.

Furthermore, the description of B.1.15 also states that the enhancements, specific inspections for rail wear and proper crane travel on rails as well as specific inspections for corrosion of crane structural components, are scheduled to be implemented prior to the period of extended operation. This Commitment #15 of Appendix A in this SER. In the same letter mentioned above, the applicant is requested to provide an explanation of the statement in the Operating Experience section of B.1.15 which indicate that this program has been successful in the past at Dresden and Quad Cities if the proposed enhancements to the AMP (which are the primary attributes of XI.M23) have not yet been implemented. In addition, the staff also requested the applicant to provide a statement to clarify that these enhanced inspections will be conducted on a routine basis as in element 4 of the GALL report AMP XI.M23, and to provide an explanation of how the conclusion that there are no fatigues concerns for the period of extended operation can be achieved without a fatigue analysis that considers the number and magnitude of lifts.

In its response dated October 3, 2003, the applicant specifies the justification for the adequacy of administrative controls in lieu of tracking the number and magnitude of lifts for the subject cranes in terms of the following reasons:

- (a) The number and magnitude of lifts that are anticipated for any crane is significantly below the design limits. See section 4.7.1 of the LRA.
- (b) Various industry documents were used to develop procedures governing crane inspections at each site, including Vendor Manuals, OSHA Chapter XVII, Title 29 Part 1910.179, and ASME/ANSI B30.2, B30.10, B30.11, B30.16 Crane Standards, NUREG-0612, Control of Heavy Loads at Nuclear Power Plants, and 10CFR50.65, Maintenance Rule
- (c) Crane inspections and functional checks are periodically performed in accordance with the above inspection procedures by qualified crane/structural steel inspectors
- (d) Crane operating procedures require crane inspection prior to each use
- (e) Crane operating procedures ensure that crane loading does not exceed crane capacities
- (f) The reactor building overhead crane has the largest capacity of any in-scope crane at each site. This crane was designed to CMAA-70 Class A1 and is compatible with the requirements of the Occupational Safety and Health Act of 1970, as amended in 1971, as well as ANSI B30.2.0.
- (g) The capacities of the cranes other than the reactor building overhead crane are relatively small. Consequently, any associated fatigue-related degradation of crane components would be identified via periodic inspections prior to loss of crane function.

The applicant further stated that enhancements to the Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems program will include the addition of

inspections for rail wear and proper crane travel on rails as well as for corrosion of crane structural components. The existing program includes visual inspections of various crane components. The applicant clarified that the statement in the Operating Experience section of LRA Section B.1.15 indicating that the program has been successful in the past applies to the existing program. Crane inspections under the existing program are routinely performed. Inspections under the enhanced program will also be routinely performed. The applicant agreed that a statement should have been added to the enhancements section of LRA Section B.1.15 indicating that the subject crane inspections will be routinely performed.

The LRA Section B.1.15 conclusion that there are no fatigue concerns for the reactor building overhead cranes for the period of extended operation is valid despite that fact that there was no fatigue analysis. The applicant stated that the basis for this conclusion is provided in LRA Section 4.7.1, Reactor Building Crane Load Cycles, which concludes that fatigue life is not significant to the operation of the reactor building overhead crane for the period of extended operation as its projected 60-year cycle estimate is only a fraction of the number of cycles for which the crane was qualified.

On the basis of its review, the staff finds that the applicant's response acceptable because; 1) the seven elements of the administrative procedures that the applicant has provided, 2) the applicant clarified the enhancements section of LRA Section B.1.15 indicating that the subject crane inspections will be routinely performed, and 3) the applicant has shown that fatigue life is not significant to the operation of the reactor building overhead crane for the period of extended operation as its projected 60-year cycle estimate is only a fraction of the number of cycles for which the crane was qualified. All issues related to this RAI B.1.15 is considered resolved.

The staff reviewed the UFSAR supplement in Section 1.15 of Appendix A of the LRA and found that the description of the Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems is consistent with Section B.1.15 of the LRA. The staff finds that the information provided in the UFSAR supplement provides an adequate summary of the program activities as required by 10 CFR 54.21 (d).

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this aging management program and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.3.2.3.2 BWR Reactor Water Cleanup System (B.1.17)

Summary of Technical Information in the Application. The applicant's program for monitoring and controlling reactor water chemistry to reduce the susceptibility of reactor water cleanup (RWCU) piping to stress corrosion cracking (SCC) and intergranular stress corrosion cracking (IGSCC) is discussed in LRA Section B.1.17, "BWR Reactor Water Cleanup System." The applicant stated that the program is consistent with GALL AMP XI.M25, "BWR Reactor Water Cleanup System," with the exception that the specification of water chemistry control is in

accordance with EPRI TR-103515-Revision 2 instead of the earlier EPRI TR-103515. The applicant also stated that LRA Section B.1.2 presents the water chemistry aging management program and the exceptions to the program as specified in GALL. The LRA credits the water chemistry activities to reduce susceptibility to SCC and IGSCC.

The applicant stated that Dresden and Quad Cities have satisfactorily completed all actions requested in NRC GL 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," and have replaced the RWCU system piping with piping that is resistant to IGSCC in accordance with NRC GL 88-01, "NRC Position on Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping." The applicant concluded that inspection of RWCU piping is not required. The applicant stated that operating experience has shown that, since replacing the RWCU system piping with IGSCC-resistant piping, there have been no adverse trends detected in the chemistry program.

The reactor water cleanup system is referenced in LRA Section 3, "Aging Management Review Results." This system-specific aging management program is credited only for the auxiliary systems. In Table 3.3-1, Ref. No. 3.3.1.24, the applicant states that crack initiation and growth due to SCC and IGSCC in components, piping and fittings in the reactor water cleanup system is managed by reactor water cleanup system inspection. No further evaluation is recommended.

In Section B.1.17 of the LRA, the applicant indicated that the BWR Reactor Water Cleanup System AMP has been demonstrated to be capable of managing SCC and IGSCC aging effects in the RWCU piping. The applicant concluded that the BWR Reactor Water Cleanup System AMP provides reasonable assurance that the aging effects will be managed such that the components subject to AMR will continue to perform their intended functions consistent with the CLB during the period of extended operation.

Staff Evaluation. In LRA Section B.1.17, "BWR Reactor Water Cleanup System," the applicant described its AMP to monitor and control reactor water chemistry to reduce the susceptibility of RWCU piping to SCC and IGSCC. The LRA states that this AMP is consistent with GALL AMP XI.M25, "BWR Reactor Water Cleanup System," with an exception regarding the specification of water chemistry control in accordance with EPRI TR-103515-R2 which is the 2000 revision of the 1993 revision of EPRI TR-103515, "BWR Water Chemistry Guidelines," and references the LRA Section B.1.2, "Water Chemistry."

By NRC Aging Management Inspection Information Request Number AMI-15 dated September 30, 2003, the staff requested that an inspection of LRA AMP B.1.17 be included in the NRC Inspection List. The staff noted that the purpose of the inspection was to verify that the criteria delineated in GALL AMP XI.M25 are met for the Dresden and Quad Cities plants so that AMP B.1.17 is consistent with GALL AMP XI.M25 (with the exception of the water chemistry program) as stated by the applicant in AMP B.1.17 in Appendix B of the LRA. In AMP B.1.17, the applicant also stated that the inspection of RWCU piping is not required because Dresden and Quad Cities have satisfactorily completed all actions requested in NRC GL 89-10, and have replaced the RWCU system piping with piping that is resistant to IGSCC in accordance with NRC GL 88-01 (the applicant claimed that this met the GALL AMP XI.M25 criteria of not requiring IGSCC inspection).

Since the applicant stated that the entire RWCU system piping was replaced with IGSCC-resistant piping in accordance with NRC GL 89-10, the staff subsequently requested the applicant to provide the following information to be verified by the NRC Audit-Inspection Team:

(i) Clarify whether the entire RWCU system piping was replaced with IGSCC-resistant material or whether only portions of the RWCU system piping for each plant were replaced.

(ii) Confirm that, if the entire RWCU system piping was replaced, the piping system includes all the RWCU welds inboard and outboard of the second isolation valves. Confirm whether the selection of material of the replaced piping and weld metal meet the material compositions as described in GALL AMP XI.M25.

(iii) Verify that, if only portions of the RWCU system piping were replaced, the entire RWCU system piping meets the screening criteria, 1(a), (b), and (c) in GALL AMP XI.M25 program element 1, Scope of the Program, as well as the material specifications in GALL AMP XI.M25 program element 2, Preventive Actions.

This was identified as Confirmatory Item B.1.17.

During the audit, the team confirmed the following technical information relating to this AMP with the applicant at the request of the NRC's technical staff:

- All in-scope portions of the RWCU system piping outboard of the second isolation valves were replaced with ASTM SA312 or SA376 Gr. TP316L with a carbon content of less than 0.035 percent. RWCU piping inboard of the second isolation valve have not been replaced with IGSCC resistant piping.
- The RWCU piping that is inboard of the second isolation valve is Class 1 and 2 piping that is managed by the ISI Program (B.1.1), ASME Section XI, Subsections IWB, IWC, and IWD. All of the RWCU piping and welds on the in-scope portion outboard of the second isolation valves were replaced. The replacement piping and weld metal meets the material compositions as described in NUREG-1801, AMP XI.M25.
- All the RWCU piping and welds on the in-scope portion outboard of the second isolation valves were replaced with piping and weld material that meet the material compositions as described in NUREG-1801, AMP XI.M25. Screening criteria 1(a), (b), and (c) of NUREG-1801, AMP XI.M25 do not apply to this piping.
- In a letter to the NRC, dated August 20, 1993, the licensee committed to replace all RWCU IGSCC susceptible outboard supply and return line piping and the regenerative heat exchangers with IGSCC resistant materials at both Dresden and Quad Cities.

License Renewal Boundary Drawings LR-DRE-M-30 and LR-QDC-M-47-1 show the piping design table for the in-scope portion of the RWCU piping outboard of the second isolation valves to be table AQ. Dresden specification K-4080 and Quad Cities specification R-4411 provide the material specification for piping design table AQ. Design table AQ provides the information on the piping material: all in-scope portions of the RWCU system piping outboard of the second isolation valves were replaced with ASTM SA312 or SA376 Gr. TP316L with a carbon content of less than 0.035 percent.

Based on the above information, the applicant confirmed that the ten elements of the GALL program, "BWR Reactor Water Cleanup System," as specified in NUREG-1801, AMP XI.M25 (with the exception of the Water Chemistry Program as noted in the LRA) are applicable to Dresden and Quad Cities, and that the applicant's program B.1.17 is consistent with GALL AMP XI.M25, with the exception as noted in the LRA.

On the basis of its review of this AMP, GALL AMP XI.M25, AMR topical report M.05, and the ISI Program plan, the audit team determined that this AMP is consistent with GALL AMP XI.M25, with the exception as noted in the LRA. Therefore, Confirmatory Item B.1.17 is closed.

Section A.1.17 of Appendix A to the LRA contains the applicant's UFSAR supplement for the BWR reactor water cleanup system program at Dresden and Quad Cities nuclear power stations. The staff reviewed the UFSAR supplement and found that the description of the BWR reactor water cleanup system program is consistent with Section B.1.17 of the LRA. The staff finds that the information contained in the UFSAR supplement presents an adequate summary of the program activities as required by 10 CFR 54.21(d).

The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the exception and its justification to determine whether the AMP, with the exception, remains adequate to manage the aging effects for which it is credited. The staff also reviewed the USAR supplement to determine whether it provides an adequate description of the revised program. In addition, for the Dresden and Quad Cities nuclear power stations, the staff determined whether the applicant properly applied the GALL program to its facilities.

Conclusions. On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.3.2.3.3 Fire Protection Program (B.1.18)

Summary of Technical Information. Appendix B, Section B.1.18 identifies the AMP for the FP components within the scope of license renewal. The AMP for FP SSCs includes the inspection, surveillance testing and maintenance for monitoring and controlling the effects of aging. This section addresses the consistency of the program described in Appendix B.1.18 with Section XI.M26 of NUREG-1801 and identifies exceptions and enhancements to its specific requirements. This section also discusses operating experience with the FP SSCs at the plants.

Staff Evaluation. The staff reviewed LRA Appendix B.1.18 to determine whether there is reasonable assurance that the AMP activities are adequate to maintain the intended functions of the FP SSCs for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff's review was conducted in accordance with Section 2.3 of the SRP-LR (NUREG-1800) and is described as below.

LRA Appendix B, Section B.1.18, "Fire Protection," states that, "With enhancements the FPP is consistent with the ten elements of aging management program XI.M26, "Fire Protection," specified in NUREG-1801 with following exceptions...." In order for the staff to evaluate the adequacy of the applicant's FP AMP and reach a conclusion that it is consistent with NUREG-1801, the staff requested, in a letter dated August 4, 2003, that the applicant follow the guidelines provided in NUREG-1801 for FP AMP. NUREG-1801 contains the staff's generic evaluation of the existing plant program and documents the technical basis for determining where existing programs are adequate without modification and where existing programs should be augmented for the period of extended operation. The frequencies identified in Appendix B, Section B.1.18 exceed those committed to in the applicant's FP program. The staff also requested that the applicant clarify if the plant FP programs include surveillance requirements consistent with regulatory guidelines, and if the activities defined in B.1.18 are in addition to the inspections provided under the FP program.

In a letter dated October 3, 2003, the applicant responded that after the enhancements discussed in Appendix B, Section B.1.18, Subsection, "Enhancements," are implemented, the Dresden and Quad Cities FPP will be consistent with the ten element program described in NUREG-1801, XI.M26, "Fire Protection." However, after the enhancements are implemented, the following exceptions will exist:

(1) NUREG-1801, XI.M26, Element 4 states that a visual inspection of fire barrier walls, ceilings, and floors is to be performed at least once every refueling outage to ensure timely detection of concrete cracking, spalling, and loss of material before there is a loss of intended function. The Dresden and Quad Cities FPP requires inspection of concrete fire barrier walls, ceilings, and floors once every five years, which exceeds the stated frequency of NUREG-1801, XI.M26. This inspection interval, which is in excess of NUREG-1801 guidance, has been justified for the following reasons:

- C Station FPP inspections and other similar station inspections have not found any significant aging effect that requires extensive corrective action for any concrete structure within the scope of license renewal. Typically, concrete cracks that have been observed have been attributed to normal concrete shrinkage occurring during construction and are non-active.
- C The environment surrounding Dresden and Quad Cities is non-aggressive for concrete.
- C Industry guidance contained in ACI 349.3R-96, "Evaluation of Existing Nuclear Safety-Related Concrete Structures," indicates that a five-year inspection frequency for concrete components is adequate for timely identification and correction of degraded conditions prior to a loss of intended function.
- C The FPP has provisions to allow for the number of components monitored and the frequency of inspections to be adjusted, to ensure the level of effort is commensurate with the existing degradation mechanisms that are identified.

The staff reviewed the applicant's response. On the basis of the justification provided, the staff agrees that the 5-year frequency is adequate for managing the aging effects of these concrete barriers.

- (2) XI.M26, Element 4 states that VT-1 or equivalent penetration seal inspections, and VT-3 or equivalent fire door inspections, are to be performed. Personnel performing seal and fire door inspections at Dresden and Quad Cities are not qualified to American Society for Nondestructive Testing (ASNT) requirements. However, personnel performing these inspections are trained and experienced in FPP requirements. The quality of the fire barrier penetration seal and fire door inspections are equivalent to the VT-1 and VT-3 inspections as is evidenced by the history of identifying conditions requiring maintenance, repair or replacement.

The staff reviewed the applicant's response and concurs that on the basis of the training provided and the absence of the need for special tools or equipment, the qualifications established for these inspectors are adequate.

- (3) GALL AMP XI.M26, Element 3 states that fire doors are visually inspected at least once bi-monthly for holes in the skin of the door and that clearances are also checked at least once bi-monthly as part of an inspection program. It also states that function tests of fire doors are performed daily, weekly, or monthly (plant-specific) to verify the operability of automatic hold-open, release, closing mechanisms, and latches. The Dresden and Quad Cities FP program provides for an in-depth inspection for condition and operability of fire doors once per operating cycle, which exceeds the stated frequency of NUREG-1801, XI.M26. Dresden checks fire door clearances as part of their operating cycle inspection. Quad Cities does not check door clearances as part of their operating cycle inspection, but does check fire door clearances after maintenance has been performed on a fire door. This inspection interval in excess of NUREG-1801 is justified because the fire doors most likely to experience excessive wear are those that are subject to the most frequent use. Most frequently used doors, such as those in normal and high-traffic areas, are additionally monitored by normal plant operation during periodic fire marshal tours, operator rounds, and security patrols.

The combination of in-depth inspections and monitoring by personnel performing tours, rounds and patrols has been effective in identifying degraded doors and prompting the applicant to take corrective action as necessary. Door degradation is due to wear and physical damage. No instance of door assembly loss of material due to corrosion has been identified.

The staff reviewed the applicant's response. The staff concurs that the frequency of checking doors for aging management concerns each operating cycle is adequate. However, the staff does not agree with the applicant's position that door clearances do not need to be monitored at Quad Cities as part of the inspection program. During the conference call dated November 3, 2003, with applicant, staff stated that the NRC does not agree that door clearances do not need to be monitored at Quad Cities as part of the inspection program. In a letter dated November 20, 2003, the applicant stated that, Quad Cities will include the checking of fire door clearances as a routine part of the operating cycle inspection activities. This will be implemented prior to the extended period of operation. This is part Commitment #18 in Appendix A of this SER. A review was performed of the associated UFSAR supplement (A.1.18) and the AMP description found in section B.1.18 of the LRA. It was determined that no changes were required as a result of this change in commitment.

The staff reviewed the applicant's response and agrees that the Quad Cities AMP will include the checking of fire door clearances as a routine part of the operating cycle inspection activities.

- (4) GALL AMP XI.M26, Element 4 states that a periodic function test and visual inspection performed at least once every six months detects degradation of the Halon and CO₂ fire suppression systems before the loss of the component's intended function. The Quad Cities and Dresden Halon and CO₂ fire suppression systems are currently tested and inspected every 18 months. However, the Technical Requirements Manual permits a testing frequency of once every two years. Either of these frequencies exceeds the stated frequency of NUREG-1801, XI.M26, but is considered sufficient to ensure system availability and operability based on station operating history that indicates no occurrence of aging-related events having adversely affected system operation.

The staff reviewed the applicant's response and concurs that on the basis of plant experience, the 18-month frequency is adequate for aging management considerations.

- (5) GALL AMP XI.M26, Element 6 states that any signs of corrosion and mechanical damage of the Halon or CO₂ fire suppression system are not acceptable. The Dresden and Quad Cities program requires that signs of aging degradation on the external surfaces of the Halon or CO₂ fire suppression systems be evaluated and corrective action be taken as required. Although this method could result in minor corrosion or mechanical damage being evaluated as acceptable, this approach provides reasonable assurance that corrective actions appropriate to the severity of the observed degradation will be implemented prior to a loss of the system or component's intended functions.

The staff reviewed the applicants response. The response provides evaluation method or criteria for the acceptance of discovered corrosion. During the conference call dated November 3, 2003, with the applicant, staff stated that the NRC does agree with the response that the Dresden and Quad Cities AMP requires that signs of aging degradation on the external surfaces of the Halon or CO₂ fire suppression systems be evaluated and corrective actions be taken as required. Further, staff stated that without definitive criteria, NRC staff cannot evaluate the adequacy of the aging degradation of Halon or CO₂ fire suppression systems components corrosion or mechanical damage. In a letter dated November 20, 2003, the applicant stated that, "The License Renewal Application, Appendix B, Section B.1.18," paragraph 5 of "Description" should have read as follows:

The program will provide for aging management of external surfaces of Dresden and Quad Cities carbon dioxide system components and Dresden Halon system components for corrosion and mechanical damage through periodic operability tests based on NFPA codes and visual inspections. Tests and inspections are implemented through predefined tasks and procedures."

In Section B.1.18, the second bullet under "Enhancements" should have read as follows:

The program will provide for inspection for corrosion and mechanical damage on external surfaces of piping and components for the Dresden and Quad Cities carbon dioxide systems and the Dresden Halon system.

The applicant will examine CO₂ piping and component external surfaces for indications of corrosion degradation, mechanical damage or leakage. Inspection criteria for corrosion degradation included in the inspection procedures are flaking or peeling paint (if painted), rust scale, rust stains on painted surfaces, or leakage. Inspection criteria for CO₂ leakage included in the inspection procedures include visible vapor, hissing, or surface condensation. Halon piping and component external surfaces are examined for indications of corrosion degradation,

utilizing the same criteria as for CO₂, and for indications of mechanical damage. When indications of corrosion, mechanical damage or leakage are found, work supervisors and unit supervisors are notified. Any identified indications of corrosion, mechanical damage or leakage are evaluated by Engineering to determine if corrective actions are needed. The evaluations are performed using Condition Reports, in accordance with Exelon procedures. As required, work requests are initiated to perform the work to correct the degraded or inoperable conditions". This is part of Commitment #18 of Appendix A of this SER.

The staff reviewed the applicant's response and agrees with the proposed AMP to manage the aging degradation on the external surfaces of the Halon or CO₂ fire suppression systems.

(6) GALL AMP XI.M26, Element 5 states that the performance of the fire pump is monitored during the periodic test to detect any degradation in the fuel supply lines and that periodic testing provides data (e.g., pressure) necessary for trending. The Dresden and Quad Cities diesel-driven fire pump test results and the Dresden isolation condenser diesel-driven makeup pump test results are not trended. Instead, in the event the predetermined acceptance criteria are not met, an engineering evaluation is conducted to determine the operability of the pump and the need for corrective action. This method is justified, given that there have been no reports of a loss of function of the Dresden or Quad Cities diesel-driven fire pumps as a result of the inability of the fuel oil system to deliver fuel to the engine and there have been no reports of a loss of material or flow blockage of the Dresden isolation condenser makeup pump fuel oil subsystem.

The staff has reviewed the applicant's response, and on the basis of the plant's experience, agrees with the applicant's testing methodology. This is part of Commitment #18 of Appendix A of this SER.

The activities described in the Dresden and Quad Cities LRA, Appendix B, Section B.1.18 comprise the Dresden and Quad Cities FP program. Other than what is identified above, the Dresden and Quad Cities FP program surveillance requirements are consistent with the regulatory guidelines stated in NUREG-1801, XI.M26, "Fire Protection."

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.3.2.3.4 Fire Water System (B.1.19)

Summary of Technical Information. Appendix B, Section B.1.19 identifies the AMP for the fire water system components within the scope of license renewal. The fire water system AMP provided for managing the loss of material and biofouling aging effects on the intended functions of the water-based FP components within the scope of license renewal. The program included inspection, surveillance testing and maintenance activities. This section addresses the consistency of B.1.19 with Section XI.M27 of NUREG-1801 and identifies exceptions and

enhancements to its specific requirements. This section also discusses operating experience with the fire water system at Dresden and Quad Cities.

Staff Evaluation. The staff reviewed LRA Appendix B.1.19 to determine whether there is reasonable assurance that the AMP activities are adequate to maintain the intended functions of the fire water system SSCs for the period of extended operation, as required by 10 CFR 54.21(a)(1)(a)(3). The staff's review was conducted in accordance with Section 2.3 of the SRP-LR (NUREG-1800) and is described as below.

LRA Appendix B, Section B.1.19, "Fire Water System," states that, "With enhancements the fire water system aging management program is consistent with the ten elements of aging management program XI.M27, "Fire Water System," specified in NUREG-1801 with the following exceptions..." In order for the staff to evaluate the adequacy of the applicant's FP AMP and reach a conclusion that it is consistent with NUREG-1801, the staff requested, in a letter dated August 4, 2003, that the applicant follow the guidelines provided in NUREG-1801 and the interim staff guidance for FP AMP [Staff Guidance (ISG)-04, "Aging Management of Fire Protection Systems for License Renewal," (ADAMS Accession ML022260137, dated December 3, 2002)]. NUREG-1801 contains the staff's generic evaluation of the existing plant programs and documents the technical basis for determining where existing programs are adequate without modification and where existing programs should be augmented for the period of extended operation.

In a letter dated October 3, 2003, the applicant responded with the following information. Part 1 of this response compares the Dresden and Quad Cities fire water system program against the NUREG-1801, XI.M27 program and identifies where exceptions still exist. Included in Part 1 is a discussion of how Dresden and Quad Cities are addressing ISG-04. Part 2 of the response discusses the Dresden and Quad Cities underground loop flow testing.

(1) The applicant concluded in the Dresden and Quad Cities LRA, Appendix B, Section B.1.19, that the fire water system program, after the enhancements discussed in Appendix B, Section B.1.19, Subsection, "Enhancements," are implemented, will be consistent with the ten-element program described in NUREG-1801, XI.M27, with certain exceptions. Although not stated in the LRA, after the enhancements are implemented, the fire water system program will be also be consistent with the NRC staff recommendations for fire water systems as provided in ISG-04.

Exelon evaluated the Dresden and Quad Cities fire water system program against the attributes of the ten elements of NUREG-1801, XI.M27 and identified that after the enhancements are implemented, the following exceptions will still exist:

- NUREG-1801, XI.M27, Element 3 states that NRC GL 89-13 recommends periodic flow testing of infrequently used loops of the fire water system at the maximum design flow to ensure that the system maintains its intended function. Flow tests at the maximum design flow are not practicable for Dresden and Quad Cities. Instead, the Dresden and Quad Cities flow tests analyze the system hydraulic resistance. Dresden measures underground piping pressure drops at given flows for selected segments of underground fire mains and compares them to pre-calculated allowable pressure drops for the same segments at the given flows. The measured pressure drop must be equal to or less than the allowable. The measured results are also compared with those of previous tests to

identify adverse trends. Quad Cities takes pressure measurements and calculates the friction loss coefficients ("C" factor) for the various sections of the underground fire mains. The calculated "C" factor must be equal to or greater than 80 for all piping tested. The calculated results are compared with those of previous tests to identify adverse trends. A low "C" factor (Quad Cities method) or a large pressure drop (Dresden method) may be indicative of either fouling or leakage of the underground fire mains.

- (b) NUREG-1801, XI.M27, "Program Description," states that the AMP (XI.M27) applies to water-based FP systems that are tested in accordance with the applicable National Fire Protection Association (NFPA) codes and standards.

The Dresden and Quad Cities fire water systems may not in all cases be tested in accordance with NFPA codes, but in these cases, technical justifications for the deviations are documented. NFPA codes were used in the design of active FP systems (i.e., fire suppression and detection systems). Similarly, inspection and periodic testing is performed in accordance with corporate and station procedures developed using NFPA codes as guidance. Corporate Procedure ER-AA-610, "Performance Based Evaluations for Fire Protection," ensures that performance-based evaluations that result in surveillance frequencies that exceed those specified in site-specific NFPA codes of record serve as the deviation justification. Where code deviations are required or desirable, they are made under the intent of the code and documented in the NFPA Code Deviation Report at each site in accordance with CC-AA-211, "Fire Protection Program." Revision to the NFPA Code Deviation Report is necessary unless the report has previously addressed the deviation.

- (c) Interim staff guidance ISG-04 was issued on December 3, 2002. Included as part of ISG-04 is an amended ten-element AMP, XI.M27, for the fire water system. Applicant evaluated the Dresden and Quad Cities fire water system program against the staff recommendations for fire water systems included in ISG-04 with the following conclusions:

- C In Element 3 of the amended XI.M27, the staff provides for the option of performing wall thickness evaluations in lieu of testing at maximum design flow. The flow testing discussed in (1)(a) is not performed at maximum design flow, but Dresden and Quad Cities will perform wall thickness measurements.
- C In Element 4 of the amended XI.M27, the staff recommends that the applicant perform a baseline pipe wall thickness evaluation of the FP piping using a non-intrusive means of evaluating wall thickness, such as volumetric inspection, to detect general corrosion before the current license term expires. The staff also recommends that the applicant perform pipe wall thickness evaluations at plant-specific intervals during the period of extended operation. As an alternative to non-intrusive testing, the amended XI.M27 allows for a visual inspection of the internal surface of the FP piping upon each entry to the system for routine or corrective maintenance as long as it can be demonstrated that inspections are performed on a representative number of locations on a reasonable basis.

Dresden and Quad Cities will perform periodic non-intrusive FP piping wall thickness measurements. These non-intrusive inspections will be conducted prior to the end of the current term and repeated on a frequency not exceeding every 10 years.

Element 4 of the amended XI.M27 also states that if the environmental and material conditions that exist on the interior surfaces of the below-grade FP piping are similar to the conditions that exist within the above-grade piping, the results of the inspections of the above-grade FP piping can be extrapolated to evaluate the condition of below-grade piping.

The below-grade fire mains at both Dresden and Quad Cities comprise uncoated carbon steel. The internal environment of the below-grade fire mains at both Dresden and Quad Cities is "raw water," the same as NUREG-1801 Reference VII.G.6-a. Therefore, the results of the inspections of above-grade FP uncoated carbon steel piping with a raw water environment can be extrapolated to evaluate to the condition of the below-grade fire mains.

- C In Element 4 of the amended XI.M27, the staff recommends, in accordance with NFPA 25, that sprinkler head testing be performed at year 50 of the sprinkler system service life, not year 50 of plant operation, with subsequent sprinkler head testing every 10 years thereafter. Representative samples of Dresden and Quad Cities sprinkler heads will be submitted to a testing laboratory prior to being in service 50 years. This testing will be repeated on a frequency not exceeding every 10 years.

The staff reviewed the applicant's response. On the basis of the justification provided, the staff concurs that the aging of fire water system components will be adequately managed by the AMP. In a letter dated August 4, 2003, the staff requested that the applicant clarify the flow rates and testing frequencies of the underground loop flow tests and describe the plant procedure for this testing.

- (2) In a letter dated October 3, 2003, the applicant responded with additional details regarding frequency and method of flow testing. Flow testing is conducted at five-year intervals at Dresden and Quad Cities. As stated in Section (1)(a) of the applicant's response, tests are not performed at the maximum design flow. By themselves, the absolute values of the flows achieved during testing at both Dresden and Quad Cities provide no indication of the condition of the underground fire mains. Utilizing the Dresden test procedure, test conditions are established to provide flow rates within a pre-determined range corresponding to a table of pre-calculated allowable pressure drops vs. flows. For the cross tie flow test, these pre-determined flows range from 2,500 gpm to 3,500 gpm. For the yard loop flow test, these pre-determined flows range from 900 gpm to 1,300 gpm.

The Quad Cities test procedure methodology ("C" factor) employs the installation of four underwriter's playpipes on each of the three pipe segments to be tested. Sequential tests are performed on each segment with one, two, three, and four playpipes flowing. Total flows and "C" factors are calculated for each combination of flowing playpipes. For each pipe segment, the "C" factors for each separate flow scenario are compared and the most appropriate one is chosen. Since more accurate "C" factors are obtained when calculated for higher flows, it is most likely that the one calculated for four flowing playpipes will be chosen. During the last flow test performed at Quad Cities, the highest calculated flows for

each of the three segments, each with four playpipes flowing, were 2,296 gpm, 2,562 gpm, and 2,547 gpm.

The staff reviewed the applicant's response and on the basis of the additional technical data, concurs that the frequency and method of testing adequately addresses NUREG-1801, XI.M27, Element 3.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

Fire Protection Portions of Table 3.3-3 - Staff Evaluation Table for Dresden and Quad Cities Auxiliary System Components Evaluated in the GALL Report

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Components in Gaseous Fire Suppression System	Loss material, due to galvanic, general, pitting, and crevice corrosion	Fire Protection	B.1.18 - Fire Protection Program	Exception taken to GALL on inspection frequency of 18 months under current licensing basis rather than six months as recommended in Gall (See Section B.1.18)
Components in Diesel Fire Pump Fuel System	Loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling	Fire Protection	B.1.18 - Fire Protection Program	Exception taken to GALL on trending of test results. (See Section B.1.18)
Components Doors and Barrier Penetration Seals	Loss of material due to wear; hardening and shrinkage due to weathering	Fire Protection	B.1.18 - Fire Protection Program	Exceptions taken to GALL on fire door at a frequency of every operating cycle under the current licensing basis rather than the bi-monthly frequency recommended in GALL (See Section B.1.18)
Components in Water-Based Fire Protection	Loss of material due to general pitting, crevice and galvanic corrosion, MIC, biofouling	Fire Water System	B.1.19 - Fire Water System	Consistent with GALL/ISG (See Section B.1.19)

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Fire Barriers, Walls, Ceilings and Floors in Fire Protection	Concrete cracking and spalling due to freeze-thaw, aggressive chemical attack, and reaction with aggregates; loss of material due to corrosion of embedded steel	Fire Protection and Structures Monitoring	B.1.18 - Fire Protection Program	Exceptions taken to Gall on concrete fire barrier inspection frequency of every five years under ACI 349.3R-96. concrete structures (See Section B.1.18)

3.3.2.3.5 Fuel Oil Chemistry (B.1.21)

Summary of Technical Information in the Application. The applicant's Fuel Oil Chemistry program is discussed in LRA Section B.1.21, "Fuel Oil Chemistry." The applicant states that with enhancements, the program is consistent with the ten elements of aging management program XI.M30, "Fuel Oil Chemistry," specified in NUREG-1801 with exceptions. The following enhancements and exceptions are identified in the LRA:

Enhancements

- The fuel oil chemistry program will provide for inspection of the fuel oil storage tank interiors for corrosion during the regularly scheduled tank cleaning and the performance of engineering evaluations in the event corrosion of the tank interiors is found. The applicant stated that the enhancement is scheduled for implementation at Dresden and Quad Cities prior to the period of extended operation.

Exceptions

- Corrosion mitigation activities are not performed for the Quad Cities Unit 1 underground fuel oil storage tank because it is constructed of fiberglass.
- The Dresden and Quad Cities programs use ASTM D2709 as specified by ASTM D975 for analysis of grades 1-D and 2-D fuel used at the stations.
- The Dresden and Quad Cities programs use ASTM D5452 as the preferred method of analysis.
- Dresden and Quad Cities particulate tests utilize filters with a pore size of 0.8 μ m instead of 3.0 μ m because 0.8 μ m filters provide conservative results. The applicant stated that the use of 0.8 μ m filters is consistent with use of ASTM D5452.
- Quad Cities does not add stabilizers because grade 1-D low sulfur fuel oil is used and stored fuel is periodically sampled and analyzed for quality. Dresden and Quad Cities do not add corrosion inhibitors because fuel oil storage tank bottoms are periodically sampled and analyzed for corrosion products in accordance with ASTM D4057 and ASTM D2709. Dresden and Quad Cities employ sample techniques and particulate contamination detection methods that identify fuel degradation or the presence of corrosion products at an early stage.

- Dresden and Quad Cities emergency diesel generator do not have the capability of being sampled. As an alternative, Dresden and Quad Cities sample for water and sediment from the bottom of the associated storage tanks quarterly and particulate from the fuel oil transfer pump discharge line on a monthly basis in accordance with approved procedures. The applicant does not perform multilevel sampling of other fuel oil day tanks (isolation condenser makeup pump [Dresden only], fire pump, and station blackout) because the tanks are small and experience a high turnover of fuel due to routine diesel engine operations. Additionally, ASTM D4057, Table 4, "Spot Sampling Requirements," indicates that multilevel sampling is not required for tanks with a capacity less than 42,000 gallons. The fuel oil storage tanks and day tanks at Dresden and Quad Cities are 15,000 gallons or smaller.
- At Dresden, the results of analysis of new fuel oil are reviewed for acceptability, but are not trended. In the event the quantitative oil acceptance criteria in plant procedures are approached or exceeded the fuel oil is restored to within limits or an action request or condition report is initiated.

In LRA Section B.1.21 and UFSAR A.1.21, the applicant describes the fuel oil chemistry aging management program as an existing aging management program that provides for preventive activities that manage the aging effects of loss of material and buildup of deposits in license renewal components that are exposed to fuel oil. More specifically, the Fuel Oil Chemistry program is credited together with the one-time inspection for managing the following aging effects during the period of extended operation:

- loss of material due to general, pitting, crevice corrosion, MIC and biofouling
- buildup of deposits.

The applicant's operating experience includes a small number of events where plugging of drain lines in fuel oil system low points was caused by sediment buildup. The applicant determined that these events did not affect the ability of the associated diesel generator or fire pump to perform its intended functions. In addition, Quad Cities experienced plugging of both fuel filters on one diesel generator in 1998 for an indeterminate reason. The applicant states that program activities assure that contaminant levels are maintained at acceptable levels in fuel oil for systems within the scope of license renewal. The applicant credits biocide added to the fuel oil storage tanks during each new fuel delivery and fuel oil sampling and analysis in accordance with procedures. The acceptance criteria for analysis contained in the Technical Specifications are based on the requirements of ASTM D975. The applicant also periodically cleans and inspects diesel fuel oil storage tanks for evidence of internal corrosion.

In Section B.1.21 of the LRA, the applicant concludes that the fuel oil chemistry aging management program provides reasonable assurance that the loss of material aging effects are adequately managed so that the intended functions of components exposed to fuel oil within the scope of license renewal are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.21, "Fuel Oil Chemistry," the applicant describes its AMP to manage aging effects for loss of material and buildup of deposits in license renewal components that are exposed to fuel oil. The LRA states that with enhancements the program is consistent with the ten elements of aging management program XI.M30, "Fuel Oil Chemistry," specified in NUREG-1801 with exceptions. The staff confirmed the applicant's claim of

consistency during the AMR inspection. The staff reviewed the UFSAR supplement to determine whether it provides an adequate description of the revised program. The staff also reviewed the exception and its justification to determine whether the AMP, with the exception, remains adequate to manage the aging effects for which it is credited. Finally, the staff determined whether the applicant properly applied the GALL program to its facility.

During its review, the staff determined that additional information was needed to complete its review. By letter dated August 4, 2003, the staff requested, in RAI B.1.21, the applicant to provide the following additional information:

For the second exception item, concerning the application of ASTM standards D1796 and D2709, the staff identified that, based on a review of both standards, D2709 is appropriate for D975 Grades 1D and 2D fuel oil. Per D2709, D1796 is appropriate for higher viscosity fuel oil. Therefore, the staff requested the applicant to provide a basis for the statement in the LRA, "NUREG-1801 indicates that ASTM D1796 standard should be used to analyze fuel oil for water and sediment," and indicate whether this item constitutes an exception to GALL, or only a clarification. In its response dated October 3, 2003 the applicant stated that the second exception should be deleted from the LRA aging management program B.1.21 (Fuel Oil Chemistry). On the basis of its review, the staff finds the applicant's response acceptable because the applicant acknowledged that the second exception quoted in the LRA should be deleted from the LRA aging management program B.1.21 Fuel Oil Chemistry.

For the third exception item, concerning the use ASTM D5452 as the preferred method of analysis the applicant was requested to clarify the origin of the fuel oil samples to be analyzed and provide technical basis for the use of ASTM D5452 as the preferred method of analysis for fuel oil content analysis. In its response dated October 3, 2003 the applicant stated that bottom samples for particulates are collected and ASTM D5452 produces more accurate and repeatable results than using a field monitor as described in ASTM D2276. The applicant also stated that the tests methods for particulate contamination per ASTM D5452 is referenced by ASTM D2276 for situations where it is not possible to take field monitor samples. On the basis of its review, the staff finds that the applicant's response acceptable because there is reasonable assurance that laboratory sample preparation and testing per ASTM D5452 produces more accurate and repeatable test results than using a field monitor as described in ASTM D2276 by line sampling.

For the fifth exception item, concerning the use of periodic sampling in lieu of adding stabilizers and corrosion inhibitors to diesel fuel oil, the applicant was requested to justify that the periodic sampling is representative. In its response dated October 3, 2003, the applicant clarified that bottom samples are collected from the underground fuel oil storage tank in accordance with Dresden and Quad Cities fuel oil sampling procedures. The applicant stated that Quad Cities and Dresden fuel oil inspection procedures meet the requirements of ASTM D4057 and ASTM D2709. Underground storage tank fuel oil quality testing (water, sediment and bacteria) is performed quarterly while particulate contamination (evidence for corrosion products) is performed on a monthly basis. Samples taken at or near the bottom of the tanks provide early detection for contamination since any water, sediment or particulates would settle towards the tank bottom. The applicant concluded that these samples provide the 'worse case' indication for identifying contamination. On the basis of its review, the staff finds the applicant's response acceptable because there is reasonable assurance that samples taken at or near the bottom of

the tanks provide early detection for contamination since any water, sediment or particulates would settle towards the tank bottom.

For the sixth exception item, concerning the inability to directly sample the emergency diesel generator fuel oil day tanks the applicant was requested to provide justification as to why the day tanks are not sampled. In its response dated October 3, 2003, the applicant stated that the diesel fuel oil day tanks do not have provisions for taking direct fuel samples. The applicant identified that monthly underground storage tank sampling, periodic transfer pump discharge line sampling, and monthly drainage of accumulated water from the day tanks have proven effective in maintaining quality fuel oil to the diesel engines. In addition, the applicant stated that neither station has an operating history of diesel engine in-operability attributed to contaminated fuel. The applicant also stated that, Dresden (as part of the Dresden Diesel Generator Surveillance Tests) meets the guidance in Regulatory Guide 1.137 and EPRI NP-6314 by removing any accumulated water from the day tanks on a monthly basis or following engine operation (greater than or equal to one hour) via the day tank drains. Quad Cities (as part of the Quad Cities Diesel Generator Surveillance Tests) meets the guidance in Regulatory Guide 1.137 and EPRI NP-6314 by removing any accumulated water from the day tanks on a monthly basis or following engine operation (greater than or equal to one hour) by draining the day tank to the underground fuel oil storage tank. Sampling of the underground fuel oil storage tank is then used to detect the presence of water. On the basis of its review, the staff finds the applicant's response acceptable because the applicant's alternative method to sample the day tanks provides reasonable assurance that contaminated fuel in the day tanks will be detected and there is no prior history of diesel engine in-operability attributed to contaminated fuel.

In the last exception, the applicant states that, at Dresden, the results of analysis of new fuel oil are reviewed for acceptability, but are not trended. The applicant was requested address how the timely detection of the conditions conducive to corrosion will be taken before the quantitative oil criteria is approached or exceeded. The applicant response dated October 3, 2003, stated that new fuel oil analysis results are not trended but are reviewed for acceptability, applies to the receipt of new fuel oil deliveries only. The applicant identified that oil samples of existing fuel oil are taken quarterly and the test results are evaluated and trended. On the basis of its review, the staff finds the applicant's response acceptable because the applicant has clarified that the statement, "new fuel oil analysis results are not trended but are reviewed for acceptability," applies to the receipt of new fuel oil deliveries only.

LRA AMP B.1.21 indicates that the diesel fuel oil storage tanks are periodically cleaned and inspected for evidence of internal corrosion and that an enhancement will provide for inspection of the fuel oil storage tank interiors. Section 3.3.1.1.8 also indicates that UT examination of the lower portion will be performed. The applicant was requested to provide information that provides more specific UT locations, the inspection interval and operating history. In its response dated October 3, 2003, the applicant specified that an UT examination of the lower portion of one carbon steel underground fuel oil storage tank and one day tank at each facility will be performed prior to the period of extended operation and specific UT locations will be defined at that time. The results of the UT's will be evaluated, corrective action if required taken and the need for further UT's will be assessed. The applicant further stated that the draining, cleaning and inspection of the underground fuel oil storage tank interiors is conducted at ten (10) year intervals. The applicant identified that, to date, no tank wall aging degradation has been identified. On the basis of its review, the staff finds the applicant's response acceptable because the applicant has specified that UT examination of the lower portion of one carbon

steel underground fuel oil storage tank and one day tank at each facility will be performed prior to the period of extended operation and the applicant has committed to the draining, cleaning and inspecting the underground fuel oil storage tank interiors at ten (10) year intervals. Specific UT locations will be defined later. This is Commitment #21 in Appendix A of this SER.

The UFSAR supplement does not include criteria for fuel monitoring identified in LRA AMP B.1.21, such as specific ASTM standards. For example, specific ASTM standards are identified in NUREG-1800 Table 3.3-2. The applicant was requested to submit a revised UFSAR supplement which includes specific ASTM standards applied in AMP B.1.21. In its response dated October 3, 2003, the applicant submitted a revised UFSAR supplement to include specific ASTM standards. On the basis of its review, the staff finds the applicant's response acceptable because the applicant has revised the UFSAR supplement A.1.21 Fuel Oil Chemistry to reflect consistency between the AMP and the UFSAR.

LRA AMP B.1.21 identifies operating experience which includes plugging of fuel filters and drain lines. This operating experience suggests that the fuel oil chemistry program was not effective in preventing or detecting contamination and corrosion products at an early stage. The applicant was requested to indicate what corrective actions have been implemented to prevent recurrence of these events. In addition, the applicant was requested to indicate if filters and strainer elements in the fuel oil system are periodically inspected to further assess the effectiveness of the fuel oil chemistry program. In its response dated October 3, 2003, the applicant considered the flow blockage events to be isolated incidents and concluded that system testing confirms the adequacy of the fuel oil inspection and testing in maintaining system functions. In addition, as part of the diesel surveillance testing, the applicant identified that fuel oil supply pressure and fuel oil filter discharge pressure are recorded and trended thus providing indication of the performance of the fuel filters and strainers. The applicant stated that readings outside the nominal range are brought to the attention of the System Engineer for evaluation. On the basis of its review, the staff finds the applicant's response acceptable because the system testing and operating history provide reasonable assurance that the fuel oil inspection and testing practices are effective in maintaining system functions.

The staff finds the applicant's response to RAI B.1.21 provided sufficient technical justification to show that the program, with exceptions and enhancements, will adequately manage the aging effects for which the program is credited. All technical concerns associated with RAI B.1.21 are considered resolved.

The applicant committed to revise UFSAR Supplement, Section A.1.2.1, as described in its response to RAI B.1.21 part (g). The staff reviewed this revised UFSAR supplement and found that the description of the Fuel Oil Chemistry program is consistent with Section B.1.21 of the LRA. The staff finds that the information provided in the UFSAR supplement provides an adequate summary of the program activities as required by 10 CFR 54.21(d).

Conclusions. On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also

reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.3.2.3.6 Boraflex Monitoring (B.1.36)

Summary of Technical Information in the Application. The applicant's Boraflex monitoring program is discussed in LRA Section B.1.36, "Boraflex Monitoring (Quad Cities Only)." The applicant stated that the program is consistent with the GALL Program XI.M22 "Boraflex Monitoring," with no deviations. The applicant stated that its AMP is based on EPRI TR-108761, "A Synopsis of the Technology Developed to Address the Boraflex Degradation Issue." The Boraflex Monitoring program is only applicable to Quad Cities because Dresden utilizes Boral as the neutron absorbing material in the spent fuel racks rather than Boraflex.

boraflex degrades when exposed to chemically-treated oxygenated water and gamma radiation. The degradation results in a loss of boron carbide and a reduction in the neutron-absorbing capacity of the Boraflex. This AMP is credited with managing the degradation.

Under "Operating Experience," the stated that past inspections under the Boraflex Monitoring program have been effective at determining boron loss. The applicant stated that, to date, a boron loss of approximately one percent has been identified and trended, and that a review of the program resulted in updating the RACKLIFE program every two years to be consistent with the maintenance rule requirements.

The applicant concludes that the Quad Cities Boraflex monitoring program provides reasonable assurance that the aging effects are adequately managed so that the 5% subcriticality margin in the spent fuel pool will be maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.36, "Boraflex Monitoring (Quad Cities Only)," the applicant described its AMP to manage the effects of aging on Boraflex. The LRA stated that this AMP is consistent with the GALL AMP XI.M22 "Boraflex Monitoring," with no exceptions. The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, for the Quad Cities plant, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

The Boraflex monitoring AMP consists of (1) neutron attenuation testing (blackness testing) to determine gap formation, (2) sampling for the presence of silica in the spent fuel pool (which accompanies the loss of boron carbide), and (3) analysis of criticality to assure that the required 5% subcriticality margin is maintained. This program is implemented in response to Generic Letter 96-04, "Boraflex Degradation in Spent Fuel Pool Storage Racks." The Boraflex monitoring activities are based on the maintenance rule and on EPRI TR-108761, "A Synopsis of the Technology Developed to Address the Boraflex Degradation Issue."

The staff noted that GALL AMP XI.M22 states that trending of the results from the silica analysis in the spent fuel pool water using the EPRI RACKLIFE predictive code (or its equivalent) is performed on a monthly, quarterly, or annual basis (depending on the Boraflex panel condition). However, in Section B.1.36 of the LRA, the applicant stated that the evaluation is performed every two years. By RAI B.1.36, the staff asked the applicant to clarify this statement and provide the technical basis for this apparent divergence from the guidelines in the GALL Report.

In its response dated October 3, 2003, the applicant stated that the silica levels in each spent fuel pool are measured by Quad Cities' chemistry department on a weekly basis and this weekly data is subsequently used as an input into the EPRI RACKLIFE program. The applicant further stated that RACKLIFE has previously been run in conjunction with the units' outage schedules (once every two years), which is within the guidance of the RACKLIFE manual, "*Guidance and Recommended Procedures for Maintaining and Using RACKLIFE Version 1.10*," published by EPRI in April 2002. However, since Quad Cities must move spent fuel from one pool to another to make room for refueling outage activities on either unit, and since RACKLIFE is updated whenever fuel is moved, the actual update frequency for RACKLIFE for each spent fuel pool is approximately three times every two years. The applicant changed the AMP to state that the evaluation is performed on an annual basis to reflect this and to ensure compliance with GALL XI.M22. On the basis of its review, the staff finds that the applicant's response to RAI B.1.36 adequate and acceptable because the applicant has verified that the silica level measurements and the evaluation are performed on a frequency consistent with GALL AMP XI.M22.

The staff reviewed the UFSAR supplement in LRA Appendix A.1.36 and found that the description of the Boraflex monitoring is consistent with Section B.1.36 of the LRA. The staff finds that the information provided in the UFSAR supplement provides an adequate summary of the program activities as required by 10 CFR 54.21(d).

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.3.2.3.7 Periodic Inspection of Plant Heating System (B.2.8)

Summary of Technical Information in the Application

The applicant's Periodic Inspection of Plant Heating System program is discussed in the applicant's response to RAI B.1.23, dated March 25, 2004. This program inspects selected components in the Dresden and Quad Cities Plant Heating System exposed to an environment of saturated steam and condensate once before the end of the current operating term and periodically at intervals of approximately every 5 years during the period of extended operation. The program will include inspections for cracking, loss of material, or other evidence of aging for plant heating system components that are within the scope of license renewal. The program is not based on a GALL report program; therefore, the applicant summarized the program in terms of the 10-element program as described in Branch Technical Position, RLSP-1 in Appendix A of the SRP-LR.

The applicant concluded that the Periodic Inspection of Plant Heating System program provides assurance that plant heating system components are routinely inspected for deterioration and leakage, and will adequately manage the components aging effects. The applicant stated that the program provides reasonable assurance that intended functions are maintained consistent

with the current licensing basis during the period of extended operation. The staff compared the program against BTP RLSB-1. This issue was identified as Confirmatory Item B.1.23-2.5.

Staff Evaluation

By letter dated March 25, 2004, the applicant described its program to manage loss of material, cracking, and leakage in selected plant heating system components for Dresden and Quad Cities exposed to an environment of saturated steam and condensate. The staff reviewed this program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR and focused on how the program manages aging effects through the effective incorporation of the following 10 elements: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls are part of the site-controlled Quality Assurance Program. The staff's evaluation of the Quality Assurance Program is provided separately in Section 3.0.4 of this SER. The remaining seven elements are discussed below. The staff also reviewed the UFSAR supplements for Dresden and Quad Cities to determine whether they provide an adequate description of the program.

[Program Scope] The program will manage age related degradation of plant heating system components such as filter/strainer housings, piping and fittings, pump casings, sight glasses, tanks, thermowells, traps, tubing, and valves. The staff finds that the scope is acceptable because it includes those components that rely on the program for aging management.

[Preventive or Mitigative Actions] The plant heating system periodic inspections do not provide any preventative actions. The inspections provide for condition monitoring to detect degradation prior to a loss of function. Preventative or mitigative actions are not needed for this condition monitoring program; therefore, the staff finds this acceptable.

[Parameters Monitored or Inspected] Visual inspections will be performed on a representative sample of brass or bronze valves, carbon steel piping and fittings, cast iron filter housings, pump casings and valves, and stainless steel thermowells and tubing used in the plant heating systems to determine if aging degradation is occurring. The components are inspected to ensure they are free of cracking, loss of material, and leakage. The inspection will consist of a visual inspection on the internal surface of components for the presence of general, crevice, galvanic, and pitting corrosion. The staff concludes that the applicant is inspecting the appropriate parameters to identify the aging effects; therefore, the staff finds this acceptable.

[Detection of Aging Effects] The plant heating inspections are performed at periodic intervals, and they detect aging prior to the equipment leaking so as to prevent spatial interaction with safety-related equipment. Inspections will be performed in accordance with ASME Code requirements and certified NDE examiners will conduct a VT-3 visual examination. The staff finds this acceptable because the inspections will identify the aging effects managed by this program.

[Monitoring and Trending] The condition of the components used in plant heating systems are monitored at intervals of approximately every 5 years, but not trended. Components are replaced if damage or unacceptable leakage is detected. Operating experience states that leaks were identified and corrected in a timely manner and did not result in a loss of function of

any safety-related component. Staff finds that monitoring of these components periodically every 5 years is adequate to identify aging degradation; therefore staff finds this acceptable .

[Acceptance Criteria] The applicant stated that components are inspected for cracking, loss of material, and leakage. The components are replaced if a degraded condition is found. Inspections will be performed in accordance with ASME Code requirements and corrective actions state that evaluations are performed for inspection results that do not satisfy established criteria. The staff finds that the applicant's proposal to perform inspections in accordance with ASME Code requirements and use of engineering evaluations of degradation components will provide acceptance criteria against which the need for corrective actions will be evaluated; therefore, staff finds this acceptable.

[Operating Experience] The applicant stated that Dresden and Quad Cities have experienced leaks in the plant heating systems, but that these leaks were identified and corrected in a timely manner and did not result in a loss of function of any safety-related system, structures, or components. The staff notes that the plant heating system is in scope of license renewal due to the potential for spatial interactions. The staff finds that the operating experience of timely correction of system leaks plus the additional periodic visual inspections supports the applicant's conclusion that the program will be effective in managing aging of the components in the scope of this program; therefore, the staff finds this acceptable.

Therefore Confirmatory Item B.1.23-2.5 is closed.

Conclusion

On the basis of its review of the applicant's program, the staff finds that the program adequately addresses the ten program elements defined in Branch Technical Position RLSB-1 in Appendix A.1 of the SRP-LR, and that the program will adequately manage the aging effects for which it is credited. The staff also reviewed the UFSAR supplement (Dresden and Quad Cities) for this aging management program and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

Therefore, on the basis of its review, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed by the Periodic Inspection of Plant Heating System program so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4 Aging Management Review of Auxiliary Systems

The following sections provide the results of the staff's evaluation of the adequacy of aging management for components in each of the auxiliary systems.

3.3.2.4.1 Refueling Equipment System

Summary of Technical Information in the Application. The description of the refueling equipment can be found in Section 2.3.3.1.1 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-1. The components, aging effects, and AMPs are provided in LRA Table 3.3-2.

Aging Effects

Table 2.3.3.1.1 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The component groups in this category in the refueling equipment system listed by the applicant in the LRA are cranes, including bridge and trolleys, and the rail system in the load handling system; fuel grapples/structural support; fuel pool gates/pressure boundary; and fuel preparation machines/structural support.

The LRA identified the following applicable aging effects for the refueling equipment:

- Carbon steel components are identified as being subject to loss of material due to general corrosion and wear from exposure to air at 100 percent relative humidity and a temperature of 49 °C (120 °F).
- Stainless steel components are identified as being subject to loss of material due to pitting and crevice corrosion from exposure to chemically treated oxygenated water.
- Aluminum components are identified as being subject to loss of material due to general and pitting corrosion from exposure to chemically treated oxygenated water.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the refueling equipment:

- Water Chemistry Program (B.1.2)
- Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems Program (B.1.15)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the refueling equipment system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in refueling equipment. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.1 and Tables 2.3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

Table 3.3-2, Reference No. 3.3.2.74 in the LRA identifies the loss of material due to pitting corrosion for stainless steel components in a chemically treated oxygenated water environment. It does not, however, identify crack initiation and growth due to SCC as a plausible aging effect/mechanism even though the same environmental conditions generally exist for pitting corrosion as for SCC. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.1, the

applicant to provide a justification for excluding crack initiation and growth due to SCC as an aging effect/mechanism that requires management for the period of extended operation.

In its response dated October 3, 2003, the applicant stated that the cracking aging effect is discussed in EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," Appendix A, Section 3.2.2, "Stress Corrosion Cracking (SCC) of Stainless Steel in Fuel Storage and Handling Equipment." The applicant further stated that this aging effect has not been detected by industry experience or by actual site operating experience. SCC tendency increases with temperature applications greater than 60 °C (140 °F) and the introduction of chlorides (in excess of permissible limits). This is the uppermost limit for long-term operating temperature in the spent fuel pool (because higher operating temperatures are detrimental to fuel pool cooling system demineralizer resin). The applicant concluded that as such, crack initiation and growth due to SCC was not considered a credible aging effect/mechanism.

On the basis of its review, the staff finds the applicant's response acceptable because the applicant has shown that this cracking aging effect has not been detected by industry experience or by actual site operating experience and that the uppermost limit for long-term operating temperature in the spent fuel pool is 60 °C (140 °F).

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations to which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The aging effects identified in the LRA for the refueling equipment system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the refueling equipment system.

- Water Chemistry Program (Section 3.0.3.2)
- Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems Program (Section 3.3.2.3.1)

The Water Chemistry Program is credited with managing the aging effects of several components in different structures and systems and is, therefore, considered a common AMP. The staff's evaluation of this AMP is discussed in Section 3.0.3.2 of this SER.

The Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems Program is only credited with managing the aging effects of the refueling equipment system components. The staff has evaluated this AMP and found it to be acceptable for managing the aging effects identified for this system. The staff's evaluation of this AMP is discussed in Section 3.3.2.3.1 of this SER.

After evaluating the applicant's AMR for each of the components in the refueling equipment system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the refueling equipment system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.2 Shutdown Cooling System (Dresden Only)

Summary of Technical Information in the Application. The description of the shutdown cooling system (Dresden only) can be found in Section 2.3.3.2 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-2. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1, 3.3-1, and 3.3-2.

Aging Effects

Table 2.3.3-2 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include closure bolting, dampeners, filters/strainers, heat exchangers (heat exchanger components), NSR vents or drains, piping, piping and fitting pumps, restricting orifices, sight glasses, thermowells, and valves.

Stainless steel components in an air, moisture, and humidity environment experience no aging effects. Copper-nickel heat exchanger components exposed to reactor coolant water are subject to the aging effects of fatigue and cracking due to SCC. Carbon steel heat exchanger components exposed to reactor coolant water or closed-cycle cooling water are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, flow-accelerated, and microbiologically influenced corrosion and wear. Stainless steel heat exchanger components exposed to reactor coolant water or closed-cycle cooling water are subject to the aging effects of fatigue and cracking due to SCC. Heat exchanger components are also subject to the aging effect of loss of heat transfer function due to buildup of deposit and fouling. Carbon steel, stainless steel, brass, or bronze components of the NSR drains, piping, and valves exposed to air, moisture, and leaking fluid environments are subject to the aging effect of loss of material due to corrosion. Carbon steel components exposed to containment nitrogen experience no aging effects. Stainless steel components exposed to a saturated air environment are subject to loss of material due to pitting and crevice corrosion. Stainless steel components exposed to

air, moisture, and humidity or containment nitrogen environments experience no aging effects. Sight glass in a wet gas environment experiences no aging effects. Several carbon steel and stainless steel components are also subject to fatigue.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the shutdown cooling system (Dresden only):

- Water Chemistry Program (B.1.2)
- BWR Stress Corrosion Cracking Program (B.1.7)
- Flow-Accelerated Corrosion Program (B.1.11)
- Bolting Integrity Program (B.1.12)
- Closed-Cycle Cooling Water System Program (B.1.14)
- Compressed Air Monitoring Program (B.1.16)
- One-Time Inspection Program (B.1.23)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the shutdown cooling system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the shutdown cooling system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.2, Table 2.3.3-2, and Tables 3.3-1, 3.3-2, and 3.1-1 in the LRA. During its review, the staff determined that additional information was needed.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations to which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter

dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or an air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40, as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

In LRA Table 3.3-2, the applicant indicated that the stainless steel valves in the shutdown cooling system are exposed to saturated air and are subject to the aging effect of loss of material due to pitting and crevice corrosion. The staff finds that valves are the only component type that are identified as exposed to a saturated air environment in the shutdown cooling system. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.2, the applicant to provide clarification as to whether there are any other associated components, such as piping, pipe fittings, tubing, and tube fittings, in the shutdown cooling system that may be exposed to the same environment and hence subject to the same aging effects. If so, the staff asked the applicant to specify the applicable AMPs.

In its response dated October 3, 2003, the applicant stated that valves are the only component type that was identified as exposed to a saturated air internal environment in the shutdown cooling system. The reason for this is that the shutdown cooling valves in this group are 2-

1099-X111A & B for Dresden Unit 2 and 3-1099-X111A & B for Dresden Unit 3. These valves are utilized when local leak rate testing of the shutdown cooling system primary containment penetrations X-111A and B is conducted. The penetrations are shown on boundary diagrams LR-DRE-M-32 (coordinate C-9) and LR-DRE-M-363 (coordinate C-9), but the level of detail of this diagram does not include the valves. There are piping and fittings connecting these valves to the penetrations. These piping and fittings are included in LRA Table 2.3.2-3 under component group, "Isolation Barriers (including piping, tubing, valves and vacuum breakers)," and the component intended function of "Pressure Boundary." The Aging Management Reference is 3.2.2.52. Valves 2(3)-1099-X111A & B should have been included in LRA Section 2.3.2.3, "Containment Isolation Components and Primary Containment Piping System," in Table 2.3.2-3, under the component group, "Isolation Barriers (including piping, tubing, valves and vacuum breakers)," along with the other test valves utilized for local leak rate testing of containment penetrations.

On the basis of its review, the staff finds the applicant's response acceptable because the components exposed to saturated air connecting to these valves are included and reviewed in LRA Table 2.3.2-3 under component group, "Isolation Barriers (including piping, tubing, valves and vacuum breakers)," and the Aging Management Reference is 3.2.2.52. The staff considers the issues related to RAI 3.3.2.4.2 to be resolved.

The aging effects identified in the LRA for the shutdown cooling system (Dresden only) are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the shutdown cooling system (Dresden only).

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.3, 3.0.3.4, 3.0.3.5, 3.0.3.7, 3.0.3.8, 3.0.3.10, and 3.0.3.14, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the shutdown cooling system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Tables 3.1-1 and 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended

by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the shutdown cooling system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.3 Control Rod Drive Hydraulic System

Summary of Technical Information in the Application. The description of the control rod drive hydraulic system can be found in Section 2.3.3.3 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-3. The components, aging effects, and AMPs are provided in LRA Tables 3.1-2, 3.3-1, and 3.3-2.

Aging Effects

Components of the control rod drive hydraulic system are described in Section 2.3.3.3 of the LRA as being within the scope of license renewal and subject to an AMR. Table 2.3.3-3 lists individual components of the system including accumulators, closure bolting, dampeners, filters/strainers, flow elements, NSR vents or drains, piping and fitting, piping and fitting (attached supports), pumps, restricting orifices, rupture discs, tanks, tubing, and valves.

Stainless steel components exposed to the dry gas environment experience no aging effects. Stainless steel accumulators, dampeners (Quad Cities only), filters/strainers, flow elements (Dresden only), piping and fittings (includes dampeners and tubing), pumps (Dresden only), restricting orifices (Dresden only), rupture discs, tanks (includes accumulators), tubing, and valves exposed to an air, moisture, and humidity environment experience no aging effects. Carbon steel, stainless steel, brass, or bronze NSR vents or drains, piping, and valves exposed to an air, moisture, and humidity environment or leaking fluid are subject to the aging effect of loss of material due to corrosion. Stainless steel piping and fittings (includes dampeners and tubing) exposed to containment nitrogen experience no aging effects. Stainless steel filters/strainers, piping and fittings (includes dampeners and tubing), tanks, and valves exposed to oxygenated water up to 288 °C (550 °F) are subject to the aging effects of loss of material due to pitting and crevice corrosion and cracking due to SCC. Stainless steel and carbon steel piping and fittings (includes dampeners and tubing) and valves exposed to saturated air are subject to the aging effect of loss of material due to general (carbon steel only), crevice, and pitting corrosion. Stainless steel and carbon steel piping and fittings, tanks, and valves exposed to wet gas are subject to the aging effect of loss of material due to general (carbon steel only), pitting, and crevice corrosion. Stainless steel tubing and rupture discs exposed to dry gas experience no aging effects. Copper, brass, or bronze tubing and valves exposed to saturated air are subject to the aging effect of loss of material due to pitting and crevice corrosion. Brass or bronze valves exposed to an environment of air, moisture, and humidity less than 100 °C (212 °F) experience no aging effects.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the control rod drive hydraulic system:

- Water Chemistry Program (B.1.2)
- Bolting Integrity Program (B.1.12)
- Compressed Air Monitoring Program (B.1.16)
- BWR Stress Corrosion Cracking Program (B.1.7)
- One-Time Inspection Program (B.1.23)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the control rod drive hydraulic system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the control rod drive hydraulic system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.3, Table 2.3.3-3, and Tables 3.3-1, 3.3-2, and 3.1-2 in the LRA. During its review, the staff determined that additional information was needed.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations to which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, and humidity or leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to a moist gas (moist nitrogen) or moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects are identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either a containment nitrogen gas environment or an air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40 as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there are no aging effects on aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

In LRA Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of copper, brass, or bronze components in the control rod drive hydraulic system exposed to the moisture and humidity air environment because, "The plant indoor environment is not an aggressive wetted environment conducive to promoting aging degradation of brass or bronze (3.3-2, Ref No 3.3.2.23) or copper (3.3.2.34) components." The staff finds that this conclusion may not be justified because copper and copper alloy components exposed to a moist air environment may experience the aging effect of loss of material due to pitting and crevice corrosion, especially when the humidity is at 60 percent or higher and/or with the presence of pollutants such as oxygen, SO₂, NO_x, and NH₄. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.3, the applicant to provide its technical basis (including the level of humidity and the level of pollutants) for this conclusion.

In its response dated October 3, 2003, the applicant stated that copper, brass, and bronze materials are used in the indoor (air, moisture, and humidity less than 100 °C (212 °F)) ambient environment for various system piping and tubing. This environment, specified for Aging Management References 3.3.2.23 and 3.3.2.34, is the same as NUREG-1801, References V.E.1-b, VII.I.1-b, and VIII.H.1-b. EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," Appendix E, conservatively concludes that the indoor ambient environment is an aggressive environment for copper and copper alloy

components if subjected to periodic wetting. However, for the specific indoor environment being considered, periodic wetting of the external surfaces would be rare. In addition, M.G. Fontana and N.D. Greene in "Corrosion Engineering," Second Edition, McGraw-Hill, New York, 1978, state that copper and copper alloys are specifically chosen for their ambient condition corrosion resistance. Additionally, other than one instance of copper/brass corrosion found at the Quad Cities station, there has been no operating experience related to corrosion of copper, brass, or bronze components in an indoor, ambient environment at either the Quad Cities or Dresden stations. This one example at the Quad Cities station was due to leakage from the sodium hypochlorite system piping joints in the area of an instrument rack. The use of the sodium hypochlorite system has since been terminated, and the system has been removed. Therefore, copper, brass, and bronze components located in an environment of air, moisture, and humidity less than 100 °C (212 °F) will not require aging management.

The staff reviewed the applicant's response to the issues raised in RAI 3.3.2.4.3. On the basis of its review, the staff finds that the applicant's response to RAI 3.3.2.4.3 does not adequately address the questions in the RAI.

While reference to "Corrosion Engineering" is correct, new research results reveal that pollutants and humidity play an important role in accelerating corrosion on low-alloy materials. In *Corrosion, Understanding the Basics* (2000), edited by J.R. Davis, pp. 207 - 210, the author specifically states that copper and copper alloy components exposed to a moist air environment will experience the aging effect of loss of material due to pitting and crevice corrosion, especially when the humidity is at 60 percent or higher and/or with the presence of pollutants such as oxygen, SO₂, NO_x, and NH₄.

Further, the applicant did not provide an answer pertaining to the second part of the question in RAI 3.3.2.4.3 (i.e., the humidity and pollutant levels). Although the applicant indicated that periodic wetting is rare for these components, the response did not completely rule out the possibility of periodic wetting, especially for the extended period of operation. By e-mail dated November 14, 2003, the applicant was requested to provide (1) further clarification on how often the periodic wetting and drying could occur on the relevant components and (2) the technical basis for the conclusion that copper, brass, and bronze components located in an environment of air, moisture, and humidity less than 100 °C (212 °F) do not require aging management.

In its response dated December 17, 2003, the applicant stated that the following is the basis for the assessment that periodic wetting (either continuously wetted or alternately wetting and drying) of the external surfaces of copper and copper alloys is rare for an indoor (air, moisture and humidity less than 100 °C (212 °F)) ambient environment.

- The internal fluids for systems containing copper and copper alloy piping and components are predominately either saturated air or dry gas. The internal fluids for copper and copper alloy piping and components in the control rod drive hydraulic system are only saturated air or dry gas. Therefore, leakage at a joint in one of these systems would not result in wetting of the affected component.
- Copper and copper alloy piping and components are typically not insulated because the fluids are predominately either saturated air or dry gas. For those cases in which the fluid is other than saturated or dry air, the fluid in contact with the copper and copper alloy piping

and components is not of a temperature that would cause condensation on the component. Therefore, wetting from contaminated insulation or condensation is not a consideration.

- Leakage from other systems onto the control rod drive hydraulic system copper and copper alloy piping and components would be detected by normal operator rounds. Leaks would not be allowed to persist, and wetting from leaks would not be long lasting or repetitive.
- The statements above are supported by the Quad Cities and Dresden station operation experience. As stated in the original response to RAI 3.3.2.4-3, other than one instance of copper/brass corrosion found at the Quad Cities station, there has been no operating experience related to corrosion of copper, brass, or bronze components in an indoor ambient environment at either the Quad Cities or Dresden Stations. This one example at the Quad Cities station was due to leakage from sodium hypochlorite system piping joints in the area of an instrument rack. The use of the sodium hypochlorite system has since been terminated, and the system has been removed.

The staff reviewed the applicant's additional response to RAI 3.3.2.4.3 supplemental information request for the control rod drive hydraulic system and finds it adequate and acceptable because the applicant has indicated that (1) the wetting caused by leakage from other systems will be detected and removed in a timely manner and the use of the sodium hypochlorite system has already been terminated, and (2) the internal fluid for copper and copper alloy piping and components in the control rod drive hydraulic system is only saturated air or dry gas. The staff considers all issues related to RAI 3.3.2.4.3 to be closed.

The aging effects identified in the LRA for the control rod hydraulic system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the control rod hydraulic system:

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Inspection of Components Subject to Moist Environments (3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.3, 3.0.3.5, 3.0.3.8, 3.0.3.10, and 3.0.3.14, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the control rod drive hydraulic system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Tables 3.1-2 and 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the control rod hydraulic system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.4 Reactor Water Cleanup System

Summary of Technical Information in the Application. The description of the reactor water cleanup system can be found in Section 2.3.3.4 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Tables 2.3.3-4. The components, aging effects, and AMPs are provided in LRA Tables 3.1-1, 3.3-1, and 3.3-2.

Aging Effects

Table 2.3.3-4 of the LRA lists individual components that are within the scope of license renewal and subject to AMR. The components include closure bolting, NSR vents or drains, piping and valves, other piping and fittings and valves, and sight glasses.

The LRA identifies that low-alloy steel, carbon steel, stainless steel, brass, and bronze in an air, moisture, and humidity environment or leaking fluid are subject to loss of material due to general corrosion/corrosion. Low-alloy steel, carbon steel, CASS, and stainless steel in air with metal temperatures up to 288 °C (550 °F) or in reactor coolant water or steam, as well as in oxygenated water, are subject to cumulative fatigue damage due to fatigue. Low-alloy steel, stainless steel, and CASS in an air, moisture, humidity and leaking fluid environment, or in 288 °C (550 °F) reactor coolant water or steam, as well as in an oxygenated water environment, are subject to crack initiation and growth due to SCC and IGSCC. Carbon steel and stainless steel in oxygenated water are also subject to loss of material from pitting and crevice corrosion. CASS in 288 °C (550 °F) reactor coolant water is subject to loss of fracture toughness due to thermal aging embrittlement. The applicant stated that glass in wet gas is not subject to any aging effect. The LRA does not identify any aging effect for stainless steel components in moist air less than 100 °C (212 °F) or in a containment nitrogen environment.

Aging Management Programs

The LRA credits the following AMPs with managing the identified aging effects for the reactor water cleanup system:

- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)
- Water Chemistry Program (B.1.2)
- BWR Stress Corrosion Cracking Program (B.1.7)
- BWR Reactor Water Cleanup System Program (B.1.17)
- ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD Program (B.1.1)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the reactor water cleanup system will be adequately managed by these AMPs during the period of extended operation.

The closure bolting, piping and fittings, and valves are also covered by TLAAs to address fatigue. TLAAs of applicable components are described in Section 4.3 of the LRA.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the reactor water cleanup system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-4, 3.1-1, 3.3-1, and 3.3-2 for the reactor water cleanup system. During its review, the staff determined that additional information was needed.

For the environment of moist air, the applicant stated, in Table 3.3-2, page 3-141 of the LRA, that loss of material due to pitting and crevice corrosion for stainless steel components is an applicable aging effect and that the One-Time Inspection Program (B.1.23) is the applicable AMP. However, in the environment of air, moisture, and humidity less than 100 °C (212 °F), stainless steel components are claimed by the applicant, in Table 3.3-2, page 3-96 of the LRA, to have no applicable aging effect. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.4, the applicant to provide the following additional information:

- (a) Explain the difference between the environment of moist air and air, moisture, and humidity less than 100 °C (212 °F), as stated in Table 3.3-2, page 3-141 and page 3-96, respectively, of the LRA, and justify the different conclusions drawn in terms of the combination of components/materials/environment/applicable aging effect.
- (b) In NUREG-1801 (Volume II, Chapter VII, Section E4), carbon steel components in auxiliary systems, such as piping and fittings and pump casings, in an oxygenated water environment are addressed. The applicable aging effects are loss of material and fatigue. For loss of material, the recommended AMP is Chapter XI.M2, "Water Chemistry," augmented by verification of the effectiveness of the Chemistry Control Program. NUREG-1801 suggests

that for these cases, the detection of aging effects is to be further evaluated. In Table 3.3-2 (page 3-116, item 3.3.3-140) of the LRA, the applicant stated that NUREG-1801 does not address carbon steel components in an oxygenated water environment. Clarify this statement based on the above information provided by NUREG-1801.

In its response dated October 3, 2003, to part (a) of the RAI, the applicant stated that the environment of moist air (identified in LRA Table 3.3-2, page 3-141) and the environment of air, moisture, and humidity less than 100 °C (212 °F) (identified in LRA Table 3.3-2, page 3-96) are the same. The only difference is in how they are described, which is verbatim with NUREG-1801, Volume II, Chapter VII, for the respective systems. For example, NUREG-1801, Volume II, Chapter VII, Items F1.1-a and H2.2-a, are aligned with the control room ventilation and the emergency diesel generator systems, respectively. Item F1.1-a identifies the environment as “Warm, moist air,” while Item H2.2-a identifies the environment as “Moist air.”

The applicant clarified that the subject Aging Management Reference (3.3.2.291) identified on page 3-141 of the LRA and those Aging Management References (3.3.2.37, 3.3.2.38, and 3.3.2.40) on page 3-96 are associated with internal environments and external environments, respectively.

The applicant further stated that Aging Management Reference 3.3.2.291 of LRA Table 3.3-2 is associated with components made of stainless steel with an indoor ambient internal environment. It specifically addressed components in the emergency diesel generator and SBO diesel generator air start systems. The “Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3,” EPRI 1003056, Appendix D, was utilized to perform the AMR for these components. It specifically identifies loss of material due pitting and crevice corrosion as the aging effect/mechanism.

The applicant further clarified that Aging Management References 3.3.2.37 and 3.3.2.38 of LRA Table 3.3-2 are associated with components made of ductile iron and malleable iron, respectively, with indoor ambient external environments. EPRI 1003056, Appendix E, was utilized to perform the AMR for these components although it does not specifically address the associated material types. However, it does address gray cast iron, which is considered to be less corrosion resistant than ductile iron and malleable iron. Therefore, the conclusions of EPRI 1003056, Appendix E, for gray cast iron should bound those for the subject material types. EPRI 1003056, Appendix E, conservatively considers an indoor ambient environment to be aggressively corrosive. Since the indoor ambient environment is only marginally corrosive, a determination was made that it was unnecessary to manage the aging of ductile iron and malleable iron components in this environment.

Finally, the applicant stated that Aging Management Reference 3.3.2.40 of LRA Table 3.3-2 is associated with components made of stainless steel in an indoor ambient external environment. EPRI 1003056, Appendix E, was utilized to perform the AMR for these components. EPRI 1003056, Appendix E, indicates that stainless steel materials are not subject to any viable aging mechanism in the absence of aggressive chemical species. The affected components are not subject to any aggressive chemical species. Therefore, the applicant concluded that it was unnecessary to manage the aging of stainless steel components in this environment.

On the basis of its review, the staff finds the applicant’s response to part (a) of RAI 3.3.2.4.4 acceptable because (1) the applicant documented that the environment of moist air (identified

in LRA Table 3.3-2, page 3-141) and the environment of air, moisture, and humidity less than 100 °C (212 °F) (identified in LRA Table 3.3-2, page 3-96) are the same, and (2) the applicant verified that the affected stainless steel components with an indoor ambient external environment described in Table 3.3-2, page 3-96, of the LRA are not subject to any aggressive chemical species and therefore it is unnecessary to manage the aging of stainless steel components in this environment. This is consistent with the recommendations of "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," EPRI 1003056, Appendix E.

In its response dated October 3, 2003, to part (b) of the RAI, the applicant stated that the statement in Aging Management Reference 3.3.2-140 (identified as 3.3.3-140 in the RAI) of LRA Table 3.3-2, indicating that NUREG-1801 does not address carbon steel components in an oxygenated water environment, is in reference to carbon steel piping and fittings in the reactor water cleanup system. The cited NUREG-1801 section (Volume II, Chapter VII, Section E4) addresses carbon steel components in the shutdown cooling system. The NUREG-1801 section corresponding to the reactor water cleanup system is Volume II, Chapter VII, Section E3, which does not address carbon steel piping and fittings. However, the applicant clarified that Aging Management Reference 3.3.2-140 of LRA Table 3.3-2 should have stated that NUREG-1801 does not address carbon steel piping and fittings in an oxygenated water environment for the reactor water cleanup system.

The staff finds the applicant's response to part (b) of RAI 3.3.2.4.4 acceptable because the applicant clarified that Aging Management Reference 3.3.2-140 of LRA Table 3.3-2 should have stated that NUREG-1801 does not address carbon steel piping and fittings in an oxygenated water environment for the reactor water cleanup system. The staff considers the issues related to RAI 3.3.2.4.4 part (a) and part (b) to be closed.

The aging effects identified in the LRA for the reactor water cleanup system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the reactor water cleanup system:

- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- BWR Reactor Water Cleanup System Program (3.3.2.3.2)
- ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD Program (Section 3.0.3.1)
- Structures Monitoring Program (3.0.3.14)

These AMPs, other than the BWR Reactor Water Cleanup System Program (B.1.17), are credited for managing the aging effects of components in several structures and systems and,

therefore, are considered common AMPs. These AMPs are evaluated in Sections 3.0.3.5, 3.0.3.10, 3.0.3.2, 3.0.3.3, and 3.0.3.1, respectively, of this SER.

The staff has evaluated the system-specific AMP, BWR Reactor Water Cleanup System Program, in Section 3.3.2.3.2 of this SER and found it to be acceptable for managing the aging effects identified for this system.

After evaluating the applicant's AMR for each of the components in the reactor water cleanup system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Tables 3.1-1 and 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

The fatigue of the reactor water cleanup system components is addressed in the TLAA in Section 4.3.3, "Reactor Coolant Pressure Boundary Piping and Component Fatigue Analysis," and Section 4.3.4, "Effects of Reactor Coolant Environment on Fatigue Life of Components and Piping (Generic Safety Issue 190)," of the LRA. This TLAA is evaluated in Section 4.3 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor water cleanup system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff concludes that the applicant has adequately identified the aging effects, and the AMPs credited for managing the aging effects, for the reactor water cleanup system so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the applicable UFSAR Supplement program descriptions and concludes that the UFSAR Supplement provides an adequate program description of the AMPs credited for managing aging in the reactor water cleanup system, as required by 10 CFR 54.21(d).

3.3.2.4.5 Fire Protection System

The applicant described its FP AMP in Sections B.1.18, Fire Protection, and B.1.19, Fire Water System, of the LRA. The applicant credits the FPP with managing the aging of FP system components that are within the scope of license renewal and subject to an AMR.

Summary of Technical Information in the Application. Table 2.3.3-5 in Section 2.3.3.2 of the LRA identifies component groups and provides aging management references in Tables 3.3.1 and 3.3.2 for GALL (NUREG-1801) and non-GALL items respectively.

Staff Evaluation. The staff reviewed Sections 3.3, Appendix B.1.18, and Appendix B.1.19 of the LRA to determine whether the applicant had demonstrated the effects of aging for the FP system will be adequately managed during the period of extended operations. The staff's review was conducted in accordance with Section 2.3 of the SRP-LR (NUREG-1800) and is described below.

Chapter XI.M26 of NUREG-1801 includes a fire barrier inspection program and a diesel-driven fire pump inspection program. The fire barrier inspection program requires periodic visual

inspection of fire barrier protection seals, fire barrier walls, ceilings, and floors, and periodic visual inspection and functional tests of fire-rated doors to ensure that their operability is maintained. The diesel-driven fire pump inspection program requires that the pump be periodically tested to ensure that the fuel supply line can perform its intended function. The AMP also includes periodic inspection and testing of the Halon/CO₂ fire suppression system.

Chapter XI.M27 of NUREG-1801 applies to water-based FP systems that consist of sprinklers, nozzles, fittings, valves, hydrants, hose stations, stand pipes, water storage tanks, and above-ground and underground piping and components that are tested in accordance with the applicable codes and standards of the National Fire Protection Association (NFPA). Such testing assures the minimum functionality of the systems. Also, these systems are normally maintained at the required operating pressure and are monitored such that loss of system pressure is immediately detected and corrective actions will be initiated.

The review of Section 3.3 of the LRA included an examination of Tables 3.3.1 and 3.3.2. LRA Tables 3.3-1 and 3.3-2 do not identify any aging effects on FP buried piping, fittings and tanks. However, these components are exposed to soil and groundwater environment, and are subject to general, pitting and crevice corrosion, and microbiological influenced corrosion (MIC) that may result in loss of material. In a letter dated August 4, 2003, the staff requested clarification regarding Tables 3.3-1 and 3.3-2. In RAI 3.3.2.4.5-1.a, the staff requested that the applicant provide justification for not identifying any aging effect/mechanism for FP SSCs.

In a letter dated October 3, 2003, the applicant responded that FP buried piping and fittings that are exposed to soil and groundwater environment are addressed in LRA Section 2.3.3.5, Table 2.3.3-5, under component group "Piping and Fittings (includes flex hose, hose reels, hoses, nozzles, tubing, sprinklers, and gaskets of buried fire mains)." These components are subject to pitting and crevice corrosion and MIC that may result in loss of material. The aging management results for this component group are provided in LRA Table 3.3-2 (Aging Management References 3.3.2.33, 3.3.2.131, and 3.3.2.154). There are no tanks in the FP system that are exposed to soil and groundwater environment (buried tank). These components are evaluated for loss of material (pitting, crevice corrosion, selective leaching and MIC), and changes in material properties (elastomer degradation and loss of resiliency) aging effects/mechanisms. The staff reviewed the applicant's response and concurs that the FP piping can be adequately addressed under the component group "Piping and Fittings" and aging management references 3.3.2.33, 3.3.2.131, and 3.3.1.154.

The staff requested in RAI 3.3.2.4.5-1.b that the applicant provide justification for not identifying any aging effect/mechanism for fire hose stations, which are exposed to a warm and moist environment and are subject to pitting and corrosion that may result in loss of material. In a letter dated October 3, 2003, the applicant responded that fire hose stations are addressed in LRA Section 2.3.3.5, Table 2.3.3-5 under the component group "Piping and Fittings (includes flex hose, hose reels, hoses, nozzles, tubing, sprinklers, and gaskets of buried fire mains)". NUREG 1801 considers fire hose station as a piping component in the Fire Water System AMP, B1.19 (NUREG-1801 XI.M27). The aging management results of the carbon steel components that are exposed to warm and moist air environment are provided in aging management reference 3.3.2.144, Table 3.3-2, under the component group "Piping and Fittings". These components are subject to general pitting and crevice corrosion, which may result in loss of material. The staff reviewed applicant's response and concurs that hose stations can be

adequately addressed under component group "Piping and Fittings" and aging management references 3.3.2.144.

The line items with reference numbers, 3.3.2.138, 3.3.2.212, and 3.3.2.234 of LRA Table 3.3.2 state that the piping and nozzles components of the CO₂ system do not require an AMP, citing a dry gas atmosphere. However, these component types are exposed to a warm and moist environment in the turbine building, and are subject to pitting and corrosion that may result in loss of material. In a letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.5-1c, that the applicant provide justification for not identifying any aging effect/mechanism for Halon/CO₂ total flooding fire suppression systems components including nozzles, valves, piping, fittings, tubing, hose stations, and tanks, as these component types are exposed to a warm and moist environment in the turbine building, and are subject to pitting and corrosion that may result in loss of material. In a letter dated October 3, 2003, the applicant responded that dry gas atmosphere is an internal environment of the Halon/CO₂ fire suppression systems and is associated with aging reference numbers, 3.3.2.138, 3.3.2.212, and 3.3.2.234 on Table 3.3-2. That table provides aging management results for the internal dry gas environment. Aging management reference 3.3.1.5 in Table 3.3.1 provides the aging management results of external surfaces for carbon steel components that are subject to pitting and corrosion, which may result in loss of material. The aging management results for the external surfaces of brass and bronze components are provided in aging management reference 3.3.2.23 in Table 3.3.2. The staff reviewed the applicant's response. Although aging management reference 3.3.1.5 on Table 3.3.1 does not specifically list either Halon or CO₂ fire suppression systems, including these systems in this aspect of the AMP is acceptable.

The line item with reference number 3.3.2.62 of LRA Table 3.3-2 states that cementitious fire proofing does not require an AMP, because a "non-aggressive," vibration free plant indoor environment is not conducive to promoting aging of cementitious fireproofing. However, industry experience, including previous experience at the Dresden Nuclear Power Station, has shown that deterioration of the steel under the coating may cause the cementitious material to become separated from the steel, and in some cases fall off. In a letter dated August 4, 2003, the applicant was requested to provide justification for not having an AMP that will assure its integrity of the cementitious fire proofing.

In a response dated October 3, 2003, the applicant agreed that upon review of aging management reference 3.3.2.62, that cementitious fire proofing requires aging management due to separation caused by deterioration of the structural steel under the coating. The structural steel coatings are currently inspected as part of AMP, B.1.18, "Fire Protection". This also applies to aging management reference 3.3.2.63, for ceramic fiber fire wrap. Both LRA aging management references 3.3.2.62 and 3.3.2.63 should have read as follows:

Ref No	Component Group	Material	Environment	Aging Effect/ Mechanism	Aging Management Program	Discussion
3.3.2.62	Fire Proofing	Cementitious Fire Proofing	Indoor	Separation/ deterioration of steel	Fire Protection (B.1.18)	NUREG-1801 does not address cementitious fireproofing in an indoor environment.
3.3.2.63	Fire Wrap	Ceramic Fiber	Indoor	Separation/ deterioration of	Fire Protection (B.1.18)	NUREG-1801 does not address

Ref No	Component Group	Material	Environment	Aging Effect/ Mechanism	Aging Management Program	Discussion
				steel		ceramic fiber fire wrap in an indoor environment.

LRA Section A.1.18 on Page A-8 (Dresden, Units 2 and 3) of the LRA should have read as follows:

The fire protection aging management program includes a fire barrier inspection program and a diesel-driven fire pump inspection program. The fire barrier inspection program requires periodic visual inspection of fire barrier penetration seals; fire wraps and fire proofing; fire barrier walls, ceilings, and floors; flood barrier penetration seals that also serve as fire barrier seals; and periodic visual inspection and functional tests of fire rated doors to ensure that their operability is maintained. The program includes surveillance tests of fuel oil systems for the diesel-driven fire pumps and isolation condenser diesel-driven makeup pumps to ensure that the fuel supply lines can perform intended functions. The program also includes visual inspections and periodic operability tests of Halon and CO₂ fire suppression systems based on NFPA codes.

Prior to the period of extended operation, the program will be revised to include:

- Inspection of oil spill barriers
- Inspection of external surfaces of the Halon and the CO₂ fire suppression system
- Periodic capacity tests of the isolation condenser makeup pumps
- Specific fuel supply leak inspection criteria for fire pumps and isolation condenser makeup pumps during tests
- Specific inspection criteria for fire doors
- Inspection frequencies for fire doors and spill barriers

This is part of Commitment #18 of Appendix A in this SER.

LRA Section A.1.18 on Page A-32 (Quad Cities, Units 1 and 2) of the LRA should have read as follows:

The fire protection AMP includes a fire barrier inspection program and a diesel-driven fire pump inspection program. The fire barrier inspection program requires periodic visual inspection of fire barrier penetration seals; fire wraps and fire proofing; fire barrier walls, ceilings, and floors; flood barrier penetration seals that also serve as fire barrier seals; and periodic visual inspection and functional tests of fire rated doors to ensure that their operability is maintained. The program includes surveillance tests of fuel oil systems for the diesel-driven fire pumps to ensure that the fuel supply line can perform intended functions. The program also includes visual inspections and periodic operability tests of the carbon dioxide fire suppression system based on NFPA codes.

Prior to the period of extended operation, the program will be revised to include:

- C Inspection of oil spill barriers

- C Inspection of external surfaces of the CO₂ fire suppression system
- C Specific fuel supply leak inspection criteria for fire pumps
- C Specific inspection criteria for fire doors

This is part of Commitment #18 of Appendix A in this SER.

LRA Section B.1.18 program description paragraph 3 on Page B-38 of the LRA should have read as follows:

The program provides for visual inspection of fire barrier penetration seals, fire wraps, fire proofing, and flood barrier penetration seals that also serve as fire barrier seals for signs of degradation, such as damage, holes, cracking, and loss of material, through periodic inspection, surveillance and maintenance activities. The inspections are implemented through station procedures. Flood barrier penetration seal inspections are part of the structures monitoring program.

The staff reviewed the applicants response. The staff finds the inclusion of fire proofing into the AMP acceptable as proposed by the applicant because the AMP as revised will effectively manage the aging effects of the fire proofing and fire wraps.

The aging effects identified in the LRA for the FP system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the FP system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.5A Fire Water System

Summary of Technical Information. Appendix B, Section B.1.19 identifies the AMP for the fire water system components within the scope of license renewal. The fire water system AMP provided for managing the loss of material and biofouling aging effects on the intended functions of the water-based FP components within the scope of license renewal. The program included inspection, surveillance testing and maintenance activities. This section addresses the consistency of B.1.19 with Section XI.M27 of NUREG-1801 and identifies exceptions and enhancements to its specific requirements. This section also discusses operating experience with the fire water system at Dresden and Quad Cities.

Staff Evaluation. The staff reviewed LRA Appendix B.1.19 to determine whether there is reasonable assurance that the AMP activities are adequate to maintain the intended functions of the fire water system SSCs for the period of extended operation, as required by 10 CFR 54.21(a)(1)(a)(3). The staff's review was conducted in accordance with Section 2.3 of the SRP-LR (NUREG-1800) and is described as below.

LRA Appendix B, Section B.1.19, "Fire Water System," states that, "With enhancements the fire water system aging management program is consistent with the ten elements of aging management program XI.M27, "Fire Water System," specified in NUREG-1801 with the following exceptions..." In order for the staff to evaluate the adequacy of the applicant's FP AMP and reach a conclusion that it is consistent with NUREG-1801, the staff requested, in a letter dated August 4, 2003, that the applicant follow the guidelines provided in NUREG-1801 and the interim staff guidance for FP AMP [Staff Guidance (ISG)-04, "Aging Management of Fire Protection Systems for License Renewal," (ADAMS Accession # ML022260137), dated December 3, 2002]. NUREG-1801 contains the staff's generic evaluation of the existing plant programs and documents the technical basis for determining where existing programs are adequate without modification and where existing programs should be augmented for the period of extended operation.

In a letter dated October 3, 2003, the applicant responded with the following information. Part 1 of this response compares the Dresden and Quad Cities fire water system program against the NUREG-1801, XI.M27 program and identifies where exceptions still exist. Included in Part 1 is a discussion of how Dresden and Quad Cities are addressing ISG-04. Part 2 of the response discusses the Dresden and Quad Cities underground loop flow testing.

- (1) The applicant concluded in the Dresden and Quad Cities LRA, Appendix B, Section B.1.19, that the fire water system program, after the enhancements discussed in Appendix B, Section B.1.19, Subsection, "Enhancements," are implemented, will be consistent with the ten-element program described in NUREG-1801, XI.M27, with certain exceptions. Although not stated in the LRA, after the enhancements are implemented, the fire water system program will also be consistent with the NRC staff recommendations for fire water systems as provided in ISG-04.

Exelon evaluated the Dresden and Quad Cities fire water system program against the attributes of the ten elements of NUREG-1801, XI.M27 and identified that after the enhancements are implemented, the following exceptions will still exist:

- NUREG-1801, XI.M27, Element 3 states that NRC GL 89-13 recommends periodic flow testing of infrequently used loops of the fire water system at the maximum design flow to ensure that the system maintains its intended function. Flow tests at the maximum design flow are not practicable for Dresden and Quad Cities. Instead, the Dresden and Quad Cities flow tests analyze the system hydraulic resistance. Dresden measures underground piping pressure drops at given flows for selected segments of underground fire mains and compares them to pre-calculated allowable pressure drops for the same segments at the given flows. The measured pressure drop must be equal to or less than the allowable. The measured results are also compared with those of previous tests to identify adverse trends. Quad Cities takes pressure measurements and calculates the friction loss coefficients (\mathcal{C} factor) for the various sections of the underground fire mains. The calculated \mathcal{C} factor must be equal to or greater than 80 for all piping tested. The calculated results are compared with those of previous tests to identify adverse trends. A low \mathcal{C} factor (Quad Cities method) or a large pressure drop (Dresden method) may be indicative of either fouling or leakage of the underground fire mains.

- (b) NUREG-1801, XI.M27, "Program Description," states that the AMP (XI.M27) applies to water-based FP systems that are tested in accordance with the applicable National Fire Protection Association (NFPA) codes and standards.

The Dresden and Quad Cities fire water systems may not in all cases be tested in accordance with NFPA codes, but in these cases, technical justifications for the deviations are documented. NFPA codes were used in the design of active FP systems (i.e., fire suppression and detection systems). Similarly, inspection and periodic testing is performed in accordance with corporate and station procedures developed using NFPA codes as guidance. Corporate Procedure ER-AA-610, "Performance Based Evaluations for Fire Protection," ensures that performance-based evaluations that result in surveillance frequencies that exceed those specified in site-specific NFPA codes of record serve as the deviation justification. Where code deviations are required or desirable, they are made under the intent of the code and documented in the NFPA Code Deviation Report at each site in accordance with CC-AA-211, "Fire Protection Program." Revision to the NFPA Code Deviation Report is necessary unless the report has previously addressed the deviation.

- (c) Interim staff guidance ISG-04 was issued on December 3, 2002. Included as part of ISG-04 is an amended ten-element AMP, XI.M27, for the fire water system. Applicant evaluated the Dresden and Quad Cities fire water system program against the staff recommendations for fire water systems included in ISG-04 with the following conclusions:

- C In Element 3 of the amended XI.M27, the staff provides for the option of performing wall thickness evaluations in lieu of testing at maximum design flow. The flow testing discussed in (1)(a) is not performed at maximum design flow, but Dresden and Quad Cities will perform wall thickness measurements.
- C In Element 4 of the amended XI.M27, the staff recommends that the applicant perform a baseline pipe wall thickness evaluation of the FP piping using a non-intrusive means of evaluating wall thickness, such as volumetric inspection, to detect general corrosion before the current license term expires. The staff also recommends that the applicant perform pipe wall thickness evaluations at plant-specific intervals during the period of extended operation. As an alternative to non-intrusive testing, the amended XI.M27 allows for a visual inspection of the internal surface of the FP piping upon each entry to the system for routine or corrective maintenance as long as it can be demonstrated that inspections are performed on a representative number of locations on a reasonable basis.

Dresden and Quad Cities will perform periodic non-intrusive FP piping wall thickness measurements. These non-intrusive inspections will be conducted prior to the end of the current term and repeated on a frequency not exceeding every 10 years. This is part of Commitment #19 of Appendix A of this SER.

Element 4 of the amended XI.M27 also states that if the environmental and material conditions that exist on the interior surfaces of the below-grade FP piping are similar to the conditions that exist within the above-grade piping, the results of the

inspections of the above-grade FP piping can be extrapolated to evaluate the condition of below-grade piping.

The below-grade fire mains at both Dresden and Quad Cities comprise uncoated carbon steel. The internal environment of the below-grade fire mains at both Dresden and Quad Cities is "raw water," the same as NUREG-1801 Reference VII.G.6-a. Therefore, the results of the inspections of above-grade FP uncoated carbon steel piping with a raw water environment can be extrapolated to evaluate to the condition of the below-grade fire mains.

- C In Element 4 of the amended XI.M27, the staff recommends, in accordance with NFPA 25, that sprinkler head testing be performed at year 50 of the sprinkler system service life, not year 50 of plant operation, with subsequent sprinkler head testing every 10 years thereafter. Representative samples of Dresden and Quad Cities sprinkler heads will be submitted to a testing laboratory prior to being in service 50 years. This testing will be repeated on a frequency not exceeding every 10 years. This is part of Commitment #19 of Appendix A of this SER.

The staff reviewed the applicant's response. On the basis of the justification provided, the staff concurs that the aging of fire water system components will be adequately managed by the AMP. In a letter dated August 4, 2003, the staff requested that the applicant clarify the flow rates and testing frequencies of the underground loop flow tests and describe the plant procedure for this testing.

- (2) In a letter dated October 3, 2003, the applicant responded with additional details regarding frequency and method of flow testing. Flow testing is conducted at five-year intervals at Dresden and Quad Cities. As stated in Section (1)(a) of the applicant's response, tests are not performed at the maximum design flow. By themselves, the absolute values of the flows achieved during testing at both Dresden and Quad Cities provide no indication of the condition of the underground fire mains. Utilizing the Dresden test procedure, test conditions are established to provide flow rates within a pre-determined range corresponding to a table of pre-calculated allowable pressure drops vs. flows. For the cross tie flow test, these pre-determined flows range from 2,500 gpm to 3,500 gpm. For the yard loop flow test, these pre-determined flows range from 900 gpm to 1,300 gpm.

The Quad Cities test procedure methodology (γ_C factor) employs the installation of four underwriter's playpipes on each of the three pipe segments to be tested. Sequential tests are performed on each segment with one, two, three, and four playpipes flowing. Total flows and γ_C factors are calculated for each combination of flowing playpipes. For each pipe segment, the γ_C factors for each separate flow scenario are compared and the most appropriate one is chosen. Since more accurate γ_C factors are obtained when calculated for higher flows, it is most likely that the one calculated for four flowing playpipes will be chosen. During the last flow test performed at Quad Cities, the highest calculated flows for each of the three segments, each with four playpipes flowing, were 2,296 gpm, 2,562 gpm, and 2,547 gpm.

The staff reviewed the applicant's response and on the basis of the additional technical data, concurs that the frequency and method of testing adequately addresses NUREG-1801, XI.M27, Element 3.

The aging effects identified in the LRA for the fire water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the fire water system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.6 Emergency Diesel Generator and Auxiliaries System

Summary of Technical Information in the Application. The description of the emergency diesel generator and auxiliaries system can be found in Section 2.3.3.6 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-6. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Components of the emergency diesel generator and auxiliaries system are described in Section 2.3.3.6 of the LRA as being within the scope of license renewal and subject to an AMR. Table 2.3.3-6 of the LRA lists individual components of the system, including piping, tubings, ducts, hinges, latches, pumps, valves, heat exchangers, coolers, filters/strainers, restricting orifices, tanks, vessels, closure bolting, doors, equipment frames, flexible hoses, flex collars, lubricators, mufflers, tanks, sight glasses, thermowells, air accumulator vessels, debris screens, NSR vents or drains, and turbochargers.

Carbon steel in outdoor ambient conditions is subject to loss of material due to general, pitting, and crevice corrosion. High-strength, low-alloy steel in outdoor ambient conditions is subject to loss of material due to general corrosion and wear. Cast iron exposed to indoor moist and humid air is subject to loss of material due to general, pitting, and crevice corrosion. No aging effect is identified for stainless steel, aluminum, brass, bronze, and copper exposed to indoor moist and humid air. Stainless steel, aluminum, brass, bronze, cast iron, and copper exposed to an internal environment of moist air are subject to loss of material due to pitting, crevice, and/or general corrosion. Elastomer seals exposed to an internal environment of moist air or saturated air are subject to hardening and loss of strength due to elastomer degradation. Cast iron exposed to an internal environment of hot diesel engine exhaust gases is subject to loss of material due to general, pitting, and crevice corrosion. Brass, bronze, cast iron, and copper exposed to chemically treated demineralized water are subject to loss of material due to general, pitting, and crevice corrosion, MIC, and/or select leaching. Carbon steel, stainless steel, brass, and bronze exposed to chemically treated demineralized water are subject to cracking due to SCC. Carbon steel and cast iron exposed to lubricating oil are subject to loss of material due to general, pitting, and crevice corrosion. No aging effect is identified for brass or bronze in dry air.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the emergency diesel generator and auxiliaries system:

- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- Closed-Cycle Cooling Water System Program (B.1.14)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Structures Monitoring Program (B.1.30)
- Compressed Air Monitoring Program (B.1.16)
- Lube Oil Monitoring Program (B.2.5)
- Fuel Oil Chemistry Program (B.1.21)
- Periodic Inspection of Ventilation System Elastomers Program (B.2.3)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the emergency diesel generator and auxiliaries system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the emergency diesel generator and auxiliaries system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.6 and Tables 2.3.3-6, 3.3-1, and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

In LRA Table 3.3-2, Reference No. 3.3.2.18, the applicant stated that high-strength, low-alloy steel closure bolting components in outdoor ambient conditions are subject to the aging effect of loss of material due to general corrosion and wear. However, the applicant did not include crack initiation and growth due to SCC or other mechanisms as an applicable aging effect/mechanism. By letter dated August 4, 2003, the staff requested, in RAI 3.3-5, the

applicant to provide its technical basis for not including this aging effect/mechanism. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.5 of this SER.

The applicant uses the Bolting Integrity Program (B.1.12) to manage general corrosion on external surfaces of many auxiliary system nonbolting components. The staff notes that the Bolting Integrity Program description states, "The program consists of visual inspections for external surface degradation that may be caused by loss of material or cracking of the bolting, or by an adverse environment." This suggests that only the bolting material will be inspected for aging degradation. By letter dated August 4, 2003, the staff requested, in RAI 3.3-9, the applicant to explain (including the acceptance criteria and inspection interval) how the Bolting Integrity Program is used to manage general corrosion on external surfaces of nonbolting components, such as piping, valves, mufflers, and others. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.9 of this SER.

In Table 2.3.3-6, page 2-119 of the LRA, Aging Management Reference 3.3.1.7 refers to piping and fittings (and attached support) and valves (and attached support). In Table 3.3-1, page 3-74 of the LRA, Aging Management Reference 3.3.1.7 credits the Fuel Oil Chemistry and One-Time Inspection Programs for managing the aging effects of the fuel oil tank and day tank. On the other hand, the "Tanks" group in Table 2.3.3-6 does not include Aging Management Reference 3.3.1.7 that links to the Fuel Oil Chemistry Program and the One-Time Inspection Program for managing the aging effects of the fuel oil tank and day tank. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.6(a), the applicant to provide clarification of the discrepancy.

In its response dated October 3, 2003, the applicant stated that the piping, fittings, and valves referred to in Aging Management Reference 3.3.1.7 belong to the diesel fuel oil system and diesel fuel oil tanks, as shown in Table 3.3-1 in the "Components Evaluated" column. The diesel fuel oil system is discussed in LRA Section 2.3.3.13, Table 2.3.3-13 (page 2-140). The "Tanks" group shown in LRA Table 2.3.3-6 (page 2-119) includes the diesel generator cooling water expansion tanks that are managed by the Closed-Cycle Cooling Water System Program.

On the basis of its review, the staff finds the applicant's response acceptable because the applicant has clarified that the "Tanks" group in Table 2.3.3-6 includes the diesel generator cooling water expansion tanks that are managed by the Closed-Cycle Cooling Water System Program. The piping, fittings, and valves referred to in Aging Management Reference 3.3.1.7 belong to the diesel fuel oil system that is managed by the Fuel Oil Chemistry and One-Time Inspection Programs. This is part of Commitment #23 of Appendix A of this SER.

Cracking is identified as an aging effect of brass or bronze valves exposed to chemically treated demineralized water in Aging Management Reference 3.3.2.258, Table 2.3.3-6, of the LRA. Loss of material is, however, not identified as an aging effect. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.6(b), the applicant to provide justification for not identifying loss of material as an aging effect for brass or bronze valves exposed to chemically treated demineralized water.

In its response dated October 3, 2003, the applicant agreed with the staff that loss of material applies for brass or bronze in a (nitrite) treated water environment. An Aging Management Reference similar to 3.3.2.134 should have been added in LRA Table 2.3.3-6 for the valves component group. The applicant has identified the Closed-Cycle Cooling Water System

Program (B.1.14) and Selective Leaching of Materials Program (B.1.24) for managing the aging effect of loss of material in these components.

On the basis of its review, the staff finds the applicant's response acceptable because the applicant stated that loss of material is an applicable aging effect for brass or bronze valves exposed to chemically treated demineralized water. The applicant also committed the Closed-Cycle Cooling Water System Program (B.1.14) and the Selective Leaching of Materials Program (B.1.24) for managing loss of material for these components. The staff considers all issues related to RAI 3.3.2.4.6(a) and (b) to be closed.

The aging effects identified in the LRA for the emergency diesel generator and auxiliaries system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the emergency diesel generator and auxiliaries system:

- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Structures Monitoring Program (Section 3.0.3.14)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- Lube Oil Monitoring Program (Section 3.0.3.16)
- Fuel Oil Chemistry Program (Section 3.3.2.3.5)
- Periodic Inspection of Ventilation System Elastomers Program (Section 3.0.3.17)
- Periodic Inspection of Components Subject to Moist Environments (3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

The Bolting Integrity Program, Open-Cycle Cooling Water System Program, Closed-Cycle Cooling Water System Program, One-Time Inspection Program, Selective Leaching of Materials Program, Structures Monitoring Program, Compressed Air Monitoring Program, Lube Oil Monitoring Program, and Periodic Inspection of Ventilation System Elastomers Program are credited with managing the aging effects of several components in different structures and systems and are, therefore, considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.5, 3.0.3.6, 3.0.3.7, 3.0.3.10, 3.0.3.11, 3.0.3.14, 3.0.3.8, 3.0.3.16, and 3.0.3.17, respectively, of this SER.

The Fuel Oil Chemistry Program is a system-specific AMP. The staff's evaluation of this AMP is documented in Section 3.3.2.3.5 of this SER.

After evaluating the applicant's AMR for each of the components in the emergency diesel generator and auxiliaries system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the emergency diesel generator and auxiliaries system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.7 HVAC—Main Control Room

Summary of Technical Information in the Application. The description of the HVAC—Main Control Room can be found in Section 2.3.3.7 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-7. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-7 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include air handlers heating/cooling (CR HVAC), dampeners, debris screens, diffusers, doors, duct fittings, hinges, latches, closure bolts, equipment frames (includes dampers), duct, housings, silencers, filters/strainers, heat exchangers, flow elements, flex collars, doors and dampener seals, housings and supports, NSR vents or drains, piping and valves, piping and fittings, piping and fittings (attached support) (Quad Cities only), seals, sight glasses, tubing, and valves.

Carbon steel components are identified as being subject to loss of material due to general, pitting, and crevice corrosion and MIC [for duct (drip-pan) and piping for moisture drainage] from exposure to warm, moist air. Copper-nickel, brass, bronze, stainless steel, and copper components are identified as being subject to loss of material due to pitting and crevice corrosion from exposure to warm, moist air. Neoprene and similar elastomers are identified as being subject to hardening and loss of material due to wear from exposure to warm, moist air. Neoprene is also identified as being subject to hardening and loss of strength and elastomer degradation from exposure to warm, moist air. Exposure of aluminum-zinc alloy components to warm, moist air has no aging effect. Exposure of carbon steel, copper, brass, bronze, and ductile iron components to dry gas has no aging effect. Copper tubes, tubesheets, and end bells and aluminum fins are identified as being subject to cracking due to mechanical fatigue from exposure to refrigerant on the tube side and warm, moist air on the shell side. Copper tubes are also identified as being subject to buildup of deposits and fouling from exposure to

refrigerant on the tube side and warm, moist air on the shell side. Heat exchanger tubes made from 90-10 copper-nickel and shells made from carbon steel are subject to cracking due to mechanical fatigue and SCC and loss of material due to general, galvanic, pitting, and crevice corrosion and MIC, erosion or flow-accelerated corrosion, and wear from exposure to raw water on the tube side and refrigerant on the shell side. Heat exchanger tubes made from 90-10 copper-nickel are also subject to buildup of deposits and fouling from exposure to raw water on the tube side and refrigerant on the shell side. Carbon steel, stainless steel, brass, or bronze components are identified as being subject to loss of material due to corrosion from exposure to air, moisture, humidity, and leaking fluid. Carbon steel pipes, fittings, and valves are identified as being subject to loss of material due to general corrosion from exposure to raw, untreated salt water or fresh water. Cast iron valves are identified as being subject to loss of material due to general, pitting, crevice, and galvanic corrosion, erosion, and selective leaching, and MIC flow blockage/biofouling, silting, and corrosion buildup from exposure to raw, untreated salt water or fresh water. External surfaces of cast iron components are also identified as being subject to loss of material due to pitting and crevice corrosion from exposure to air, moisture, and humidity less than 100 °C (212 °F).

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the HVAC—Main Control Room:

- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- Compressed Air Monitoring Program (B.1.16)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Periodic Inspection of Ventilation System Elastomers Program (B.2.3)
- Heat Exchanger Test and Inspection Activities Program (B.2.6)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the HVAC—Main Control Room will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the HVAC—Main Control Room. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.7, Table 2.3.3-7, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations for which loss of

material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various auxiliary systems. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

The applicant uses the Bolting Integrity Program (B.1.12) to manage general corrosion on external surfaces of many auxiliary system nonbolting components. The staff notes that the Bolting Integrity Program description states, "The program consists of visual inspections for external surface degradation that may be caused by loss of material or cracking of the bolting, or by an adverse environment." This suggests that only the bolting material will be inspected for aging degradation. By letter dated August 4, 2003, the staff requested, in RAI 3.3-9, the applicant to explain (including the acceptance criteria and inspection interval) how the Bolting Integrity Program is used to manage general corrosion on external surfaces of non-bolting components, such as piping, valves, mufflers, and others. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.9 of this SER.

In the treated water environment of the HVAC—Main Control Room, the relevant conditions could exist for crack initiation and growth due to SCC to occur in carbon steel components. However, this aging effect/mechanism was only addressed for heat exchanger tubes in the auxiliary systems AMR. The staff requested the applicant to provide justification for not including crack initiation and growth due to SCC in carbon steel components, other than the heat exchanger tubes, in a treated water environment. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.7 pertaining to this issue.

In its response dated October 3, 2003, the applicant stated that, for carbon steel components, SCC occurs only in nitrite treated water, per Appendix A of "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," EPRI 1003056. For the Dresden and Quad Cities stations, the emergency diesel generator jacket water, reactor building closed-cycle cooling water system, and turbine building closed-cycle cooling water system utilize nitrite treated water; therefore, these are subject to SCC and the resulting crack initiation and growth. These aging mechanisms, aging effects, and required AMPs are shown for these systems in

LRA Section 3.3—Aging Management References 3.3.2.68 (flow elements), 3.3.2.77 or 3.3.2.117 (heat exchangers), 3.3.2.137 (piping and fittings), 3.3.2.174 (pumps), 3.3.2.211 (tanks), 3.3.2.233 (tubing), and 3.3.2.267 (valves). These reference numbers apply to the following component groups for the abovementioned systems.

- emergency diesel generator jacket water (LRA Section 2.3.3.6), including piping and fittings, pumps, tanks, tubing, and valves
- reactor building closed-cycle cooling water system (LRA Section 2.3.3.17), including flow elements, heat exchangers (3.3.2.117 for Dresden heat exchangers and 3.3.2.77 for Quad City heat exchangers), piping and fittings, pumps, tanks, tubing, and valves
- turbine building closed-cycle cooling water system (LRA Section 2.3.3.18), including piping and fittings and valves

The heat exchanger tubes, including those of the control room HVAC coolers, for Dresden and Quad Cities are not made of carbon steel. Additionally, the environment for the main control room HVAC coolers is raw water, refrigerant, and warm, moist air. Therefore, the conditions relevant to SCC do not exist.

On the basis of its review, the staff finds the applicant's response acceptable because the applicant provided further clarifications on the AMR for these relevant components and the heat exchanger tubes, including those of the control room HVAC coolers, for Dresden and Quad Cities that are not made of carbon steel. The staff considers the issues related to RAI 3.3.2.4.7 to be resolved.

The aging effects identified in the LRA for the HVAC—Main Control Room are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the HVAC—Main Control Room:

- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.15)
- Periodic Inspection of Ventilation System Elastomers Program (Section 3.0.3.17)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is discussed in Sections 3.0.3.5, 3.0.3.6, 3.0.3.8, 3.0.3.10, 3.0.3.11, 3.0.3.15, and 3.0.3.17, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the HVAC—Main Control Room, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the HVAC—Main Control Room will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.8 HVAC—Reactor Building

Summary of Technical Information in the Application. The description of the HVAC—Reactor Building can be found in Section 2.3.3.8 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-8. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-28 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include doors, closure bolts, duct fittings, equipment frames (including dampers, duct, housings, piping, and valves), hinges, latches, tubing, and valves. Listed components particular only to Dresden include debris screens, housing and supports, filters/strainers, piping and fittings, and seals.

Aluminum-zinc alloy components exposed to warm, moist air have no aging effect. Carbon steel components exposed to warm, moist air are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion. Stainless steel components exposed to warm, moist air or saturated air are subject to the aging effect of loss of material due to pitting and crevice corrosion. Copper and copper alloys exposed to saturated air are subject to the aging effect of loss of material due to pitting and crevice corrosion. Copper, copper alloys, and stainless steel exposed to air, moisture, and humidity experience no aging effects.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the HVAC—Reactor Building:

- Compressed Air Monitoring Program (B.1.16)
- One-Time Inspection Program (B.1.23)
- Periodic Inspection of Ventilation System Elastomers Program (B.2.3)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the HVAC—Reactor Building will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the HVAC—Reactor Building. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.8, Table 2.3.3-8, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or the air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40 as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on the aluminum components of the air handlers heating/cooling system exposed to an air,

moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

Loss of material due to selective leaching may be an applicable aging effect for copper alloy components exposed to a saturated air environment where water condensation on the surfaces of these components may occur. However, in LRA Table 3.3-2, Reference No. 52, 242, and 262, loss of material due to selective leaching was not identified as an applicable aging effect for copper alloy components in saturated air. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.8 requesting the applicant to provide the technical basis for excluding this aging effect from AMR.

In its response dated October 3, 2003, the applicant stated that the copper alloy materials of Aging Management References 3.3.2.52, 3.3.2.242, and 3.3.2.262 are used in compressed gas and ventilation systems at Dresden and Quad Cities. These are not installed in areas where water would be expected to pool. For Aging Management References 3.3.2.52, 3.3.2.242, and 3.3.2.262, the susceptible materials, copper alloys, are not exposed to water for prolonged periods and, therefore, selective leaching is not considered an aging mechanism for Dresden and Quad Cities applications. The staff requested the applicant to provide clarification, with justification, on how long is considered a prolonged period to support the conclusion that selective leaching is not considered an applicable aging mechanism.

In its response dated December 17, 2003, the applicant stated that the copper alloy components used in the reactor building HVAC system, and referenced in Aging Management References 3.3.2.52, 3.3.2.242, and 3.3.2.262, contain air (instrument and process air) as their process fluid. The applicable components are (1) tubing for instrumentation, (2) restricting orifice (filter/strainer) for differential pressure instrument, and (3) tubing, manual/check valves, and solenoid valves for air-operated dampers and valves. These components are located in the reactor building general areas where the relative humidity level is a maximum of 90 percent. Neither the internal process nor the external environments could cause wetting of these components. The statement, "not exposed to water for prolonged periods," refers to the fact that the only potential source of wetting would be exposure to leaks from other systems. Since the HVAC controls are located in the reactor building general areas, these leaks would be detected by operators during their rounds and corrected. Operator rounds in the reactor building are performed at least once per day, so the duration of wetting would at most be a few days, assuming the leakage starts small. Therefore, the copper alloy components in the reactor building HVAC are not subject to an aggressive wetted environment conducive to promoting a loss of material due to selective leaching. The external environment AMR results for these components are provided in LRA Reference Nos. 3.3.2.23 and 3.3.2.34.

The staff finds the applicant's additional response to the RAI 3.3.2.4-8 supplemental information request adequate and acceptable because the applicant has demonstrated that the occasions in which the copper alloy components could come in contact with water are very rare and the periods during which these components are wet, if any, are very limited (only a few days). Therefore, no aging management is required for the copper alloy components in the HVAC—Reactor Building.

The aging effects identified in the LRA for the HVAC—Reactor Building are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the HVAC—Reactor Building.

- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Periodic Inspection of Ventilation System Elastomers Program (Section 3.0.3.17)

These AMPs are credited for managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.8, 3.0.3.10, and 3.0.3.17, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the HVAC—Reactor Building, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the HVAC—Reactor Building will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.9 Emergency Core Cooling System Corner Room HVAC

Summary of Technical Information in the Application. The description of the ECCS corner room HVAC can be found in Section 2.3.3.9 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-9. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-9 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include air handlers heating/cooling (Aux & RW HVAC), duct and fittings, access doors, closure bolting, and equipment frames.

The LRA identifies that copper, stainless steel, and carbon steel components exposed to a raw water environment on one side and a warm, moist air environment on the other side are subject

to the aging effects of loss of material due to general (carbon steel), galvanic, pitting, crevice, and microbiologically influenced corrosion, erosion or flow-accelerated corrosion, and wear. Copper, stainless steel, and carbon steel components exposed to a raw water environment on one side and a warm, moist air environment on the other side are subject to the aging effect of cracking due to fatigue and SCC. Copper tubes exposed to a raw water environment are also subject to the loss of heat transfer function aging effect due to buildup of deposit and fouling. Aluminum fins exposed to a warm, moist air environment experience no aging effects. Aluminum fins connected to copper tubes are subject to loss of material due to galvanic corrosion.

Aging Management Programs

The following AMP is utilized to manage the identified aging effects in the ECCS corner room HVAC:

- Open-Cycle Cooling Water System Program (B.1.13)

A description of this AMP is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the air handler components of the ECCS corner room HVAC will be adequately managed by this AMP during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMP credited for managing the aging effects, in the ECCS corner room HVAC. The staff also reviewed the applicable UFSAR Supplements for the AMP to ensure that the program descriptions adequately describe the AMP.

Aging Effects

The staff reviewed the information in Section 2.3.3.9, Table 2.3.3-9, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various systems, including the ECCS corner room HVAC system. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

Normally, HVAC systems contain elastomer materials, but no elastomer materials are identified in LRA Table 2.3.3-9. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.9, the applicant to clarify if there are any elastomer components in the ECCS corner room HVAC. By letter dated October 3, 2003, the applicant responded that there is no ductwork attached to the cooler and there are no flexible collars, damper or door gaskets, seals, or other soft parts associated with the ECCS corner room HVAC system. This response is acceptable because it clarifies that there are no elastomers in the ECCS corner room HVAC system.

The aging effects identified in the LRA for the ECCS corner room HVAC system are consistent with industry operating experience for the materials and environments listed. The staff finds that

all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMP to manage the aging effects described above for the ECCS corner room HVAC:

- Open-Cycle Cooling Water System Program (Section 3.0.3.6)

This AMP is credited for managing the aging effects of components in several structures and systems and, therefore, is considered a common AMP. The staff's evaluation of this AMP is documented in Section 3.0.3.6 of this SER.

After evaluating the applicant's AMR for each of the components in the ECCS corner room HVAC system, the staff evaluated the AMP listed above to determine if it is appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMP recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effects.

The response to RAI 3.3-7 clarified that the Open-Cycle Cooling Water System Program is used to manage external surfaces in the ECCS corner room HVAC system.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the ECCS corner room HVAC system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.10 Station Blackout Building HVAC

Summary of Technical Information in the Application. The description of the station blackout building HVAC can be found in Section 2.3.3.10 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-10. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3.10 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include air handlers heating/cooling (DGB HVAC (Quad Cities only)), debris screens, duct fittings, hinges, latches, flow elements, and tubing.

Carbon steel components are subject to loss of material due to general, pitting, and crevice corrosion and MIC [for duct (drip-pan) and piping for moisture drainage] from exposure to warm, moist air. Stainless steel and copper components are subject to loss of material due to pitting

and crevice corrosion from exposure to warm, moist air. Exposure of aluminum-zinc alloy components to warm, moist air has no aging effect. Copper tubes and galvanized steel end bells are identified as being subject to loss of material due to galvanic, pitting, and crevice corrosion and wear from exposure to refrigerant on the tube side and warm, moist air on the shell side. Copper tubes are also identified as being subject to buildup of deposits and fouling from exposure to refrigerant on the tube side and warm, moist air on the shell side.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the station blackout building HVAC:

- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- One-Time Inspection—Ventilation System (B.1.23)
- Heat Exchanger Test and Inspection Activities Program (B.2.6)
- Periodic Inspection of Ventilation System Elastomers Program (B.2.3)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the air handler components of the station blackout building HVAC will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the station blackout building HVAC. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.10 and Tables 2.3.3-10, 3.3-1, and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly

when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or the air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40 as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various auxiliary systems. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

The aging effects identified in the LRA for the station blackout building HVAC are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the station blackout building HVAC:

- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- One-Time Inspection—Ventilation System Program (Section 3.0.3.10)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.15)
- Periodic Inspection of Ventilation System Elastomers Program (Section 3.0.3.17)

The Bolting Integrity, Open-Cycle Cooling Water System, One-Time Inspection—Ventilation System, Heat Exchanger Test and Inspection Activities, and Periodic Inspection of Ventilation System Elastomers Programs are credited with managing the aging effects of several components in different structures and systems and are, therefore, considered common AMPs. The staff's evaluation of these AMPs is discussed in Sections 3.0.3.5, 3.0.3.6, 3.0.3.10, 3.0.3.15, and 3.0.3.17, respectively, of the SER.

After evaluating the applicant's AMR for each of the components in the station blackout building HVAC, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the station blackout building HVAC will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.11 Station Blackout System (Diesel and Auxiliaries)

Summary of Technical Information in the Application. The description of the station blackout system (diesel and auxiliaries) can be found in Section 2.3.3.11 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-11. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-11 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include air accumulators, closure bolting, filters/strainers, flexible hoses, flow elements, heat exchangers (includes coolers and heat exchangers), lubricators, mufflers, piping and fittings (includes heaters, orifices, and thermowells), pumps, restricting orifices, sight glasses, thermowells, tubing, turbochargers, and valves.

High-strength, low-alloy steel closure bolting components exposed to outdoor ambient air are subject to the aging effect of loss of material due to general corrosion and wear. Aluminum components exposed to an air, moisture, and humidity environment experience no aging effects. Aluminum components exposed to a moist air environment are subject to the aging effect of loss of material due to general and pitting corrosion. Aluminum components exposed to a diesel fuel oil environment are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion.

Cast iron components exposed to a diesel fuel oil environment are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Cast

iron components exposed to a lubricating oil environment are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion. Cast iron components exposed to a moist air environment are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion. Cast iron components exposed to an air, moisture, and humidity environment are subject to the aging effect of loss of material due to pitting and crevice corrosion. Cast iron components exposed to a treated demineralized water less than 90 °C (194 °F) environment are subject to the aging effect of loss of material due to general, galvanic, pitting, crevice, and microbiologically influenced corrosion and selective leaching. Cast iron components exposed to hot diesel engine gases containing moisture and particles are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion.

Carbon steel components exposed to lubricating oil (with contaminants and/or water) are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Carbon steel or cast steel components exposed to Glycol-based cooling water are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, and microbiologically influenced corrosion, erosion or flow-accelerated corrosion, and wear and cracking due to mechanical fatigue. Carbon steel or cast steel components exposed to outdoor ambient air are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion.

Stainless steel components exposed to chemically treated demineralized water less than 90 °C (194 °F) are subject to the aging effect of cracking due to SCC and IGSCC. Stainless steel components exposed to lubricating oil (with contaminants and/or water) or moist air are subject to the aging effect of loss of material due to pitting and crevice corrosion. Stainless steel components exposed to diesel fuel oil are subject to the aging effect of loss of material due to pitting and crevice corrosion. Stainless steel components exposed to moist air are subject to the aging effect of loss of material due to pitting and crevice corrosion. Stainless steel components exposed to air, moisture, and humidity experience no aging effects.

Copper piping and fittings or copper alloy thermowell or heat exchanger tubes exposed to Glycol-based cooling water are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, and microbiologically influenced corrosion, erosion or flow-accelerated corrosion, wear (except thermowell), cracking due to mechanical fatigue (except thermowell), and selective leaching (copper alloy). Copper heat exchanger tubes exposed to Glycol-based cooling water are also subject to the aging effect of loss of intended function due to buildup of deposit/fouling. Copper alloy components exposed to diesel fuel oil or lubricating oil are subject to the aging effect of loss of material due to general, crevice, and pitting corrosion. Copper or copper alloy components exposed to an air, moisture, and humidity environment experience no aging effects.

Neoprene components exposed to dry gas or saturated air are subject to the aging effects of hardening and loss of strength and elastomer degradation. Iron malleable components exposed to chemically treated demineralized water environments are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, and microbiologically induced corrosion and selective leaching. Iron malleable components exposed to a lubricating oil environment are subject to the aging effects of loss of material due to general, galvanic, pitting, and crevice corrosion. Iron malleable components exposed to an air, moisture, and humidity environment experience no aging effects. Glass components exposed to chemically treated demineralized water or air, moisture, and humidity environments experience no aging effects.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the station blackout system (diesel and auxiliaries):

- Bolting Integrity Program (B.1.12)
- Closed-Cycle Cooling Water System Program (B.1.14)
- Fuel Oil Chemistry Program (B.1.21)
- One-Time Inspection—Compressed Gas Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Buried Piping and Tanks Inspections Program (B.1.25)
- Structures Monitoring Program (B.1.30)
- Lube Oil Monitoring Activities Program (B.2.5)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the station blackout system (diesels and auxiliaries) will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the station blackout system (diesel and auxiliaries). The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.11, Table 2.3.3-11, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects are identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps,

orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or an air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40 as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on the aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

In LRA Table 3.3-2, Reference No. 3.3.2.18, the applicant stated that high-strength, low-alloy steel closure bolting components in the outdoor ambient conditions are subject to the aging effect of loss of material due to general corrosion and wear. However, the applicant does not include crack initiation and growth due to SCC or other mechanisms as an applicable aging effect/mechanism. By letter dated August 4, 2003, the staff requested, in RAI 3.3-5, the applicant to provide its technical basis for not including this aging effect/mechanism. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.5 of this SER.

Loss of material due to selective leaching is a plausible aging effect for cast iron components in a moist air and humidity environment, especially when there is water condensation on the surfaces of these components. However, in LRA Table 3.3-2, Reference No. 55, loss of material due to selective leaching was not identified as a plausible aging effect for cast iron components in moist air. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.11(a) requesting the applicant to provide its technical basis for excluding this aging effect from the AMR. In its response dated October 3, 2003 and Supplemental RAI 3.3.2.4.11 response dated December 22, 2003, the applicant stated that the cast iron material components in AMR Reference No. 3.3.2.55 are not installed in areas where water or condensation would be expected to pool or where there would be prolonged exposure to water; therefore, the applicant concluded that selective leaching is not considered an aging mechanism for Dresden and Quad Cities applications. Since the fuel oil strainers covered by AMR Reference No. 3.3.2.55 are not installed in areas where water or condensation would pool or where there would be a prolonged exposure to water, the staff concludes that it is unlikely for the strainers to experience selective leaching. The staff also notes that these components will receive a one-time inspection for loss of material and that this inspection would identify selective leaching if it were to occur. Therefore, the staff finds the identification of aging effects and the aging management acceptable for the strainers.

Loss of material due to pitting and crevice corrosion is a plausible aging effect on stainless steel exposed to a chemically treated and demineralized water environment. However, in Table 2.3.3-11 of the LRA, the applicant did not identify any loss of material aging effect on the stainless steel components exposed to a chemically treated and demineralized water environment. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.11(b) requesting the applicant to provide its technical basis for excluding this applicable aging effect. In its response dated October 3, 2003, the applicant concurred that stainless steel in a treated water environment may be susceptible to loss of material due to pitting and crevice corrosion. The applicant added aging management references to address this aging effect/mechanism for the components in the station blackout system (diesels and auxiliaries), and the applicant credited the Closed-Cycle Cooling Water System Program (B.1.14). Since the applicant has identified loss of material due to pitting and crevice corrosion for the stainless steel components exposed to chemically treated and demineralized water, and has identified an appropriate AMP to manage this aging effect, the staff finds this acceptable.

The aging effects identified in the LRA for the station blackout system (diesels and auxiliaries) are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the station blackout system (diesels and auxiliaries):

- Bolting Integrity Program (Section 3.0.3.5)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- One-Time Inspection—Compressed Gas Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspections Program (Section 3.0.3.12)
- Structures Monitoring Program (Section 3.0.3.14)
- Fuel Oil Chemistry Program (Section 3.3.2.3.5)
- Lube Oil Monitoring Activities Program (Section 3.0.3.16)
- Periodic Inspection of Components Subject to Moist Environments (3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.5, 3.0.3.7, 3.0.3.10, 3.0.3.11, 3.0.3.12, 3.0.3.14, 3.3.2.3.5, and 3.3.2.3.7, respectively, of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the station

blackout system (diesels and auxiliaries) will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.12 Diesel Generator Cooling Water System

Summary of Technical Information in the Application. The description of the diesel generator cooling water system can be found in Section 2.3.3.12 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Tables 2.3.3-12. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-12 of the LRA lists individual system components that are within the scope of license renewal and subject to AMR. The components include air handlers heating/cooling (DGB HVAC), closure bolting, NSR vents or drains, piping and valves, orifice bodies, tubing, pumps, thermowells, pulsation dampers, strainer screens, and strainer bodies.

The LRA identifies that copper, carbon steel, and aluminum components in open-cycle cooling water and warm, moist air environments are subject to the aging effects of cracking from mechanical fatigue and SCC, as well as loss of material from general, pitting, crevice, and galvanic corrosion, MIC, erosion or flow-accelerated corrosion, and wear. Copper components in a raw water environment are also subject to buildup of deposit from fouling. Loss of material due to general corrosion and wear is an applicable aging effect for high-strength, low-alloy steel components. The LRA identifies that carbon steel, stainless steel, brass, and bronze components in an air, moisture, humidity, and leaking fluid environment are subject to loss of material from general corrosion and pitting and crevice corrosion. Cast iron (lined or unlined) components in raw water or fresh water environments are subject to loss of material from selective leaching, general, pitting, crevice, and galvanic corrosion, erosion, and MIC. Additional aging effects for cast iron components in the same environments include flow blockage from biofouling, silting, and corrosion product buildup. The applicant identified flow blockage from biofouling as the only applicable aging effect for titanium components in raw water or fresh water environments. The LRA does not identify any aging effects for stainless steel components in an environment of air, moisture, and humidity less than 100 °C (212 °F) or for titanium components in an air, moisture, humidity, and leaking fluid environment.

Aging Management Programs

The following AMPs are utilized to manage the aging effects in the diesel generator cooling water system:

- Open-Cycle Cooling Water System Program (B.1.13)
- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)

- Buried Piping and Tanks Inspection Program (B.1.25)
- Structures Monitoring Program (B.1.30)
- Heat Exchanger Test and Inspection Activities Program (B.2.6)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the diesel generator cooling water system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the diesel generator cooling water system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-12, 3.3-1, and 3.3-2 for the diesel generator cooling water system. During its review, the staff determined that additional information was needed.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or an air, moisture, and humidity environment because these components "are not subject to any viable aging mechanism in the absence of aggressive chemical species." By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40 as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

In LRA Table 3.3-2, Reference No. 3.3.2.18, the applicant stated that high-strength, low-alloy steel closure bolting components in the outdoor ambient conditions are subject to the aging

effect of loss of material due to general corrosion and wear. However, the applicant does not include crack initiation and growth due to SCC or other mechanisms as an applicable aging effect/mechanism. By letter dated August 4, 2003, the staff requested, in RAI 3.3-5, the applicant to provide its technical basis for not including this aging effect/mechanism. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.5 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various systems, including the diesel generator cooling water system. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

The staff identified that LRA Table 3.3-2, Reference No. 3.3.2.16 lists loss of material from erosion or flow-accelerated corrosion as an applicable aging effect/mechanism. The Open-Cycle Cooling Water System Program (B.1.13) is identified as the applicable AMP. By letter dated August 4, 2003, the staff requested, in part (a) of RAI 3.3.2.4.12, the applicant to clarify whether erosion or flow-accelerated corrosion is the applicable aging mechanism for components in the diesel generator cooling water system identified in Table 2.3.3-12 in the LRA. If erosion is the applicable aging mechanism, and not flow-accelerated corrosion, the applicant was requested to state so explicitly in the LRA. Otherwise, the staff requested the applicant to clarify how the Open-Cycle Cooling Water System Program (B.1.13) will manage the aging effect of loss of material due to flow-accelerated corrosion.

Furthermore, the staff identified that NUREG-1800, Section 3.3.2.2.11, states that loss of material due to general, pitting, and crevice corrosion and MIC could occur in the underground piping and fittings in the open-cycle cooling water system. The Dresden UFSAR Section 9.5.5 states that the remaining part of the system's piping and valves traverse to and from the missile-protected diesel and reactor buildings via a reinforced concrete tunnel that runs below ground. By letter dated August 4, 2003, the staff requested, in part (b) of RAI 3.3.2.4.12, the applicant to clarify if there is any underground piping in the diesel generator cooling water system that is buried or inaccessible. If buried or inaccessible piping does exist, the staff requested the applicant to explain how such piping will be managed for loss of material during the period of extended operation.

In its response dated October 3, 2003, the applicant stated, with regard to part (a) of the RAI, that Exelon has reviewed LRA Table 3.3-2, Aging Management Reference 3.3.2.16, for loss of material due to erosion or flow-accelerated corrosion as an applicable aging effect/mechanism. Flow-accelerated corrosion is not the valid aging mechanism for heat exchangers in the scope of license renewal since heat exchangers are operated within their design flow and operating parameters. The applicant clarified that LRA Table 3.3-2, Aging Management Reference 3.3.2.16, should have only stated erosion as the aging mechanism, instead of erosion or flow-accelerated corrosion.

With regard to part (b) of the RAI, the applicant stated that the diesel generator cooling water system piping traverses to the crib house from the missile-protected diesel and turbine buildings via a reinforced concrete tunnel. However, the tunnel does not extend completely from the turbine building to the crib house. Portions of the diesel generator cooling water piping do run underground (buried) to the crib house. The applicant clarified that LRA Section 2.3.3.12, Table 2.3.3-12, should have included buried piping Aging Management Reference 3.3.1.16 under

“Piping and Fittings” with pressure boundary as the component intended function. LRA Table 3.3-1, Aging Management Reference 3.3.1.16, discusses the aging management of buried piping and fittings for loss of material due to general, pitting, and crevice corrosion and MIC. Finally, the applicant stated that the Buried Piping and Tanks Inspection Program (B.1.25) will manage the aging of the diesel generator cooling water system buried piping and piping components.

The staff finds the applicant’s response to RAI 3.3.2.4.12 acceptable because (1) the applicant clarified that LRA Table 3.3-2, Aging Management Reference 3.3.2.16, should have stated only erosion as the aging mechanism, instead of erosion or flow-accelerated corrosion, and (2) the applicant clarified that LRA Section 2.3.3.12, Table 2.3.3-12, should have included buried piping Aging Management Reference 3.3.1.16 under “Piping and Fittings” with pressure boundary as the component intended function. In addition, the applicant stated that the Buried Piping and Tanks Inspection Program (B.1.25) is the applicable AMP. The staff considers the issues related to RAI 3.3.2.4.12 to be resolved.

The aging effects identified in the LRA for the diesel generator cooling water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the diesel generator cooling water system:

- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Heat Exchanger Test and Inspection Activities Program (Section 3.0.3.16)
- Structures Monitoring Program (Section 3.0.3.14)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. These AMPs are evaluated in Sections 3.0.3.6, 3.0.3.5, 3.0.3.10, 3.0.3.11, 3.0.3.16, 3.0.3.14, and 3.0.3.12, respectively, of this SER.

After evaluating the applicant’s AMR for each of the components in the diesel generator cooling water system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

The response to RAI 3.3-7 identified that the Heat Exchanger Testing and Inspection Program (B.2.6), the Bolting Integrity Program (B.1.12), and the Structures Monitoring Program (B.1.30) would be used to manage aging effects in the diesel generator cooling water system.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the diesel generator cooling water system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.13 Diesel Fuel Oil System

Summary of Technical Information in the Application. The description of the diesel fuel oil system can be found in Section 2.3.3.13 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-13. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-13 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include closure bolting, filters/strainers, flame arresters, piping and fittings, piping and fittings (attached support), pumps, restricting orifices (Quad Cities only), sight glasses, tanks, tubing, valves, and valves (attached support).

The LRA identifies that high-strength, low-alloy steel closure bolting components exposed to outdoor ambient air are subject to the aging effect of loss of material due to general corrosion and wear. Cast iron components exposed to an air, moisture, and humidity environment are subject to the aging effect of loss of material due to pitting and crevice corrosion. Cast iron components exposed to diesel fuel oil are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Carbon steel components exposed to diesel fuel oil are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Carbon steel components exposed to outdoor ambient air are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion. Carbon steel components exposed to lubricating oil (with contaminants and/or water) are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Carbon steel components exposed to soil and ground water are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Stainless steel components exposed to diesel fuel oil are subject to the aging effect of loss of material due to pitting and crevice corrosion. Stainless steel components exposed to air, moisture, and humidity experience no aging effects. Glass components exposed to fuel oil or air, moisture, and humidity environments experience no aging effects. Fiberglass components exposed to fuel oil are subject to loss of intended function due to buildup of deposit and biofouling. Fiberglass components exposed to soil and groundwater experience no aging effects. Brass or bronze components exposed to diesel fuel oil are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion. Brass or bronze components exposed to air, moisture, and humidity experience no aging effects.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the diesel fuel oil system:

- Bolting Integrity Program (B.1.12)
- Fuel Oil Chemistry Program (B.1.21)
- One-Time Inspection Program (B.1.23)
- Buried Piping and Tanks Inspection Program (B.1.25)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the diesel fuel oil system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the diesel fuel oil system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.13, Table 2.3.3-13, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations for which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant did not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting

corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on the aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing the AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various systems, including the diesel fuel oil system. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

LRA Table 2.3.3-13 references items 3.3.1.5, 3.3.1.7, 3.3.2.29, and 3.3.2.139 for managing piping and fittings. None of these AMR references include an AMP for buried piping in the diesel fuel oil system. LRA AMP B.1.25 identifies a one-time visual inspection of the external surface of a buried piping section, but the system is not identified. LRA Section 3.3.1.1.4 indicates that a buried section of fire mains is included in the Buried Piping and Tanks Inspection Program. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.13 part (a) to request the applicant to explain how buried piping in the diesel fuel oil system will be managed, including a justification based on operating experience.

In its response dated October 3, 2003, the applicant stated that LRA Table 2.3.3-13, with a component group of "Piping and Fittings," should have referred to Aging Management Reference 3.3.1.16, which addresses NUREG-1801, Item VII.H1.1-b, "Diesel Fuel Oil System Underground Piping and Fittings," and addresses the aging effect of loss of material due to general, pitting, and crevice corrosion and MIC.

The staff finds the applicant's response to part (a) adequate and acceptable because the applicant identified the aging effects of the diesel fuel oil system underground piping and fittings and appropriate AMPs.

The staff requested additional information to evaluate how the aging effects for filters and strainers are managed. Filters and strainers are included in Table 2.3.3-13 as passive components with a filter function. Table 3.3-1, Reference 3.3.1.7, identifies loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling as an aging effect for filters and strainers in the diesel generator fuel oil system. The Fuel Oil Chemistry and One-Time Inspection Programs are credited for managing the aging effect. In RAI 3.3.2.4.13 part (b), the applicant was requested to explain how the Fuel Oil Chemistry and One-Time Inspection Programs manage biofouling in the filter and strainer elements. The staff also asked the applicant to clarify if filter elements are considered replaceable or long-lived, passive components.

In its response dated October 3, 2003, the applicant stated that filter elements are replaced on a frequent basis and are therefore not considered long lived. The response clarified that biofouling is not considered an aging mechanism for strainers and is managed at its source

within the fuel oil storage tanks. Further, the aging management of filter/strainers was evaluated in AMR Reference 3.3.1.7, with the NUREG-1801 component of “Diesel fuel oil tanks in diesel fuel oil system and emergency diesel generator system.” The response identified that the Fuel Oil Chemistry Program manages biofouling in the fuel oil tanks and includes the following preventive actions:

- Periodic emergency and station blackout diesel generator, diesel driven fire pump, and Dresden isolation condenser makeup pump fuel oil samples are analyzed for the presence of water and particulates.
- Storage tank bottoms are periodically sampled for the presence of water.
- Fuel oil storage tank samples are routinely analyzed for biological growth.
- Samples of new fuel deliveries are analyzed for water, sediment, and the quality of the fuel being delivered.
- A biocide is added to new fuel oil when the fuel is delivered.
- Water and particulates are removed from the fuel whenever the fuel oil analysis acceptance criteria are approached or exceeded.
- Fuel oil storage tanks are periodically cleaned and inspected for evidence of internal corrosion.
- During normal operations, fuel oil day tanks are filled from the bulk fuel oil storage tanks to which the biocide has been added.

The staff finds the applicant’s response to RAI 3.3.2.4.13 part (b) adequate and acceptable because the applicant provided details on how the biofouling aging effect is managed by various activities in the Fuel Oil Chemistry and the One-Time Inspection Programs. The Fuel Oil Chemistry and the One-Time Inspection Programs are evaluated in Sections 3.3.2.3.5 and 3.0.3.10, respectively, of this SER.

The aging effects identified in the LRA for the diesel fuel oil system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs to manage the aging effects described above for the diesel fuel oil system:

- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection—Compressed Gas Program (Section 3.0.3.10)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)
- Structures Monitoring Program (Section 3.0.3.14)
- Fuel Oil Chemistry Program (Section 3.3.2.3.5)

With the exception of the Fuel Oil Chemistry Program, these AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.5, 3.0.3.10, 3.0.3.12, and 3.0.3.14, respectively, of this SER. The Fuel Oil Chemistry Program is evaluated in Section 3.3.2.3.5 of this SER.

After evaluating the applicant's AMR for each of the components in the diesel fuel oil system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

The response to RAI 3.3-7 clarified that the Bolting Integrity Program (B.1.12), the One-Time Inspection Program (B.1.23), and the Structures Monitoring Program (B.1.30) are to be used to manage aging effects in the diesel fuel oil system.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the diesel fuel oil system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.14 Process Sampling System

Summary of Technical Information in the Application. The description of the process sampling system can be found in Section 2.3.3.14 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-14. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-14 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include piping and fittings, tubing, valves, vents and drains, and closure bolting.

Carbon steel, stainless steel, brass, bronze, and low-alloy steel exposed to moist and humid air and leaking fluid are subject to loss of material due to corrosion. Loss of material is identified for carbon steel exposed to an external sheltered environment of moist and humid air. No aging effect is identified for stainless steel, aluminum, brass, bronze, and copper exposed to an external sheltered environment of moist and humid air. Carbon steel, stainless steel, brass, bronze, and copper exposed to an internal environment of moist air are subject to loss of material due to general, pitting, and crevice corrosion. Stainless steel exposed to saturated air is subject to loss of material due to pitting and crevice corrosion. No aging effect is identified for stainless steel in containment nitrogen. Carbon steel exposed to chemically treated demineralized water is subject to loss of material due to general, pitting, and crevice corrosion.

Stainless steel exposed to chemically treated demineralized water is subject to cracking due to SCC.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the process sampling system:

- Bolting Integrity Program (B.1.12)
- Water Chemistry Program (B.1.2)
- One-Time Inspection Program (B.1.23)
- Compressed Air Monitoring Program (B.1.16)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the process sampling system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in Section 2.3.3.14 and Tables 2.3.3-14, 3.3-1, and 3.3-2 in the LRA and finds the applicant's identification of the applicable aging effects of carbon steel, stainless steel, brass, bronze, and low-alloy steel components acceptable. In addition, the applicant's conclusion that stainless steel components in a containment nitrogen environment experience no aging effects is also acceptable.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

The aging effects identified in the LRA for the process sampling system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the process sampling system.

- Bolting Integrity Program (Section 3.0.3.5)

- Water Chemistry Program (Section 3.0.3.2)
- One-Time Inspection Program (Section 3.0.3.10)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- Structures Monitoring Program (Section 3.0.3.14)

The Bolting Integrity Program, Water Chemistry Program, One-Time Inspection Program, Compressed Air Monitoring Program, and Structures Monitoring Program are credited with managing the aging effects of several components in different structures and systems and are, therefore, considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.5, 3.0.3.2, 3.0.3.10, 3.0.3.8, and 3.0.3.14, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the process sampling system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the process sampling system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.15 Carbon Dioxide System

Summary of Technical Information in the Application. The description of the carbon dioxide system can be found in Section 2.3.3.15 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-15. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-15 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include closure bolting, piping and fittings (including thermowells and nozzles), valves, tubing, and tanks.

The LRA identifies that carbon steel components in sheltered environments are subject to loss of material due to general, pitting, and crevice corrosion, and MIC. Loss of material due to general corrosion, as well as crack initiation and growth/cyclic loading or SCC, are applicable aging effects for high-strength, low-alloy steel components in an air, moisture, humidity, and leaking fluid environment. The LRA identified no aging effect on carbon steel, brass, or bronze components in a dry gas environment. No aging effect was identified for brass or bronze components in an environment of air, moisture, and humidity less than 100 °C (212 °F).

Aging Management Programs

The following AMPs are utilized to manage aging effects in the carbon dioxide system:

- Bolting Integrity Program (B.1.12)
- Fire Protection Program (B.1.18)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the carbon dioxide system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the carbon dioxide system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-15, 3.3-1, and 3.3-2 for the carbon dioxide system. During its review, the staff determined that additional information was needed.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various systems, including the carbon dioxide system. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

In item 3.3.2.260 of LRA Table 3.3-2, for the material/environment of brass or bronze/dry gas, the applicant has listed no applicable aging effect. The staff identified that in the discussion column the applicant explained that, "A moisture free gaseous environment (nitrogen) is not conducive to promoting aging degradation of brass or bronze components." By letter dated August 4, 2003, the staff requested, in part (a) of RAI 3.3.2.4.15, the applicant to clarify whether dry carbon dioxide should be included in this discussion, or to explain the applicability of this discussion to the carbon dioxide system.

The staff identified that in item 3.3.2.212 of LRA Table 3.3-2, the applicant identified an environment of dry gas for the tank component of the carbon dioxide system. In Section 2.3.3.15 of the LRA, the applicant described part of the Cardox unit as a liquid carbon dioxide tank. The staff also requested, in part (a) of RAI 3.3.2.4.15, the applicant to resolve the apparent discrepancy between a dry gas environment and liquid carbon dioxide.

The staff further identified that the applicant identified no aging effect for carbon steel, brass, or bronze components in a dry gas environment. Dry carbon dioxide is not a degrading environment for carbon steel, brass, or bronze components. But carbon steel components may be sensitive to the presence of moisture in the carbon dioxide environment. Moisture may induce corrosion and corrosion-erosion. The staff requested, in part (b) of RAI 3.3.2.4.15, the applicant to clarify the degree of dryness of the carbon dioxide environment. The staff asked the applicant to specify the activities in place to verify and maintain the degree of dryness of the

carbon dioxide environment necessary to minimize aging degradation of carbon steel components during the period of subsequent operation, including after periods in which carbon dioxide must be replenished or refilled.

In its response dated October 3, 2003, the applicant stated that for part (a) of the RAI 3.3.2.4.15, Aging Management Reference 3.3.2.260 of LRA Table 3.3-2 explicitly addresses a nitrogen gaseous environment. This statement applies to dry gases in general, including dry carbon dioxide (see EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," Appendix D). The discussion column for Aging Management Reference 3.3.2.260 of LRA Table 3.3-2 should not have included the parenthetical reference to nitrogen in the second sentence. The applicant further stated that the discussion column of Aging Management Reference 3.3.2.212 in LRA Table 3.3-2 identifies an environment of dry gas for the tank component of the carbon dioxide system. The environment is further clarified in that section as "dry gas (moisture free)," indicating that the environment is free of water. LRA Section 2.3.3.15 (page 2-144) describes part of the Cardox unit as a liquid carbon dioxide tank. The description in this section is correct because the carbon dioxide in the tank is maintained in its pressurized liquid form. However, little or no moisture in the form of water is contained in the tank. Therefore, the applicant concluded that there is no discrepancy between the environments identified in Aging Management Reference 3.3.2.212 of LRA Table 3.3-2 and LRA Section 2.3.3.15.

In the same response dated October 3, 2003, to part (b) of the RAI 3.3.2.4.15, the applicant stated that the carbon dioxide environment at Dresden Station and Quad Cities Station is associated with the Cardox system. The carbon dioxide environment in this system is dry (anhydrous) carbon dioxide, which is at least 99.5 percent carbon dioxide. There are no activities specifically involving quantifying tank moisture levels. However, the applicant specified that tank moisture levels are maintained sufficiently low enough to preclude any appreciable amount of corrosion or corrosion-erosion by (1) performing tank filling operations with vendor assistance in accordance with vendor recommendations, (2) periodically monitoring tank pressure and temperature and condition, limiting the possibility of undetected leaks, and (3) periodically calibrating tank pressure and temperature instrumentation.

The staff finds the applicant's response to part (a) of RAI 3.3.2.4.15 acceptable because the applicant agrees that the discussion column for Aging Management Reference 3.3.2.260 of LRA Table 3.3-2 should not have included the parenthetical reference to nitrogen in the second sentence. In addition, the applicant stated that there is little or no moisture in the form of water contained in the tank. The staff also finds that the applicant's response to part (b) of RAI 3.3.2.4.15 acceptable because the applicant has specified the moisture level of the carbon dioxide and has shown that tank moisture levels are maintained sufficiently low enough to preclude any appreciable amount of corrosion or corrosion-erosion by specific procedures. The staff considers the issues related to RAI 3.3.2.4.15 to be resolved.

The aging effects identified in the LRA for the carbon dioxide system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the carbon dioxide system.

- Bolting Integrity Program (Section 3.0.3.5)
- Fire Protection Program (Section 3.3.2.3.3)

The Bolting Integrity Program is credited for managing the aging effects of components in several structures and systems and, therefore, is considered a common AMP. This AMP is evaluated in Section 3.0.3.5 of this SER. The Fire Protection Program is evaluated in Section 3.3.2.3.3 of this SER.

After evaluating the applicant's AMR for each of the components in the carbon dioxide system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

The Fire Protection Program (B.1.18) is applicable to the carbon dioxide system since the applicant stated in the AMP (page b-38 of the LRA) that, "The program will provide for aging management of external surfaces of Dresden and Quad Cities carbon dioxide system components and Dresden halon system components for corrosion through periodic operability tests based on NFPA codes and visual inspections. Testing and inspections are implemented through predefined tasks and procedures." The applicant has also clarified the role of this AMP for the carbon dioxide system in its response to RAI 3.3-7 which is evaluated in Section 3.3.2.5.7 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the carbon dioxide system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.16 Service Water System

Summary of Technical Information in the Application. The description of the service water system can be found in Section 2.3.3.16 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-16. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-16 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include closure bolting, piping and fittings, valves, orifice bodies, tubing, pumps and pump casings, strainer screens, and strainer bodies.

The LRA identifies the following applicable aging effects for the service water system. The applicant identified in the LRA that carbon steel in outdoor ambient conditions is subject to loss of material due to general, pitting, and crevice corrosion. Copper, brass, and bronze components in saturated air are subject to loss of material due to pitting and crevice corrosion. Loss of material due to general, pitting, crevice corrosion, MIC, and macroorganisms is an applicable aging effect on high-strength, low-alloy steel components in raw water (submerged). The LRA identifies that cast iron and carbon steel in an air, moisture, humidity, and leaking fluid environment are subject to loss of material due to general corrosion and/or pitting and crevice corrosion. Cast iron components in raw water, untreated salt water, or fresh water environments are subject to loss of materials due to selective leaching, general, pitting, crevice, and galvanic corrosion, erosion, and MIC. Additional aging effects for cast iron components in the same environments include flow blockage due to biofouling, silting, and corrosion product buildup. The applicant identified flow blockage due to biofouling as the only applicable aging effect for titanium components in raw water, untreated salt water, or fresh water environments. The LRA identified no aging effects for stainless steel, brass, or bronze components in an environment of air, moisture, and humidity less than 100 °C (212 °F) or for titanium components in an air, moisture, humidity, and leaking fluid environment, as well as in raw water, untreated salt water, or fresh water. The applicant identified no aging effects for copper components in an environment of air, moisture, and humidity less than 100 °C (212 °F).

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the service water system:

- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- Closed-Cycle Cooling Water System Program (B.1.14)
- Compressed Air Monitoring Program (B.1.16)
- Fire Water System Program (B.1.19)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Buried Piping and Tanks Inspection Program (B.1.25)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the service water system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the service water system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-16, 3.3-1, and 3.3-2 for the service water system. During its review, the staff determined that additional information was needed.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

The AMR of this system specifies References 3.3.2.208 and 3.3.2.179 for cast iron components in raw water. Reference 3.3.2.208 includes galvanic corrosion as a mechanism for loss of material, but Reference 3.3.2.179 does not. In RAI 3.3.2.4.16, by letter dated August 4, 2003, the staff asked the applicant to clarify whether the components covered by Reference 3.3.2.179 (pump casings) are also susceptible to galvanic corrosion and to provide the applicable AMP(s). In its response dated October 3, 2003, the applicant stated that, according to EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," Appendix B, galvanic corrosion is an applicable aging mechanism for cast iron components that are in contact with metals higher in the galvanic series. The applicant stated that Reference 3.3.2.208 is associated with cast iron strainer bodies in the Dresden CCSW and service water systems. These strainer bodies are in raw water environments and are in contact with strainer filters made of stainless steel, which is higher in the galvanic series than cast iron. Therefore, the applicant concluded that galvanic corrosion is an applicable aging effect for the strainer bodies. The applicant further stated that Reference 3.3.2.179 is associated with cast iron pump casings in raw water environments in the Dresden CCSW and service water systems. These pump casings are not in contact with any metals higher in the galvanic series; therefore, the applicant concluded that galvanic corrosion is not an applicable aging mechanism. On the basis of its review, since the pump casings are not in contact with metals higher in the galvanic series, the staff agrees with the applicant's conclusion that there is no galvanic corrosion of the pump casings. Therefore, the staff finds the applicant's response to RAI 3.3.2.4.16 acceptable.

The aging effects identified in the LRA for the service water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the service water system:

- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- Compressed Air Monitoring Program (Section 3.0.3.8)

- Fire Water System Program (Section 3.3.2.3.4)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)

These AMPs (with the exception of Fire Water System Program) are credited with managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. These common AMPs are evaluated in Sections 3.0.3.5, 3.0.3.6, 3.0.3.7, 3.0.3.8, 3.0.3.10, and 3.0.3.11, respectively, of this SER. The Fire Water System Program (B.1.19) is evaluated in Section 3.3.2.3.4 of this SER.

The staff identified that loss of material due to galvanic corrosion is location dependent. Adequate aging management may need to target susceptible locations for inspection and testing. By letter dated August 4, 2003, the staff asked the applicant to clarify whether the inspection and testing activities described in the Open-Cycle Cooling Water System Program (B.1.13) are targeted or opportunistic with respect to managing loss of material due to galvanic corrosion (RAI B.1.13). In its responses dated October 3, 2003, and December 17, 2003, the applicant stated that the Open-Cycle Cooling Water System Program manages galvanic corrosion through periodic inspections of in-scope components, as appropriate. The in-scope components include heat exchangers and strainer bodies. The applicant further stated that a new surveillance for periodic inspection of the strainer in the CCSW supply line to the main control room HVAC refrigeration condensing unit will be added to this program and will be implemented prior to the end of the current license. This is Commitment #13 of Appendix A of this SER. The applicant also updated the UFSAR Supplement for the Open-Cycle Cooling Water System Program to reflect this addition. The staff concludes that the use of periodic inspections performed as part of the Open-Cycle Cooling Water System Program is an appropriate method of managing the loss of material due to galvanic corrosion; therefore, the staff finds this acceptable.

After evaluating the applicant's AMR for each of the components in the service water system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the service water system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.17 Reactor Building Closed Cooling Water System

Summary of Technical Information in the Application. The description of the reactor building closed cooling water system can be found in Section 2.3.3.17 of the LRA. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-17.

The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-17 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include closure bolting, flow elements, NSR vents or drains, piping and fittings, pumps, tanks, and valves. Components specific to Dresden only include heat exchanger, manifolds, thermowells, tubing, and orifice bodies. Components specific to Quad Cities only are heat exchanger (spatial interaction), piping and fittings (spatial interaction) (include flow elements), and valves (attached support).

Carbon steel and stainless steel components exposed to chemically treated demineralized water are subject to the aging effects of loss of material due to general, galvanic (carbon steel only), pitting, crevice, microbiologically influenced, erosion, or flow-accelerated corrosion and wear and crack initiation and growth due to fatigue and SCC. Carbon steel, stainless steel, brass, or bronze components exposed to warm and moist air are subject to the aging effect of loss of material due to corrosion. Brass and bronze components exposed to chemically treated demineralized water are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, and microbiologically influenced corrosion and selective leaching, and crack initiation and growth due to fatigue and SCC. Stainless steel exposed to air, moisture, and humidity experiences no aging effects. Heat exchangers exposed to raw water are subject to the aging effect of loss of heat transfer function due to buildup of deposit and fouling.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the reactor building closed cooling water system:

- Water Chemistry Program (B.1.2)
- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- Closed-Cycle Cooling Water System Program (B.1.14)
- Compressed Air Monitoring Program (B.1.16)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the reactor building closed cooling water system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the reactor building closed cooling water system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.17, Table 2.3.3-17, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations for which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or an air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40, as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

Loss of material due to general, pitting, and crevice corrosion may be an applicable aging effect on carbon steel components exposed to chemically treated demineralized water. However, in several AMR references, the applicant identified crack initiation and growth due to SCC and IGSCC as the applicable aging effect/mechanism instead of loss of material due to general,

pitting, and crevice corrosion. By letter dated August 4, 2003, the staff requested, in RAI 3.3-6, the applicant to provide clarification. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.6 of this SER.

The aging effects identified in the LRA for the reactor building closed cooling water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs with managing the aging effects described above for the reactor building closed cooling water system:

- Water Chemistry Program (Section 3.0.3.2)
- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Inspection of Components Subject to Moist Environments Program (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for components in this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.5, 3.0.3.6, 3.0.3.7, 3.0.3.8, 3.0.3.10, 3.0.3.11, and 3.0.3.14, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the reactor building closed cooling water system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the reactor building closed cooling water system will effectively manage or monitor the aging effects identified in the LRA.

In response to the staff's concern, expressed in RAI 2.1-2, regarding the extent of the boundary of the non-safety-related piping attached to the safety-related piping, the applicant has since included additional piping to the scope of license renewal. The applicant stated that while additional components have been added to the scope of license renewal for each system, the components are comprised of the same materials and experience the same environments as other components within the system. As such, there are no new AMPs required. For the auxiliary systems, only the reactor building closed cooling water system, Table 2.3.3-17, needed revision to (1) remove a note, "(Quad City only)," for piping, fittings, and valves (attached support) and (2) replace the AMR reference 3.3.2.267 with the AMR reference 3.3.2.40 for valves (attached support). No other auxiliary systems scoping and screening tables are affected. The staff has reviewed the revised Table 2.3.3-17, and verified that the added piping and valves to the scope of license renewal are included in the same AMPs already applied to other components within the reactor building closed cooling water system. Based on the above, the staff concluded that the applicants response to RAI 2.1-2 is acceptable for the auxiliary systems.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.18 Turbine Building Closed Cooling Water System

Summary of Technical Information in the Application. The description of the turbine building closed cooling water system can be found in Section 2.3.3.18 of the LRA. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-18. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-18 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include closure bolting, heat exchanger, piping and fittings, and valves.

Carbon steel and admiralty brass components exposed to raw water are subject to the aging effects of loss of material due to general, galvanic, microbiologically influenced, erosion, flow-accelerated, pitting, and crevice corrosion, wear, and selective leaching, and crack initiation and growth due to fatigue and SCC; carbon steel components exposed to chemically treated demineralized water less than 90° C (194 °F) are subject to the aging effect of crack initiation and growth due to fatigue and SCC.

Aging Management Programs

The LRA credited the following AMPs for managing the identified aging effects for the turbine building closed cooling water system:

- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- Closed-Cycle Cooling Water System Program (B.1.14)
- Structures Monitoring Program (B.1.30)
- Selective Leaching of Materials Program (B.1.24)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the turbine building closed cooling water system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the turbine building closed cooling water system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.18, Table 2.3.3-18, and Tables 3.3-1 and 3.3-2 in the LRA. On the basis of its review, the staff finds that the applicant has correctly identified the applicable aging effects on the components consistent with industry experience for the combinations of materials and environments in the turbine building closed cooling water system.

The aging effects identified in the LRA for the turbine building closed cooling water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the turbine building closed cooling water system:

- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Closed-Cycle Cooling Water System Program (Section 3.0.3.7)
- Structures Monitoring Program (Section 3.0.3.14)
- Selective Leaching of Materials Program (Section 3.0.3.11)

These AMPs are credited for managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for

this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.5, 3.0.3.6, 3.0.3.7, 3.0.3.14, and 3.0.3.11, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the turbine building closed cooling water system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the turbine building closed cooling water system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.19 Demineralized Water Makeup System

Summary of Technical Information in the Application. The description of the demineralized water makeup system can be found in Section 2.3.3.19 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-19. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-19 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include closure bolting, NSR vents or drains, piping and fittings, piping and fittings (spatial interaction), piping and fittings (attached support), valves, and valves (spatial interaction). The components specific to Dresden only include pumps and restricting orifices. The components specific to Quad Cities only include flow elements (spatial interaction), piping and valves (attached support), pumps (spatial interaction), restricting orifices (spatial interaction), strainers (spatial interaction), and valves (attached support).

The LRA identifies that high-strength, low-alloy steel closure bolting components exposed to outdoor ambient conditions are subject to the aging effect of loss of material due to general corrosion and wear. Carbon steel, stainless steel, brass, or bronze components in the NSR vents or drains, piping, and valves system that are exposed to an air, moisture, humidity, and leaking fluid environment are subject to the aging effect of loss of material due to corrosion. Carbon steel and stainless steel components exposed to treated water are subject to the aging effect of loss of material due to general (carbon steel only), pitting, and crevice corrosion. Carbon steel components exposed to outdoor ambient conditions are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion. Stainless steel components exposed to air, moisture, and humidity or outdoor ambient conditions experience no aging effects. Cast iron components exposed to treated water are subject to the aging effect of loss of material due to selective leaching. Cast iron components exposed to air, moisture, and humidity are subject to the aging effect of loss of material due to pitting and crevice corrosion. Aluminum

components exposed to treated water less than 90 °C (194 °F) are subject to the aging effect of loss of material due to pitting and crevice corrosion. Aluminum components exposed to outdoor ambient conditions are subject to the aging effect of loss of material due to pitting corrosion. Brass or bronze components exposed to demineralized water are subject to the aging effect of loss of material due to pitting and crevice corrosion. Brass or bronze components exposed to air, moisture, and humidity experience no aging effects.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the demineralized water makeup system:

- Water Chemistry Program (B.1.2)
- BWR Stress Corrosion Cracking Program (B.1.7)
- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the demineralized water makeup system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the demineralized water makeup system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.19, Table 2.3.3-19, and Section 3.3.3, Table 3.3-2 in this SER. During its review, the staff determined that additional information was needed.

In LRA Table 3.3-2, Reference No. 3.3.2.18, the applicant stated that high-strength, low-alloy steel closure bolting components in the outdoor ambient conditions are subject to the aging effect of loss of material due to general corrosion and wear. However, the applicant did not include crack initiation and growth due to SCC or other mechanisms as an applicable aging effect/mechanism. By letter dated August 4, 2003, the staff requested, in RAI 3.3-5, the applicant to provide its technical basis for not including this aging effect/mechanism. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.5 of this SER.

Loss of material due to general, pitting, and crevice corrosion may be an applicable aging effect on carbon steel components exposed to chemically treated demineralized water. However, in several AMR references, the applicant identified crack initiation and growth due to SCC and IGSCC as the applicable aging effect/mechanism instead of loss of material due to general, pitting, and crevice corrosion. By letter dated August 4, 2003, the staff requested, in RAI 3.3-6, the applicant to provide clarification. The staff's evaluation of the applicant's response is

documented in Section 3.3.2.5.6 of this SER.

For several AMR items, the LRA was not clear as to how the applicant was verifying the effectiveness of the Water Chemistry Program. By letter dated August 4, 2003, the staff requested, in RAI 3.3-8, the applicant to clarify whether a one-time inspection should be performed for these components to verify the effectiveness of the Water Chemistry Program. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.8 of this SER.

The applicant uses the Bolting Integrity Program (B.1.12) to manage general corrosion on external surfaces of many auxiliary system nonbolting components. The staff notes that the Bolting Integrity Program description states, "The program consists of visual inspections for external surface degradation that may be caused by loss of material or cracking of the bolting, or by an adverse environment." This suggests that only the bolting material will be inspected for aging degradation. By letter dated August 4, 2003, the staff requested, in RAI 3.3-9, the applicant to explain (including the acceptance criteria and inspection interval) how the Bolting Integrity Program is used to manage general corrosion on external surfaces of nonbolting components, such as piping, valves, mufflers, and others. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.9 of this SER.

The LRA identifies that loss of material due to pitting and crevice corrosion may be an applicable aging effect on aluminum components exposed to outdoor ambient conditions or cast iron exposed to treated water. However, in Table 3.3-2, Reference No. 3.3.2.22, the applicant identified loss of material due to pitting corrosion as the only aging effect/mechanism on the aluminum components exposed to outdoor ambient conditions. Similarly, in Table 3.3-2, Reference No. 3.3.2.182, the applicant identified only loss of material due to selective leaching as the applicable aging effect/mechanism on cast iron exposed to treated water. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.19, the applicant to provide the technical basis for excluding the aging effect of loss of material due to crevice corrosion and/or pitting corrosion from the AMR.

In its response dated October 3, 2003, the applicant stated that according to the "Metals Handbook," Ninth Edition, Volume 13, the aging effect/mechanism that may affect aluminum components exposed to an outdoor ambient environment is loss of material due to pitting. Aluminum alloys have excellent resistance to atmospheric corrosion, and in many outdoor applications, such alloys do not require shelter, protective coatings, or maintenance. Corrosion of most aluminum alloys by weathering is restricted to mild surface roughening by shallow pitting, with no general thinning. Therefore, the applicant concluded that loss of material due to pitting is the only applicable aging effect on aluminum components exposed to an outdoor environment, as evaluated in Aging Management Reference 3.3.2.22. The applicant further stated that loss of material due to pitting and crevice corrosion of cast iron components is addressed by Aging Management Reference 3.3.2.300. Aging Management Reference 3.3.2.182 addresses the aging effect of loss of material due to selective leaching on cast iron exposed to a treated water internal environment. The applicant clarified that Aging Management Reference 3.3.2.300 addresses the aging effect of loss of material due to pitting and crevice corrosion on cast iron exposed to an external environment of air, moisture, and humidity less than 100 °C (212 °F).

On the basis of its review, the staff finds the applicant's response to RAI 3.3.2.4.19 acceptable

because the applicant has shown that (1) loss of material due to pitting is the only applicable aging effect on aluminum components exposed to an outdoor environment, (2) Aging Management Reference 3.3.2.182 addresses the aging effect of loss of material due to selective leaching on cast iron exposed to a treated water internal environment, and (3) Aging Management Reference 3.3.2.300 addresses the aging effect of loss of material due to pitting and crevice corrosion on cast iron exposed to an external environment of air, moisture, and humidity less than 100 °C (212 °F). The staff considers the issues related to RAI 3.3.2.4.19 to be resolved.

The aging effects identified in the LRA for the demineralized water makeup system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the demineralized water makeup system.

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress Corrosion Cracking Program (Section 3.0.3.3)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Structures Monitoring Program (Section 3.0.3.14)

These AMPs are credited for managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.3, 3.0.3.5, 3.0.3.10, 3.0.3.11, and 3.0.3.14, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the demineralized water makeup system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effects.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in various systems, including the demineralized water makeup. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the demineralized water makeup system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the

effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.20 Residual Heat Removal Service Water System (Quad Cities Only)

Summary of Technical Information in the Application. The description of the residual heat removal service water system can be found in Section 2.3.3.20 of the SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-20. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-20 of the LRA lists individual system components within the scope of license renewal and subject to AMR. The components include air handlers heating/cooling (Aux & RW HVAC), ducts and fittings, access doors, heat exchangers, and NSR vents or drains. The components specific to Quad Cities only include closure bolting, dampeners, equipment frames, orifice bodies, piping and fittings, piping and fittings (attached support), pulsation dampeners, pumps, sight glass (attached supports), strainer bodies, strainer screens, thermowells, tubing, tubing (attached supports), valves, and valves (attached support).

Air handlers with copper tubes, stainless steel tubesheets, and carbon steel end bells exposed to raw water or warm moist air are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, and microbiologically influenced corrosion, erosion or flow-accelerated corrosion, wear, and cracking initiation and growth due to fatigue and SCC. Copper tubes in air handlers are subject to the aging effect of loss of heat transfer function due to buildup of deposit/fouling. Heat exchangers with stainless steel tubes, cast iron tubesheets, carbon steel or cast iron shells, and cast iron channel heads exposed to raw water on the tube side and torus water on the shell side are subject to the aging effects of loss of material due to general, galvanic, pitting, crevice, and microbiologically influenced corrosion, erosion or flow-accelerated corrosion, selective leaching, wear, and cracking initiation and growth due to fatigue and SCC. Heat exchanger tubes are subject to the aging effect of loss of heat transfer function due to buildup of deposit/fouling. Heat exchanger external surfaces exposed to air, moisture, humidity, and leaking fluids are subject to the aging effect of loss of material due to pitting and crevice corrosion. Carbon steel, stainless steel, brass, or bronze NSR vents or drains exposed to air, moisture, and leaking fluid are subject to the aging effect of loss of material due to corrosion. Brass or bronze, carbon steel, saran-lined steel, iron cast (lined), and stainless steel components exposed to air, moisture, humidity, and leaking fluid are subject to the aging effect of loss of material due to general (carbon steel, saran-lined steel), pitting, and crevice corrosion. Carbon steel components exposed to raw water are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion. Saran-lined steel components exposed to raw water are subject to the aging effect of loss of material due to general, pitting, crevice, galvanic, and microbiologically influenced corrosion and erosion. Saran-lined steel components exposed to raw water are subject to the aging effect of loss of intended function due to flow blockage caused by biofouling, silting, and corrosion product buildup. Iron cast (lined) components exposed to raw water are subject to the aging effect of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion and selective leaching. Brass or bronze components exposed to an air, moisture, and humidity environment experience no aging effects. Cast iron components exposed to raw water are

subject to the aging effect of loss of material due to general, pitting, crevice, galvanic, and microbiologically influenced corrosion and selective leaching. Cast iron components exposed to raw water are subject to the aging effect of loss intended function due to flow blockage caused by biofouling, silting, and corrosion product buildup. Cast iron components exposed to an air, moisture, and humidity environment are subject to the aging effect of loss of material due to pitting and crevice corrosion.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the residual heat removal service water system:

- Water Chemistry Program (B.1.2)
- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- One-Time Inspection Program (B.1.23)
- Selective Leaching of Materials Program (B.1.24)
- Buried Piping and Tanks Inspections Program (B.1.25)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the residual heat removal service water system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the residual heat removal service water system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.20, Table 2.3.3-20, and Tables 3.3-1 and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed. The issues addressed in the RAIs are related to this system, in addition to other systems, even though the RAIs are evaluated in other sections of this SER as specified in the following text.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations for which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging

effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, brass, and bronze components exposed to moist gas (moist nitrogen) or a moist air environment may experience the aging effect of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves exposed to either the containment nitrogen gas environment or an air, moisture, and humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40, as to whether pollutants such as oxygen, NO_x, SO₂, or CO are present, and if so, to what extent, in the containment gas or air, moisture, and humidity environments. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Aluminum and aluminum alloys components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA only identifies loss of material due to general and pitting corrosion as a plausible aging effect for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to an air, moisture, and humidity environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of the cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

Loss of material due to general, pitting, and crevice corrosion may be an applicable aging effect on carbon steel components exposed to chemically treated demineralized water. However, in several AMR references, the applicant identified crack initiation and growth due to SCC and IGSCC as the applicable aging effect/mechanism instead of loss of material due to general, pitting, and crevice corrosion. By letter dated August 4, 2003, the staff requested, in RAI 3.3-6, the applicant to provide clarification. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.6 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which

specific AMP(s) is applicable for managing the AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in the various auxiliary systems. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

For several AMR items, the LRA was not clear as to how the applicant was verifying the effectiveness of the Water Chemistry Program. By letter dated August 4, 2003, the staff requested, in RAI 3.3-8, the applicant to clarify whether a one-time inspection should be performed for these components to verify the effectiveness of the Water Chemistry Program. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.8 of this SER.

Loss of material due to selective leaching may be an applicable aging effect for copper alloy components exposed to a saturated air environment where water condensation may occur on the surfaces of these components. However, in LRA Table 3.3-2, Reference Nos. 52, 242, and 262, loss of material due to selective leaching was not identified as an applicable aging effect for copper alloy components in saturated air. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.8 requesting the applicant to provide the technical basis for excluding this aging effect from AMR. The staff's evaluation of the applicant's response is documented in Section 3.3.2.4.8 of this SER.

The aging effects identified in the LRA for the residual heat removal service water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the residual heat removal service water system:

- Water Chemistry Program (Section 3.0.3.2)
- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- One-Time Inspection Program (Section 3.0.3.10)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tanks Inspections Program (Section 3.0.3.12)
- Structures Monitoring Program (Section 3.0.3.14)

These AMPs are credited for managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.5, 3.0.3.6, 3.0.3.10, 3.0.3.11, 3.0.3.12, and 3.0.3.14, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the residual heat removal service water system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs

recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the residual heat removal service water system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.21 Containment Cooling Service Water System (Dresden Only)

Summary of Technical Information in the Application. The description of the containment cooling service water system can be found in Section 2.3.3.21 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-21. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Components of the containment cooling service water system are described in Section 2.3.3.21 of the LRA as being within the scope of license renewal and subject to an AMR. Tables 2.3.3-21, 3.3-1, and 3.3-2 of the LRA list individual components of the system, including piping and fittings, buried piping, tubing, valves, pumps, thermowells, strainer bodies and screens, orifice bodies, heat exchangers, flow elements, duct and fittings, access doors, equipment frames, air handlers, and closure bolting.

Carbon steel, stainless steel, brass, bronze, and cast iron exposed to an external environment of high moisture and humidity air and leaking fluid in the pump vault are subject to loss of material due to corrosion. Loss of material is identified for cast iron exposed to the plant's indoor building environment (defined in the LRA as air, moisture, and humidity less than 100 °C (212 °F)). No aging effect is identified for stainless steel, brass, and bronze exposed to the plant's indoor building environment. Carbon steel submerged in raw water is subject to loss of material due to general, pitting, and crevice corrosion and MIC. Carbon steel in a buried environment is also subject to loss of material due to general, pitting, and crevice corrosion and MIC. Cast iron exposed to raw water is subject to loss of material due to general, pitting, crevice corrosion, MIC, and selective leaching. Copper and carbon steel heat exchanger components exposed to raw water on the tube side are subject to loss of material, cracking, and fouling. Copper and carbon steel heat exchanger components exposed to torus water (demineralized water) on the shell side are subject to loss of material and cracking.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the containment cooling service water system:

- Water Chemistry Program (B.1.2)
- Bolting Integrity Program (B.1.12)

- Open-Cycle Cooling Water System Program (B.1.13)
- Selective Leaching of Materials Program (B.1.24)
- Structures Monitoring Program (B.1.30)
- Buried Piping and Tanks Inspection Program (B.1.25)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the containment cooling service water system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation.

Aging Effects

The staff reviewed the information in Section 2.3.3.21 and Tables 2.3.3-21, 3.3-1, and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed.

The description in item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as an aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of material for the relevant components, as well as the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Aging management of the air handlers (heat exchangers) is addressed by Aging Management Reference Nos. 3.3.2.8 and 3.3.2.9. While these references discuss both the internal and external environment of the heat exchanger tubes, it was not clear whether the aging effects or the AMPs had been identified for both the internal and external environments. The tube internal environment is open-cycle cooling water (raw water) and the external environment is warm, moist air. The applicant identified loss of material and cracking as applicable aging effects, and the credited Open-Cycle Cooling Water System Program (B.1.13) with managing these aging effects. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.21(a), the applicant to provide justification for not identifying any aging effects for the components on the shell side exposed to warm, moist air, especially considering condensation on the tubes.

In its response dated October 3, 2003, the applicant stated that condensation is present on the tubes of the shell side of the air handlers (heat exchangers). Aging Management References 3.3.2.8 and 3.3.2.9 of LRA Table 3.3-2 address open/coil fin type air coolers. The materials are stainless steel, copper, aluminum, and carbon steel, and they are exposed to warm, moist air. Appendix G of "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," EPRI 1003056, which is applicable to air handlers in air environments, identifies loss of material due to wear, buildup of deposit due to fouling, and cracking due to fatigue as the applicable aging effects/mechanisms for stainless steel, copper, and aluminum air handling components in air environments. EPRI 1003056, Appendix D, which is applicable to carbon steel components in air/gas environments, identifies loss of material due to general corrosion,

galvanic corrosion, and MIC as an aging effect/mechanism for carbon steel in air environments.

The applicant stated that Aging Management References 3.3.2.8 and 3.3.2.9, along with Aging Management Reference 3.3.2.7, include aging effects for both tube side and shell side surfaces. These references identify the above aging effects/mechanisms for the subject air handler surfaces in a warm, moist air environment. The applicant stated that the associated AMP, the Open-Cycle Cooling Water System Program (B.1.13), includes provisions for inspection of the external surfaces of the air handler cooling water components. On the basis of its review, the staff finds the applicant's response to RAI 3.3.2.4.21(a) acceptable because the applicant has identified the applicable aging effects and has provided an appropriate AMP to manage the aging effects.

The AMR of this system specifies References 3.3.2.208 and 3.3.2.179 for cast iron components in raw water. Reference 3.3.2.208 includes galvanic corrosion as a mechanism for loss of material, but Reference 3.3.2.179 does not. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.21(b), the applicant to clarify whether the components covered by Reference 3.3.2.179 (pump casings) are also susceptible to galvanic corrosion, and to provide the applicable AMP(s). In its response dated October 3, 2003, the applicant stated that, according to EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3," Appendix B, galvanic corrosion is an applicable aging mechanism for cast iron components that are in contact with metals higher in the galvanic series. The applicant stated that Reference 3.3.2.208 is associated with cast iron strainer bodies in the Dresden containment cooling service water and service water systems. These strainer bodies are in raw water environments and are in contact with strainer filters made of stainless steel, which is higher in the galvanic series than cast iron. Therefore, the applicant concluded that galvanic corrosion is an applicable aging effect for the strainer bodies.

The applicant further stated that Reference 3.3.2.179 is associated with cast iron pump casings in raw water environments in the Dresden CCSW and service water systems. These pump casings are not in contact with any metals higher in the galvanic series; therefore, the applicant concluded that galvanic corrosion is not an applicable aging mechanism. On the basis of its review, since the pump casings are not in contact with metals higher in the galvanic series, the staff agrees with the applicant's conclusion that there is no galvanic corrosion of the pump casings. Therefore, the staff finds the applicant's response to RAI 3.3.2.4.21 acceptable.

The aging effects identified in the LRA for the containment cooling service water system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the containment cooling service water system:

- Water Chemistry Program (Section 3.0.3.2)
- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Selective Leaching of Materials Program (Section 3.0.3.11)

- Structures Monitoring Program (Section 3.0.3.14)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)

The Bolting Integrity Program, Open-Cycle Cooling Water System Program, Water Chemistry Program, Selective Leaching of Materials Program, Structures Monitoring Program, and Buried Piping and Tanks Inspection Program are credited with managing the aging effects of several components in different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.5, 3.0.3.6, 3.0.3.12, 3.0.3.11, 3.0.3.14, and 3.0.3.12, respectively, of this SER.

The staff identified that loss of material due to galvanic corrosion is location dependent. Adequate aging management may need to target susceptible locations for inspection and testing. By letter dated August 4, 2003, the staff asked the applicant to clarify whether the inspection and testing activities described in the Open-Cycle Cooling Water System Program (B.1.13) are targeted or opportunistic with respect to managing loss of material due to galvanic corrosion (RAI B.1.13). In its responses dated October 3, 2003, and December 17, 2003, the applicant stated that the Open-Cycle Cooling Water System Program manages galvanic corrosion through periodic inspections of in-scope components, as appropriate. The in-scope components include heat exchangers and strainer bodies. The applicant further stated that a new surveillance for periodic inspection of the strainer in the containment cooling service water supply line to the main control room HVAC refrigeration condensing unit will be added to this program and will be implemented prior to the end of the current license. The applicant also updated the UFSAR Supplement for the Open-Cycle Cooling Water System Program to reflect this addition. The staff concludes that the use of periodic inspections performed as part of the Open-Cycle Cooling Water System Program is an appropriate method of managing the loss of material due to galvanic corrosion; therefore, the staff finds this acceptable.

After evaluating the applicant's AMR for each of the components in the containment cooling service water system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the containment cooling service water system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.22 Ultimate Heat Sink

Summary of Technical Information in the Application. The description of the ultimate heat sink can be found in Section 2.3.3.22 of this SER. The passive, long-lived components in this

system that are subject to an AMR are identified in LRA Tables 2.3.3-22. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-22 of the LRA lists individual system components that are within the scope of license renewal and subject to AMR. The components include closure bolting, piping and fittings, stop logs, valves, including the ice melt gates (from the applicant's response to RAI 2.3.3.22-1), and pump casings.

The LRA identifies the following applicable aging effects for the ultimate heat sink. The LRA identifies that cast iron, low-alloy steel, and carbon steel components in an air, moisture, humidity, and leaking fluid environment are subject to loss of material from general corrosion, pitting, and crevice corrosion (for carbon steel and cast iron), as well as crack initiation and growth from cyclic loading and SCC for the low-alloy steel components. Cast iron components in raw water or untreated fresh water environments are subject to loss of material from selective leaching, general, pitting, and crevice corrosion and MIC. Carbon steel components in a submerged raw water environment are subject to the aging effect of loss of material from general, pitting, and crevice corrosion, MIC, and macroorganisms. Carbon steel piping and fittings buried in soil are subject to the aging effect of loss of material due to general, pitting, and crevice corrosion, and MIC. The LRA does not identify any aging effects for carbon steel components encased in concrete. The applicant did not identify any aging effects for aluminum stop logs in the indoor environment (from the applicant's response to RAI 2.3.3.22-2).

Aging Management Programs

The LRA credited the following AMPs for managing the identified aging effects for the ultimate heat sink:

- Open-Cycle Cooling Water System Program (B.1.13)
- Bolting Integrity Program (B.1.12)
- Structures Monitoring Program (B.1.30)
- Selective Leaching of Materials Program (B.1.24)
- Buried Piping and Tank Inspection (B.1.25)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the ultimate heat sink will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, of the components in the ultimate heat sink. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-22, 3.3-1, and 3.3-2 for the ultimate heat sink. During its review, the staff determined that additional information was needed.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subject to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have material/environment combinations for which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing the AMR item 3.3.1.5, "Specific Corrosion Mechanism," and to explain how the AMP(s) manages that corrosion mechanism for components in the various auxiliary systems. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

The applicant uses the Bolting Integrity Program (B.1.12) to manage general corrosion on the external surfaces of many auxiliary system nonbolting components. The staff notes that the Bolting Integrity Program description states, "The program consists of visual inspections for external surface degradation that may be caused by loss of material or cracking of the bolting, or by an adverse environment." This suggests that only the bolting material will be inspected for aging degradation. By letter dated August 4, 2003, the staff requested, in RAI 3.3-9, the applicant to explain (including the acceptance criteria and inspection interval) how the Bolting Integrity Program is used to manage general corrosion on external surfaces of non-bolting components, such as piping, valves, mufflers, and others. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.9 of this SER.

Loss of material from erosion and flow blockage from biofouling, silting, and corrosion product buildup may also be applicable aging effects/aging mechanisms for some cast iron components in a raw water environment. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.22 (a), the applicant to clarify whether these are applicable aging effects/aging mechanisms for these components in the ultimate heat sink. If so, the staff requested the applicant to provide the applicable AMP(s). If not, the applicant was requested to provide the basis for excluding erosion and flow blockage as applicable aging effects/aging mechanisms, including applicable operating experience.

In addition, in Table 2.3.3-22 and in item 3.3.2.28 of Table 3.3-2 of the LRA, for the material/environment of carbon steel components encased in concrete, the applicant stated that there is no applicable aging effect. The staff notes that good design and construction practices are necessary to prevent steel corrosion in an environment of being embedded in concrete. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.22 (b), the applicant to provide specifics of the design and construction practices used for the carbon steel components encased in concrete in the ultimate heat sink, including applicable standards and operating experience.

In its response dated October 3, 2003, the applicant stated that for part (a) of the RAI 3.3.2.4.22, loss of material from erosion and flow blockage from biofouling, silting, and corrosion product buildup are not applicable aging effects/aging mechanisms for cast iron components in a raw water environment in the ultimate heat sink. Cast iron components within the scope of

license renewal in the ultimate heat sink are pumps and valves with a pressure boundary component intended function. The aging effect/mechanism for these components is “Loss of material/General, pitting and crevice corrosion, selective leaching and microbiologically influenced corrosion.” The applicant further stated that a review of plant operating history did not reveal any loss of intended function for cast iron components in the ultimate heat sink due to the erosion and flow blockage aging mechanisms. The applicant clarified that Aging Management Reference 3.3.2.172 addresses the aging management of the internal surfaces of cast iron components, and that Aging Management Reference 3.3.2.300 addresses the aging management of the external surfaces of cast iron components.

For part (b) of RAI 3.3.2.4.22, the applicant stated that EPRI TR-114881, “Aging Effects for Structures and Structural Components (Structural Tools)” identifies that “the high alkalinity of concrete (pH > 12.5) provides an environment around embedded steel and steel reinforcement which protects them from corrosion.” EPRI TR-114881 further states that the corrosion rate is insignificant until a pH of 4.0 is reached. The concrete structures and structural members are designed and constructed in accordance with ACI-318-63 and ASTM standards which provide a good quality, dense, low permeability concrete that provides adequate concrete cover over the encased steel. The applicant further stated that a review of plant operating history did not reveal any loss of intended function for the carbon steel components encased in concrete in the ultimate heat sink.

The applicant clarified that Aging Management Reference 3.3.2.28 discusses the aging management of external surfaces of the carbon steel components (underground corrugated steel ice melting piping) encased in concrete, and further stated that Aging Management Reference 3.3.1.15 discusses the aging management of the internal surfaces of carbon steel components (underground corrugated steel ice melting piping) in a raw water environment.

On the basis of its review, the staff finds the applicant’s response to RAI 3.3.2.4.22 acceptable because (1) the applicant showed that a review of plant operating history did not reveal any loss of intended function for cast iron components in the ultimate heat sink due to the erosion and flow blockage aging mechanisms, and (2) the applicant demonstrated that the concrete structures and structural members are designed and constructed in accordance with ACI-318-63 and ASTM standards. Further, the applicant showed that a review of plant operating history did not reveal any loss of intended function for the carbon steel components encased in concrete in the ultimate heat sink. The staff considers the issues related to RAI 3.3.2.4.22 parts (a) and (b) to be resolved.

The aging effects identified in the LRA for the ultimate heat sink are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the ultimate heat sink:

- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Bolting Integrity Program (Section 3.0.3.5)

- Structures Monitoring Program (Section 3.0.3.14)
- Selective Leaching of Materials Program (Section 3.0.3.11)
- Buried Piping and Tank Inspection (Section 3.0.3.12)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. These AMPs are evaluated in Sections 3.0.3.6, 3.0.3.5, 3.0.3.14, and 3.0.3.11, and 3.0.3.12, respectively, of this SER.

After evaluating the applicant's AMR for each of the components in the ultimate heat sink, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the ultimate heat sink will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.23 Fuel Pool Cooling and Filter Demineralizer System (Dresden Only)

Summary of Technical Information in the Application. The description of the fuel pool cooling and filter demineralizer system can be found in Section 2.3.3.23 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-23. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Components of the fuel pool cooling and filter demineralizer system are described in Section 2.3.3.23 of the LRA as being within the scope of license renewal and subject to an AMR. Table 2.3.3-23 of the LRA lists individual components of the system including fittings, valves, sight glasses, and closure bolting.

Carbon steel and low-alloy steel exposed to external sheltered environment with warm, moist air is subject to loss of material due to corrosion. No aging effect is identified for stainless steel exposed to external sheltered environment with warm, moist air. Carbon steel exposed to internal environment of demineralized oxygenated water, wet gas, or warm, moist air is subject to loss of material due to general, pitting, and crevice corrosion. Stainless steel exposed to internal environment of chemically treated oxygenated water is subject to loss of material due to general, pitting, and crevice corrosion.

Aging Management Programs

The following AMPs are utilized to manage aging effects in the fuel pool cooling and filter demineralizer system:

- Water Chemistry Program (B.1.2)
- One-time Inspection Program (B.1.23)
- Bolting Integrity Program (B.1.12)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effect of aging associated with the components of the fuel pool cooling and filter demineralizer system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the fuel pool cooling and filter demineralizer system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.23 and Tables 2.3.3-23, 3.3-1, and 3.3-2 in the LRA. During its review, the staff determined that additional information was needed to complete its review.

The description in Item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as the aging effect/mechanism for carbon steel, stainless steel, brass, or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of the corrosion responsible for the aging effect of loss of material for the relevant components and the criteria for selecting these samples including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

NUREG-1801 identifies loss of material due to corrosion is an aging effect for shell-side components (shell and access cover, channel head, and tubes) of the heat exchanger of the fuel pool cooling and cleanup system exposed to closed-cycle cooling water. LRA Table 2.3.3-23 does not include any aging effect for the heat exchanger of the fuel pool cooling and cleanup system. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.23, the applicant to provide justification for not identifying any aging effect for the shell-side components of the heat exchanger of the fuel pool cooling and filter demineralizer system in LRA Table 2.3.3-23.

In its response dated October 3, 2003, the applicant stated that the applicant does not consider the Dresden heat exchangers associated with the fuel pool cooling and cleanup system to be within the scope of license renewal. The applicant explained that the fuel pool cooling and

cleanup system is a non-safety-related closed-loop system that is normally in continuous operation. In normal operation, the fuel pool cooling and cleanup system interfaces directly with the spent fuel pool, which is a Class I structure, and during refueling operations it may be aligned to support filling or draining the reactor cavity and/or the equipment storage pool. The non-safety-related reactor building closed cooling water system provides the cooling medium for the fuel pool cooling heat exchangers, and the non-safety-related demineralized water makeup system is the normal makeup water supply for the fuel storage pool. Each of the two spent fuel pool cooling system return lines to the spent fuel pool have openings in the pipe about 6 inches below the pool surface to act as antisiphon devices by allowing air into the pipe to break the vacuum if siphoning begins. This precludes uncontrolled draining of the spent fuel pool in the event of a pipe failure. Additionally, the heat exchangers are not located near safety-related equipment that could be affected by failure of these components.

The applicant further explained that the complete loss of fuel pool cooling could result in overheating of fuel rods stored in the fuel pool if makeup systems were not activated and the fuel pool were allowed to boil away. However, this is not a design- or licensing-basis event and several hours would be available for restoration of makeup systems. Makeup systems available include the condensate transfer system, the demineralized water system, and the fire water system, any of which could be connected by hoses to provide makeup to the spent fuel pool. Calculations performed as part of the extended power uprate evaluation determined that with a complete loss of cooling to the spent fuel pool, it would take at least 8 hours for the Dresden fuel pool to reach 212 °F (100 °C) . This would provide adequate time to establish alternative sources of makeup water to the pool. Because failure of the fuel pool cooling system does not threaten to cause consequential failure of other safety-related systems or components, and because postulated failure of the fuel pool cooling system allows ample time to implement alternative makeup to the fuel pool, failure of the fuel pool cooling system is not considered a failure of a non-safety-related system whose failure could prevent satisfactory accomplishment of any of the safety-related functions identified in 10 CFR 54.4(a)(1).

The staff understands that the fuel pool cooling and cleanup system at Dresden is a non-safety-related closed-loop system that is normally in continuous operation. The design objectives of the system are to handle the spent fuel pool cooling load and to maintain pool water clarity. The only intended function of the system is to preclude adverse effects from failure of segments of piping and components on safety-related SSCs.

In its response dated October 3, 2003, the applicant stated that the fuel pool cooling and cleanup system (with the exception of the segments of piping discussed below) is not located near safety-related equipment that could be affected by failure of fuel pool cooling and cleanup system components. The applicant performed a walkdown of the system and determined that—

- The segment of line 2-1910B-6"-K red highlighted on boundary diagram LR-DRE-M-31 is in scope of license renewal because it is physically located such that leakage or spray from this line could spatially interact with safety-related primary containment isolation valve AOV 2-1601-23.
- The red-highlighted portion of the drain line (from globe valve 3-1901-11 to the 6"x4" reducer) as shown on boundary diagram LR-DRE-M-362 is physically located such that leakage from this line could spatially interact with safety-related primary containment isolation valve AOV 3-1601-23. Because of this spatial relationship, the highlighted portion

of the line was determined to be in scope of license renewal.

On the basis of its review, the staff finds the applicant's response acceptable because the spent fuel pool cooling heat exchangers are not located near safety-related equipment and their failure does not threaten to cause consequential failure of other safety-related systems or components. Therefore, the spent fuel pool cooling heat exchangers are not in scope of license renewal and are not included in LRA Table 2.3.3.12. The staff considers issues related to RAI 3.3.2.4.23 to be resolved.

The aging effects identified in the LRA for the fuel pool cooling and filter demineralizer system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs for managing the aging effects in the fuel pool cooling and filter demineralizer system.

- Water Chemistry Program (Section 3.0.3.2)
- One-time Inspection Program (Section 3.0.3.10)
- Bolting Integrity Program (Section 3.0.3.5)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Inspection of Components Subject to Moist Environments Program (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

The Water Chemistry, One-time Inspection, Bolting Integrity, and Structures Monitoring Programs are credited with managing the aging effects of several components in different structures and systems and are, therefore, considered common AMPs. The staff has evaluated these common AMPs and has found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.10, 3.0.3.5, and 3.0.3.14 of this SER.

After evaluating the applicant's AMR for each of the components in the fuel pool cooling and filter demineralizer system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the fuel pool

cooling and filter demineralizer system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.24 Plant Heating System

Summary of Technical Information in the Application. The description of the plant heating system can be found in Section 2.3.3.24 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-24. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-24 of the LRA lists individual system components that are within the scope of license renewal and subject to an AMR. The components include closure bolting, filters/strainers, NSR vents or drains, piping and valves (Dresden only), piping and fittings, pumps, sight glasses (Quad Cities only), tanks, thermowells (Dresden only), traps, tubing, and valves. All of these components are in the scope of license renewal due to the potential for spatial interactions.

The LRA identified the following applicable aging effects for the plant heating system. The LRA identifies that cast iron, low-alloy steel, carbon steel, stainless steel, and brass or bronze components in air, moisture, humidity, or leaking fluid environments are subject to loss of material from general corrosion (not for stainless steel), pitting and crevice corrosion, as well as crack initiation and growth from cyclic loading, and SCC for the low-alloy steel components. Cast iron, carbon steel, copper, and brass or bronze components in saturated steam/condensate environments are subject to loss of materials from general corrosion; while stainless steel components in the same environment are subject to the aging effects of loss of material from pitting and crevice corrosion. The LRA does not identify any aging effects for stainless steel, copper, and brass or bronze components in the air, moisture, and humidity less than 100 °C (212 °F) environment.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the plant heating system.

- Open-Cycle Cooling Water System Program (B.1.13)
- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the plant heating system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the plant heating system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-24, 3.3-1, and 3.3-2 for the plant heating system. During its review, the staff determined that additional information was needed to complete its review.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subjected to the aging effect of loss of material from galvanic corrosion. Many system components of the auxiliary system described by various items in Table 3.3-2 of the LRA have materials/environment combinations to which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. However, the applicant does not include loss of material due to galvanic corrosion as an aging effect/mechanism that requires management for the period of extended operation. By letter dated August 4, 2003, the staff issued RAI 3.3-1 pertaining to this issue. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.1 of this SER.

The description in Item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as aging effect/mechanism for carbon steel, stainless steel, and brass or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of materials for the relevant components and the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Carbon steel, stainless steel, and brass and bronze components exposed to moist gas (moist nitrogen) or moist air environment may experience aging effects of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects are identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valve components exposed to either the containment nitrogen gas environment or air, moisture, humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information on whether the pollutants such as oxygen, NO_x, SO₂, or CO are present, and, if so, to what extent in the containment gas or air, moisture, humidity environments to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

Loss of material from selective leaching may be an applicable aging effect/aging mechanism for cast iron and brass components in saturated steam/condensate, as well as air, moisture, humidity, and leaking fluid environments if stagnant liquids are present in these environments; however, the LRA only identifies a loss of material due to general corrosion for these components. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.24(a), the applicant to clarify whether selective leaching is applicable to components in the plant heating system and, if so, to provide the applicable AMP(s). In its responses dated October 3 and December 22, 2003, the applicant stated that these components are subject to loss of material due to general corrosion, and they may also be subject to loss of material due to selective leaching if stagnant liquids are present in these environments. The loss of material is managed by periodic inspections in stagnant flow areas. The applicant also stated that selective leaching in brass alloys results in either a uniform attack or a localized plug attack, while selective leaching of gray cast iron results in iron being dissolved, leaving a porous mass consisting of graphite, voids, and rust. The applicant stated that the inspection will detect the loss of material whether it is due to selective leaching or general corrosion. The staff finds that periodic inspections for loss of material will identify selective leaching if it is occurring; therefore, the staff finds this acceptable.

The aging effects identified in the LRA for the plant heating system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the following AMPs to manage the aging effects described above for the plant heating system.

- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Periodic Inspection of Plant Heating System (Section 3.3.2.3.7)

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. These AMPs are evaluated in Sections 3.0.3.6, 3.0.3.5, 3.0.3.10, and 3.3.2.3.7 of this SER.

The LRA credits a one-time inspection for aging management of a carbon steel tank in this system. By letter dated August 4, 2003, the staff asked for clarification related to whether all parts of the tank are accessible, or how the inaccessible parts of the tank would be managed. In its response dated October 3, 2003, the applicant stated that the tanks (grouped under Aging Management Reference 3.3.2.214) are not buried or embedded in a way that makes large areas of the tanks inaccessible for inspection and will be periodically inspected.

Consistent with its response to RAI B.1.23-2, the applicant stated that one or more components in the plant heating system with material consisting of carbon steel exposed to an environment of saturated steam/condensate will be periodically inspected using the Period Inspection of Plant Heating System Program (B.2.8), which is described in the applicant's letter dated January 26, 2004. The applicant further stated that the inspected component(s) will serve as a

representative sample for all carbon steel components in the plant heating system, encompassing both the accessible parts of the plant heating system and any small areas of the tank where access may be difficult. The staff noted that the applicant planned to periodically inspect a representative sample of accessible locations, but that it was not clear that the accessible locations would be a leading indicator for the tank bottom. The staff noted that this system is only in scope for spatial interactions and a leak in the tank bottom may not pose a concern. Therefore, the staff asked the applicant to describe how the proposed inspections would bound the loss of material in the tank bottom, or justify that a leak in this area is not a concern. In its response dated December 22, 2003, the applicant stated that the plant heating steam system was included within the scope of license renewal at both sites because of the numerous instances in which heating steam components were found located above safety-related equipment. In these instances, the possibility exists in which failed plant heating steam components could spray water onto safety-related equipment located below. While not all heating steam components have the ability to spatially interact with safety-related equipment, a decision was made to include all of the plant system components within the scope of license renewal. The applicant further stated that the tanks in question are among those plant heating steam components that cannot spatially interact with safety-related equipment. Therefore, the applicant concluded that potential leakage from the plant heating system tanks does not jeopardize the functionality of any safety-related structures or components, and does not present a concern for loss of any safety-related intended functions during the period of extended operation. The staff concludes that the proposed inspections would adequately identify degradation of the plant heating system; therefore, the staff finds this acceptable.

After evaluating the applicant's AMR for each of the components in the plant heating system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the plant heating system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.25 Containment Atmosphere Monitoring System

Summary of Technical Information in the Application. The description of the containment atmosphere monitoring system can be found in Section 2.3.3.25 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Tables 2.3.3-25. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-25 of the LRA lists individual system components that are within the scope of

license renewal and subject to an AMR. Table 2.3.3-25 lists all component groups in this category, components not evaluated in GALL and considered as plant-specific, in the containment atmosphere monitoring system. The components listed by the applicant in the Dresden/Quad Cities Nuclear Stations LRA for this category include closure bolting, filters/strainers, flexible hoses, NSR vents or drains, piping and valves (attached support), piping and fittings (attached support), piping and fittings, pumps, restricting orifices, sample pumps, tubing, valves, and valves (attached support).

The LRA identified the following applicable aging effects for the containment atmosphere monitoring system. The LRA identifies that low-alloy steel, carbon steel, stainless steel, and brass or bronze components in air, moisture, humidity, or leaking fluid environments are subject to loss of material from general corrosion (not for stainless steel), pitting, and crevice corrosion, as well as crack initiation and growth from cyclic loading, SCC for the low-alloy steel components. Stainless steel components in warm, moist air and wet gas environments, as well as moist containment atmosphere (air/nitrogen), steam, or demineralized water environment are subject to loss of materials from pitting and crevice corrosion. Elastomer neoprene and similar materials in both dry gas and warm, moist air environments are subject to the aging effect of hardening and loss of strength from elastomer degradation. The LRA does not identify any aging effect for stainless steel, or brass or bronze components in dry gas environment and in containment nitrogen environment (for stainless steel).

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the containment atmosphere monitoring system.

- One-Time Inspection Program (B.1.23)
- Bolting Integrity Program (B.1.12)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effects of aging associated with the components of the containment atmosphere monitoring system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the containment atmosphere monitoring system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Tables 2.3.3-25, 3.3-1, and 3.3-2 for the containment atmosphere monitoring system. During its review, the staff determined that additional information was needed to complete its review.

Carbon steel, stainless steel, and brass and bronze components exposed to moist gas (moist nitrogen) or moist air environment may experience aging effects of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless

steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, the applicant concluded that no aging effects are identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valve components exposed to either the containment nitrogen gas environment or air, moisture, humidity environment because these components are not subject to any viable aging mechanism in the absence of aggressive chemical species. By letter dated August 4, 2003, the staff issued RAI 3.3-3 requesting the applicant to provide information on whether the pollutants such as oxygen, NO_x, SO₂, or CO are present, and, if so, to what extent in the containment gas or air, moisture, humidity environments to justify the conclusions in Table 3.3-2, Reference Nos. 3.3.2.27 and 3.3.2.40. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.3 of this SER.

The aging effects identified in the LRA for the containment atmosphere monitoring system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the containment atmosphere monitoring system.

- One-Time Inspection Program (Section 3.0.3.10)
- Bolting Integrity Program (Section 3.0.3.5)
- Periodic Inspection of Components Subject to Moist Environments (3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited for managing the aging effects of components in several structures and systems and, therefore, are considered common AMPs. The staff's evaluation of these AMPs is documented in Sections 3.0.3.10 and 3.0.3.5 of this SER.

After evaluating the applicant's AMR for each of the components in the containment atmosphere monitoring system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited an AMP that is appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the containment atmosphere monitoring system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.26 Nitrogen Containment Atmosphere Dilution System

Summary of Technical Information in the Application. The description of the nitrogen containment atmosphere dilution system can be found in Section 2.3.3.26 of this SER. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-26. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-26 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include closure bolting, restricting orifices (Dresden only), tubing, and valves.

High-strength, low-alloy steel closure bolting components exposed to outdoor ambient conditions are subject to loss of materials due to general corrosion and wear; copper, brass, or bronze components exposed to dry gas or air, moisture, and humidity environment experience no aging effect; copper, brass, or bronze components exposed to outdoor ambient conditions are subject to aging effect of loss of materials due to pitting and crevice corrosion.

Aging Management Programs

The LRA credited the following AMP with managing the identified aging effects for the nitrogen containment atmosphere dilution system:

- Bolting Integrity Program (B.1.12)

A description of this AMP is provided in Appendix B of the LRA. The applicant concluded that the effect of aging associated with the components of the nitrogen containment atmosphere dilution system will be adequately managed by this AMP during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMP credited for managing the aging effects, in the components of the nitrogen containment atmosphere dilution system. The staff also reviewed the applicable UFSAR Supplement for the AMP to ensure that the program description adequately describes the AMP.

Aging Effects

The staff reviewed the information in Section 2.3.3.26, Table 2.3.3-26, and Table 3.3-2 in the LRA. During its review, the staff determined that additional information was needed to complete its review.

In LRA Table 3.3-2, Reference No. 3.3.2.18, the applicant stated that high-strength, low-alloy steel closure bolting components in the outdoor ambient conditions are subject to aging effects of loss of material due to general corrosion and wear. However, the applicant did not include crack initiation and growth due to SCC or other mechanisms as applicable aging effects/mechanisms. By letter dated August 4, 2003, the staff requested, in RAI 3.3-5, the applicant to provide technical basis for not including this aging effect/mechanism. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.5 of this SER.

In LRA Table 3.3-2, Reference Nos. 3.3.2.23 and 3.3.2.34, the applicant concluded that no aging effects were identified for the external surfaces of copper tanks and accumulators and the external surfaces of brass or bronze valves. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.3, the applicant to provide the technical basis (including the level of humidity and the level of pollutants) for this conclusion. The evaluation of the applicant's response is documented in Section 3.3.2.4.3 of this SER.

The aging effects identified in the LRA for the nitrogen containment atmosphere dilution system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMP to manage the aging effects described above for the nitrogen containment atmosphere dilution system.

- Bolting Integrity Program (Section 3.0.3.5)

This AMP is credited for managing the aging effects on components in several structures and systems and, therefore, is considered a common AMP. The staff has evaluated this common AMP and has found it to be acceptable for managing the aging effects identified for this system. The staff's evaluation of this AMPs is documented in Section 3.0.3.5 of this SER.

After evaluating the applicant's AMR for each of the components in the nitrogen containment atmosphere dilution system, the staff evaluated the AMP listed above to determine if it is appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMP recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited the AMP that is appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the nitrogen containment atmosphere dilution system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.27 Drywell Nitrogen Inerting System

Summary of Technical Information in the Application. The description of the drywell nitrogen inerting system can be found in Section 2.3.3.27 of the LRA. The passive, long-lived components in this system that are subject to an AMR are identified in LRA Table 2.3.3-27. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-28 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include closure bolting, filters/strainers, flow elements, isolation barriers, piping and fittings, tanks (include vaporizers), thermowells, traps (Quad Cities only), tubing, and valves.

Aluminum, brass or bronze, carbon steel, or stainless steel components exposed to dry gas experience no aging effect. Carbon steel and stainless steel components exposed to warm, moist air are subject to aging effect of loss of material due to general (carbon steel only), pitting, and crevice corrosion. Brass or bronze components exposed to saturated air are subject to aging effect of loss of material due to pitting and crevice corrosion. Aluminum, copper, and stainless steel components exposed to air, moisture, and humidity environment experience no aging effect. Carbon steel components exposed to containment nitrogen experience no aging effect. Copper, brass, or bronze components exposed to outdoor ambient conditions are subject to aging effect of loss of material due to pitting and crevice corrosion. Aluminum components exposed to outdoor ambient conditions are subject to aging effect of loss of material due to pitting corrosion. Stainless steel exposed to outdoor ambient environments experience no aging effect.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the drywell nitrogen inerting system:

- Bolting Integrity Program (B.1.12)
- 10 CFR Part 50, Appendix J (B.1.28)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effect of aging associated with the components of the drywell nitrogen inerting system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the components of the drywell nitrogen inerting system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.27, Table 2.3.3-27, and Tables 3.3-1 and

3.3-2 in the LRA. During its review, the staff determined that additional information was needed to complete its review.

The description in Item 3.3.2.130 of Table 3.3-2 lists loss of material/corrosion as aging effect/mechanism for carbon steel, stainless steel, and brass or bronze components in an environment of air, moisture, humidity, and leaking fluid. However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of materials for the relevant components and the criteria for selecting these samples, including susceptible locations for inspections. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.2 of this SER.

Aluminum and aluminum alloy components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA, only identifies loss of material due to general and pitting corrosion as plausible aging effects for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to air, moisture, and humidity environments. By letter dated August 4, 2003, the staff requested, in RAI 3.3-4, the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of cooling coils. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

In LRA Table 3.3-2, Reference Nos. 3.3.2.23 and 3.3.2.34, the applicant concluded that no aging effects were identified for the external surfaces of copper tanks and accumulators and the external surfaces of brass or bronze valves. By letter dated August 4, 2003, the staff requested, in RAI 3.3.2.4.3, the applicant to provide the technical basis (including the level of humidity and the level of pollutants) for this conclusion. The evaluation of the applicant's response is documented in Section 3.3.2.4.3 of this SER.

In Table 3.3-2, Reference No. 124 of the LRA, the applicant identified carbon steel material exposed to warm, moist air as subject to aging effect of loss of material due to pitting and crevice corrosion. However, in Reference No. 273 for the same material/environment combination, the applicant identified loss of material due to general, pitting, and crevice corrosion as the applicable aging effect. By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.27 requesting the applicant to clarify why different AMR results were arrived at for components with the same material/environment combinations.

In its response dated October 3, 2003, the applicant stated that Aging Management Reference 3.3.2.124 assigned to Table 3.3-2 inadvertently omitted general corrosion. Table 3.3-2, Aging Management Reference 3.3.2.124 should have read "Loss of material/General, pitting and crevice corrosion." On the basis of its review, the staff finds the applicant's response adequate and acceptable because the applicant has added general corrosion to Reference No. 3.3.2.124 and the corresponding AMP.

The aging effects identified in the LRA for the drywell nitrogen inerting system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the drywell nitrogen inerting system.

- Bolting Integrity Program (Section 3.0.3.5)
- 10 CFR Part 50, Appendix J (Section 3.0.3.13)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Inspection of Components Subject to Moist Environments (3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of the one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

These AMPs are credited with managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.5, 3.0.3.13, and 3.0.3.14 of this SER.

After evaluating the applicant's AMR for each of the components in the drywell nitrogen inerting system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the drywell nitrogen inerting system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.4.28 Safe Shutdown Makeup Pump System (Quad Cities Only)

Summary of Technical Information in the Application. The description of the safe shutdown makeup pump system can be found in Section 2.3.3.28 of this SER. The passive, long-lived

components in this system that are subject to an AMR are identified in LRA Table 2.3.3-28. The components, aging effects, and AMPs are provided in LRA Tables 3.3-1 and 3.3-2.

Aging Effects

Table 2.3.3-28 of the LRA lists individual system components within the scope of license renewal and subject to an AMR. The components include air handlers heating/cooling (auxiliary and RW HVAC), access doors, closure bolting, ducts and fittings, closure bolts, equip frames, filters/strainers, piping and fittings (include spectacles), pumps, restricting orifices, and valves.

Piping and fittings (including spectacle flanges), pumps, restricting orifices, and valve components in the safe shutdown makeup pump system exposed to the reactor water environment are subject to loss of material due to general, pitting, and crevice corrosion. Ducts and fittings, access doors, closure bolts, equip frames, filters/strainers, piping and fittings (including spectacle flanges), pumps, and valve components in the safe shutdown makeup pump system exposed to warm, moist air environment are subject to loss of material due to general, pitting, and crevice corrosion, and MIC. Air handlers heating/cooling components with copper tubes, stainless steel tubesheets, and carbon steel end bells exposed to raw water on the tube side and warm, moist air on the shell (including the fin) side are subject to aging effects of loss of material due to general, galvanic, pitting, and crevice corrosion, MIC, erosion or flow-accelerated corrosion, and wear and cracking due to mechanical fatigue and SCC. Air handlers with tube sides exposed to raw water are also subject to aging effect of loss of intended function due to buildup of deposit and fouling. Aluminum fins and stainless steel components exposed to air, moisture, and humidity (less than 100 °C) experience no aging effect.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the safe shutdown makeup pump system:

- Water Chemistry Program (B.1.2)
- BWR Stress-Corrosion Cracking Program (B.1.7)
- Bolting Integrity Program (B.1.12)
- Open-Cycle Cooling Water System Program (B.1.13)
- Fire Water System (B.1.19)
- One-Time Inspection Program (B.1.23)
- Structures Monitoring Program (B.1.30)

A description of these AMPs is provided in Appendix B of the LRA. The applicant concluded that the effect of aging associated with the components of the safe shutdown makeup pump system will be adequately managed by these AMPs during the period of extended operation.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, on components in the safe shutdown makeup pump system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.3.28, Table 2.3.3-28, and Table 3.3-2 in the LRA. During its review, the staff determined that additional information was needed to complete its review.

Aluminum and aluminum alloy components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, in Table 3.3-2, Reference No. 3.3.2.126 of the LRA, the applicant identified only loss of material due to general and pitting corrosion as plausible aging effects for aluminum components exposed to moist air. In Table 3.3-2, Reference No. 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to air, moisture, and humidity environments. By letter dated August 4, 2003, the staff issued RAI 3.3-4 requesting explanations on why different conclusions on aging effects were arrived at in Table 3.3-2, Reference Nos. 3.3.2.21 and 3.3.2.126 for the same material/environment combination and provide technical basis for not including loss of material due to crevice corrosion as an applicable aging effect. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.4 of this SER.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing the AMR Item 3.3.1.5 specific corrosion mechanism, and explain how the AMP(s) manages that corrosion mechanism for components in various systems, including the carbon dioxide system. The staff's evaluation of the applicant's response is documented in Section 3.3.2.5.7 of this SER.

LRA Table 2.3.3-28 includes filters/strainers with a filter function and references 3.3.1.19 in Section 3.3. It appears that Reference No. 3.3.1.19 applies to fire protection rather than the safe shutdown makeup pump system, and this reference does not indicate how the filter function is managed. LRA Section 2.3.3.28 indicates that the evaluation boundary includes the safe shutdown room cooler and its associated piping from the service water system (evaluated with the service water system). By letter dated August 4, 2003, the staff issued RAI 3.3.2.4.28 requesting the applicant to clarify if the strainer screens in the safe shutdown makeup pump system (such as the safe shutdown room cooler strainer) are evaluated with the service water system in Table 3.3-1, Reference No. 3.3.1-15, which credits the B.1.13 AMP. If the filters/strainers in the safe shutdown makeup pump system are not evaluated with the service water system, the applicant was requested to clarify how the strainer screens are managed. If the pump suction strainers (shown in boundary diagram LR-QDC-M-70) are temporary startup strainers that are replaced by a spool piece once in operation, the applicant was requested to so clarify. If these suction strainers are permanent, the applicant was requested to identify their appropriate AMR reference.

In its response dated October 3, 2003, the applicant stated that the safe shutdown room cooler strainer is not evaluated with the service water system. The applicant clarified that the strainer is evaluated with the safe shutdown makeup pump system, which was scoped as a subsystem of the fire protection system. The applicant identified that this strainer is cleaned on a monthly basis and the cleaning requirements are defined in a station procedure. This response also stated that the AMP associated with Aging Management Reference 3.3.1.19 is B.1.19, Fire Water System, and is appropriately assigned to this strainer.

The applicant further stated that the section of piping labeled “A spool piece for inline strainer” in the suction of the safe shutdown makeup pump is not a strainer. No additional aging management reference is required for this spool piece.

The staff finds that the applicant’s response adequate and acceptable because the applicant has clarified that the safe shutdown room cooler strainer is evaluated with the safe shutdown makeup pump system, which was scoped as a subsystem of the fire protection system and this strainer is cleaned on a monthly basis.

The aging effects identified in the LRA for the safe shutdown makeup pump system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the safe shutdown makeup pump system.

- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Bolting Integrity Program (Section 3.0.3.5)
- Open-Cycle Cooling Water System Program (Section 3.0.3.6)
- Fire Water System Program (Section 3.3.2.3.4)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)

Except for the Fire Water System Program, these AMPs are credited with managing the aging effects on components in several structures and systems and, therefore, are considered common AMPs. The staff has evaluated these common AMPs and found them to be acceptable for managing the aging effects identified for this system. The staff's evaluation of these AMPs is documented in Sections 3.0.3.2, 3.0.3.3, 3.0.3.5, 3.0.3.6, 3.0.3.10, and 3.0.3.14 of this SER. The Fire Water System Program is evaluated in Section 3.3.2.3.4 of this SER.

After evaluating the applicant’s AMR for each of the components in the demineralized water makeup system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects. For those components identified in Table 3.3-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report. For the components identified in LRA Table 3.3-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

The response to RAI 3.3-7 clarified that AMPs B.1.12, Bolting Integrity Program, B.1.13, Open-Cycle Cooling Water Program, and B.1.30, Structures Monitoring Program are to be used to manage aging effects in the safe shutdown makeup pump system.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the demineralized water makeup system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5 *General Aging Management Review Issues*

This section discusses the staff's evaluation of nine general AMR issues that are applicable to components in several auxiliary systems included in Section 3.3 of the LRA.

3.3.2.5.1 Galvanic Corrosion

This general AMR issue concerns aging management of loss of material due to galvanic corrosion in auxiliary systems. The concern is associated with components identified by the applicant in LRA Table 3.3-2 that are not addressed in GALL.

Metals and alloys that are in contact with different, more cathodic metals or alloys in the presence of an electrolyte fluid may be subjected to the aging effect of loss of material from galvanic corrosion. Many systems/components of the auxiliary systems described by various items in Table 3.3-2 of the LRA have materials/environment combinations to which loss of material from galvanic corrosion may be an applicable aging effect/mechanism. By letter dated August 4, 2003, the staff requested, in RAI 3.3-1, the applicant to provide the technical basis, including plant operating experience, for determining whether loss of material due to galvanic corrosion is an applicable aging effect/mechanism for the applicable components included in the auxiliary systems.

In its response dated October 3, 2003, the applicant stated that design and installation techniques were utilized at Dresden and Quad Cities, including galvanic corrosion control mechanisms. The applicant clarified that, following good industry practices for the design of power plant piping systems and heat exchangers, materials that would be in electrical contact were selected from groups as close as possible in the galvanic series. Further, the applicant stated that wherever practical, dissimilar metals were electrically insulated by the use of insulated flanges or dielectric unions, and coatings were applied in many cases to address potential galvanic corrosion concerns. The applicant concluded that, in general, these techniques have been successful in preventing occurrences of galvanic corrosion. The applicant further stated that there have been a few occurrences of galvanic corrosion identified in the operating experience history of Dresden and Quad Cities piping systems and heat exchangers due to design errors, and that these problems have been resolved through design modifications.

In its response, the applicant stated that LRA Appendix B, B.2.6, "Heat Exchanger Test and Inspection Activities," manages the "loss of materials" aging effect for both the control room and diesel generator building air handling units by performing periodic inspections. The applicant further stated that corrosion would be detected during these periodic inspections, regardless of the mechanism involved. The staff was concerned that different types of corrosion (pitting, crevice, galvanic, etc.) may be prevalent in different susceptible locations and requested the applicant to clarify that periodic inspections for both the control room and diesel generator building air handling units are conducted on locations that include those susceptible to galvanic corrosion. By letter dated December 22, 2003, the applicant responded by stating that locations

that are potentially susceptible to galvanic corrosion are the copper cooling coil interfaces with the aluminum cooling fins, the locations where the copper tubing penetrates the galvanized steel housing, and the galvanized steel tube support interfacing with the copper cooling coils. The applicant stated that these locations are inspected as part of the periodic visual inspections. The staff finds that the applicant's response is acceptable because the applicant has specifically identified locations in the air handling units that are susceptible to galvanic corrosion and that these locations are to be inspected as part of the periodic visual inspections.

The staff also identified a concern that AMP B.2.6 does not appear to include the diesel generator building air handling units and requested the applicant to address this concern. By letter dated December 17, 2003, the applicant clarified that the response to RAI 3.3-1 should have read, "The air handlers identified in Aging Management Reference 3.3.2.14 of LRA Table 3.3-2 are the Quad Cities Units 1 and 2 station blackout diesel generator battery room heat exchangers." The staff verified that these heat exchangers are included as components managed by AMP B.2.6, "Heat Exchanger Test and Inspection Activities," and, therefore, this concern is considered resolved. The staff considers all issues related to RAI 3.3-1 to be closed.

On the basis of its review, the staff finds the applicant's response adequate and acceptable because the applicant has demonstrated that (1) loss of material due to galvanic corrosion is controlled by following good design and installation practices, (2) these techniques have been successful in preventing the occurrence of galvanic corrosion, (3) the few occurrences of galvanic corrosion in the Dresden and Quad Cities operating experience have been resolved through design modifications that follow good design practices, and (4) appropriate AMPs, such as B.2.6, are credited for managing galvanic corrosion in heat exchangers.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to galvanic corrosion. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.2 Corrosion Mechanisms and Sampling of One-Time Inspections

For HVAC—main control room system, shutdown cooling system, and control rod drive hydraulic system, the applicant identified in AMR Reference No. 3.3.2.130 of Table 3.3-2 the material environment combination and applicable aging effects on components of NSR vents or drains, piping, and valves. The description in Reference No. 3.3.2.130 lists "Loss of material/corrosion" as aging effect/mechanism for carbon steel, stainless steel, and brass or bronze components in an environment of "Air, moisture, humidity and leaking fluid." However, the LRA does not specifically identify which type of corrosion is responsible for the loss of material. The type of corrosion is important because it determines the susceptible locations to be inspected. For example, the appropriate susceptible locations for inspection for general, crevice, galvanic, and pitting corrosion may not be the same. In addition, the staff noted that in the One-Time Inspection AMP (B.1.23), which is credited with managing the aging effects on these components, the applicant stated that this AMP will inspect a sample of the NSR vents or drains, piping, and valves in the shutdown cooling system (Dresden only) and the control rod drive hydraulic system for general, crevice, galvanic, and pitting corrosion. By letter dated August 4, 2003, the staff requested, in RAI 3.3-2, the applicant to provide a specific description of the types of corrosion responsible for the aging effect of loss of materials for the relevant

components and the criteria for selecting these samples including susceptible locations for inspections.

In its response dated October 3, 2003, the applicant stated that the aging mechanism description for Aging Management Reference 3.3.2.130 of LRA Table 3.3-2 should have been "General, pitting, and crevice corrosion," and the inspections to be performed as part of the One-Time Inspection Program B.1.23 will include the appropriate inspection information. The applicant also provided criteria used for selection of susceptible inspection locations. The staff's evaluation of these criteria is discussed in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds the applicant's response to RAI 3.3.2 acceptable because (1) it appropriately identified the aging mechanisms for the loss of materials due to corrosion, including its associated AMP, and (2) the staff found AMP B.1.23 to be acceptable as described in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of corrosion mechanisms and sampling of one-time inspections. The applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.3 Corrosion on Carbon Steel, Stainless Steel, Brass, and Bronze

Carbon steel and stainless steel components exposed to moist gas (moist nitrogen) or moist air environment may experience aging effects of loss of material due to general (for carbon steel only), pitting, and crevice corrosion (for both carbon steel and stainless steel) when pollutants such as oxygen, SO₂, NO_x, or CO are present in the moist air, particularly when the humidity is greater than 60 percent. However, in Table 3.3-2, Reference No. 3.3.2.27 (for carbon steel), and Reference No. 3.3.2.40 (for stainless steel) of the LRA, the applicant concluded that no aging effects were identified for the external surfaces of the carbon steel and stainless steel piping and fittings, accumulators, dampeners, filters/strainers, flow elements, pumps, orifices, rupture discs, tanks, tubing, and valves components exposed to either the containment nitrogen gas environment or air, moisture, humidity environment because these components "are not subject to any viable aging mechanism in the absence of aggressive chemical species." In addition, the LRA does not identify any aging effect for stainless steel, brass or bronze components in "the air, moisture, and humidity < 100°C environment" for components in the containment atmosphere monitoring system. The staff noted that the LRA identifies stainless steel components in apparently similar environments (such as warm, moist air, wet gas, and moist containment atmosphere in items Reference Nos. 3.3.2.166, 3.3.2.299, 3.3.2.195) as being subjected to loss of materials from pitting and crevice corrosion.

By letter dated August 4, 2003, the staff requested, in RAI 3.3-3, the applicant to clarify whether the pollutants, such as oxygen, NO_x, SO₂, or CO, are present and if so, to what extent in the containment gas or air, moisture, humidity environments to justify the conclusions in Table 3.3-2, items Reference Nos. 3.3.2.27 and 3.3.2.40. In addition, the staff requested the applicant to clarify why the LRA identifies stainless steel components in apparently similar environments (such as warm, moist air, wet gas, and moist containment atmosphere in items Reference Nos. 3.3.2.166, 3.3.2.299, 3.3.2.195) as being subjected to loss of materials from pitting and crevice

corrosion.

In its response dated October 3, 2003, the applicant stated that AMR Reference 3.3.2.27 of LRA Table 3.3-2 is for the external surfaces of carbon steel components in containment nitrogen environments. The conclusion in Aging Management Reference 3.3.2.27 that there was no aging effect for carbon steel components exposed to containment nitrogen environments was based on information provided in Appendix E of Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, EPRI 1003056 regarding external surfaces. EPRI 1003056 does not identify any applicable aging mechanisms for carbon steel in a nonaggressive environment. A review of Dresden and Quad Cities operating experience was conducted as part of the AMR for external surfaces. No site operating experience involving age-related degradation of the external surfaces of carbon steel components in nitrogen environments was identified.

Aging Management Reference 3.3.2.40 of LRA Table 3.3-2 is for the external surfaces of stainless steel components in indoor (sheltered) environments. The conclusion in Aging Management Reference 3.3.2.40 that there was no aging effect for stainless steel components exposed to air, moisture, and humidity less than 100 °C (212 °F) was also based on information provided in EPRI 1003056, Appendix E, regarding external surfaces. EPRI 1003056 does not identify any applicable aging mechanisms for stainless steel in the absence of aggressive chemical species. No site operating experience involving age-related degradation of the external surfaces of stainless steel components in indoor (sheltered) environments was identified for Dresden or Quad Cities.

In the same letter, the applicant stated that pollutants in the form of oxygen, NO_x, SO₂, or CO are present in the containment gas and air, moisture, humidity environments at minimal levels. The nitrogen concentration of the containment gas environment is controlled, monitored, and maintained at above 96 percent. The air, moisture, humidity environment is for areas that are controlled indoor (sheltered) environments. EPRI 1003056, Appendix E, assumes that the level of contaminants in external environments cannot be concentrated to levels that will promote corrosion unless subjected to factors such as cyclic (wet-dry) condensation, contaminated insulation, accidental contamination, or leakage. Neither of the environments associated with Aging Management References 3.3.2.27 and 3.3.2.40 of LRA Table 3.3-2 are subjected to these factors. However, LRA Table 3.3-2 does include items addressing materials in aggressive environments. For example, Aging Management Reference 3.3.2.26, which involves external surfaces of carbon steel components in air, moisture, humidity, and leaking fluid environments, identifies loss of material due to general, pitting, and crevice corrosion as applicable aging effects/mechanisms. The staff identified that EPRI Report 1003056, Appendix E also indicates that copper and copper alloys are only susceptible to crevice, pitting, and selective leaching if exposed to an aggressive environment. For aggressive environments, AMP B.1.23 is credited for managing crevice and pitting corrosion and AMP B.1.24 is credited for managing selective leaching in copper and copper alloys.

The staff reviewed the applicant's response to the issues raised in RAI 3.3-3. On the basis of its review, the staff finds the applicant's response acceptable because (1) the applicant assured that pollutants in the form of oxygen, NO_x, SO₂, or CO are present in the containment gas and air, moisture, humidity environments at minimal levels, (2) the applicant has properly clarified that both of the environments associated with Aging Management References 3.3.2.27 and 3.3.2.40 of LRA Table 3.3-2 conform to the assumptions in the EPRI 1003056, Appendix E (i.e.,

the level of contaminants in external environments cannot be concentrated to levels that will promote corrosion unless subjected to factors such as cyclic (wet-dry) condensation, contaminated insulation, accidental contamination, or leakage), and (3) the applicant verified that there is no site operating experience involving age-related degradation of the external surfaces of carbon steel components in nitrogen environments or stainless steel components in indoor (sheltered) environments for Dresden or Quad Cities.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of corrosion on carbon steel, stainless steel, brass, and bronze. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.4 Corrosion of Aluminum and Aluminum Alloys

Aluminum and aluminum alloy components may experience general, pitting, and crevice corrosion when exposed to moisture and humidity environments, especially with the presence of contaminants and water (condensation from moist air). However, AMR Reference No. 3.3.2.126 of Table 3.3-2 of the LRA, only identifies loss of material due to general and pitting corrosion as plausible aging effects for aluminum components exposed to moist air. In Table 3.3-2, Ref No 3.3.2.21 of the LRA, the applicant concluded that there is no aging effect on aluminum components of the air handlers heating/cooling system exposed to air, moisture, and humidity environments.

By RAI 3.3-4, the staff asked the applicant to (1) explain the different conclusions on aging effects described above, (2) provide the technical basis for not including loss of material due to crevice corrosion as an applicable aging effect, and (3) clarify if there is any condensate on the aluminum fins of cooling coils.

In its response dated October 3, 2003, the applicant stated that the difference between the conclusions made in Aging Management References 3.3.2.126 and 3.3.2.21 of LRA Table 3.3-2 is that Aging Management Reference 3.3.2.126 involves component internal surfaces and Aging Management Reference 3.3.2.21 involves component external surfaces in indoor (sheltered) environments.

Regarding whether crevice corrosion is a plausible aging effect on aluminum exposed to moist air, in its response dated October 3, 2003, the applicant stated that the aging mechanisms associated with Aging Management Reference 3.3.2.126 were derived from information provided in Chapter 20 of Uhlig's Corrosion Handbook, 2nd Edition. This source did not identify crevice corrosion as a viable aging mechanism for internal surfaces of aluminum and aluminum alloy components in moisture and humidity environments. Therefore, crevice corrosion was excluded as a viable aging mechanism for this item.

Pertaining to the issue on whether there is any condensate on the aluminum fins of cooling coils and the technical basis for conclusion in Table 3.3-2, Reference No. 3.3.2.21 of the LRA, in its response dated October 3, 2003, the applicant stated that the external surfaces of aluminum fins of cooling coils are exposed to condensate. The conclusion in Aging Management Reference 3.3.2.21 that there was no aging effect on aluminum components of air handler heating cooling systems exposed to air, moisture, and humidity environments was based on

information provided in Appendix E of Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, EPRI 1003056, regarding external surfaces. EPRI 1003056 does not identify any applicable aging mechanisms for aluminum alloys in a nonaggressive environment. The subject aluminum components are not exposed to an aggressive environment. Furthermore, although aluminum is a reactive metal, it develops an aluminum oxide film that protects it from further corrosion. Therefore, no viable aging effect exists in an indoor environment with variable humidity and temperature less than 100 °C (212 °F) for this item. The applicant stated that a review of Dresden and Quad Cities operating experience was conducted as part of the AMR for external surfaces and no operating experience involving age-related degradation of the external surfaces of aluminum fins in air, moisture, and humidity environments was identified.

The staff reviewed the applicant's response to the issues raised in RAI 3.3.4. On the basis of its review, the staff finds the applicant's response acceptable because (1) the applicant provided information on the differences between the environments in Reference Nos. 3.3.2.126 and 3.3.2.21 of the LRA, (2) the applicant asserted that the environment the aluminum alloy components were exposed to is not an aggressive environment and satisfies the conditions assumed in EPRI 1003056, Appendix E, Section 4.1, and (3) no operating experience involving age-related degradation of the external surfaces of aluminum fins in air, moisture, and humidity environments was identified.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of corrosion of aluminum and aluminum alloys. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.5 Stress-Corrosion Cracking

In LRA Table 3.3-2, Ref No 3.3.2.18, the applicant stated that high-strength, low-alloy steel closure bolting components in the outdoor ambient conditions are subject to aging effects of loss of material due to general corrosion and wear. However, the applicant did not include crack initiation and growth due to SCC or other mechanisms as applicable aging effects/mechanisms. By letter dated August 4, 2003, the staff requested, in RAI 3.3-5, the applicant to provide the technical basis for not including crack initiation and growth due to SCC as applicable aging effects/mechanisms for high-strength, low-alloy steel closure bolting components in the outdoor ambient conditions.

In its response dated October 3, 2003, the applicant stated that for closure bolting in the high-pressure or high-temperature portions of systems, the applicable aging effect is crack initiation and growth due to SCC. The bolts associated with LRA Table 3.3-2, Aging Management Reference 3.3.2.18, are on the portion of piping with low pressure and low temperature, which are not subject to cyclic loading.

The applicant further stated that EPRI 1003056, Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, Appendix F, Closure bolting, states that "stress corrosion cracking is not an applicable aging effect for bolting material with a tensile strength of less than 150 ksi." The bolts used are ASTM A193 Grade B7 with a tensile strength of 125 ksi. EPRI 1003056 states, "The use of appropriate materials (such as ASTM A193, Gr. B7) for

bolting also reduces the potential for SCC of fasteners by maintaining fastener minimum yield strengths below threshold values found in ["Degradation and Failure of Bolting in Nuclear Power Plants," EPRI NP-5796]."

The applicant concluded that for bolting in the low-pressure or low-temperature portion of the system (in the outdoor ambient condition), loss of material due to general corrosion or wear is the only applicable aging effect and is covered by LRA Table 3.3-2, Aging Management Reference 3.3.2.18.

On the basis of its review, the staff concurs with the applicant's assertion that for bolting in the low-pressure, low-temperature portion of the system (in the outdoor ambient condition), which is not subject to cyclic loading, SCC is not an applicable aging effect; therefore, the staff finds this acceptable.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of SCC. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.6 General, Pitting, and Crevice Corrosion on Carbon Steel Components Exposed to Chemically Treated Demineralized Water

Loss of material due to general, pitting, and crevice corrosion may be an applicable aging effect on carbon steel components exposed to chemically treated demineralized water. However, in several AMR references, the applicant identified crack initiation and growth due to SCC and IGSCC as the applicable aging effects/mechanisms instead of loss of material due to general, pitting, and crevice corrosion. By letter dated August 4, 2003, the staff requested, in RAI 3.3-6, the applicant to provide clarification.

In its response dated October 3, 2003, the applicant clarified that the loss of material due to general, pitting, and crevice corrosion is addressed through AMR Reference 3.3.1.13, since this AERM is covered by the GALL Report. The AMR references in question address crack initiation growth of carbon steel in a nitrite-based chemically treated water environment. EPRI 1003056, Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3, identifies this as an applicable aging effect/mechanism. The GALL does not address this environment; therefore, the applicant included additional AMR references in LRA Table 3.3-2.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of general, pitting, and crevice corrosion on carbon steel components exposed to chemically treated demineralized water. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.7 Detailed Breakdown on the Aging Management Programs for Loss of Material Due to General, Pitting, and Crevice Corrosion, and MIC

For various in-scope components of the auxiliary systems, the applicant uses Reference No. 3.3.1.5 of Table 3.3-1 to describe the aging management of these components. Reference No. 3.3.1.5 refers to Section 3.3.1.1.7 of the LRA for further evaluation of loss of material due to general, microbiologically influenced, pitting, and crevice corrosion. This section also describes the AMPs that will be used to manage the above AERM for the various components; however, the staff noted that the descriptions in Section 3.3.1.1.7 of the LRA of how AMPs would manage the aging effects were not always consistent with the LRA description of the AMPs. The staff also noted that the LRA did not provide sufficient information on which corrosion mechanisms were applicable to the various equipment, or how the AMPs were adequate for these particular mechanisms. By letter dated August 4, 2003, the staff requested, in RAI 3.3-7, the applicant to clarify which specific AMP(s) is applicable for managing the AMR item 3.3.1.5 specific corrosion mechanism, and explain how the AMP(s) manage that corrosion mechanism for components in various auxiliary systems.

In its response dated October 3, 2003, the applicant explained this aging management will be evaluated using several AMPs, as follows:

Bolting Integrity Program (B.1.12): This program includes routine system walkdowns that manage system component external surfaces. These walkdowns check both the general external surface condition of the system components and also the leakage integrity of the components and bolted joints.

Structures Monitoring Program (B.1.30): This program uses a spaces approach, which inspects a sampling of piping and component supports and the adjacent exposed piping and component surfaces. This sampling provides confirmation that external surface aging degradation of like materials in like environments are not occurring.

One-Time Inspection Program—Compressed Gas (B.1.23): This program uses VT-3 visual inspections on a sample of components that represent or bound the piping system components within the scope of license renewal to verify that there is no unacceptable loss of material in the compressed gas systems.

Heat Exchanger Testing and Inspection Program (B.2.6): This program provides condition monitoring, inspection, and performance testing activities to manage the aging effects of loss of material, cracking, and buildup of deposits in heat exchangers.

One-Time Inspection Program—Ventilation System (B.1.23): This program uses VT-3 visual inspections of a representative sample of ventilation system ductwork, equipment frames and housings, valves, debris screens, access doors, and closure bolting to confirm that there is no penetrating corrosion, which could indicate an unacceptable loss of material condition. Drip pan drain piping will be inspected for corrosion that could result in a pipe wall perforation.

Open-Cycle Cooling Water Program (B.1.13): This program uses visual and NDE inspection of components for detection of degradation and corrosion coupons for determining general corrosion rates. This program also uses performance testing for flow rates, temperatures, and pressures, and visual inspections for fouling and silting.

Buried Piping and Tanks Inspection Program (B.1.25): This program manages loss of material (general, pitting, crevice, and MIC) through the use of piping and component coatings and wrappings, periodic inspections, and pressure testing. The condition of the coatings, which provide a mitigative function, is inspected whenever buried components are uncovered during station excavation activities. Since this could be infrequent, additional periodic leak testing and component inspections are being credited. These include ISI leakage testing for buried Class 3 piping, operational pressure monitoring for buried fire protection piping, periodic fuel oil storage tank inspections, "one-time" UTs of the buried fuel oil storage tank internals and the internal bottom surface of an outdoor aluminum tank (such as a CCST), and a "one-time" inspection of buried piping.

Fire Protection Program (B.1.18): This program provides for managing the effects of aging of the external piping and component surfaces of the station halon (Dresden only) and cardox systems (both stations). The program is based on NFPA 12A and 72E standards and provides for periodic system operability testing. While performing the operability testing, it is recommended that visual aging degradation inspections also be performed.

One-Time Inspection Program—NSR/SR Inspection (B.1.23): This program uses a visual inspection of a representative sample of component material—environment "pairs" for the presence of general, crevice, galvanic, and pitting corrosion to provide assurance that corrosion of system components is not occurring or is occurring at an acceptable rate.

The staff's evaluation of these programs appears in the following sections of this SER:

- Bolting Integrity Program (Section 3.0.3.5)
- Structures Monitoring Program (Section 3.0.3.14)
- One-Time Inspection Program (Section 3.0.3.10)
- Heat Exchanger Testing and Inspection Program (Section 3.0.3.16)
- Open-Cycle Cooling Water Program (Section 3.0.3.6)
- Buried Piping and Tanks Inspection Program (Section 3.0.3.12)
- Fire Protection Program (Section 3.3.2.3.3)

The applicant's response dated October 3, 2003, also provided minor revisions and/or clarifications of the system-specific AMR related to loss of material due to general, pitting, and crevice corrosion, and MIC. These revisions/clarifications are addressed in the applicable system writeups in Sections 3.3.2.4.1 to 3.3.2.4.28 of this SER.

The staff finds that the applicant's response to RAI 3.3-7 is acceptable because it has clarified the management of loss of material due to general, pitting, and crevice corrosion, and MIC for auxiliary system components.

On the basis of its review, the staff concludes that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.5.8 Verification of Water Chemistry Program

For several AMR items, LRA was not clear whether the applicant was verifying the effectiveness of the Water Chemistry Program. By letter dated August 4, 2003, the staff requested, in RAI 3.3-8, the applicant to clarify whether a one-time inspection should be performed for these components to verify the effectiveness of the chemistry program. In its responses to the staff's RAI, the applicant clarified the aging management of the components and/or justified why inspections were not needed.

In its October 3, 2003, letter, the applicant stated that for AMR Item 3.3.2.120, the component group "heat exchanger" also credits the Open-Cycle Cooling Water Program. The activities in this AMP involve chemistry control, performance monitoring, periodic inspections, and periodic flushing in order to control biofouling, verify heat transfer, monitor degradation, and to ensure compliance with the CLB for affected heat exchangers. Performance monitoring, periodic inspections, and flushing will verify the effectiveness of the chemistry program to ensure that significant degradation is not occurring and the component intended function would be maintained. The staff finds this acceptable because the Open-Cycle Cooling Water Program activities will verify the effectiveness of the Water Chemistry Program.

For AMR Item 3.3.2.186, the applicant's October 3, 2003, letter noted that GALL Program Section XI.M2, "Water Chemistry Program," states that the Water Chemistry Program is effective in removing impurities from intermediate and high-flow areas. It also states that the Water Chemistry Program may not be effective in low-flow or stagnant-flow areas. In low-flow or stagnant-flow areas, verification of the effectiveness of the chemistry program is undertaken to ensure that significant degradation is not occurring and the component intended function will be maintained. In addition, the applicant stated that the component group "flow orifices" is not typically in low-flow or stagnant areas. The applicant, therefore, concluded that verification of the effectiveness of the chemistry program through a one-time inspection, B.1.23, is not required. The staff was concerned that the term "typically" was not definitive and requested the applicant to clarify whether any restricting orifices are in low-flow or stagnant flow-areas and to discuss why a One-Time Inspection Program is not needed to verify the effectiveness of the Water Chemistry Program for these restricting orifices.

The applicant's response dated December 17, 2003, stated that the review of Item 3.3.2.186 determined that this component was inadvertently included and will be removed from the LRA scope. The response also stated that the clean demineralized water and makeup demineralized water systems did not identify any restricting orifices that are in a low-flow or stagnant-flow area based on the system function. The applicant added that AMR references 3.3.2.72 and 3.3.2.188 will be managed with one-time inspection to verify the effectiveness of the chemistry program. The staff finds that the applicant's response is acceptable because the inspection will verify the effectiveness of the chemistry program. The staff considers all issues related to RAI 3.3-8 to be closed.

For AMR Item 3.3.2.257, the applicant's October 3, 2003, letter stated that the components are brass or bronze valves in clean demineralized water hose stations that are in scope of license renewal for spatial interaction component intended function. The applicant stated that one-time inspections are performed for carbon and stainless steel components to verify the effectiveness of the chemistry program, and indicated that these would be leading indicators of the loss of material in the brass and bronze valves. The staff agrees that inspections of the carbon and

stainless steel components would provide a leading indicator; therefore, the staff agrees that inspections of the brass or bronze valves are not required to verify the effectiveness of the Water Chemistry Program.

On the basis of its review, the staff finds the applicant's response adequate and acceptable because the inspections and activities described above will verify the effectiveness of the Water Chemistry AMP in preventing the identified aging effects.

3.3.2.5.9 Aging Management of Nonbolting Components Using Bolting Integrity Program

The applicant uses the Bolting Integrity Program (B.1.12) to manage general corrosion on external surfaces of many auxiliary system nonbolting components. The staff notes that the Bolting Integrity Program description states, "The program consists of visual inspections for external surface degradation that may be caused by loss of material or cracking of the bolting, or by an adverse environment," suggesting that only the bolting material will be inspected for aging degradation. By letter dated August 4, 2003, the staff requested, in RAI 3.3-9, the applicant to explain (including the acceptance criteria and inspection interval) how the Bolting Integrity Program is used to manage general corrosion on external surfaces of nonbolting components, such as piping, valves, mufflers, and others.

In its response dated October 3, 2003, the applicant stated that Chapter XI of NUREG-1801, Generic Aging Lessons Learned, does not contain any program to monitor the effects of aging for the exterior surface of auxiliary system components. As such, Exelon made the decision to include the aging management for nonbolting components, such as piping, valves, and mufflers, within the Bolting Integrity Program. The Bolting Integrity Program (B.1.12) consists of visual inspections, which rely on detection of visible leakage during preventive maintenance and routine walkdowns (routine observation activities). The routine walkdowns are also credited for detecting aging degradation (general corrosion) on the external surfaces of system piping and piping components. Finally, the applicant stated that depending on the accessibility of the systems or components, walkdown inspection intervals vary from quarterly to every refueling outage, and the presence of component external surface corrosion requires engineering evaluation.

The staff finds that the applicant has adequately explained how the Bolting Integrity Program is used to manage general external corrosion for auxiliary system components. The staff's evaluation of the Bolting Integrity Program is presented in Section 3.0.3.5 of this SER.

On the basis of its review, the staff concludes that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4 Steam and Power Conversion Systems

This section addresses the aging management of the components of the steam and power conversion systems (SPCS) group. The systems that make up the SPCS group are described in the following SER sections:

- main steam system (Section 2.3.4.1)

- feedwater system (Section 2.3.4.2)
- condensate and condensate storage systems (Section 2.3.4.3)
- main condenser (Section 2.3.4.4)
- main turbine and auxiliary systems (Section 2.3.4.5)
- turbine oil system (Quad Cities only, Section 2.3.4.6)
- main generator and auxiliary system (Quad Cities only, Section 2.3.4.7)

As discussed in Section 3.0.1 of this SER, the components in the SPCS are described in several LRA tables. LRA Table 3.4-1 discusses the treatment of SPCS components that are evaluated in the GALL Report. LRA Tables 3.1-1 and 3.2-1 discuss the treatment of components that the GALL Report evaluates as part of the RCS and ESF systems groups, respectively; however, several of these components are scoped under SPCS at Dresden and Quad Cities (these components are evaluated in Sections 3.1 and 3.2 of this SER, respectively). LRA Tables 2.3.4-1 through 2.3.4-7 show all of the components in each system, regardless of whether they are addressed in the GALL Report. For those system components that are addressed in the GALL Report, LRA Tables 2.3.4-1 through 2.3.4-7 refer to LRA Tables 3.1-1, 3.2-1, or 3.4-1 for additional information.

3.4.1 Summary of Technical Information in the Application

In LRA Section 3.4, the applicant described its AMRs for the SPCS.

The description of the systems that comprise the SPCS group can be found in Section 2.3.4 of the LRA.

The passive, long-lived components in these systems that are subject to an AMR are identified in LRA Tables 2.3.4-1 through 2.3.4-7.

The applicant's AMRs included an evaluation of plant-specific and industry operating experience. The plant-specific evaluation included reviews of condition reports and discussions with appropriate site personnel to identify aging effects that require management. These reviews concluded that the aging effects requiring management based on the plant's operating experience were consistent with aging effects identified in GALL.

The applicant's review of industry operating experience included a review of operating experience through 2002. The results of this review concluded that aging effects requiring management based on industry operating experience were consistent with aging effects identified in GALL.

The applicant's ongoing review of plant-specific and industry-wide operating experience is conducted in accordance with Exelon's Operating Experience Program.

3.4.2 Staff Evaluation

In Section 3.4 of the LRA, the applicant described its AMR for the SPCS. The staff reviewed Section 3.4 to determine whether the applicant has provided sufficient information to demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB throughout the period of extended operation, in accordance with the requirements of 10 CFR 54.21(a)(3), for the SPCS

components that are determined to be within the scope of license renewal and subject to an AMR.

The applicant referenced the GALL Report in its AMR. The staff has previously evaluated the adequacy of the aging management of SPCS components for license renewal as documented in the GALL Report. Thus, the staff did not repeat its review of the matters described in the GALL Report, except to ensure that the material presented in the LRA was applicable and to verify that the applicant had identified the appropriate programs as described and evaluated in the GALL Report. The staff evaluated those aging management issues recommended for further evaluation in the GALL Report. The staff also reviewed aging management information submitted by the applicant that was different from that in the GALL Report or was not addressed in the GALL Report. Finally, the staff reviewed the UFSAR Supplement to ensure that it provided an adequate description of the programs credited with managing aging for the SPCS components.

In LRA Section 3.4, the applicant provided brief descriptions of the SPCS and summarized the results of its AMR of the SPCS.

Table 3.4-1 below provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Section 3.4 that are addressed in the GALL Report.

Table 3.4-1 Summary of Aging Management Programs for Steam and Power Conversion Systems Evaluated in Chapter VII of the GALL Report

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Piping and fittings in main feedwater line, steam line and AFW piping (PWR only)	Cumulative fatigue damage	TLAA, evaluated in accordance with 10 CFR 54.21(c)	TLAA	Consistent with GALL. GALL recommends further evaluation (see 3.4.2.2.1 below).
Piping and fittings, valve bodies and bonnets, pump casing, tanks, tubes, tubesheets, channel head and shell (except main steam system)	Loss of material due to general (carbon steel only), pitting, and crevice corrosion	Water Chemistry and One-Time Inspection	Water Chemistry (B.1.2), and One-Time Inspection (B.1.23) Programs	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.4.2.2.2 below).
External surface of carbon steel components	Loss of material due to general corrosion	Plant specific	Water Chemistry (B.1.2) and One-Time Inspection (B.1.23) Programs	Consistent with GALL with exceptions. GALL recommends further evaluation (see Section 3.4.2.2.4 below).
Carbon steel piping and valve bodies	Wall thinning due to flow-accelerated corrosion	Flow-Accelerated Corrosion	Flow-Accelerated Corrosion Program (B.1.11)	Consistent with GALL with exceptions (see Section 3.4.2.1 below).

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Carbon steel piping and valve bodies in main steam system	Loss of material due to pitting and crevice corrosion	Water Chemistry	Water Chemistry Program (B.1.2)	Consistent with GALL with exceptions (see Section 3.4.2.1 below).
Closure bolting in high-pressure or high-temperature systems	Loss of material due to general corrosion; crack initiation and growth due to cyclic loading and/or SCC	Bolting Integrity	Bolting Integrity (B.1.12)	Consistent with GALL with exceptions (see Section 3.4.2.1 below).
Heat exchangers and coolers/condensers serviced by open-cycle cooling water	Loss of material due to general (carbon steel only), pitting, and crevice corrosion, MIC, and biofouling; buildup of deposit due to biofouling	Open-Cycle Cooling Water System	Not applicable	The components identified in GALL are not within the scope of license renewal.
Heat exchangers and cooler/ condensers serviced by closed-cycle cooling water	Loss of material due to general (carbon steel only), pitting, and crevice corrosion	Closed-Cycle Cooling Water System	Not applicable	The components identified in GALL are not within the scope of license renewal.
External surface of aboveground condensate storage tank	Loss of material due to general (carbon steel only), pitting, and crevice corrosion	Aboveground Carbon Steel Tanks	Not applicable	The GALL specifies carbon steel, however, Dresden and Quad Cities have tanks constructed of aluminum.
External surface of buried condensate storage tank and AFW piping	Loss of material due to general, pitting, and crevice corrosion and MIC	Buried Piping and Tanks Surveillance or Buried Piping and Tanks Inspection	Not applicable	The components identified in GALL are not applicable.

The staff's review of the SPCS for the Dresden and Quad Cities LRA is contained within four sections of this SER. Section 3.4.2.1 is the staff review of components in the SPCS that the applicant indicates are consistent with GALL and do not require further evaluation. Section 3.4.2.2 is the staff review of components in the SPCS that the applicant indicates are consistent with GALL and GALL recommends further evaluation. Section 3.4.2.3 is the staff evaluation of AMPs that are specific to the SPCS systems group. Section 3.4.2.4 contains an evaluation of the adequacy of aging management for components in each system in the SPCS group and includes an evaluation of components in the SPCS that the applicant indicates are not in GALL.

3.4.2.1 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL does not recommend further evaluation, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation. The staff also sampled component groups to determine whether the applicant had properly identified those component groups in GALL that were not applicable to its plants. The staff also identified several areas where additional information or clarification was needed.

On the basis of its review, the staff has verified the applicant's claim of consistency with the GALL report. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.2 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which GALL Recommends Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL recommends further evaluation, the staff reviewed the applicant's evaluation to determine whether it adequately addressed the issues for which GALL recommended further evaluation. In addition, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation.

The GALL Report indicates that further evaluation should be performed for the aging effects discussed in the following sections.

3.4.2.2.1 Cumulative Fatigue Damage

Fatigue is a TLAA as defined in 10 CFR 54.3. TLAAs are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The applicant discussed this TLAA in LRA Section 4.3.3.2, "Reactor Coolant Pressure Boundary Piping and Components Designed to USAS B31.1, ASME Section III Class 2 and 3, or ASME Section VIII Class B and C." The staff reviewed the evaluation of this TLAA in Section 4.3 of this SER.

3.4.2.2.2 Loss of Material Due to General, Pitting, and Crevice Corrosion

The SRP recommends further evaluation of programs to manage loss of material due to general, pitting, and crevice corrosion of carbon steel piping and fittings, valve bodies and bonnets, pump casings, pump suction and discharge lines, tanks, tubesheets, channel heads, and shells (except for main steam system components), and for loss of material due to crevice and pitting corrosion for stainless steel tanks and heat exchanger/cooler tubes to verify the effectiveness of the Water Chemistry Program. The SRP states that an acceptable verification program consistent of a one-time inspection of select components and susceptible locations in the system. The GALL Water Chemistry Program relies on monitoring and control of water chemistry, based on the guidelines in BWRVIP-29 (EPRI TR-103515) for water chemistry in BWRs, to manage the effect of loss of material due to general, pitting, or crevice corrosion. However, corrosion may occur at locations of stagnant flow conditions. Therefore, the GALL Report recommends that the effectiveness of the Chemistry Control Program be verified to ensure that corrosion is not occurring.

The staff reviewed the applicant's proposed program to ensure that corrosion is not occurring and that the component intended function will be maintained during the period of extended operation. If the applicant proposed a one-time inspection of select components and susceptible locations to ensure that corrosion is not occurring, the staff verified that the applicant's selection of susceptible locations is based on severity of conditions, time of service, and lowest design margin. The staff also verified that the proposed inspection would be performed using techniques similar to ASME Code and ASTM standards.

Section 3.4.1.1.2 of the LRA states that an inspection of selected components exposed to a stagnant flow water environment will be conducted in accordance with the One-Time Inspection Program (B.1.23) to verify that significant degradation is not occurring and the component intended function will be maintained during the extended period of operation. The LRA states that examinations will be conducted on carbon and stainless steel components in an area where typically stagnant flow is present but occasionally there is flow, which will cause replenishment of the oxygen supply. Specifically, inspections will be conducted on the HPCI torus suction check valves, the HPCI booster pumps, and the CRD scram valves. The carbon steel HPCI torus suction check valves are exposed to torus water and will undergo a visual exam followed by an ultrasonic exam if significant corrosion is observed, while the carbon steel HPCI booster pumps and the stainless steel CRD scram valves are exposed to condensate storage tank water and will undergo a visual examination. The applicant concluded that these components provide representative samples of the aging effects seen in SPCS.

The staff concurs with the applicant's approach of using the One-Time Inspection Program to sample similar materials and environments to provide representative samples for the SPCS components. The staff's review of the One-Time Inspection Program is in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to general, pitting, and crevice corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.2.3 Loss of Material Due to General Corrosion

The GALL Report recommends further evaluation of programs to manage loss of material due to general corrosion for external surfaces of all carbon steel structures and components, including closure bolting, exposed to operating temperatures less than 212 °F. Such corrosion may be due to air, moisture, or humidity. The staff reviewed the applicant's proposed program to ensure that an adequate program will be in place for the management of this aging effect.

Section 3.4.1.1.3 of the LRA states that aging management of the external surface of the main steam, feedwater, condensate, and condensate storage system components in a sheltered environment with moist, warm air will be managed either by the Structures Monitoring Program (B.1.30) or by system engineer walkdowns performed by the Bolting Integrity Program (B.1.12) aging management activities. The staff's review of these programs is in Section 3.0.3.14 and 3.0.3.5 of this SER, respectively.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to general corrosion, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.3 Aging Management Program for the Steam and Power Conversion System Components

The applicant credits nine AMPs to manage the aging effects associated with components in the SPCS group. Of the nine, all but one of the AMPs are credited with managing aging for components in other system groups (common AMPs). The staff's evaluation of the common AMPs is provided in Section 3.0.3 of this SER. The common AMPs credited with managing aging for SPCS components are listed below along with the corresponding SER section numbers.

- ASME Section XI Inservice Inspection Program, Subsection IWB, IWC, & IWD (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- One-Time Inspection Program (Section 3.0.3.10)
- Structures Monitoring Program (Section 3.0.3.14)

The staff's evaluation of the SPCS-specific AMP is provided below.

3.4.2.3.1 Generator Stator Water Chemistry Activities (B.2.7)

Summary of Technical Information in the Application. The description of the Generator Stator Water Chemistry Activity AMP can be found in Appendix B, Section B.2.7, "Generator Stator Water Chemistry Activities (Quad Cities Only)," of the LRA. The program is designed to prevent aging by maintaining a high purity level of the stator water cooling, in accordance with General Electric guidelines for stator water cooling water systems. The applicant stated that continuous conductivity monitoring and resin-bed filtration are used to maintain the water quality. The applicant further stated that no age-related degradation of the stator water cooling system components within the scope of license renewal has been observed.

The applicant concluded that the Generator Stator Water Cooling Water Chemistry Activities program provides reasonable assurance that the intended functions of the Quad Cities stator water cooling system components will be maintained consistent with the CLB during the period of extended operation.

Staff Evaluation. In LRA Section AMP, B.2.7, "Generator Stator Water Chemistry Activities (Quad Cities Only)," the applicant described its program for managing the loss of material aging effects to piping and associated components in the main steam and main generator and auxiliaries systems within the scope of license renewal. This program is not based on a GALL program; therefore, the staff reviewed the program using the guidance in Branch Technical Position RLSB-1 in Appendix A of the SRP-LR. The staff's evaluation focused on management of aging effects through incorporation of the following 10 elements from RLSB-1: program scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, acceptance criteria, corrective actions, confirmation process, administrative controls, and operating experience. The applicant indicated that the corrective actions, confirmation process, and administrative controls for license renewal are in accordance

with the site-controlled quality assurance program. The staff's evaluation of the applicant's quality assurance program is provided separately in Section 3.0.4 of this SER, and the evaluation of the remaining seven elements is provided below. The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

[Program Scope] Section B.2.7 of the LRA states that this program is used to manage loss of material and cracking of stainless steel components in the stator water cooling system. The staff's review indicates that this is consistent with the components that credit this AMP in the AMR tables; therefore, the staff finds this acceptable. By letter dated May 18, 2004, the applicant expanded the scope of this program to include Dresden. The staff finds this change acceptable, as discussed in SER Section 3.0.5.

[Preventive or Mitigative Actions] The LRA describes the Generator Stator Water Chemistry Activities program as a mitigative program. This program relies on maintaining water chemistry parameters in accordance with General Electric guidelines for preventing the identified aging effects. The LRA states that the program mitigates loss of material through chemistry control. The LRA also states that SCC is prevented because the water impurity levels are low and because the system operating temperature is less than 140°F. The staff agrees that maintaining the stator water chemistry within the General Electric guidelines will effectively mitigate the identified aging effects; therefore, the staff finds this acceptable.

[Parameters Monitored or Inspected] LRA Section B.2.7 states that the stator water cooling system water is continuously monitored for purity by a conductivity cell, and that water chemistry data is periodically logged. The staff finds these to be appropriate parameters to monitor for managing the water chemistry; therefore, the staff finds this acceptable.

[Detection of Aging Effects] LRA Section B.2.7 states that the Generator Stator Water Chemistry Activities program is a preventative program and does not include actions to detect aging effects (other than corrective actions if parameters are outside the required band). Since the program is designed to prevent aging, and since the water is maintained at high purity levels in accordance with the General Electric guidelines, the staff finds this acceptable.

[Monitoring and Trending] As stated above, the water conductivity is continuously monitored via an on-line conductivity monitor. In addition, chemistry data is periodically logged. The staff finds this monitoring and trending to be appropriate for maintaining the water chemistry within the required parameters; therefore, the staff finds this acceptable.

[Acceptance Criteria] Section B.2.7 of the LRA states that the water chemistry acceptance criteria are in accordance with the General Electric guidelines. In its October 3, 2003, response to RAI 3.0-1 related to the definitions of the environments used in the LRA, the applicant provided additional information related to the conductivity, dissolved oxygen, silica, and copper levels for this system. Since the water chemistry is maintained in accordance with the General Electric guidelines, the staff finds this acceptable.

[Operating Experience] Section B.2.7 of the LRA states that no age-related degradation of stator water systems components within the scope of license renewal has been observed. In addition, in a conference call on November 26, 2003, the applicant stated that the plant operating experience is consistent with industry operating experience (nuclear and non-nuclear applications) with General Electric generators stator water cooling systems. The applicant

concluded that the current water chemistry activities have proven effective. The staff finds that the operating experience supports the conclusion that the Generator Stator Water Chemistry Activities program is effective at preventing aging of the stator water cooling system components; therefore, the staff finds this acceptable.

Conclusions. On the basis of its review of the applicant's program, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.4.2.4 Aging Management Review of the Steam and Power Conversion Systems

The staff reviewed the components listed in LRA Tables 2.3.4-1 through 2.3.4-7 to determine whether the applicant had properly identified the applicable AMRs and AMPs needed to adequately manage the aging effects for the components. This portion of the staff review involved identification of the aging effects for each component, ensuring that each aging effect was evaluated using the appropriate AMR in Section 3, and that management of the aging effect was captured in the appropriate AMP. The results of the staff's review are provided below. The staff also reviewed the UFSAR Supplements for the AMPs credited with managing aging in the SPCS components to determine whether the program description adequately described the program.

The following sections provide the results of the staff's evaluation of the adequacy of aging management for components in each SPCS.

3.4.2.4.1 Main Steam System

Summary of Technical Information in the Application. The description of the main steam system can be found in Section 2.3.4.1 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-1, 3.1-1, 3.2-1, 3.4-1, and 3.4-2.

Aging Effects

Table 2.3.4-1 in the LRA lists the components for the main steam system as closure bolting, dampeners, filters/strainers, flow elements, NSR vents or drains, piping and valves, thermowells, tubing, valves, piping and fittings, restricting orifices, accumulators, flexible hoses, rupture discs, and vacuum breakers.

The LRA identified the following applicable aging effects for the main steam system:

Low-alloy steel exposed to air with metal temperature up to 288 °C (550 °F) is subject to cumulative fatigue damage due to fatigue. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid experiences loss of material due to general corrosion. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as experiencing crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to air, moisture, humidity and leaking fluid is subject to loss of material

due to corrosion. Carbon steel exposed to moist containment atmosphere (air/nitrogen), steam, or demineralized water experiences loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to 288 °C (550 °F) steam is subject to cumulative fatigue damage due to fatigue. Carbon steel exposed to moist containment air, steam, or 288 °C (550 °F) steam is identified as subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to steam or 288 °C (550 °F) steam experiences wall thinning due to accelerated corrosion. Carbon steel exposed to 288 °C (550 °F) reactor coolant water is subject to crack initiation and growth due to stress-corrosion cracking, intergranular stress-corrosion cracking, thermal, and mechanical stress. Carbon steel exposed to containment nitrogen or air, moisture, and humidity where the surface is >100 °C (212 °F) experiences no aging effects.

Stainless steel exposed to moist containment atmosphere (air/nitrogen), steam, or demineralized water experiences loss of material due to general, pitting, and crevice corrosion. Stainless steel exposed to 288 °C (550 °F) reactor coolant water or steam is identified as experiencing crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to saturated air or warm moist air is subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, humidity, and leaking fluid experiences loss of material due to corrosion. Stainless steel external surfaces exposed to air, moisture, and humidity <100 °C (212 °F), or air, moisture, and humidity where the surface temperature is >100 °C (212 °F), and containment nitrogen experience no aging effects.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid are subjected to loss of material due to corrosion.

Elastomers, neoprene, and similar material exposed to saturated air or containment nitrogen experiences hardening and loss of strength due to elastomer degradation.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the main steam system:

- ASME Section XI Inservice Inspection Program, Subsection IWB, IWC, & IWD (B.1.1)
- Water Chemistry Program (B.1.2)
- BWR Stress-Corrosion Cracking Program (B.1.7)
- Flow-Accelerated Corrosion Program (B.1.11)
- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)
- Compressed Air Monitoring Program (B.1.16)
- Structures Monitoring Program (B.1.30)

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the main steam system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.4.1 and Tables 2.3.4-1, 3.1-1, 3.2-1, 3.4-1, and 3.4-2 of the LRA. During its review, the staff determined that additional information was needed to complete its review.

By letter dated August 4, 2003, the staff requested additional information, per RAI 3.4.1-1, to resolve a discrepancy in Table 3.4-2, AMR Reference 3.4.2.51. In this reference, the discussion column addresses crevice and pitting corrosion in a treated water environment, while the aging effect/mechanism addresses crack initiation and growth/stress-corrosion cracking and intergranular stress-corrosion cracking in a 288 °C steam environment. The staff asked the applicant to verify that the aging effect is loss of material or to include the BWR Stress-Corrosion Cracking Program. In its response dated October 3, 2003, the applicant stated that the discussion in Table 3.4-2, Reference 3.4.2.51, should have read "NUREG-1801 does not address stress-corrosion cracking of stainless steel in a steam environment," indicating that the reference is to cracking, not loss of material. Further, the applicant stated that GALL Program XI.M7, "BWR Stress Corrosion Cracking," is not being used because it is applicable to stainless steel piping components that are part of the reactor coolant pressure boundary exposed to reactor coolant at or above temperature of 93 °C. The components associated with Reference 3.4.2.51 are main steam system valves with an environment of 288 °C steam. Therefore, the applicant stated that the appropriate AMP is the Water Chemistry Program (B.1.2), which mitigates the effects of cracking in stainless steel by reducing the presence of impurities such as sulfates and chlorides. The staff finds that the applicant has resolved the typographical error. In addition, the staff agrees that GALL Program XI.M7 is not applicable to the components or environment addressed by this reference, since historically intergranular stress-corrosion cracking of stainless steel in a steam environment has not been problematic, as indicated by systems referenced in the GALL for which intergranular stress-corrosion cracking has been identified. Further, the staff agrees that the Water Chemistry Program is appropriate for managing the aging effect for these components; therefore, the staff finds this acceptable.

By letter dated August 4, 2003, the staff requested additional information, per RAI 3.4.1-2, to clarify the information related to AMR Reference 3.2.1.3. The discussion column refers to Section 3.2.1.1.3 of the LRA; however, Section 3.2.1.1.3 does not address the main steam system. By letter dated October 3, 2003, the applicant stated that the difference results from the use of GALL terminology. In GALL, the safety relief discharge piping is classified as part of the automatic depressurization system, which is scoped in the ECCS group. However, at Dresden and Quad Cities, the safety relief discharge piping is classified as part of the main steam system. The staff finds the applicant's clarification to be acceptable. The staff notes that this clarification is also applicable to the applicant's use of AMR Reference 3.2.1.5, which also addresses the safety relief discharge piping. The GALL recommends further evaluation for these AMR references. The staff's evaluation of these AMR references is in Sections 3.2.2.2.2 and 3.2.2.2.3 of this SER.

For flexible hoses in the main steam system, the LRA uses Ref. No. 3.4.2.18, which addresses elastomers of neoprene and similar materials in a containment nitrogen environment, and identifies no aging effects. Environmental conditions such as temperature and radiation can affect the aging of neoprene and similar materials. Therefore, in RAI 3.4.1-3, the staff asked the applicant clarify the environment with respect to temperature, radiation levels, and time when the containment is not or has not been inerted, to justify that the neoprene hoses do not require

aging management. In its response dated October 3, 2003, the applicant stated that the flexible hoses in question are in the main steam system attached to the air accumulators for the MSIVs, and the LRA should have shown the aging effect/aging mechanism as hardening and loss of strength due to elastomer degradation, and the aging management program credited should have been B.1.23, "One-Time Inspection." The staff asked for further information on the environmental conditions, including temperature and radiation levels, to justify the use of a one-time inspection. In its response dated January 26, 2004, the applicant stated that they believe the hoses are constructed of stainless steel with an overall stainless steel outer braided jacket. In the one-time inspection, the applicant will verify that the hoses are stainless steel and inspect for mechanical damage. If the hoses are found to be elastomer, they will be replaced with stainless steel hoses. The applicant further clarified that the internal environment is saturated air up to 135 °F, the outside environment is containment nitrogen up to 135 °F with up to 90 percent relative humidity, and the 60-year radiation dose is 1.65E07 Rads. The staff finds that a one-time inspection of stainless steel flexible hoses in the above environment is acceptable, since no significant degradation is expected to occur. The staff also finds that replacement of the elastomer hoses with stainless steel hoses alleviates the concern on elastomer degradation; therefore, the staff finds this acceptable.

The aging effects identified in the LRA for the main steam system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the main steam system:

- ASME Section XI Inservice Inspection Program, Subsection IWB, IWC, & IWD (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-time Inspection Program (Section 3.0.3.10)
- Compressed Air Monitoring Program (Section 3.0.3.8)
- Structures Monitoring Program (Section 3.0.3.14)
- Periodic Inspection of Components Subject to Moist Environments Program (Section 3.0.3.18)

As part of RAI B.1.23.2-6, the staff questioned the use of one-time inspections to manage aging for components in a moist air environment. In its response dated March 25, 2004, the applicant credited the Periodic Inspection of Components Subject to Moist Environments program to manage aging effects for stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components exposed to moist air environments and subject to wetting. The staff's evaluation of the Periodic Inspection of Components Subject to Moist Environments AMP is contained in SER section 3.0.3.18.

After evaluating the applicant's AMR for each of the components in the main steam system, the

staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Tables 3.1-1, 3.2-1, and 3.4-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report or that the AMPs credited are appropriate for the identified aging effects. For the components identified in LRA Table 3.4-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

For the component “NSR vents or drains, piping and valves” addressed by AMR Reference 3.4.2.30, the applicant has identified that the material-environment includes carbon steel exposed to air, moisture, humidity, and leaking fluid. In its response to RAI B.1.23-2(b), the applicant implies that the loss of material due to corrosion is expected to be sufficiently slow that a one-time inspection can be used for aging management. This issue was identified as part of Open Item B.1.23-2. The staff finds this acceptable, as discussed in Section 3.0.3.10 of this SER.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the main steam system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.4.2 Feedwater System

Summary of Technical Information in the Application. The description of the feedwater system can be found in Section 2.3.4.2 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-2, 3.1-1, 3.4-1, and 3.4-2.

Aging Effects

Table 2.3.4-2 in the LRA lists the following components for the feedwater system—closure bolting, NSR vents or drains, piping and fittings, and valves.

The LRA identified the following applicable aging effects for the feedwater system:

High-strength, low-alloy steel exposed to air with metal temperature up to 288 °C (550 °F) experiences cumulative fatigue damage. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is subject to loss of material due to general corrosion. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is identified as experiencing crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to air, moisture, humidity, and leaking fluid is identified as subject to loss of material due to corrosion. Carbon steel exposed to 288 °C (550 °F) reactor coolant water is subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Carbon steel exposed to 288 °C (550 °F) reactor coolant water or up to 225 °C (437 °F) reactor coolant water, or treated water experiences cumulative fatigue damage due to fatigue. Carbon steel exposed to treated water is subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to 288 °C (550 °F) reactor coolant

water or up to 225 °C (437 °F) reactor coolant water, or treated water experiences wall thinning due to accelerated corrosion. Carbon steel exposed to air, moisture, and humidity where surface temperature is >100 °C (212 °F), and containment nitrogen experiences no aging effects.

Stainless steel exposed to 288 °C (550 °F) reactor coolant water is identified as subject to crack initiation and growth due to stress-corrosion cracking and intergranular stress-corrosion cracking. Stainless steel exposed to 288 °C (550 °F) reactor coolant water is subject to cumulative fatigue damage due to fatigue. Stainless steel exposed to air, moisture, humidity, and leaking fluid experiences loss of material due to corrosion. Stainless steel exposed to treated water is identified as subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, and humidity <100 °C (212 °F); air, moisture and humidity where surface temperature is >100 °C (212 °F); and containment nitrogen experiences no aging effects.

Cast austenitic stainless steel exposed to 288 °C (550 °F) reactor coolant water is subject to cumulative fatigue damage due to fatigue.

Brass and bronze exposed to air, moisture, humidity, and leaking fluid are subject to loss of material due to corrosion.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the feedwater system:

- ASME Section XI Inservice Inspection Program, Subsection IWB, IWC, & IWD (B.1.1)
- Water Chemistry Program (B.1.2)
- BWR Stress-Corrosion Cracking Program (B.1.7)
- Flow-Accelerated Corrosion Program (B.1.11)
- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in the feedwater system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified in the LRA for the feedwater system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the feedwater system:

- ASME Section XI Inservice Inspection Program, Subsection IWB, IWC, & IWD (Section 3.0.3.1)
- Water Chemistry Program (Section 3.0.3.2)
- BWR Stress-Corrosion Cracking Program (Section 3.0.3.3)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)

After evaluating the applicant's AMR for each of the components in the feedwater system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Tables 3.1-1 and 3.4-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report or that the AMPs credited are appropriate for the identified aging effects. For the components identified in LRA Table 3.4-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the feedwater system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.4.3 Condensate and Condensate Storage Systems

Summary of Technical Information in the Application. The description of the condensate and condensate storage systems can be found in Section 2.3.4.3 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-1, 3.4-1, and 3.4-2.

Aging Effects

Table 2.3.4-3 in the LRA lists the following components for the condensate and condensate storage systems—closure bolting, piping and fittings, tanks, thermowells, tubing, and valves.

The LRA identified the following applicable aging effects for the condensate and condensate storage system.

Low-alloy steel exposed to containment nitrogen experiences crack initiation and growth from cyclic loading. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is subject to loss of material due to general corrosion. High-strength, low-alloy steel exposed to outdoor ambient conditions is identified as experiencing loss of material due to general corrosion and wear.

Carbon steel exposed to treated water is subject to loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to treated water is subject to loss of material due to general and pitting corrosion. Carbon steel exposed to treated water is identified as subject to wall thinning due to accelerated corrosion. Carbon steel exposed to outdoor ambient conditions experiences loss of material due to general, pitting, and crevice corrosion. Carbon steel exposed to soil and ground water is subject to loss of material due to general, pitting, crevice, and microbiologically influenced corrosion.

Stainless steel exposed to treated water is subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to outdoor ambient conditions, or soil or ground water, experiences loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, and humidity <100 °C (212 °F) experiences no aging effects.

Aluminum exposed to <90 °C (194 °F) treated water experiences loss of material due to pitting and crevice corrosion. Aluminum exposed to outdoor ambient conditions, or soil or ground water, experiences loss of material due to pitting. Aluminum exposed to outdoor ambient conditions experiences cracking due to stress-corrosion cracking. Aluminum exposed to air, moisture, and humidity <100 °C (212 °F) experiences no aging effects.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the condensate and condensate storage systems:

- Water Chemistry Program (Section 3.0.3.2)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects, and the AMPs credited for managing the aging effects, in the condensate and condensate storage systems. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The staff reviewed the information in Section 2.3.4.3 and Tables 2.3.4-3, 3.4-1, and 3.4-2 of the LRA. During its review, the staff determined that additional information was needed to complete its review.

In RAI 3.4.3-1, issued on August 4, 2003, the staff asked why the high-strength, low-alloy steel closure bolting in outdoor ambient conditions, covered by AMR Reference 3.4.2.2, are only subject to loss of material due to general corrosion and wear. The GALL report, Chapter VIII H.2-a&b, lists carbon steel low-alloy steel closure bolting in air, moisture, humidity, and leaking fluid environments as being subject to loss of material due to general corrosion and crack initiation, and growth due to cyclic loading and/or stress-corrosion cracking. This GALL reference is used for other closure bolting in SPCS, as identified by Reference 3.4.1.6. By letter dated October 3, 2003, the applicant responded that GALL Chapter VIII, H.2-b, refers to closure

bolting in high-pressure or high-temperature systems. For bolting in the high-pressure or high-temperature portions of SPCS, the applicable aging effects are listed in Reference 3.4.1.6. The applicant stated that the bolts associated with LRA Reference 3.4.2.2 are on the piping to the condensate storage tanks, which is low-pressure and low-temperature piping not subject to cyclic loading. The applicant further stated that the bolts used are ASTM A193, Grade B7 with a tensile strength of 125 ksi. EPRI 1003056, "Non-Class 1 Mechanical Guideline and Mechanical Tools," Appendix F, "Closure Bolting," states that stress-corrosion cracking is not an applicable aging effect for bolting material with a tensile strength of less than 150 ksi. The applicant concluded that for bolting in the low-pressure, low-temperature portion of the condensate and condensate storage system, loss of material due to general corrosion or wear is the only applicable aging effect. The staff concurs that, based on the applicant's clarification of the location, operating environment, and bolting materials, the bolting in question would not be subject to crack initiation and growth due to cyclic loading and/or stress-corrosion cracking. The staff concludes that the applicant has identified the appropriate aging effects for this bolting; therefore, the staff finds this acceptable.

The aging effects identified in the LRA for the condensate and condensate storage systems are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the condensate and condensate storage systems:

- Water Chemistry Program (Section 3.0.3.2)
- Flow-Accelerated Corrosion Program (Section 3.0.3.4)
- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)

After evaluating the applicant's AMR for each of the components in the condensate and condensate storage systems, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for these systems. For those components identified in Table 3.4-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report or that the AMPs credited are appropriate for the identified aging effects. For the components identified in LRA Table 3.4-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the condensate and condensate storage systems will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.4.4 Main Condenser

Summary of Technical Information in the Application. The description of the main condenser can be found in Section 2.3.4.4 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-4 and 3.4-2.

Aging Effects

Table 2.3.4-4 in the LRA lists the following components for the main condenser—main condenser hotwells, false floors, main condenser tubes, tubesheets, main condenser waterboxes, and hatches.

The LRA identified the following applicable aging effects for the main condenser:

Carbon steel and stainless steel exposed to steam or open-cycle cooling water (raw water side) experience no aging effects. Carbon steel exposed to air, moisture, and humidity <100 °C (212 °F) also experiences no aging effects.

Aging Management Programs

The LRA did not credit any AMPs for the main condenser system because the applicant did not identify any aging effects requiring management.

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in the main condenser.

Aging Effects

The staff reviewed the information in Section 2.3.4.4 and Tables 2.3.4-4 and 3.4-2 of the LRA. During its review, the staff determined that additional information was needed to complete its review.

In RAI 3.4.4-3, sent by letter dated August 4, 2003, the staff asked the applicant to explain the conclusion that the components in the main condenser do not require aging management. The material-environment combinations include carbon steel in steam, carbon steel in raw water, stainless steel in raw water, and carbon steel in air, moisture, and humidity <100 °C. All of these material-environment combinations are subject to aging degradation; however, the applicant determined that no aging management was required. The staff asked the applicant to provide justification. In its response dated October 3, 2003, the applicant stated that the license renewal intended function of the main condenser is to provide post accident containment, holdup, and plate-out of iodine for MSIV bypass leakage. This intended function is dependent on the condenser's surface area, volume, and leakage integrity, and that aging degradation would only impact the leakage integrity. The applicant argued that leakage integrity sufficient to perform the post accident intended function is continuously confirmed by normal plant operation because the main condenser must perform a significant pressure boundary function (maintain vacuum) in support of normal plant operation. Therefore, the applicant concluded that there are no creditable aging effects that would affect the intended function of the main condenser, and no AMP is required. The staff has reviewed the applicant's response and concurs that the

condenser's intended function is continually verified during normal plant operation. Therefore, the staff finds that there are no aging effects that require management for the main condenser.

By letter dated August 4, 2003, the staff requested two clarifications of apparent inconsistencies between the component groups listed in LRA Table 2.4.4-4 and Table 3.4-2. The applicant clarified the component groups that were included in the AMR references. Since all main condenser components are associated with appropriate AMR references, the staff finds the clarifications to be acceptable.

The aging effects identified in the LRA for the main condenser are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant did not identify any AMPs for the main condenser. The staff finds this acceptable because there are no aging effects that require management for the main condenser.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.4.5 Main Turbine and Auxiliary Systems

Summary of Technical Information in the Application. The description of the main turbine and auxiliary systems can be found in Section 2.3.4.5 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-5, 3.4-1, and 3.4-2.

Aging Effects

Table 2.3.4-5 in the LRA lists the following components for the main turbine and auxiliary systems—closure bolting, piping and fittings, tubing, valves, and accumulators.

The LRA identified the following applicable aging effects for the main turbine and auxiliary systems:

Low-alloy steel exposed to air, moisture, humidity, and leaking fluid experiences loss of material due to general corrosion. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is subject to crack initiation and growth due to cyclic loading stress-corrosion cracking.

Stainless steel exposed to turbine EHC fluid is identified as subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed air, moisture, and humidity <100 °C (212 °F) experiences no aging effects.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the main

turbine and auxiliary systems:

- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in the main turbine and auxiliary systems. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified in the LRA for the main turbine and auxiliary systems are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the main turbine and auxiliary systems:

- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Lube Oil Monitoring Activities (Section 3.0.3.16)

After evaluating the applicant's AMR for each of the components in the main turbine and auxiliary systems, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for these systems. For those components identified in Table 3.4-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report or that the AMPs credited are appropriate for the identified aging effects. For the components identified in LRA Table 3.4-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

In RAI B.1.23-2, the staff questioned the use of a one-time inspection as the only aging management activity for components exposed to an environment of EHC oil. The staff's concern was that proper maintenance of oil chemistry is critical to preventing any aging effects in this environment. In its response dated January 26, 2004, the applicant stated that monitoring of the EHC oil, which is already performed at the stations, will be credited under AMP B.2.5, "Lubricating Oil Monitoring Activities." The staff finds that monitoring and controlling the EHC oil quality will prevent significant aging of the system components in this environment; therefore, the staff finds the use of a one-time inspection as a verification to be acceptable. The staff's review of the Lubricating Oil Monitoring Activities program and the One-Time Inspection program are addressed in SER Sections 3.0.3.16 and 3.0.3.10, respectively.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the main turbine and auxiliary systems will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the

effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.4.6 Turbine Oil System (Quad Cities Only)

Summary of Technical Information in the Application. The description of the turbine oil system can be found in Section 2.3.4.6 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-6, 3.4-1, and 3.4-2.

Aging Effects

Table 2.3.4-6 in the LRA lists the following components for the turbine oil system—closure bolting, filters/strainers, piping and fittings, valves, pump casing, and tanks.

The LRA identified the following applicable aging effects for the turbine oil system:

Low-alloy steel exposed to air, moisture, humidity, and leaking fluid experiences loss of material due to general corrosion. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is subject to crack initiation and growth due to cyclic loading stress-corrosion cracking.

Carbon steel exposed to generator hydrogen seal oil is identified as subject to loss of material due to pitting and crevice corrosion.

Cast iron exposed to generator hydrogen seal oil and air, moisture, and humidity <100 °C (212 °F) experiences loss of material due to pitting and crevice corrosion.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the turbine oil system:

- Bolting Integrity Program (B.1.12)
- One-Time Inspection Program (B.1.23)

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in the turbine oil system. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified in the LRA for the turbine oil system are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the turbine oil system:

- Bolting Integrity Program (Section 3.0.3.5)
- One-Time Inspection Program (Section 3.0.3.10)
- Lube Oil Monitoring Activities (Section 3.0.3.16)

After evaluating the applicant's AMR for each of the components in the turbine oil system, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.4-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report or that the AMPs credited are appropriate for the identified aging effects. For the components identified in LRA Table 3.4-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

In RAI B.1.23-2, the staff questioned the use of a one-time inspection as the only aging management activity for components exposed to an environment of generator hydrogen seal oil. The staff's concern was that proper maintenance of oil chemistry is critical to preventing any aging effects in this environment. In its response dated January 26, 2004, the applicant stated that monitoring of the generator hydrogen seal oil, which is already performed at the stations, will be credited under AMP B.2.5, "Lubricating Oil Monitoring Activities." The staff finds that monitoring and controlling the generator hydrogen seal oil quality will prevent significant aging of the system components in this environment; therefore, the staff finds the use of a one-time inspection as a verification to be acceptable. The staff's review of the Lubricating Oil Monitoring Activities program and the One-Time Inspection program are addressed in SER Sections 3.0.3.16 and 3.0.3.10, respectively.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the turbine oil system will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.4.2.4.7 Main Generator and Auxiliaries (Quad Cities Only)

Summary of Technical Information in the Application. The description of the main generator and auxiliaries can be found in Section 2.3.4.7 of this SER. The components, aging effects, and AMPs are provided in LRA Tables 2.3.4-7, 3.4-1, and 3.4-2.

Aging Effects

Table 2.3.4-7 in the LRA lists the following components for the main generator and auxiliaries—closure bolting, piping and fittings, pumps, valves, heat exchangers, housings, and tanks.

The LRA identified the following applicable aging effects for the main generator and auxiliaries:

Low-alloy steel exposed to air, moisture, humidity, and leaking fluid experiences loss of material due to general corrosion. Low-alloy steel exposed to air, moisture, humidity, and leaking fluid is subject to crack initiation and growth due to cyclic loading stress-corrosion cracking.

Stainless steel exposed demineralized water or stator liquid cooling is identified as subject to loss of material due to pitting and crevice corrosion. Stainless steel exposed to air, moisture, and humidity <100 °C (212 °F) experiences no aging effects.

Aging Management Programs

The LRA credited the following AMPs with managing the identified aging effects for the main generator and auxiliaries:

- Bolting Integrity Program (B.1.12)
- Main Generator Stator Cooling Water Chemistry Program (B.2.7)

Staff Evaluation. This section provides the results of the staff's evaluation of the applicant's AMR for the aging effects and the AMPs credited for managing the aging effects in the main generator and auxiliaries. The staff also reviewed the applicable UFSAR Supplements for the AMPs to ensure that the program descriptions adequately describe the AMPs.

Aging Effects

The aging effects identified in the LRA for the main generator and auxiliaries are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the main generator and auxiliaries:

- Bolting Integrity Program (Section 3.0.3.5)
- Main Generator Stator Cooling Water Chemistry Program (Section 3.4.2.3.1)

After evaluating the applicant's AMR for each of the components in the main generator and auxiliaries, the staff evaluated the AMPs listed above to determine if they are appropriate for managing the identified aging effects for this system. For those components identified in Table 3.4-1 of the LRA, the staff verified that the applicant credited the AMPs recommended by the GALL Report or that the AMPs credited are appropriate for the identified aging effects. For the components identified in LRA Table 3.4-2, the staff verified that the applicant credited AMPs that are appropriate for the identified aging effects.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the main generator and auxiliaries will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5 Containment, Structures, and Component Supports

This section addresses the aging management of the structures and structural components. The structures that make up this group are described in the following SER sections:

- primary containment—(Section 2.4.1)
- reactor building—(Section 2.4.2)
- main control room and auxiliary electric equipment room—(Section 2.4.3)
- turbine building—(Section 2.4.4)
- diesel generator building—(Section 2.4.5)
- station blackout building and yard structures—(Section 2.4.6)
- isolation condenser pump house (Dresden only)—(Section 2.4.7)
- makeup demineralizer building (Dresden only)—(Section 2.4.8)
- radwaste floor drain surge tank—(Section 2.4.9)
- miscellaneous foundations— (Section 2.4.10)
- crib house—(Section 2.4.11)
- Unit 1 crib house (Dresden only)—(Section 2.4.12)
- station chimney—(Section 2.4.13)
- crane and hoists—(Section 2.4.14)
- component supports commodity group—(Section 2.4.15)
- insulation commodity group—(Section 2.4.16)

As discussed in Section 3.0.1 of this SER, the structures and structural components subject to an AMR are included in one of two LRA tables. Table 3.5-1 of the LRA consists of structures and structural components that are evaluated in the GALL Report. The "Discussion" column of this table references LRA Section 3.5.1.1 for further evaluations of aging management, as recommended by GALL, and also references LRA Section 3.5.1.2 for aging management programs or evaluations that are different from GALL. Table 3.5-2 of the LRA consists of structures and structural components that are not evaluated in the GALL Report.

3.5.1 Summary of Technical Information in the Application

The applicant presents the results of its AMRs for the containment, structures, and component supports in LRA Section 3.5. The applicant's description of the containment, structures, and component supports can be found in LRA Section 2.4. The passive, long-lived components in these structures that are subject to an AMR are identified in LRA Tables 2.4-1 through 2.4-16. The "Aging Management Ref" column in these tables identifies the corresponding row of LRA Table 3.5-1 or Table 3.5-2 that contains the applicable AMR results.

3.5.2 Staff Evaluation

In LRA Section 3.5, the applicant summarized the results of its AMR for structures and structural components. The staff reviewed LRA Section 3.5 to determine whether the applicant has provided sufficient information to demonstrate that the effects of aging will be adequately

managed so that the intended function(s) will be maintained consistent with the CLB throughout the period of extended operation, in accordance with the requirements of 10 CFR 54.21(a)(3), for structures and structural components that are determined to be within the scope of license renewal and subject to an AMR.

The applicant referenced the GALL Report in its AMR. The staff has previously evaluated the adequacy of the aging management of structures and structural components for license renewal as documented in the GALL Report. Thus, the staff did not repeat its review of the matters described in the GALL Report, except to ensure that the material presented in the LRA was applicable, and to verify that the applicant had identified the appropriate programs as described and evaluated in the GALL Report. The staff evaluated those aging management issues recommended for further evaluation in the GALL Report. The staff also reviewed aging management information submitted by the applicant that was different from that in the GALL Report or was not addressed in the GALL Report. Finally, the staff reviewed the UFSAR Supplements to ensure that they provided an adequate description of the programs credited with managing aging for structures and structural components.

In LRA Section 3.0, under the heading "Operating Experience," the applicant stated the following:

A review of plant-specific operating experience was conducted to identify aging effects requiring management. Industry-wide operating experience since the preparation of NUREG-1801 was also reviewed to identify aging effects requiring management. These reviews concluded that the aging effects identified by plant-specific and industry-wide operating experience were consistent with those identified in NUREG-1801. Ongoing review of plant-specific and industry operating experience is performed in accordance with corrective action programs and operating experience programs.

The applicant has not identified the source material utilized in the plant-specific operating experience review or in the industry-wide operating experience review. The applicant was requested in RAI 3.5-2 to submit details of its operating experience review, including the time frame covered by the review, the information sources used, and any key findings that led to exclusion of aging effects identified in NUREG-1801.

In its response to RAI 3.5-2, the applicant stated the following:

The operating experience reviews included a search of the Dresden and Quad Cities Corrective Action databases, which contain Condition Reports (CR) and the predecessor program Problem Identification Forms (PIF) (from 1993 to present), the work control database which contains maintenance work orders and modifications (from 1984 to present), and a search of the NRC website for regulatory correspondence, such as Generic Letters, Information Bulletins, and Information Notices (from April 2001, the date NUREG-1801 was issued, to the present). Additionally, the EPRI Electrical, Mechanical, and Structural Tools were used to identify relevant industry operating experience.

The Dresden and Quad Cities License Renewal Application (LRA) identifies the exceptions to aging effects identified by NUREG-1801 in the Chapter 3 Tables under the Discussion column. These tables provide the basis for excluding the aging effect or a reference to further discussion of why the aging effect is not applicable.

The staff finds the applicant's response to be acceptable and considers RAI 3.5-2 resolved. Tables 3.5-1, 3.5-2, 3.5-3, and 3.5-4 below provides a summary of the staff's evaluation of

components, aging effects/mechanisms, and AMPs listed in LRA Table 3.5-1 for the components addressed in the GALL Report.

Table 3.5-1. Staff Evaluation for Structures and Structural Components in NUREG-1801 (GALL): Common Components of All Types of PWR and BWR Containment

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
(LRA Ref No 3.5.1.1)	Cumulative fatigue damage (CLB fatigue analysis exists)	TLAA evaluated in accordance with 10 CFR 54.21(c)	TLAA evaluated in accordance with 10 CFR 54.21(c)	Penetration sleeves, penetration bellows, and dissimilar metal welds Further evaluation of cumulative fatigue damage is provided in LRA Section 3.5.1.1.4 and LRA Section 4.6. (See SER Section 3.5.2.2.1.) Penetration sleeves, bellows, and dissimilar metal welds
(LRA Ref No 3.5.1.2)	Cracking due to cyclic loading, or crack initiation and growth due to SCC	Containment ISI and Containment Leak Rate Test	Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28)	Consistent with NUREG-1801, with exceptions evaluated in SER Sections 3.5.2.3.1. Penetration sleeves, penetration bellows, and dissimilar metal welds
(LRA Ref No 3.5.1.3)	Loss of material due to corrosion	Containment ISI and Containment Leak Rate Test	Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28)	Consistent with NUREG-1801, with exceptions evaluated in SER Section 3.5.2.3.1. Personnel airlock and equipment hatch
(LRA Ref No 3.5.1.4)	Loss of material due to corrosion	Containment ISI and Containment Leak Rate Test	Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28)	Consistent with NUREG-1801, with exceptions evaluated in SER Section 3.5.2.3.1. Personnel airlock and equipment hatch
(LRA Ref No 3.5.1.5)	Loss of leak tightness in closed position due to mechanical wear of locks, hinges, and closure mechanism	Containment Leak Rate Test and plant technical specifications	Containment Leak Rate Test (B.1.28) and plant technical specifications	Consistent with NUREG-1801. (See SER Section 3.5.2.1.) Seals, gaskets, and moisture barriers

(LRA Ref No 3.5.1.6)	Loss of sealant and leakage through containment due to deterioration of joint seals, gaskets, and moisture barriers	Containment ISI and Containment Leak Rate Test	Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28)	Consistent with NUREG-1801, with exceptions evaluated in SER Section 3.5.2.3.1
----------------------	---	--	--	--

Table 3.5-2: PWR Concrete (Reinforced and Prestressed) and Steel Containment BWR Concrete (Mark II and III) and Steel (Mark I, II, and III) Containment

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation Concrete elements: foundation, walls, dome
(LRA Ref No 3.5.1.7)	Aging of accessible and inaccessible concrete areas due to leaching of calcium hydroxide, aggressive chemical attack, and corrosion of embedded steel	Containment ISI	Not applicable	Not applicable for a Mark I steel containment Concrete elements: foundation
(LRA Ref No 3.5.1.8)	Cracks, distortion, and increases in component stress level due to settlement	Structures Monitoring	Not applicable	Not applicable for a Mark I steel containment Concrete elements: foundation
(LRA Ref No 3.5.1.9)	Reduction in foundation strength due to erosion of porous concrete subfoundation	Structures Monitoring	Not applicable	Not applicable for a Mark I steel containment Concrete elements: foundation, dome, and wall
(LRA Ref No 3.5.1.10)	Reduction of strength and modulus due to elevated temperature	Plant specific	Not applicable	Not applicable for a Mark I steel containment Prestressed containment: tendons and anchorage components
(LRA Ref No 3.5.1.11)	Loss of prestress due to relaxation, shrinkage, creep, and elevated temperature	TCAA evaluated in accordance with 10 CFR 54.21(c)	Not applicable	Not applicable for a Mark I steel containment Steel elements: liner plate, containment shell

(LRA Ref No 3.5.1.12)	Loss of material due to corrosion in accessible and inaccessible areas	Containment ISI and Containment Leak Rate Test	Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28)	Consistent with NUREG-1801, with exceptions evaluated in SER Sections 3.5.2.4.1, 3.5.2.3.1, and 3.5.2.2.1 Steel elements: vent header, drywell head, torus, downcomers, pool shell
(LRA Ref No 3.5.1.13)	Cumulative fatigue damage (CLB fatigue analysis exists)	TCAA evaluated in accordance with 10 CFR 54.21(c)	TCAA evaluated in accordance with 10 CFR 54.21(c)	Further evaluation of cumulative fatigue damage is provided in SER Section 3.5.2.2.1 Steel elements: protected by coating
(LRA Ref No 3.5.1.14)	Loss of material due to corrosion in accessible areas only	Protective Coating Monitoring and Maintenance	Protective Coating Monitoring and Maintenance (B.1.32)	Consistent with NUREG-1801, with exceptions evaluated in SER Section 3.5.2.4.1 Prestressed containment: tendons and anchorage components
(LRA Ref No 3.5.1.15)	Loss of material due to corrosion of prestressing tendons and anchorage components	Containment ISI	Not applicable	Not applicable for a Mark I steel containment Concrete elements: foundation, dome, and wall
(LRA Ref No 3.5.1.16)	Scaling, cracking, and spalling due to freeze-thaw; expansion and cracking due to reaction with aggregate	Containment ISI	Not applicable	Not applicable for a Mark I steel containment Steel elements: vent line bellows, vent headers, downcomers
(LRA Ref No 3.5.1.17)	Cracking due to cyclic loads or crack initiation and growth due to SCC	Containment ISI and Containment Leak Rate Test	Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28)	Consistent with NUREG-1801, with exceptions evaluated in SER Sections 3.5.2.3.1 and 3.5.2.2.1 Steel elements: suppression chamber liner
(LRA Ref No 3.5.1.18)	Crack initiation and growth due to SCC	Containment ISI and Containment Leak Rate Test	Not applicable	Not applicable for a Mark I steel containment Steel elements: drywell head and downcomer pipes

(LRA Ref No 3.5.1.19)	Fretting and lockup due to wear	Containment ISI	Not applicable	Applicant states that material does not exist at Dresden or Quad Cities
-----------------------	---------------------------------	-----------------	----------------	---

Table 3.5-3: Class I Structures

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation All groups except Group 6: accessible interior/exterior concrete and steel components
(LRA Ref No 3.5.1.20)	All types of aging effects	Structures Monitoring	Structures Monitoring Program (B.1.30)	Consistent with NUREG-1801 with exceptions evaluated in SER Section 3.5.2.2.2
Groups 1–3, 5, 7–9: inaccessible concrete components, such as exterior walls below grade and foundation (LRA Ref No 3.5.1.21)	Aging of inaccessible concrete areas due to aggressive chemical attack and corrosion of embedded steel	Plant specific	Plant specific	Further evaluation of aging management of inaccessible areas is described in LRA Section 3.5.1.1.7. (See SER Section 3.5.2.2.2.) Group 6: all accessible/in-accessible concrete, steel, and earthen components
(LRA Ref No 3.5.1.22)	All types of aging effects, including loss of material due to abrasion, cavitation, and corrosion	Inspection of Water-Control Structures or FERC/US Army Corps of Engineers Dam Inspections and Maintenance	Inspection of Water-Control Structures (B.1.31) or FERC/US Army Corps of Engineers Dam Inspections and Maintenance Programs	Consistent with NUREG-1801, with exceptions evaluated in SER Sections 3.5.2.4.2 and 2.4.11 Group 5: liners
(LRA Ref No 3.5.1.23)	Crack initiation and growth from SCC and loss of material due to crevice corrosion	Water Chemistry Program and Monitoring of Spent Fuel Pool Water Level	Water Chemistry Program (B.1.2) and Monitoring of Spent Fuel Pool Water Level Programs	Consistent with NUREG-1801. (See SER Section 3.5.2.1.) Group 1–3, 5, 6: all masonry block walls
(LRA Ref No 3.5.1.24)	Crack due to restraint, shrinkage, creep, and aggressive environment	Masonry Wall	Masonry Wall Program (B.1.29)	Consistent with NUREG-1801. (See SER Section 3.5.2.1.) Group 1–3, 5, 7–9: foundation

(LRA Ref No 3.5.1.25)	Cracks, distortion, and increases in component stress level due to settlement	Structures Monitoring	Structures Monitoring Program (B.1.30)	Consistent with NUREG-1801 Further evaluation is described in LRA Section 3.5.1.1.1 (See SER Section 3.5.2.2.1.) Group 1–3, 5–9: foundation
(LRA Ref No 3.5.1.26)	Reduction in foundation strength due to erosion of porous concrete subfoundation	Structures Monitoring	Structures Monitoring Program (B.1.30)	Consistent with NUREG-1801 Further evaluation is described in LRA Section 3.5.1.1.1. (See SER Section 3.5.2.2.1.) Group 1–5: concrete
(LRA Ref No 3.5.1.27)	Reduction of strength and modulus due to elevated temperature	Plant specific	Plant specific.	Further evaluation is described in LRA Section 3.5.1.1.2. (See SER Section 3.5.2.2.1.) Groups 7, 8: liners
(LRA Ref No 3.5.1.28)	Crack initiation and growth from SCC and loss of material due to crevice corrosion	Plant specific	Plant specific.	Exceptions to NUREG-1801 described in SER Section 3.5.2.4.2

Table 3.5-4: Component Supports

Component Group	Aging Effect/Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation All Groups—
support members: anchor bolts, concrete surrounding anchor bolts, welds, grout pad, bolted connections, etc. (LRA Ref No 3.5.1.29)	Aging of component support	Structures Monitoring	Structures Monitoring Program (B.1.30)	Consistent with NUREG-1801. (See SER Section 3.5.2.1.) Groups B1.1, B1.2, and B1.3—
support members: anchor bolts, welds (LRA Ref No 3.5.1.30)	Cumulative fatigue damage (CLB fatigue analysis exists)	TAA evaluated in accordance with 10 CFR 54.21(c)	TAA evaluated in accordance with 10 CFR 54.21(c)	Further evaluation of cumulative fatigue damage is provided in SER Section 3.5.2.2.3. All Groups—support members: anchor bolts, welds

All Groups: support members: anchor bolts, welds	Loss of material due to boric acid corrosion	Boric Acid Corrosion	Not applicable	Not applicable for BWR Groups B1.1, B1.2, and B1.3—support members: anchor bolts, welds, spring hangers, guides, stops, and vibration isolators
(LRA Ref No 3.5.1.31)	Loss of material due to environmental corrosion; loss of mechanical function due to corrosion, distortion, dirt, overload, etc.	ISI	ISI (B.1.27)	Consistent with NUREG-1801, with exceptions evaluated in SER Section 3.5.2.4.5 Group B1.1—high-strength low-alloy bolts
(LRA Ref No 3.5.1.32)	Crack initiation and growth due to SCC	Bolting Integrity	Bolting Integrity Program (B.1.12).	Consistent with NUREG-1801, with exceptions evaluated in SER Sections 3.5.2.4.5 and 3.0.3

3.5.2.1 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, Which Do Not Require Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL does not recommend further evaluation, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation. The staff also sampled component groups to determine whether the applicant had properly identified those component groups in GALL that were not applicable to its plants. The staff also identified several areas where additional information or clarification was needed.

On the basis of its review, the staff has verified the applicant's claim of consistency with the GALL report. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5.2.2 Aging Management Evaluations in the GALL Report That Are Relied on for License Renewal, for Which the GALL Report Recommends Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL recommends further evaluation, the staff reviewed the applicant's evaluation to determine whether it adequately addressed the issues for which GALL recommended further evaluation. In addition, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation.

The GALL Report indicates that further evaluation should be performed for the aging effects discussed in the following sections.

3.5.2.2.1 Containments

Aging of Inaccessible Concrete Areas. The GALL Report recommends further evaluation of programs to manage aging effects in inaccessible concrete areas of PWR and BWR containments. Possible effects due to leaching of calcium hydroxide and aggressive chemical attack are cracking, spalling, and increases in porosity and permeability. Possible effects due to corrosion of embedded steel in PWR concrete and steel containments, BWR Mark II concrete containments, and Mark III concrete and steel containments are cracking, spalling, loss of bond, and loss of material. Both Dresden and Quad Cities have BWR Mark I steel containments; therefore, aging of inaccessible concrete areas does not apply.

Cracking, Distortion, and Increases in Component Stress Level due to Settlement and Reduction of Foundation Strength Due to Erosion of Porous Concrete Subfoundations, If Not Covered by Structures Monitoring Program. The GALL Report recommends aging management of (1) cracking, distortion, and increases in component stress level due to settlement for PWR concrete and steel containments, BWR Mark II concrete containments, and BWR Mark III concrete and steel containments, and (2) reduction of foundation strength due to erosion of porous concrete subfoundations for all types of PWR/BWR containments. If a dewatering system is relied upon for control of settlement and erosion, then proper functioning of the dewatering system should be monitored for the period of extended operation. The GALL Report also recommends further evaluation of cracks, distortion, and increase in component stress level due to settlement for Groups 1–3, 5, and 7–9 Class I structures and reduction of foundation strength due to erosion of porous concrete subfoundation for Groups 1–3 and 5–9 Class I structures.

Both Dresden and Quad Cities have BWR Mark I steel containments. The applicant addresses aging related to settlement and erosion of porous concrete subfoundation for the reactor building (GALL Group 2 structure). For Groups 1–3, 5, and 7–9 structures, the applicant states in LRA Section 3.5.1.1.1 that cracks, distortion, and increase in component stress level due to settlement are not applicable to Dresden and Quad Cities concrete structures, and no aging management is required. The Dresden and Quad Cities licensing basis does not include a program to monitor concrete for settlement nor is a dewatering system in place. Dresden and Quad Cities structures are founded on rock or naturally compacted soil with no documented changes in groundwater conditions or a history of settlement. Dresden and Quad Cities evaluations of Information Notices 97-11 and 98-26 concluded that no porous materials were used.

In LRA Table 3.5-1, Reference No. 3.5.1.25 and 3.5.1.26, the applicant credits the Structures Monitoring Program (B.1.30) for managing aging due to settlement and erosion of porous concrete subfoundation and indicates "Consistent with NUREG-1801." This appears to be inconsistent with the further evaluations presented in LRA Section 3.5.1.1.1. The applicant was requested in RAI 3.5-3 to clarify this apparent inconsistency.

In its response to RAI 3.5-3, the applicant stated the following:

Exelon concurs with the staff assessment of LRA Table 3.5-1, Aging Management References 3.5.1.25 and 3.5.1.26. Each reference should have stated the aging management evaluations were "Exception to NUREG-1801" as defined in section 3.0 of the LRA.

Since the applicant in its response to RAI 3.5-3 has addressed the inconsistency, the staff finds the applicant's response to be acceptable and considers RAI 3.5-3 resolved.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of cracking, distortion, and increase in component stress level due to settlement or reduction of foundation strength due to erosion of porous concrete subfoundations, if not covered by the Structures Monitoring Program, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Reduction of Strength and Modulus of Concrete Structures Due to Elevated Temperature. The GALL Report recommends further evaluation of programs to manage reduction of strength and modulus of concrete structures due to elevated temperature for PWR concrete and steel containments, BWR Mark II concrete containments, and BWR Mark III concrete and steel containments. The GALL Report notes that the implementation of Subsection IWL examinations and 10 CFR 50.55a would not be able to detect the reduction of concrete strength and modulus due to elevated temperature and also notes that no mandated aging management exists for managing this aging effect. The GALL Report also recommends further evaluation of loss of strength and modulus of concrete structures due to elevated temperatures for Groups 1–5 structures.

The GALL Report recommends that a plant-specific evaluation be performed if any portion of the concrete components exceeds specified temperature limits (for example, general temperature 66 °C (150 °F) and local area temperature 93 °C (200 °F)). The staff verifies that the applicant's discussion in the renewal application indicates that the affected components are not exposed to temperatures that exceed the temperature limits (operating temperature less than 66 °C (150 °F), local area temperature less than 93 °C (200 °F)). For concrete components that operate above these temperature limits, the staff reviews the applicant's proposed programs to ensure that the effects of elevated temperature will be managed during the period of extended operation.

Both Dresden and Quad Cities have Mark I steel containments; therefore, aging of concrete due to elevated temperature does not apply to the containments. For Groups 1–5 structures, the applicant states in LRA Section 3.5.1.1.2 that reduction of strength and modulus due to elevated temperature is not applicable for Dresden and Quad Cities concrete structures, and no aging management is required since Dresden and Quad Cities normal operating temperatures are less than 150 °F general and less than 200 °F local. The staff requested in RAI 3.5-4 that the applicant (1) clarify whether the local concrete temperature or the local ambient air temperature was compared to the 200 °F limit and (2) describe what provisions exist to ensure that the concrete surrounding hot piping penetrations does not exceed 200 °F.

In response to RAI 3.5-4, the applicant stated the following:

The Dresden and Quad Cities Groups 1–5 concrete structures were installed in accordance with ACI 349-85, Code Requirements for Nuclear Safety-related Concrete Structures, Appendix A. The operating temperature limits associated with these structures are consistent with the guidance provided in NUREG 1801 (which states that temperatures shall not exceed 150 °F except for local areas which are allowed to have increased temperature not to exceed 200 °F).

All hot pipe penetrations at Dresden and Quad Cities Nuclear Power Stations are designed such that the local area ambient temperature near the surrounding concrete does not exceed 200 °F. Hot pipe air gaps through wall penetrations are large enough by design to maintain the area concrete temperature below 200 °F. Dresden and Quad Cities normal operating ambient temperature limits do not exceed 150 °F. The following provisions exist to ensure that the local area temperature near concrete surrounding the hot piping penetrations do not exceed 200 °F.

Penetration sleeves are designed and installed to maintain the area concrete temperature below 200 °F, based on the penetrating piping temperature.

The Drywell Coolers support the Primary Containment by maintaining the Primary Containment bulk temperature within limits during normal operation (an average temperature of approximately 135 °F).

The staff finds that appropriate design provisions to ensure that concrete does not exceed prescribed American Concrete Institute code limits are identified in the applicant's response. However, the statement "The Dresden and Quad Cities Groups 1–5 concrete structures were installed in accordance with ACI 349-85, Code Requirements for Nuclear Safety-related Concrete Structures, Appendix A" appears to be incorrect, given the dates of first commercial operation for these units. Although the staff finds that the applicant has implemented the appropriate design provisions to ensure that the concrete does not exceed the ACI code limits, the applicant was requested to identify the correct code of record and the temperature limits prescribed in that code. In a letter dated December 5, 2003, the applicant stated that Dresden and Quad Cities Groups 1–5 concrete structures were designed to ACI 318-63, Building Code requirements for reinforced concrete. The ACI 318-63, Building Code does not address susceptibility of concrete to aging effects associated with elevated temperatures. Appendix A to ACI 349-85 is specifically cited by NUREG-1801 as providing temperature criteria to be used in determining the susceptibility of concrete to aging effect. The applicant used the criteria of ACI 349-85 code to assess the temperature aging effect for Dresden and Quad Cities concrete. The staff finds the applicant's response acceptable and considers RAI 3.5-4 resolved.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of reduction of strength and modulus of concrete structures due to elevated temperatures, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Loss of Material Due to Corrosion in Inaccessible Areas of Steel Containment Shell or Liner Plate. The GALL Report identifies programs to manage loss of material due to corrosion of the steel containment shell or the steel liner plate for all types of PWR and BWR containments. The AMP consists of ASME Section XI, Subsection IWE, and the requirements of 10 CFR 50.55a for inaccessible areas. Subsection IWE exempts from examination portions of the containments that are inaccessible, such as embedded or inaccessible portions of steel liners and steel containment shells, piping, and valves penetrating or attaching to the containment.

To cover the inaccessible areas, 10 CFR 50.55a(b)(2)(ix) requires that the licensee shall evaluate the acceptability of inaccessible areas when conditions exist in accessible areas that could indicate the presence of, or result in, degradation to such inaccessible areas. In addition, the GALL Report recommends further evaluation of plant-specific programs to manage the

aging effects for inaccessible areas if specific criteria defined in the GALL Report cannot be satisfied. The staff reviewed the applicant's proposed AMP to verify that, where appropriate, an effective inspection program has been developed and implemented to ensure that the aging effects in inaccessible areas are adequately managed.

Section 3.5.1.1.3 of the LRA provides information on the AMR of loss of material due to corrosion in inaccessible areas of the steel containment shell for both Dresden and Quad Cities. The applicant provided the following information to address the criteria defined in the GALL Report:

- Corrosion of containment steel elements in inaccessible areas will be confirmed as insignificant in accordance with AMP ASME Section XI, Subsection IWE (B.1.26).
- Since Dresden Unit 3 had more water leakage in the sand pocket area than Quad Cities and Dresden Unit 2, ultrasonic test examinations were performed on Dresden Unit 3 sand pocket area in 1988. The examinations indicated that significant corrosion was not occurring, and it was concluded that corrosion is insignificant at Dresden Unit 2 and Quad Cities as well. A UT examination of the same locations at Dresden Unit 3 is conducted as an augmented inspection in accordance with AMP ASME Section XI, Subsection IWE (B.1.26) to confirm that significant corrosion is not occurring.
- A general visual inspection of the moisture barrier at the junction of the steel drywell shell and the concrete floor is performed once each inspection period in accordance with AMP ASME Section XI, Subsection IWE (B.1.26).
- Dresden and Quad Cities documentation demonstrates that concrete meeting the requirements of ACI 318-63 and the guidance of ACI 201.2R-77 was used for the concrete in contact with the embedded drywell shell at the sand pocket location. The concrete is monitored for penetrating cracks that provide a path for water seepage in accordance with Structures Monitoring Program (B.1.30).

In RAI 3.5-5, the staff requested the following additional information regarding this review:

- (a) How was it determined that Dresden Unit 3 had more leakage in the drywell sand pocket area than Dresden Unit 2 and Quad Cities?
- (b) Define the quantitative basis for concluding that "significant corrosion was not occurring" in Dresden Unit 3.
- (c) What is the technical basis for concluding that corrosion in the sand pocket area is insignificant at Dresden Unit 2 and Quad Cities?
- (d) What controls exist on all four units to limit future leakage into the sand pocket areas, and how will the leakage be monitored?
- (e) What were the results of the augmented inspection of the sand pocket area for Dresden Unit 3, which was scheduled for the second half of 2002?
- (f) How often will the augmented UT inspection of the sand pocket area be conducted for Dresden Unit 3, and what is the basis for not conducting similar inspections for Dresden Unit 2 and Quad Cities?
- (g) It is stated that a general visual inspection of the moisture barrier at the junction of the steel drywell shell and the concrete floor is performed once each inspection period in accordance with the B.1.26 AMP. Is the inspection conducted each inspection period for

all four units? If not, explain why not.

- (h) Confirm that the concrete floor inside the drywell of all four units (1) meets "the requirements of ACI 318-63 and the guidance of ACI 201.2R-77" and (2) "is monitored for penetrating cracks that provide a path for water seepage in accordance with Structures Monitoring Program (B.1.30)." This is the staff's interpretation of the fourth paragraph of LRA Section 3.5.1.1.3.

In response to RAI 3.5-5, the applicant stated the following:

- (a) Dresden Unit 3 had significant quantities of water introduced to the drywell annulus to extinguish a fire in the drywell expansion foam. Additionally, the sand pocket drain lines were found to be clogged at Dresden Units 2 and 3 when performing the initial investigation in response to Generic Letter 87-05. When the drain lines were unclogged, there was water present in the sand pocket region of both units. At Quad Cities, both units had three of the four drain lines essentially dry and unplugged. This information was provided to the NRC in response to Generic Letter 87-05 and is the only information that could be found in the current licensing basis. Additional information provided in responses (b) through (h) below provide justification for concluding that Dresden Unit 3 is the most limiting of the units with respect to leakage.
- (b) The design of the containment vessel is such that margin exists between the required shell thickness and the actual thickness of steel plate provided. A reevaluation of the required shell thickness (based on loads and data compatible with the original certified containment vessel stress report by Chicago Bridge & Iron Company) was performed on the containment shell in the region of the sand pocket. The thickness of the plates in the sand pocket region may be reduced to approximately 1/4-inch below nominal and still be within ASME Code allowable stress limits. In response to IE Information Notice 86-99 and NRC Generic Letter 87-05, an extensive review was conducted of the potential for drywell steel corrosion in the area of the containment sand pocket. This review included an evaluation of the actual plate thickness at Dresden Unit 3. Ultrasonic Test (UT) results indicated that in over 18 years of operation of Dresden Unit 3, no detrimental corrosion occurred in the drywell steel plate at the sand pocket level. This conclusion was further supported by the fact that all of the thickness measurements were greater than the nominal 1.0625-inch thickness. The initial drywell plate thickness measurements along with subsequent thickness measurements are shown in the table below. The initial thickness measurements supported the conclusion that significant corrosion was not occurring.

Dresden Unit 3 Drywell Liner UT Thickness Measurements (Sand Pocket Region)
Sample

Location	1988 Measurement Inches	1997 Measurement Inches	1999 Measurement Inches	2000 Measurement Inches	2002 Measurement Inches
1.12	1.15	1.1	1.12	1.13	112.5.1.1A
1.12	1.12	1.09	1.08	1.09	112.5.1.1B
1.1	1.12	1.12	1.09	1.07	112.5.1.2A
1.08	1.08	1.08	1.12	1.13	112.5.1.2B
1.14	1.2	1.15	1.17	1.18	157.5.1.1A
1.14	1.16	1.14	1.15	1.11	157.5.1.1B
1.14	1.18	1.14	1.14	1.13	157.5.1.2A
1.12	1.16	1.11	1.1	1.12	157.5.1.2B
1.08	1.09	1.1	1.11	1.13	202.5.1.1A
1.08	1.1	1.08	1.1	1.11	202.5.1.1B
1.1	1.12	1.08	1.12	1.09	22.5.1.1A
1.14	1.1	1.12	1.15	1.12	22.5.1.1B

1.18	1.14	1.09	1.07	1.09	22.5.1.2A
1.1	1.12	1.1	1.06	1.04	22.5.1.2B
1.18	1.16	1.1	1.08	1.1	292.5.1.1A
1.12	1.16	1.12	1.1	1.12	292.5.1.1B
1.12	1.12	1.08	1.09	1.10	292.5.1.2A
1.26	1.12	1.12	1.14	1.15	292.5.1.2B
1.2	1.17	1.15	1.16	1.15	337.5.1.1A
1.08	1.11	1.1	1.09	1.09	337.5.1.1B
1.12	1.14	1.12	1.08	1.04	337.5.1.2A
1.24	1.12	1.09	1.06	1.08	337.5.1.2B

- (c) In response to IE Information Notice 86-99 and NRC Generic Letter 87-05, an extensive review was conducted of the potential for drywell steel corrosion in the area of the containment sand pocket. This review included an evaluation of the actual plate thickness at Dresden Unit 3. Ultrasonic Test (UT) results indicated that in over 18 years of operation of Dresden Unit 3, no detrimental corrosion occurred in the drywell steel plate at the sand pocket level. This conclusion was further supported by the fact that all of the thickness measurements were greater than the nominal 1.0625-inch thickness. These results have been obtained in spite of the fact that substantial moisture has previously been found in the sand pocket.

Since the as-found material thickness in Dresden Unit 3 was greater than or equal to design thicknesses, there was no reason to expect a reduction in thickness on Dresden Unit 2. A surveillance procedure had been established to monitor sand pocket drain lines during refuel activities and analysis of water samples taken from the lines reflected a non-corrosive environment.

At Quad Cities, the drywell sand pocket detail is identical to the Dresden detail. The moisture found at the [in the] sand pocket drains during inspections around the same time period as Dresden in the late 1980s was considered negligible in comparison to Dresden Unit 3. Therefore, it was not expected that any corrosion had occurred at either Quad Cities unit and the ongoing surveillance program will ensure active assessment of future potential problems. No leakage through the drywell liners was detected during the most recent refuel outage inspections following cavity flood-up. Accordingly, Quad Cities continues to be bounded by the routine UT results from Dresden Unit 3.

- (d) No special controls exist at either station for limiting leakage. Formal inspections occur at each station during refuel outages that monitor for leakage from the sand pocket drains following reactor cavity flood-up. Corrective action is taken based on the results of these inspections.
- (e) The results of the last four Dresden Unit 3 drywell wall thickness measurements are provided in the table shown above in the response to question (b). The augmented inspection completed in October 2002 on Dresden Unit 3 was evaluated as acceptable with no drywell liner degradation noted. The design of the containment vessel is such that margin exists between the required shell thickness and the actual thickness of steel plate provided. The thickness of the plates in the sand pocket region may be reduced to approximately 1/4-inch below nominal (1.0625 inch) and still be within ASME Code allowable stress limits. As shown in the table, all of the thickness measurements remain above the minimum wall thickness allowed.
- (f) The augmented UT inspection for Dresden Unit 3 is currently completed every refueling outage. The frequency of future examinations will be evaluated based on inspection results. This inspection was specially configured to accommodate UT inspections by drilling 22 core holes for UT measurements. As long as Dresden Unit 3 remains the bounding condition for corrosion potential, there is no need to drill holes and conduct routine UT measurements on the remaining three units.

- (g) A general visual inspection of the moisture barrier at the junction of the steel drywell shell and the concrete floor is performed once each inspection period for Dresden Units 2 and 3 and once each inspection interval for both Quad Cities units. The difference in the two inspection periods is attributed to the ASME Section XI Code edition in effect at each plant. Dresden performs this inspection in accordance with the 1998 Edition of ASME Section XI and Relief Request MCR-02. Quad Cities performs the [inspection] in accordance with the 1992 Edition of ASME Section XI, 1992 Addenda, Table IWE-2500-1. The original Quad Cities drywell moisture barriers in both units were replaced during outages in the year 2002 due to age degradation.
- (h) The concrete floor inside the drywell of all four units (1) was designed per ACI 318-63 and meets the guidance of ACI 201.2R-77 and (2) is periodically monitored for penetrating cracks that provide a path for water seepage, in accordance with the Structures Monitoring Program (B.1.30).

The staff's detailed evaluation of parts (a) through (f) of this RAI response is documented in the Dresden SER Section 4.7.2.2, TLAA for Degradation Rates of Inaccessible Exterior Drywell Plate Surfaces. The staff finds the applicant's response to parts (g) and (h) of RAI 3.5-5 to be acceptable on the basis that it is consistent with the guidance provided in the GALL Report for aging management of the inside surface of the embedded portion of the containment shell.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of loss of material due to corrosion in inaccessible areas of the steel containment shell or liner plate, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Loss of Prestress Due to Relaxation, Shrinkage, Creep, and Elevated Temperature. The GALL Report identifies loss of prestress due to relaxation, shrinkage, creep, and elevated temperature for PWR/BWR Mark II prestressed concrete containments as a TLAA to be performed for the period of license renewal.

As the applicant notes in LRA Section 3.5.1.1.9, both Dresden and Quad Cities have BWR Mark I steel containments; therefore, this aging effect does not apply.

Cumulative Fatigue Damage. If included in the CLB, fatigue analyses of containment steel liner plates and steel containment shells (including welded joints) and penetrations (including penetration sleeves, dissimilar metal welds, and penetration bellows) for all types of PWR and BWR containments and BWR vent headers and downcomers are TLAA's as defined in 10 CFR 54.3. The TLAA's are required to be evaluated in accordance with 10 CFR 54.21(c).

In LRA Section 3.5.1.1.4, the applicant states that fatigue analyses of BWR Mark I and Mark II containment steel elements, penetration sleeves, and penetration bellows are TLAA's as defined in 10 CFR 54.3. Dresden and Quad Cities are Mark I containments. Cumulative fatigue damage of BWR Mark I containment steel elements, penetration sleeves, and penetration bellows is required to be evaluated in accordance with 10 CFR 54.21(c). The TLAA evaluation of cumulative fatigue damage is addressed in LRA Section 4.6. The staff evaluation of this TLAA is addressed in SER Section 4.6.

Cracking Due to Cyclic Loading and Stress-Corrosion Cracking. The GALL Report

recommends further evaluation of programs to manage cracking of containment penetrations (including penetration sleeves, penetration bellows, and dissimilar metal welds) due to cyclic loading or SCC for all types of PWR/BWR containments. A similar recommendation for further evaluation of programs to manage cracking of vent line bellows, vent headers, and downcomers due to SCC is also provided for BWR containments. Containment ISI and leak rate testing may not be sufficient to detect cracks. The staff evaluated the applicant's proposed programs to verify that adequate inspection methods will be implemented to ensure that cracks are detected.

In LRA Section 3.5.1.1.4, the applicant addressed cracking due to cyclic loading as a TLAA for both Dresden and Quad Cities (see the discussion in SER Section 3.5.2.2.1). In LRA Section 3.5.1.1.5, the applicant provided the following information to address the criteria defined in the GALL Report related to cracking due to SCC:

For Mark 1 containment steel elements and stainless steel containment penetrations (NUREG-1801, Items II.B1.1.1-d, and II.B4.1-d), stress corrosion cracking (SCC) is a concern for dissimilar metal welds, exposed to a corrosive environment. These components are in a sheltered environment, outside containment and inside the reactor building, and are not exposed to a corrosive environment. Therefore, existing requirements for Appendix J leak rate testing (B.1.28) and containment ISI plan surface inspections, in accordance with ASME Section XI, Subsection IWE (B.1.26), are adequate to detect cracking. In addition, other factors associated with SCC with regard to temperature, pressure, and concentrated chlorides are not at threshold levels at the installed locations.

ASME Section XI, Subsection IWE weld examination categories E-B and E-F have been removed from the ASME Section XI, 1998 Edition. Both of these weld categories are considered to be part of the containment boundary surface in the current Dresden Containment Inservice Inspection (CISI) Program (ASME Section XI, Subsection IWE 1998 Edition) and Quad Cities CISI Programs and are subject to the examination requirements of Category E-A.

Based on information provided in LRA Section 2.4 and referenced UFSAR sections, stainless steel expansion bellows are utilized in (1) primary containment mechanical penetrations, (2) vent line-to-suppression chamber connections, (3) the reactor vessel-to-drywell refueling seal, and (4) the drywell-to-reactor building refueling seal. The LRA specifically identifies the containment penetration and vent line bellows. The staff recognizes that loss of material due to general corrosion is not an applicable aging effect for stainless steel. However, stainless steel bellows and associated dissimilar metal welds are potentially susceptible to cracking due to SCC when exposed to certain environmental conditions. Degradation of stainless steel bellows has occurred at nuclear power plants; consequently, close attention to loss of intended functions is warranted.

In LRA Section 3.5.1.1.5, the applicant has indicated that the stainless steel bellows at Dresden and Quad Cities do not require augmented aging management beyond general visual examination conducted under IWE Examination Category E-A and Appendix J leak rate testing. The staff position is that the potential for cracking exists; that a crack would not be detected by a general visual examination (i.e., VT-3) before intended function is compromised; and that more detailed examination (e.g., IWE 1992 Examination Categories E-B and E-F) is warranted.

To complete its evaluation of the applicant's conclusion that augmented inspection of stainless steel bellows and associated dissimilar metal welds is not necessary at Dresden and Quad Cities, the applicant was requested, in RAI 3.5-6, to submit the following information for all four units covered by this LRA:

- (a) a detailed description of plant-specific operating experience for all stainless steel bellows

(including any not within the scope of license renewal that serve a similar function in a similar environment), identifying all specific incidences of degradation, how degradation was detected, the root cause, corrective actions taken, and current inspection procedures

- (b) the environment (temperature, pressure, humidity, presence of aggressive agents) to which stainless steel bellows are exposed, both on a continuing basis and on a periodic or intermittent basis
- (c) identification of the applicable aging effects requiring management for stainless steel bellows at Dresden and Quad Cities
- (d) the detailed technical basis, including identification of supporting reference material, for concluding that Appendix J leak rate testing and IWE Examination Category E-A general visual inspection are sufficient for managing aging of stainless steel bellows

In its response to RAI 3.5-6, the applicant stated the following:

Expansion bellows are used at Quad Cities and Dresden on primary containment mechanical penetrations, vent line-to-suppression chamber connections, on extraction steam piping that penetrates the turbine casings, and as a refueling cavity area seal during flood up for refueling. The information that follows is provided to address stainless steel bellows assemblies and their attachment welds.

- (a) The refueling bellows are made of stainless steel and are not in scope of license renewal. Justification for excluding the refueling bellows from the scope of license renewal is discussed in the response to RAI 2.4.3. The refueling bellows experience a different environment and have a different function. As such, they are excluded from further discussion.

Extraction steam piping bellows are made of Inconel and experience different environments than the primary containment penetration bellows. Additionally, the extraction steam piping bellows are not included in the scope of license renewal. For these reasons, they are excluded from further discussion.

Expansion bellows are installed on the Dresden and Quad Cities primary containment mechanical penetrations on the following process lines. The list includes the vent line-to-suppression chamber connections. All of the mechanical penetration expansion bellows are in scope of license renewal.

- (1) Main Steam (4 per unit)
- (2) Steam Line Drain (1 per unit)
- (3) Feedwater (2 per unit)
- (4) RCIC Steam Supply (1 per unit, at Quad Cities only)
- (5) Isolation Condenser Steam Supply (1 per unit, at Dresden only)
- (6) Isolation Condenser Condensate (2 per unit, at Dresden only)
- (7) Shutdown Cooling Suction (2 per unit, at Dresden only)
- (8) RHR Suction from Reactor (1 per unit, at Quad Cities only)
- (9) LPCI Injection (2 per unit, at Dresden only)
- (10) RHR Injection (2 per unit, at Quad Cities only)
- (11) Reactor Water Clean Up Supply (1 per unit)
- (12) HPCI Steam Supply (1 per unit)
- (13) RBCCW Supply (1 per unit)
- (14) RBCCW Return (1 per unit)
- (15) Vent from Drywell (1 per unit)
- (16) Vent to Drywell (1 per unit)
- (17) Core Spray Injection (2 per unit)

- (18) Standby Liquid Control Injection (1 per unit)
- (19) Head spray (1 per unit, at Dresden only)
- (20) Drywell to Suppression Chamber Vent Lines (8 per unit)

There have been no recordable indications identified on any bellows assemblies or attachment welds at either Dresden or Quad Cities utilizing Examination Category E-A, Containment Surfaces, of ASME Boiler and Pressure Vessel Code, Subsection IWE.

Degradation was detected on 16 bellows assemblies at Dresden and 8 bellows assemblies at Quad Cities over the history of plant operation while conducting 10 CFR Part 50, Appendix J, testing. The degradation was significant enough to require bellows replacement. Fifteen of the 16 degraded bellows assemblies at Dresden were replaced. One penetration with a degraded bellows assembly at Dresden was sealed inside containment as part of an unrelated modification to remove the return line to the vessel for the control rod drive water. For this reason, replacement of the sixteenth bellows was unnecessary. The eight degraded bellows assemblies at Quad Cities were replaced.

The root cause of the bellows assembly degradation was attributed to cracking due to transgranular stress corrosion cracking (TGSCC). Several degraded bellows that were replaced were metallurgically analyzed. Quad Cities Unit 1 X-16A bellows, replaced in 1984, was found to be contaminated with "magnesium salts." The corrosive species responsible for the crack initiation on Quad Cities Unit 1 X-25 bellows was identified as chlorides, fluorides, and sulfides. Since operating conditions do not introduce these materials, it has been concluded they were most probably introduced during construction. Additionally, the method of bellows manufacturing introduces residual stresses in the bellows. Bellows are cold-formed from cylinders fabricated from sheet stainless steel.

A listing of identified degraded bellows assemblies, Unit, and date replaced is provided below. A discussion of current inspection procedures is included in part (d) to this question.

Penetration	Date	Site, Unit
X-113 (Reactor Water Clean Up Supply)	September, 1990	Dresden, Unit 2
X-105A (Main Steam)	December, 1991	Dresden, Unit 3
X-107B (Feedwater)	March, 1992	Dresden, Unit 3
X-125 (Vent from Drywell)	May, 1993	Dresden, Unit 2
X-149A (Core Spray Injection)	May, 1993	Dresden, Unit 2
X-149B (Core Spray Injection)	May, 1993	Dresden, Unit 2
X-144 (Control Rod Drive Water Return)	Sealed inside drywell	Dresden, Unit 2
X-111A (Shutdown Cooling Suction)	May, 1994	Dresden, Unit 3
X-125 (Vent from Drywell)	May, 1994	Dresden, Unit 3
X-138 (Standby Liquid Control Injection)	May, 1994	Dresden, Unit 3
X-149B (Core Spray Injection)	May, 1994	Dresden, Unit 3
X-108A (Isolation Condenser Steam Supply)	February, 1997	Dresden, Unit 2
X-116A (LPCI Injection)	February, 1997	Dresden, Unit 2
X-126 (Vent to Drywell)	February, 1997	Dresden, Unit 2
X-116B (LPCI Injection)	January, 2003	Dresden, Unit 2
X-124 (RBCCW Return)	January, 2003	Dresden, Unit 2
X-16B (Core Spray Injection)	September, 1983	Quad Cities, Unit 2
X-16A (Core Spray Injection)	September, 1984	Quad Cities, Unit 1
X-16B (Core Spray Injection)	November, 1989	Quad Cities, Unit 1
X-12 (RHR Suction from Reactor)	March, 1991	Quad Cities, Unit 1

X-25 (Vent from Drywell)	March, 1991	Quad Cities, Unit 1
X-14 (Reactor Water Clean Up Supply)	May, 1993	Quad Cities, Unit 2
X-7B (Main Steam)	August, 1994	Quad Cities, Unit 1
X-12 (RHR Suction from Reactor)	December, 1996	Quad Cities, Unit 2

- (b) The bellows assemblies are exposed to two environments; inside containment (either drywell or suppression chamber air space) on the inner surface of the bellows, and outside containment on the outer surface of the bellows. Neither environment contains aggressive agents. The environments are further described as follows.

Inside Containment

The drywell is made inert with nitrogen to render the primary containment atmosphere non-flammable by maintaining the oxygen content below 4% by volume during normal operation. The drywell has an average temperature of 135 F during normal operations. The relative humidity in the drywell ranges from 20% - 90%. During normal operation, the drywell pressure is maintained at approximately one psig. The suppression chamber air space above the water level, is also inerted to maintain the oxygen content below 4% by volume during normal operation. The air temperature follows the normal, maximum operating suppression chamber water temperature of 95 F and the relative humidity is between 20 and 90%. During normal operation, the suppression chamber pressure is maintained at approximately zero psig. Periodically, each entire containment is subjected to a pressure of 48 psig during the performance of a 10 CFR Part 50, Appendix J, Type A, Primary Containment Integrated Leak Rate Test (ILRT).

Outside Containment

The Reactor Building (outside the drywell, suppression chamber, and steam tunnel) normal operating area temperatures range from 65 F to 103 F for Dresden and 65 F to 104 F for Quad Cities, with relative humidity ranging from 20% - 90%.

- (a) The applicable aging effects requiring management for stainless steel bellows assemblies at Dresden and Quad Cities are cumulative fatigue damage (NUREG 1801 line II.B4.1-b and LRA Reference 3.5.1.1) and crack initiation and growth due to SCC (NUREG 1801 line II.B4.1-d and LRA Reference 3.5.1.2).
- (b) Based on Dresden and Quad Cities operating experience, there is potential for cracking in the bellows assemblies, but not in the dissimilar welds associated with the assemblies. 10 CFR Part 50, Appendix J testing has been effective in identifying past bellows assembly degradation due to cracking.

The primary containment mechanical penetration expansion bellows assemblies originally installed at Quad Cities and Dresden were each constructed of two-ply of Type 304 Stainless Steel, formed together into a cylindrical corrugated bellows assembly. 10 CFR Part 50, Appendix J Type B LLRT testing was performed on them by pressurizing the volume between the plies. In 1990, Quad Cities discovered that it was not always possible to quantify the bellows assembly leakage rate due to the design and construction of the bellows assemblies. This was reported to the NRC by Exelon and then communicated by the NRC to the industry in IN 92-20. An exemption for certain Type B LLRT testing requirements for Quad Cities and Dresden was requested from the NRC in 1991 and was granted in February, 1992. A revision to the exemption was requested in October 1994, and was granted in February 1995. The exemptions apply to the original two-ply bellows assemblies. As they are replaced, the new bellows fall under the full Type B LLRT testing requirements.

Replacement bellows are single ply. This ply becomes the primary containment pressure boundary. Transition rings are added to the bellows assemblies to allow for the installation of an outer bellows over the first one. The installation of this outer bellows allows for the performance of a Type B LLRT test. Replacement bellows are cold-formed during fabrication, as were the original bellows. To minimize the potential for contamination, installation instructions for the replacement bellows include cleaning the entire outer surface of the inner

bellows after welding of the transition rings, and cleaning of the entire inner and outer surfaces of the outer bellows before it is welded.

Degraded bellows assemblies identified since 1991 were identified utilizing the methodology developed to comply with the exemptions. Briefly, this testing methodology is:

- (a) All two-ply bellows assemblies are pressurized between the plies. Any bellows assembly with leakage measuring 0.5 scfh are further tested with helium.
- (b) The bellows assembly is pressurized between the plies with helium, and the inner and outer plies are sniffed with a helium sniff detector.
- (c) If helium is detected through both plies, the outer ply is examined with penetrant and/or snoop testing. All flaws are measured and mapped.
- (d) All indications are evaluated by Engineering to assess current and projected leakage rates, and for structural integrity.
- (e) The 1992 exemption required a Type A ILRT upon completion of all two-ply testing. The 1995 revision provides the option of performing a test in accordance with Type B LLRT requirements on all bellows assemblies with leaks through both plies, or performing a Type A ILRT.
- (f) The 1992 exemption required that all two-ply bellows assemblies with demonstrated leakage through both plies be replaced during the subsequent refueling outage. There is reasonable assurance that the leaking bellows assemblies will not degrade excessively during this period because TGSCC is characterized by the slow development and propagation of cracks. The 1995 revision provides the option of performing a test in accordance with Type B LLRT requirements to demonstrate license limits are met or replacing the bellows assemblies. The bellows assembly welds at Dresden and Quad Cities are inspected utilizing Examination Category E-A, Containment Surfaces, of ASME Boiler and Pressure Vessel Code, Subsection IWE.

Based on the applicant's response to part (a) of this RAI, there are a total of 120 bellows within the scope of license renewal (32 for each Dresden unit; 28 for each Quad Cities unit). Of the 120 total, 24 bellows have been identified as degraded due to transgranular stress-corrosion cracking (TGSCC) over the period September 1990 through January 2003 and have been replaced (23) or taken out of service (1). The applicant states in part (d) of its response, "Degraded bellows assemblies identified since 1991 were identified utilizing the methodology developed to comply with the exemptions."

Since there are 96 original bellows still in place, and the period of extended operation will begin in approximately 10 years, it is not clear to the staff that reliance on Appendix J Leak Rate Testing and IWE Examination Category E-A to manage aging for license renewal is sufficient, without an additional commitment to continue the pressurized testing methodology described in (1) through (6) under part (d) of the RAI response. In a letter dated December 5, 2003, the applicant stated that it would credit the pressurized testing methodology summarized above in steps (1) through (6) under part (d) of the RAI 3.5.6 response for aging management of bellows during the period of extended operation. This is part of Commitment #26 in Appendix A of this SER. The staff finds the applicant's response acceptable and considers RAI 3.5-6 resolved.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of cracking due to cyclic loading and SCC, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the

period of extended operation, as required by 10 CFR 54.21(a)(3).

Conclusions. The staff has reviewed the applicant's evaluation of the issues for which the GALL Report recommends further evaluation of structural components in containment. On the basis of its review, the staff finds that the applicant has provided sufficient information to demonstrate that the issues for which the GALL Report recommends further evaluation have been adequately addressed and that the subject aging effects will be adequately managed for the period of extended operation.

3.5.2.2.2 Class I Structures

Aging of Structures Not Covered by Structures Monitoring Program. The GALL Report recommends further evaluation of certain structure/aging effect combinations if they are not covered by the Structures Monitoring Program. This includes (1) scaling, cracking, and spalling due to repeated freeze-thaw for Groups 1–3, 5 and 7–9 structures; (2) scaling, cracking, spalling, and increase in porosity and permeability due to leaching of calcium hydroxide and aggressive chemical attack for Groups 1–5 and 7–9 structures; (3) expansion and cracking due to reaction with aggregates for Groups 1–5 and 7–9 structures; (4) cracking, spalling, loss of bond, and loss of material due to corrosion of embedded steel for Groups 1–5 and 7–9 structures; (5) cracks, distortion, and increase in component stress level due to settlement for Groups 1–3, 5 and 7–9 structures; (6) reduction of foundation strength due to erosion of porous concrete subfoundation for Groups 1–3 and 5–9 structures; (7) loss of material due to corrosion of structural steel components for Groups 1–5 and 7–8 structures; (8) loss of strength and modulus of concrete structures due to elevated temperatures for Groups 1–5 structures; and (9) crack initiation and growth due to SCC and loss of material due to crevice corrosion of stainless steel liner for Groups 7 and 8 structures. Further evaluation is necessary only for structure/aging effect combinations not covered by the Structures Monitoring Program.

Technical details of the aging management issue are presented in SER Section 3.5.2.2.1 for items (5), (6) and (8).

The applicant stated in LRA Section 3.5.1.1.6 that the Structures Monitoring Program (B.1.30) is required to manage the following structural aging effects for accessible concrete areas:

- loss of material and cracking due to freeze-thaw of concrete
- increase in porosity and permeability and loss of strength due to leaching of calcium hydroxide of concrete
- increase in porosity and permeability, cracking, and loss of material (spalling, scaling) due to aggressive chemical attack of concrete
- expansion and cracking due to reaction with aggregates of concrete
- cracking, loss of bond, and loss of material (spalling, scaling) due to corrosion of embedded steel [in] concrete

The applicant has included inspection of accessible concrete areas in the scope of its Structures Monitoring Program; therefore, the GALL Report recommends no further evaluation.

In LRA Section 3.5.1.1.6, the applicant also stated that no aging management is required for inaccessible areas:

1. For loss of material and cracking due to freeze-thaw of concrete in inaccessible areas, no aging management is required. Dresden and Quad Cities are located in severe weathering conditions. Dresden and Quad Cities have documented evidence to show that the concrete air content is between 3% and 6%. Plant inspections did not show freeze-thaw degradation. Therefore, loss of material and cracking due to freeze-thaw of concrete in inaccessible areas are not applicable and no aging management is required.
2. For increase in porosity and permeability and loss of strength due to leaching of calcium hydroxide of concrete in inaccessible areas, no plant-specific aging management is required. Dresden and Quad Cities concrete is not exposed to flowing water and there is documented evidence that the concrete used was constructed in accordance with the recommendations in ACI 201.2R-77 for durability. Therefore, increase in porosity and permeability and loss of strength due to leaching of calcium hydroxide of concrete in inaccessible areas are not applicable and no plant-specific aging management is required.
3. For expansion and cracking due to reaction with aggregates of concrete in inaccessible areas, no aging management is required. Dresden and Quad Cities documented evidence demonstrates that the concrete used meets the requirements of ACI 201.2R-77 with no evidence of reactive aggregates. Therefore, expansion and cracking due to reaction with aggregates of concrete in inaccessible areas are not applicable and no aging management is required.
4. For the drywell radial beam lubrite baseplates, aging management of loss of material due to galvanic corrosion, lock-up or wear of lubrite baseplates will be performed by One-Time Inspection (B.1.23). The torus saddle support lubrite baseplates will be visually inspected to verify unacceptable loss of material due to galvanic corrosion, lock-up or wear has not occurred. The drywell radial beam lubrite baseplates and torus saddle support lubrite baseplates are comprised of the same materials and are exposed to similar environments. The drywell radial beam lubrite baseplates are not accessible for inspection; therefore the inspection of the torus saddle support lubrite baseplates will be used as a representative inspection for aging of the drywell radial beam lubrite baseplates.

The staff finds that the technical bases for the conclusions in items (1) through (3) above are consistent with the GALL Report and, therefore, require no further evaluation.

Concerning loss of material in drywell radial beam lubrite baseplates (item (4) above), the staff requested, in RAI 3.5-7, the following additional information:

- (a) Describe the prior operating experience of the torus saddle support lubrite baseplates. Under what program have they been inspected? Are lubrite baseplates used at any other locations in Dresden and Quad Cities? If so, what has been the operating experience?
- (b) The torus saddle support lubrite baseplates are covered under GALL Item III B1.3.2-a, and it is expected that they would be managed by ASME Section XI, Subsection IWF. This GALL item is part of LRA Table 3.5-1, Reference No. 3.5.1.31, which states that Dresden and Quad Cities is consistent with GALL, with one exception. The only exception discussed in LRA Table 3.5-1 for this item pertains to aging of downcomer bracing. Explain why aging management of loss of material due to galvanic corrosion, lockup or wear of the torus saddle support lubrite baseplates will be performed by One-Time Inspection (B.1.23) and not by ASME Section XI, Subsection IWF (B.1.27).
- (c) What is the sample size for the inspection of the torus saddle support lubrite baseplates that will be used to confirm the condition of the inaccessible drywell radial beam lubrite baseplates?

- (d) Confirm that all radial beam lubrite baseplates inside the drywell are inaccessible, and explain the conditions that make them inaccessible.
- (e) Discuss the environments that the torus saddle support lubrite baseplates and the drywell radial beam lubrite baseplates are exposed to and explain why they are considered to be similar.

In its response to RAI 3.5-7, the applicant stated the following:

Exelon has reviewed the LRA Section 3.5.1.1.6 and the following additional information is provided for clarification.

- (a) The torus saddle support lubrite baseplates have not been inspected to date and are currently not included in the ASME Section XI, Subsection IWF aging management program. Exelon will revise this program to include the torus saddle support lubrite baseplates. However, this program will not be revised before the end of the current 10-year ISI program interval expires. To ensure that a baseline inspection is performed before the current operating license expires, a one-time inspection of the torus saddle support lubrite baseplates will be performed. This initial inspection will be performed under aging management program, B.1.23, One-Time Inspection. It will be replaced by aging management program B.1.7, ASME Section XI, Subsection IWF, once it has been revised and approved by the NRC.

A historical review of the Exelon corrective action program did not identify any problems with the torus saddle support lubrite baseplates. These plates are used on the torus column supports and other piping systems and component supports to reduce friction between sliding supports and the bearing plates.

- (b) As stated above in item (a), torus saddle support lubrite baseplates will be managed by ASME Section XI, Subsection IWF, and are addressed under NUREG 1801 Item III.B.1.3.1-a in the aging management review. The torus saddle support lubrite baseplates are addressed in LRA Section 2.4.15, Table 2.4-15, under Component Group "Sliding Surfaces". LRA Table 3.5-1, Aging Management Reference 3.5.1.31, discusses the aging management of the saddle support lubrite baseplate. A sample of the torus saddle support lubrite baseplates has been selected for a one time inspection that is representative of the inaccessible drywell radial beam lubrite baseplates. The lubrite baseplates are addressed in LRA Section 2.4.1, Table 2.4-1, under Component Group "Beam Seats" requiring aging management.
- (c) The one-time inspection of the torus saddle support lubrite baseplate sample will consist of one saddle support baseplate located in a dry area of the Reactor Building basement. An additional inspection will be performed on a saddle support lubrite baseplate in an area that has experienced water exposure, if such a location can be found. Otherwise, a second dry area inspection will be performed.
- (d) The drywell lubrite bearing plates are hidden behind the base plates of the radial floor beams located on the main floor of the drywell. These radial floor beams are located between the reactor vessel biological shield and the drywell shell and provide structural support for the main floor grating and major components located on that elevation. Removal of the radial floor beams would jeopardize the structural integrity of the attached equipment. For this reason, the primary containment radial lubrite beams are considered inaccessible.
- (e) The drywell radial beam lubrite baseplates are exposed to the Inside Drywell Environment. The drywell is made inert with nitrogen to render the primary containment atmosphere non-flammable by maintaining the oxygen content below 4% by volume during normal operation. The drywell has an average temperature of 135 /F during normal operation. The relative humidity in the drywell ranges from 20% - 90%.

The torus saddle support lubrite baseplates are exposed to the Outside Drywell Environment which is identical to that found in the Reactor Building. The Reactor Building (which includes the area containing the torus saddle supports) normal operating area temperatures range from 65 F to 103 F for Dresden and 65 F to 104 F for Quad Cities with relative humidity ranging from 20% - 90%.

The drywell radial beam lubrite baseplates are exposed to a milder environment than the torus saddle support lubrite baseplates because of the lack of oxygen in the nitrogen-inerted environment. The temperature of the Inside Drywell Environment is constant during power operation, reducing the likelihood of condensation accumulation on the steel components. The higher temperature itself is not detrimental to the steel components. For this reason, the torus saddle support lubrite baseplates are considered to be representative and bounding of the drywell radial beam lubrite base plates.

Given the inaccessibility of the radial beam seats, the staff considers the applicant's approach to be an acceptable alternative to direct inspection. This is part of Commitment #23 of Appendix A of this SER. Therefore, RAI 3.5-7 is resolved.

The "Discussion" column of LRA Table 3.5-1, Reference No. 3.5.1.20, states that "Dresden and Quad Cities do not use stainless steel lined, carbon steel tanks as evaluated in NUREG-1801, line III.A8.2-a." The staff notes that NUREG-1801, line III A8.2-a, addresses loss of material due to corrosion for unlined carbon steel tanks, and that NUREG-1801, line III A8.2-b, addresses stainless steel liners in steel tanks. The "Discussion" column of LRA Table 3.5-1, Reference No.3.5.1.28, states that "Dresden and Quad Cities do not use steel tanks lined with stainless as identified in NUREG-1801, line III.A8.2-b."

Based on the information provided in LRA Table 3.5-1, the staff cannot determine (1) whether any unlined carbon steel tanks are included in the license renewal scope; and (2) if so, where the AMR results are located in the LRA. The applicant was requested in RAI 3.5.8 to identify any unlined carbon steel tanks in the license renewal scope and, if applicable, to describe the AMR and the credited AMPs.

In its response to RAI 3.5-8, the applicant stated the following:

The statement "Dresden and Quad Cities do not use stainless steel lined, carbon steel tanks as evaluated in NUREG-1801, line III.A8.2-a" in LRA Table 3.5-1, Aging Management Reference 3.5.1.20, was inadvertently placed in this line entry.

Tanks are evaluated with the primary system in which they were installed. Some examples of carbon steel tanks can be found in LRA Table 2.3.2-1, High Pressure Coolant Injection, LRA Table 2.3.2-3, Containment Isolation Components and Primary Containment Piping System, and LRA Table 2.3.3-6, Emergency Diesel Generator and Auxiliaries. None of the LRA Chapter 2 component tables requiring aging management containing tanks are linked to Chapter 3 Aging Management Reference 3.5.1.20.

In its RAI response, the applicant also identified a revision to LRA Table 3.5.1, Reference No. 3.5.1.20, removing the statement in the "Discussion" column. The staff verified that all tanks are evaluated with the primary system in which they are installed, and that there are no AMR references to entry 3.5.1.20 in LRA Table 3.5-1. This review confirmed the applicant's assertion that, with one exception, the Radwaste Floor Drain Surge Tank is included in the structures scope (LRA Section 2.4.9) and is evaluated as a structure (AMR reference LRA Table 3.5-1). Therefore, RAI 3.5-8 is resolved.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results

involving management of aging of structures not covered by the Structures Monitoring Program, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Aging Management of Inaccessible Areas. The GALL Report recommends further evaluation of aging management for inaccessible concrete areas, such as foundation and exterior walls below grade exposed to ground water, if specific criteria defined in the GALL Report cannot be satisfied. The staff reviewed the AMP to ensure that the intended functions will be maintained during the period of extended operation. The degradations managed are cracking, spalling, and increases in porosity and permeability due to aggressive chemical attack; and cracking, spalling, loss of bond, and loss of material due to corrosion of embedded steel for Group 1– 3, 5, and 7–9 structures.

In LRA Section 3.5.1.1.7, the applicant stated that no plant-specific aging management is required to manage the following structural aging effects for inaccessible areas:

- increase in porosity and permeability, cracking, and loss of material (spalling, scaling) due to aggressive chemical attack of concrete
- cracking, loss of bond, and loss of material (spalling, scaling) due to corrosion of embedded steel of concrete.

To support this conclusion, the applicant states in LRA Section 3.5.1.1.7 that Dresden and Quad Cities ground- water test data obtained during construction, and for the 1980's, 1990's, and 2000's shows that the below-grade environment is not aggressive based on NUREG-1801 criteria (chlorides less than 500 ppm, sulfates less than 1500 ppm, and pH greater than 5.5). Examination of representative samples of below- grade concrete, when excavated for any reason, is included as part of the Structures Monitoring Program. To ensure conditions are maintained throughout the period of extended operations, the Structures Monitoring Program will be enhanced to include monitoring of below-grade water chemistry to demonstrate that the environment remains non-aggressive. Existing plant procedures will be used to periodically sample pH, chlorides, and sulfates.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of aging management of inaccessible areas, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Conclusions. The staff has reviewed the applicant's evaluation of the issues for which the GALL Report recommends further evaluation of Class I structures. On the basis of its review, the staff finds that the applicant has provided sufficient information to demonstrate that the issues for which the GALL Report recommends further evaluation have been adequately addressed and that the subject aging effects will be adequately managed for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5.2.2.3 Component Supports

Aging of Supports Not Covered by Structures Monitoring Program. The GALL Report recommends further evaluation of certain component support/aging effect combinations if they are not covered by the Structures Monitoring Program. This includes (1) reduction in concrete anchor capacity due to degradation of the surrounding concrete, for Groups B1—B5 supports; (2) loss of material due to environmental corrosion, for Groups B2 – B5 supports; and (3) reduction/loss of isolation function due to degradation of vibration isolation elements, for Group B4 supports. Further evaluation is necessary only for structure/aging effect combinations that are not covered by the Structures Monitoring Program.

The applicant addressed the above criterion defined in the GALL Report, regarding the need for further evaluation to manage the potential aging of component supports, in LRA Table 3.5-1. In row entry 3.5.1.29 of LRA Table 3.5-1, the applicant stated that it will use its Structures Monitoring Program to manage the aging effects identified above in the preceding paragraph.

Since the applicant is managing the aging effect for the component supports covered by row entry 3.5.1.29 of LRA Table 3.5-1, as recommended by the GALL Report, the staff finds that the applicant has adequately addressed this further evaluation criterion. The staff's evaluation of the applicant's Structures Monitoring Program is found in Section 3.0.3.14 of this SER.

On the basis of its review, the staff finds that the applicant appropriately evaluated AMR results involving management of aging of supports not cover by the Structures Monitoring Program, as recommended in the GALL report. Since the applicant's AMR results are otherwise consistent with the GALL report, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

Cumulative Fatigue Damage due to Cyclic Loading. Fatigue of support members, anchor bolts, and welds for Groups B1.1, B1.2, and B1.3 component supports is a TLAA as defined in 10 CFR 54.3, only if a CLB fatigue analysis exists. The TLAA's are required to be evaluated in accordance with 10 CFR 54.21(c).

In LRA Section 3.5.1.1.8, the applicant states that Dresden and Quad Cities piping and component supports were designed to ASME Section VIII and ANSI USAS B31.1. Dresden Unit 3 ASME III Class I replacement piping was analyzed to Subsection NB, 1980 Edition including Summer 1982 Addenda. None of these codes required formal fatigue analysis of supports or design of supports for fatigue effects. Some ASME III Class MC support components were the subject of fatigue analysis in support of the Mark I "New Loads" program. Cumulative fatigue damage of ASME III Class MC support components is required to be evaluated in accordance with 10 CFR 54.21(c)(1). The TLAA evaluation of the ASME III Class MC support components is addressed in LRA Section 4.6. The staff's evaluation of this TLAA is in DSER Section 4.6 of this SER.

Conclusions. The staff has reviewed the applicant's evaluation of the issues for which the GALL Report recommends further evaluation for component supports. On the basis of its review, the staff finds that the applicant has provided sufficient information to demonstrate that the issues for which the GALL Report recommends further evaluation have been adequately addressed and that the subject aging effects will be adequately managed for the period of

extended operation.

3.5.2.3 Aging Management Programs for Containment, Structures, and Component Supports

In LRA Section 3.5, the applicant credits a total of 10 AMPs to manage the aging effects associated with structures and structural components. Five of the AMPs are credited with managing aging for components in other system groups (common AMPs); and five AMPs are credited with managing aging only for structures and structural components. The staff's evaluations of the common AMPs are provided in the following sections of this SER:

- Water Chemistry Program (B.1.2)—(Section 3.0.3.2)
- Bolting Integrity Program (B.1.12)—(Section 3.0.3.5)
- One-Time Inspection Program (B.1.23) —(Section 3.0.3.10)
- Appendix J, Containment Leak Rate Test Program (B.1.28)—(Section 3.0.3.13)
- Structures Monitoring Program (B.1.30)—(Section 3.0.3.14)

The staff's evaluations of the five AMPs credited with managing aging only for the containment, structures, and component supports are provided in this section of the SER.

3.5.2.3.1 ASME Section XI, Subsection IWE (B.1.26)

Summary of Technical Information in the Application. The Quad Cities program complies with Subsection IWE for steel containments (Class MC) of ASME Section XI, 1992 Edition including 1992 Addenda. The Dresden program utilizes a relief request. The relief request permits utilization of the 1998 Edition of Subsection IWE of ASME Section XI in its entirety instead of the 1992 Edition and Addenda. The applicant states that the ASME Section XI, Subsection IWE aging management program is consistent with the ten elements of aging management program XI.S1, "ASME Section XI, Subsection IWE," specified in NUREG-1801 (GALL), with the following exceptions:

- NUREG-1801 indicates that ASME Section XI, Subsection IWE and the additional requirements specified in 10 CFR 50.55a(b)(2) constitute an existing mandated program applicable to managing aging of a steel containment. The NUREG-1801 evaluation covers both the 1992 Edition with the 1992 Addenda and the 1995 Edition with the 1996 Addenda of ASME Section XI, Subsection IWE, as approved in 10 CFR 50.55a. The Dresden program utilizes a relief request. The Dresden program is based on the 1998 Edition of Subsection IWE of ASME Section XI as provided for in Relief Request MCR-02.
- NUREG-1801 indicates that pressure retaining weld visual examinations and pressure retaining dissimilar metal welds surface examinations are optional. These requirements are not part of the Dresden program because it is based on the 1998 Edition of Subsection IWE of ASME Section XI as provided for in Relief Request MCR-02.
- NUREG-1801 indicates that bolt preload is checked by either a torque or tension test. The Dresden and Quad Cities programs do not provide for checking of bolt preload by either torque or tension test because acceptance is based on Appendix J testing of associated bolted components and general visual examination. This practice is consistent with Dresden Relief Request MCR-02 and Quad Cities Relief Request CR-24.

- NUREG-1801 indicates that the program provides for examination of seals, gaskets and moisture barriers by visual methods prescribed in ASME Section XI, Subsection IWE
- The Dresden program uses Relief Request MCR-02 and the Quad Cities program uses Relief Request CR-21 as the basis for not routinely inspecting seals and gaskets, and the extent of surface examination of moisture barriers. Aging management program 10 CFR Part 50, Appendix J (B.1.28) provides for monitoring of seals and gaskets. Seals and gaskets are inspected only when sealed or gasketed components are disassembled for maintenance. Moisture barriers, which are accessible, are examined for tears, cracks or other damage that would allow intrusion of moisture, using general visual criteria.

As described in LRA Section B.1.26, the ASME Section XI, Subsection IWE aging management program is credited with managing aging of the primary containment for loss of material. The basic program requires visual examination. Limited surface or volumetric examination is conducted when IWE requires augmented examination. It is implemented through station plans and procedures and covers steel containment shells and their integral attachments; containment hatches and airlocks; seals, gaskets and moisture barriers; and pressure-retaining bolting.

The applicant stated that the operating experience of the inservice inspection (ISI) programs at Dresden and Quad Cities, which includes ASME Code, Section XI, Subsection IWE aging management program activities, has not shown any adverse trend of program performance. Periodic self-assessments of the ISI programs have been performed to identify the areas that need improvement to maintain program quality.

Inspections were conducted on Dresden Unit 3 drywell in response to NRC Generic Letter (GL) 87-05, "Request for Additional Information Assessment of Licensee Measures to Mitigate and/or Identify Degradation of Mark I Drywells," and Information Notice 86-99, "Degradation of Steel Containments," which addressed the potential for corrosion of boiling water reactor (BWR) Mark I steel drywells in the "sand pocket region." The results of these inspections and analysis of the results concluded that ultrasonic examinations showed evidence of no apparent corrosion of liner in the "sand pocket region." The conclusions were found to also apply to Dresden Unit 2 and both Quad Cities units, as Dresden Unit 3 conditions were determined to be bounding based on more occasions of moisture in its sand pocket region. Dresden Unit 3 has experienced leakage from the drywell sand pocket drains during refueling outages in 1997 and 2000. As a result, an augmented UT inspection of the Unit 3 drywell sand pocket area is scheduled for the second half of 2002.

The applicant concluded that the ASME Code, Section XI, Subsection IWE aging management program provides reasonable assurance that the loss of material aging effects are adequately managed so that the intended functions of primary containment components are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.26, "ASME Section XI, Subsection IWE", the applicant described its AMP to manage aging of the steel containment. The LRA stated that this AMP is consistent with GALL AMP XI.S1, with the exceptions described above in Section 3.5.2.3.1 of this report. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the exceptions to determine whether the AMP, with the

exceptions, remains adequate to manage the aging effects for which it is credited. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for both Dresden and Quad Cities to determine whether they provide an adequate description of the revised program.

The staff notes that the exceptions described by the applicant are different for Dresden and for Quad Cities; and for each exception, the applicant references a current Relief Request granted by the staff.

The staff position is that current Relief Requests granted by the staff have no bearing on License Renewal commitments, because the basis for the relief request and the period of time during which the relief request is applicable generally will not carry over to the period of extended operation. Consequently, for license renewal the staff expects a commitment to IWE and supplemental requirements consistent with 10 CFR 50.55a. The staff notes that 10 CFR 50.55a was updated in 2002 to include the 1998 edition with the 1999 and 2000 Addenda of Subsection IWE, with the additional requirements of paragraphs (b)(2)(ix) (A), (B), and (F) through (I).

Therefore, the applicant was requested in RAI B.1.26 to (1) describe the extent of its commitment to the IWE requirements specified in the most recent issuance of 10 CFR 50.55a; (2) specifically identify any exceptions taken to these requirements, for the extended period of operation; and (3) submit a detailed technical basis for each exception taken.

In its response to RAI B.1.26 dated October 3, 2002, the applicant stated:

LRA Appendix B.1.26 describes the current "ASME Section XI, Subsection IWE" aging management program and its exceptions as defined by Relief Requests. This program was developed in response to the August 8, 1996 Federal Register posting of the final rulemaking, mandating a comprehensive containment inservice inspection program. This program is valid for 120-month inspection interval. At the end of this 120-month interval, the program must be updated to comply with 10 CFR 50.55a(g)(4)(ii).

Exelon agrees that the current Relief Requests do not have a bearing on the period of extended operation. Based on the requirements of 10 CFR 50.55a(g)(4)(ii), the program will be based on the latest edition and addenda, which is approved by the NRC 12 months prior to the end of the current 120-month inspection interval.

Based on these requirements, the program will be updated by 2008 (prior to the beginning of the extended period of operation) and then again by 2018 and 2028 (both during the period of extended operation).

Exelon will continue to follow the regulations as established in 10 CFR 50.55a, which include a commitment to IWE and the established supplemental requirements.

The additional information provided by the applicant in its RAI response is consistent with the staff's position on Relief Requests. The staff accepts the applicant's commitment for license renewal to IWE and supplemental requirements consistent with 10CFR50.55a. This is part of Commitment #26 in Appendix A of this SER.

Conclusions. On the basis of its review and audit of the applicants program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be

adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.5.2.3.2 ASME Section XI, Subsection IWF (B.1.27)

Summary of Technical Information in the Application. The applicant stated in LRA Section B.1.27 that, with enhancements, the ASME Section XI, Subsection IWF aging management program is consistent with the ten elements of aging management program XI.S3, "ASME Section XI, Subsection IWF," specified in NUREG-1801.

The ASME Code, Section XI, Subsection IWF aging management program is credited for visual examination of component and piping supports within the scope of license renewal for loss of material and loss of mechanical function aging effects. The program is implemented through station procedures, which provide for visual examination of inservice inspection Class 1, 2, and 3 supports in accordance with the requirements of ASME Code, Section XI, Subsection IWF, 1989 Edition and Code Case N-491-1.

The applicant stated that, for license renewal, the program will be enhanced to provide for inspection of Class MC component supports consistent with NUREG-1801, Chapter III, Section B1.3. This enhancement is scheduled for implementation prior to the period of extended operation.

In its discussion on operating experience, the applicant stated that the operating experience of the inservice inspection (ISI) programs at Dresden and Quad Cities, which include ASME Section XI, Subsection IWF aging management program activities, has not shown any adverse trend of program performance. Periodic self-assessments of the ISI programs have been performed to identify the areas that need improvement to maintain program quality.

The applicant concluded that the aging management program provides reasonable assurance that the loss of material and loss of mechanical function aging effects are adequately managed so that the intended functions of component and piping supports within the scope of license renewal are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.27, "ASME Section XI, Subsection IWF," the applicant described its AMP to manage aging in ASME Code, Section XI Class 1, 2, 3 and MC supports. The LRA stated that this AMP is consistent with GALL AMP XI.S3, when enhanced to provide for inspection of Class MC component supports. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the enhancement to determine whether the AMP, with the enhancement, is adequate to manage the aging effects for which it is credited. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for Dresden and Quad Cities to determine whether they provide an adequate description of the revised program.

In its description of this AMP, the applicant specifically stated "The program is implemented through station procedures, which provide for visual examination of inservice inspection Class 1, 2, and 3 supports in accordance with the requirements of ASME Section XI, Subsection IWF, 1989 Edition and Code Case N-491-1." Inspection of Class MC supports is identified as an

"enhancement" that is "scheduled for implementation prior to the period of extended operation." This is part of Commitment #27 of Appendix A of this SER.

The staff considers the applicant's program to be consistent with GALL, except for the element of "Scope". GALL presents a generic evaluation of IWF, an existing mandated program for inspection of ASME Class 1, 2, 3, and MC supports. The applicant's existing IWF program is not consistent with GALL in that it does not include the inspection of Class MC supports. The staff's acceptance of IWF (or any other existing program) for aging management during the license renewal period is substantially based on the assumption that the components covered by the scope of the existing program are being periodically inspected during the current licensing term and any problems affecting performance of intended function(s) have been detected and corrected.

Therefore, the applicant was requested in RAI B.1.27 to describe the plant-specific operating experience for the aging of Class MC supports in terms of: (1) the current inspection method, frequency, scope, and acceptance criteria; and (2) any observed degradation and subsequent corrective actions taken to manage the aging of these components.

In its response to RAI B.1.27 dated October 3, 2003, the applicant stated:

10 CFR 50.55a(g)(4) states in part "...components (including supports) which are classified as ASME Code Class 1, Class 2 and Class 3 must meet the requirements, ...set forth in Section XI..." It later states, "Components which are classified as Class MC pressure retaining components and their integral attachments, and components which are classified as Class CC pressure retaining components and their integral attachments must meet the requirements, ...set forth in Section XI..."

The CFR statement above specifically requires Class 1, 2, and 3 supports to meet the requirements of Section XI. However, other than integral attachments, there is no mention of the Class MC supports. The Dresden and Quad Cities Inservice Inspection programs have complied with the requirements of 10 CFR 50.55a. Therefore, containment supports are not required to be examined in accordance with Subsection IWF.

There are no inspections required by Subsection IWF that will not be performed by the use of Subsection IWE. Per the 1989 Edition and the 1992 Edition, with the 1992 Addenda of ASME Section XI, Table IWE-2500-1, Item E1.11, the Class MC integral attachments are subject to a General Visual Examination (as described in IWE-3510.1) prior to each Type A Test. Additionally, per Item E1.12, these integral attachments are subject to a VT-3 each inspection interval. Per the 1995 Edition, with the 1996 Addenda of ASME Section XI, Table IWF-2500-1, supports are subject to a VT-3 each inspection interval.

The containment inservice inspection (CISI) program was developed in response to a recently mandated final rulemaking per an amendment to the Code of Federal Regulations (10 CFR 50.55a). This rulemaking incorporates, by reference, the requirements of the 1992 Edition with the 1992 Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, Division 1, Subsections IWE and IWL with specified modifications. The final rulemaking was published on August 8, 1996 and specified an effective date of September 9, 1996 as well as an expedited implementation of these requirements within five years of the effective date (September 9, 2001). In response, the Dresden and Quad Cities CISI program included integral attachments as part of the IWE examination boundary.

As there is no inspection history of containment supports, there is no site operating experience related to this program to provide.

The applicant's response to RAI B.1.27 did not address the staff's concern, but served to reinforce the concern regarding the inspection of Class MC Supports. The applicant's existing IWF program is not consistent with GALL in that it does not include the inspection of Class MC supports. In its response to RAI B.1.27, the applicant states that "containment supports are not

required to be examined in accordance with Subsection IWF." Furthermore, the response states that "as there is no inspection history of containment supports, there is no site operating experience related to this program to provide." Since there is no existing program to inspect Class MC supports, the staff cannot accept the use of IWF in the license renewal period without further information or actions by the applicant. Furthermore, the staff is confused as to which Class MC supports the applicant is proposing to inspect under IWF in the license renewal period. The response to RAI 2.4-2 lists at least three items that appear to be Class MC supports (items c, d and j), but the LRA Table number and component group referenced for each item leads to the Structures Monitoring program, not IWF. The response to RAI 2.4-2 also lists a number of items that appear to be Class 1 supports (items a, b, and f (regarding anchor bolts)), but the LRA Table number and component group referenced for each item leads to the Structures Monitoring Program, not IWF. Some of the same components discussed in the response to RAI 2.4-10 reference IWF, so there is an inconsistency between the two RAI responses.

The applicant's response to RAI 3.5-14 provides a justification for inspecting downcomer bracing (a Class MC support) using IWE. This raised an additional staff concern as to how many other Class MC supports the applicant intends to inspect using IWE rather than IWF.

Some of the Class MC supports discussed by the applicant in the above RAI responses seem to be inaccessible. Therefore, the staff needed to better understand how the applicant is treating these supports. This was identified as Open Item 3.5.2.3.2-1.

To resolve the concerns, the staff requested the applicant to provide the following information:

- (a) Identify each type of Class MC support by name and confirm whether the support will be inspected under IWF during the period of extended operation. Provide a technical explanation for those supports that are proposed to be inspected under another program (such as IWE or Structures Monitoring) or for cases where no inspection is planned.
- (b) Since Class MC supports are not currently being inspected, provide a commitment to perform a baseline inspection of typical samples of each type of Class MC component support prior to the period of extended operation, to identify and correct any problems affecting performance of intended functions.
- (c) Describe how the performance of Class MC component supports in inaccessible areas is currently being managed and how the supports will be managed during the period of extended operation. Clarify the commitment to the provisions of 10 CFR 50.55(a) covering inaccessible areas.
- (d) Review the response to RAI 2.4-2 and identify the aging management program applicable to each item (a) through (k). Also verify the consistency of this RAI response with the response to RAI 2.4-10.

The applicant submitted the responses, dated April 9, 2004. After reviewing the applicant's responses, the staff accepts the applicant's proposed use of its Structures Monitoring Program as an alternate AMP to the GALL's ASME IWF program for its Class MC piping supports, with the following modifications.

Modification #1 states that the sample size of the Class MC piping supports should be 15% of the support population, as stipulated in Table IWF-2500-1, because the ten sample supports proposed by the applicant is insufficient.

Modification #2 states that the person, who performs the inspection, should have demonstrated knowledge of inspection attributes on Class MC piping supports and under oversight guidance from the administrator or his designee during the initial inspection activity.

Modification #3 states that a baseline inspection should be performed on the sample supports prior to the period of extended operation.

The applicant submitted its revised responses in a letter dated June 22, 2004. The responses satisfactorily resolve the sample size and inspector's qualification issues. However, the staff was not sure whether the applicant intended to only revise its Structures Monitoring Program prior to the period of extended operation or actually have the MC supports and MC piping sample supports inspected prior to the period of extended operation. In a telephone conference with the applicant on July 13, 2004, the applicant clarified that a baseline inspection would be performed for these supports prior to the period of extended operation. The staff considers the Open Item 3.5.2.3.2-1 resolved. This is part of Commitment #30 of Appendix A of this SER.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff since the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.5.2.3.3 Masonry Wall Program (B.1.29)

Summary of Technical Information in the Application. The applicant states in LRA Section B.1.29 that the masonry wall program is consistent with the ten elements of aging management program XI.S5, "Masonry Wall Program," specified in NUREG-1801.

The masonry wall program, which is part of the structures monitoring program, is based on guidance provided in I. E. Bulletin 80-11, "Masonry Wall Design," and Information Notice 87-67, "Lessons Learned from Regional Inspections of Licensee Actions in Response to I. E. Bulletin 80-11," and is implemented through station procedures. The program provides for inspections of masonry walls within the scope of license renewal for cracking. The program includes all masonry walls that perform intended functions in accordance with 10 CFR 54.4, and is credited for management of aging effects so that the established evaluation basis for each masonry wall within the scope of license renewal remains valid through the period of extended operation.

In its discussion on operating experience, the applicant states that the masonry wall program has provided for detection of cracks, and other minor aging effects in masonry walls. The corrective action process has ensured timely repair in order to prevent continued degradation. Maintenance history revealed minor degradation of masonry block walls. In response to I. E. Bulletin 80-11, "Masonry Wall Design," and Information Notice 87-67, "Lessons Learned from

Regional Inspections of Licensee Actions in Response to I. E. Bulletin 80-11," various actions were taken. Actions included program enhancements, follow-up inspections to substantiate masonry wall analyses and classifications, and the development of procedures for tracking and recording changes to the walls. These actions addressed all concerns raised by I. E. Bulletin 80-11 and Information Notice 87-67, namely unanalyzed conditions, improper assumptions, improper classification, and lack of procedural controls. Operating history shows that the program was and continues to be assessed for its effectiveness based on program specific corrective actions that addressed issues such as inspection schedules and program database discrepancies.

The applicant concludes that the masonry wall program provides reasonable assurance that the aging effects of cracking are adequately managed so that the intended functions of masonry walls within the scope of license renewal are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.29, "Masonry Wall Program," the applicant described its AMP to manage aging in masonry walls. The LRA stated that this AMP is consistent with GALL AMP XI.S5. The staff confirmed the applicant's claim of consistency during the AMR inspection. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for Dresden and Quad Cities to determine whether it provides an adequate description of the program.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. The GALL program is acceptable to the staff since the applicant has demonstrated that the effects of aging will be adequately managed so that there is reasonable assurance that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.5.2.3.4 RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants

Summary of Technical Information in the Application. The applicant states in LRA Section B.1.31 that, with enhancements, the RG 1.127 aging management program is consistent with the ten elements of aging management program XI.S7, "RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants," specified in NUREG-1801.

The RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," aging management program is part of the structures monitoring program and consists of procedures that provide for condition monitoring of structural steel elements and concrete. With enhancements, the program provides for visual inspections of structural steel and concrete components within the scope of license renewal that are in the Unit 1 and Unit 2 and 3 crib houses at Dresden, and the Unit 1 and 2 crib house and discharge canal weir structure supporting the ultimate heat sink at Quad Cities. The program is credited for aging management of concrete and structural steel elements exposed to raw water and aging management of concrete not exposed to raw water, and is based on Regulatory Guide 1.127, Revision 1.

For license renewal, the following enhancements will be made. Enhancements are scheduled for implementation prior to the period of extended operation.

- The program will provide for monitoring of crib house concrete walls and slabs with an opposing side in contact with river water and the Quad Cities discharge canal weir.
- Procedures will be revised to emphasize inspecting for structural integrity of concrete and steel components and identify specific types of components to be inspected.

In its description of operating experience, the applicant stated that the operating history of crib houses at Dresden and Quad Cities indicates that structural components are not experiencing any significant degradation. Minor degradation of concrete has been detected such as cracks with water stains, pitting, and leaching. These types of degradation were evaluated and addressed. The effective use of the corrective action process has provided significant quantitative and qualitative data on performance, extent of degradation, and effects of operating and environmental conditions ensuring timely identification and correction of degraded conditions. The program has been assessed for its effectiveness based on program specific corrective actions that addressed issues such as inspection schedules and program database discrepancies.

The applicant concluded that the RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," aging management program provides reasonable assurance that the aging effects are adequately managed so that the intended functions of concrete and structural steel components in water control structures within the scope of license renewal are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.31, "RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants," the applicant described its AMP to manage aging of structural steel and concrete components within the scope of license renewal that are in the Unit 1 and Unit 2 and 3 crib houses at Dresden, and the Unit 1 and 2 crib house and discharge canal weir structure supporting the ultimate heat sink at Quad Cities. The LRA stated that this AMP is consistent with GALL AMP XI.S7 with the enhancements described in the previous section. The staff will confirm the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the enhancements to determine whether the AMP, with the enhancements, is adequate to manage the aging effects for which it is credited. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for both Dresden and Quad Cities to determine whether they provide an adequate description of the revised program.

In its description, the applicant stated that this program "is part of the structures monitoring program and consists of procedures that provide for condition monitoring of structural steel elements and concrete."

Based on the applicant's description of this aging management program, it is not readily apparent to the staff that it is consistent with the ten elements of GALL XI.S7. The staff cannot determine whether this is an existing program, and cannot identify the specific structures and structural components, environments, and aging effects that are managed by this program. In RAI 2.4-7, the staff has questioned the apparent omission from the scope of license renewal of many structures that appear to be essential elements of the ultimate heat sinks at Dresden and

Quad Cities. These structures are typically monitored using the guidance in RG 1.127, and for license renewal should be included in the scope of an aging management program consistent with GALL AMP XI.S7.

To complete its evaluation of this aging management program, the staff requested the applicant to submit the following additional information:

- (a) Clarify whether the program described in LRA Appendix B.1.31 is an existing program. If so, explain what structures and structural components, environments, and aging effects are currently inspected under this program at Dresden and Quad Cities. If not, explain how the condition of water-control structures is currently monitored at Dresden and Quad Cities.
- (b) Describe the plant-specific operating experience with regard to the inspection of all essential structural elements of the ultimate heat sink, including (as applicable) the intake and discharge canals and on-site ponds.
- (c) Under the first "Enhancement", the applicant stated that "The program will provide for monitoring of crib house concrete walls and slabs with an opposing side in contact with river water and the Quad Cities discharge canal weir." Clarify whether the sides of the crib house concrete wall and slabs that are exposed to raw water are inspected under this program? If not, explain why not. Also, verify that the underwater surfaces of the Quad Cities discharge canal weir are inspected under this program, or explain why they are not.
- (d) Under the second "Enhancement", the applicant stated that "Procedures will be revised to emphasize inspecting for structural integrity of concrete and steel components and identify specific types of components to be inspected." Describe the procedures that already exist and provide a more detailed description of the revisions that will be made.
- (e) Describe any additional enhancements to this program that may be required as a result of the response to staff RAI 2.4-7, related to the scope of water-control structures that serve an intended function for license renewal.

In its response to RAI B.1.31 dated October 3, 2003, the applicant stated:

- (a) The program described in LRA Appendix B.1.31 is an existing program. The structures currently monitored include the Dresden Unit 1 and 2/3 Crib Houses intake and discharge canal, and the Quad Cities Unit 1/2 Crib House. The parameters monitored at these concrete structures include cracking, movements, settlement, deflection, cavitation, in-leakage, abrasion, spalling, scaling, leaching of calcium hydroxide, corrosion of embedded steel, and others. For further details see the clarifications provided in (d) below.
- (b) The Dresden intake and discharge canals were determined to be in the scope of license renewal and the Dresden cooling lake was determined to be out of scope of license renewal (Reference RAI 2.4-7). A search of the corrective action database indicated that there have been several leaks found in the cooling lake dike by various means including the bi-monthly dike inspection, and operator and security rounds. Corrective actions were taken to resolve the leaking such as installing sheet piling. However there were no conditions of canal wall degradation found. It should be noted that the canal walls are not subject to the same failure mechanisms as the cooling lake dike walls. The canals are trenched in existing ground topography, where the cooling lake dike walls were built above the grade of the surrounding topography.

- (c) The program does inspect the crib house concrete walls and slabs exposed to raw water. The existing program does not include the Quad Cities discharge canal weir. However, the discharge canal weir is being added as an enhancement as noted in (d) below.
- (d) The current structural monitoring program procedures inspect concrete beams, floor and roof slabs, columns and walls. This program inspects concrete surfaces for the following conditions: leaching and chemical attack; abrasion, erosion, and cavitation; drummy areas (poorly consolidated concrete with past deficiencies); pop-outs and voids; scaling; spalling; signs of corrosion in reinforcing steel or anchorage components; corrosion of exposed embedded metal surfaces and corrosion stains around the embedded metal; and detached embedments or loose bolts. The program inspects steel elements for the following conditions: excessive deflection, cross-section distortion, or member misalignment; significant corrosion; cracks, tears, and laminations; loose or missing bolts on bolted connections. The enhancements to be made to this procedure as it applies to water control structures include the following:
 - (a) Enhance the Monitoring and Trending section to include review of previous inspection reports, photos, etc. of elements to be inspected at the next inspection interval/period.
 - (b) Clarify scope to include inspections of all Crib House interior concrete walls with an opposing side in contact with river water and all Crib House concrete slabs with an opposing side in contact with river water.
 - (c) Add inspection parameters for joints, and structural isolation gaps.
 - (d) Add a task to review ground water chemistry data to ensure limits are not exceeded and include task frequency.
 - (e) Clarify scope for Dresden Unit 1 Crib House.
 - (f) Clarify scope to include the discharge canal weir at Quad Cities.
 - (g) Clarify inspection scope is to include condition monitoring of concrete below water line.
 - (h) Add requirements for qualifications for personnel performing inspections and personnel evaluating results.
 - (e) The additional component groups added to the scope of License Renewal in response to RAI 2.4-7 are already being inspected through structural monitoring program or had no viable aging mechanisms requiring aging management. The additional existing activity to be credited as license renewal commitments is monitoring the earthen structures (canal) at Dresden.

The additional information provided by the applicant in its response to RAI B.1.31 did not completely address all of the staff's request for information and raised some additional concerns as discussed below. Therefore, the applicant was requested to provide the following additional information to supplement its initial RAI response:

- (1) The response to RAI B.1.31(a) states the parameters monitored for the concrete structures (Dresden Unit 1 and 2/3 Crib House and Quad Cities Unit 1 / 2 Crib House) included in the existing B.1.31 program. However, the RAI response also indicates that the Dresden intake and discharge canals are currently monitored under this existing program. Based on the information provided in the response to RAI 2.4-7, the staff understands that these canals are earthen structures. Therefore, the staff asked the applicant to explain what parameters are monitored for the earthen structures under this existing program.
- (2) The response to RAI B.1.31(a) did not explain how the condition of water control structures within the scope of license renewal that are not included in the existing program are currently monitored at Dresden and Quad Cities. The staff asked the applicant to provide this information for all structures and components identified in the response to RAI 2.4-7 as being within the scope of license renewal, as well as any other applicable structures and components that may not have been listed by the staff as part of RAI 2.4-7.

- (3) The response to RAI B.1.31(b) only described the operating experience with regard to the Dresden intake and discharge canals and the Dresden cooling lake (which is stated as being out of the scope of license renewal). The staff asked the applicant to describe the operating experience with regard to the inspection of all essential structural elements of the ultimate heat sink for both Dresden and Quad Cities as identified in the response to RAI 2.4-7.
- (4) The response to RAI B.1.31(d) does not discuss any existing procedures or planned enhancements related to the inspection of earthen structures. The staff asked the applicant to describe these procedures since it is clear that earthen structures are being monitored under the B.1.31 program.
- (5) The response to RAI B.1.31 does not address the Quad Cities intake flume/canal. The response to RAI 2.4-7 discusses the intake flume/canal boundaries, but does not specify whether the flume/canal is included in the license renewal scope, and does not provide a reference for the aging management review of the topographic basin. The staff requested the applicant to clarify whether the Quad Cities flume/canal, including the topographic basin, is monitored under the B.1.31 program. If it was, the staff asked the applicant to describe the monitoring procedures used. If it was not, the staff asked the applicant to explain the technical basis for its exclusion.
- (6) For the structures and components of the ultimate heat sink that are not currently being inspected under an existing program, the staff requested the applicant to provide a commitment to perform a baseline inspection of typical portions of each structure or component prior to the period of extended operation, to identify and correct any problems affecting performance of intended functions.
- (7) The staff notes that in LRA Section A.1.31 for both Dresden and Quad Cities there is no mention of earthen structures in the description of the RG 1.127 program for the UFSAR Supplement. The staff requested the applicant to revise these supplements to specifically identify earthen structures as being within the scope of this program, and also to include a discussion of any other significant changes in the scope of this program that have occurred as a result of the applicant's responses to the staff RAIs related to this program.

In its response to the staff's request for additional information dated December 5, 2003, to supplement the initial RAI response, the applicant stated

(1) The canals are earthen structures that require aging management. Specifically, these structures are vulnerable to the buildup of sedimentation. Existing station procedures monitor the aging effect, "Loss of Form due to Sedimentation", to ensure that the required volume of water is available in the ultimate heat sink to support emergency cooling conditions. This includes the forebay at Dresden and the forebay at Quad Cities. (Note the "Dresden Only" annotation in table 2.3.3-22 for Component Group "Earthen Structures" provided RAI 2.4-7 was incorrect and has been deleted.)

The Quad Cities Earthen Structure consists of a bay excavated from the river front area down and into the existing bedrock up to the in-scope concrete structures. The sidewalls of this structure are engineering designed earthen slopes and are covered with rip-rap, both above and below the water line.

The Dresden Earthen Structure was excavated through the soil. The actual canals are excavated

from bedrock. The soil portions above the canals are capped with concrete.

The aging management review of these structures found that "Loss of Form" was the only applicable aging effect, and sedimentation the only applicable aging mechanism contributing to this effect based on the design and configuration of these structures.

(2) The existing Aging Management activities for the in-scope Quad Cities components as discussed in RAI 2.4-7 are:

- Intake Flume - Aging management of the earthen portion of this structure is discussed in the response to (1) above. Concrete portions are addressed in LRA Table 2.4-11, under Component Group, "Concrete Walls", and Aging Management Reference 3.5.22, RG 1.127, Inspection of Water Control Structures Associated with Nuclear Power Plants, Program B.1.31.
- 16' diameter discharge piping - This piping is addressed in LRA Table 2.3.3-22, under Component Group, "Piping and Fittings", and Aging Management Reference 3.3.1.15, Open Cycle Cooling Water Program B.1.13.
- 96" Ice Melting Line, including Gate - The ice melt line is addressed in LRA Table 2.3.3-22, under Component Group, "Piping and Fittings", and Aging Management Reference 3.3.1.15, Open Cycle Cooling Water Program B.1.13. The gate is addressed in LRA Table 2.3.3-22, under Component Group, "Valves" and Aging Management Reference 3.3.2.278, Open Cycle Cooling Water Program B.1.13 and Aging Management Reference 3.3.2.300, Bolting Integrity Program B.1.12.
- Discharge Flume/Canal - This structure is addressed in LRA Table 2.4-11, under Component Group, "Concrete Walls", and Aging Management Reference 3.5.1.22, RG 1.127, Inspection of Water Control Structures Associated with Nuclear Power Plants, Program B.1.31. However, these aging management activities are an enhancement and are not currently implemented.
- Weir Gate in discharge canal - This component is addressed in LRA Table 2.4-11, under Component Group, "Concrete Walls", and Aging Management Reference 3.5.1.22, RG 1.127, Inspection of Water Control Structures Associated with Nuclear Power Plants, Program B.1.31. However, these aging management activities are an enhancement and are not currently implemented.

The existing Aging Management activities for the in-scope Dresden components as discussed in RAI 2.4-7 are:

- Intake flume/canal - Aging management of the earthen portion of this structure is discussed in the response to (1) above. Concrete portions are addressed in LRA Table 2.4-11, under Component Group, "Concrete Walls", and Aging Management Reference 3.5.1.22, RG 1.127, Inspection of Water Control Structures Associated with Nuclear Power Plants, Program B.1.31.
- Crib House Stop Logs - These components are addressed in LRA Table 2.3.3-22, Component Group "Stop Logs" and Aging Management Reference 3.3.2.304, with no aging management required (as supplied in RAI 2.4-7 response).
- Crib house dewatering valves and trash rake refuse pit - The valves are addressed in LRA Table 2.3.3-22, under Component group, "Valves", and Aging Management Reference 3.3.2.278, Open Cycle Cooling Water Program B.1.13 and Aging Management Reference 3.3.2.300, Bolting Integrity Program B.1.12. The refuse pit is addressed in LRA Table 2.4-11 under component groups "Concrete Walls and Concrete Slabs" and Aging Management Reference 3.5.1.22, RG 1.127, Inspection of Water Control Structures Associated with Nuclear Power Plants, Program B.1.31.
- Discharge Outfall Structure - This structure is addressed in LRA Table 2.3.3-22, under Component Groups, "Concrete Walls and Concrete Slabs", and Aging Management Reference 3.5.1.22, RG 1.127, Inspection of Water Control Structures Associated with Nuclear Power Plants, Program B.1.31 (as supplied in RAI 2.4-7 response). However, these aging management activities are an enhancement and are not currently implemented.

- 8' Diameter Ice Melt Recirculating Pipe, including ice melt gate - The ice melt pipe is addressed in LRA Table 2.3.3-22, under Component Group, "Piping and Fittings", and Aging Management Reference 3.3.1.15, Open Cycle Cooling Water Program B.1.13. The gate is addressed in LRA Table 2.3.3-22, under Component Group, "Valves", and Aging Management Reference 3.3.2.278, Open Cycle Cooling Water Program B.1.13. and Aging Management Reference 3.3.2.300, Bolting Integrity Program B.1.12.

- Discharge flume/canal - The aging management for this earthen structure is discussed in the response to (1) above.

(3) Section B.1.31 of the LRA does list the operating experience for concrete structures. Section B.1.13 of the LRA lists the operating experience for the piping components covered by the Open Cycle Cooling Water Program.

The operating experience for the earthen structures:

Dresden has performed inspections of the intake and discharge canals and has not found any appreciable silting. However, minor silting was found at the intake structure near the bar racks. This silting was removed prior to loss of function of the ultimate heat sink.

Quad Cities, taking suction directly off the Mississippi River, has found significant levels of silting in the earthen structure of the intake flume as well as at the intake structure on several occasions. Timely corrective actions (dredging or cleaning) were completed prior to the loss of function of the ultimate heat sink, indicating an effective monitoring program.

(4) The only enhancement needed is to annotate the existing requirements of the Exelon procedures that monitor the aging effect, "Loss of Form due to Sedimentation", to ensure that the required volume of water is available in the ultimate heat sink to support emergency cooling conditions as license renewal commitments. This requirement is implemented through a site Predefine Activity for scheduling and tracking purposes at Quad Cities. A similar Predefine Activity will be developed for Dresden.

(5) The Quad Cities intake flume is in the scope of license renewal. Management of this earthen structure is discussed in the response to (1) above.

(6) A baseline inspection will be performed prior to the period of extended operation for the Quad Cities Discharge Flume/Canal and Weir Gate and the Dresden Outfall Structure. Any problems affecting performance of intended functions will be identified and corrected.

Note that there are no current aging management activities performed for the Dresden Stop Logs. As there has been no viable aging mechanism identified, the stop logs will not be included in the baseline inspection.

(7) LRA Section A.1.31 for Dresden and Quad Cities will be updated to specifically indicate the applicable in-scope earthen structures (Dresden intake/discharge flumes and Quad Cities intake/discharge flumes) and the aging management activities associated with these structures.

The baseline inspection of item (6) above is Commitment #31 of Appendix A of this SER. Based on the initial and supplemental information provided by the applicant, the staff finds that the water control structures in the scope of license renewal have been appropriately evaluated in the applicant's AMR, and that AMP B.1.31 - "RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants" has been appropriately credited and enhanced to manage aging of water control structures for the period of extended operation. Therefore, RAI B.1.31 is resolved.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the

applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.5.2.3.5 Protective Coating Monitoring and Maintenance (B.1.32)

Summary of Technical Information in the Application. The applicant states in LRA Section B.1.32 that, with enhancements, the protective coating monitoring and maintenance program is consistent with the ten elements of aging management program XI.S8, "Protective Coating Monitoring and Maintenance Program," specified in NUREG-1801.

For license renewal, the following enhancements will be made. Enhancements are scheduled for implementation prior to the period of extended operation.

- Procedure revisions will provide for thorough visual inspections of Service Level I coatings near sumps or screens associated with the emergency core cooling system.
- Procedure revisions will provide for pre-inspection reviews of previous reports so that trends can be identified.
- Procedure revisions will provide for analysis of suspected reasons for coating failure.

This is Commitment #32 of Appendix A of the SER. The protective coating monitoring and maintenance program is credited for aging management of Service Level I coatings inside primary containment. Service Level I coatings are used in areas where the coating failure could adversely affect the operation of post-accident fluid systems and thereby impair safe shutdown.

The program provides for visual inspections to identify any condition that adversely affects the ability of the coating film to function as intended. It is implemented through procedures based on the technical and quality requirements of Regulatory Guide 1.54, Revision 0, "Quality Assurance Requirements for Protective Coatings Applied to Water Cooled Nuclear Power Plants," and ANSI N101 4-1972, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities," and the guidance provided in EPRI TR-109937, "Guidelines on Nuclear Safety-Related Coating."

In its discussion on operating experience, the applicant stated that examinations of the Dresden internal drywell accessible steel surfaces during refueling outages revealed that the original coatings were acceptable other than exhibiting minor surface rust, paint flaking and discoloration. The applicant identified no significant degradation in the corrective action process records. The internal surfaces of the torus for each of the Dresden units were re-coated with an epoxy coating in the late 1980's during refuel outages D2R11 and D3R10. Surveillance of the coated torus internal surfaces during refueling outages has resulted in local coating repairs. A review of past inspections of the torus shells indicates the majority of the problems have been attributed to blistering of coating in small areas, localized pitting, and mechanical damage. Since the application of the epoxy protective coating on the internal surfaces, torus wall thinning has not been an issue. Inspections of drywell steel at Quad Cities have not identified any significant coating or corrosion problems requiring repair of the torus. In 1994 the Quad Cities

Unit 1 torus internal surface corrosion was removed and the base metal was re-coated. During the subsequent refueling outage the torus shell immersion area was inspected. Coating deficiencies, such as mechanical damage, burrs and projections were identified and repaired. Minor local repairs to the coating on the inside of the Quad Cities Unit 2 torus were performed in March 1974. Inspections are conducted each outage, with local coating repairs performed as required.

The applicant concludes that the protective coating monitoring and maintenance program provides reasonable assurance that aging effects are adequately managed so that the intended functions of Service Level 1 coatings inside primary containment are maintained during the period of extended operation.

Staff Evaluation. In LRA Section B.1.32, "Protective Coating Monitoring and Maintenance Program," the applicant described its AMP to manage Service Level 1 coatings inside primary containment. The LRA stated that this AMP is consistent with GALL AMP XI.S8 with the enhancements described in the previous section. The staff confirmed the applicant's claim of consistency during the AMR inspection. Furthermore, the staff reviewed the enhancements to determine whether the AMP, with the enhancements, is adequate to manage the aging effects for which it is credited. In addition, the staff determined whether the applicant properly applied the GALL program to its facility. The staff also reviewed the UFSAR supplements for both Dresden and Quad Cities to determine whether they provide an adequate description of the revised program.

In order to complete its evaluation, the applicant was requested in RAI B.1.32 to submit the following information:

- (a) It is the staff's understanding that this program is being credited for prevention/mitigation of loss of material due to corrosion of steel structural components inside containment, including the accessible inside surfaces of the containment drywell and torus. In addition, it is the staff's understanding that this program augments, but does not replace, inspections conducted under IWE, IWF, and structures monitoring program. Please confirm that these understandings are correct, or provide additional explanatory information to clarify the scope and purpose of the Protective Coating Monitoring and Maintenance program.
- (b) Does the scope of this program include monitoring and maintenance of anti-corrosion coatings applied to the sand pocket region of the drywell? If not, what program monitors the condition of these coatings?
- (c) In the third paragraph under "Operating Experience," the LRA states "Inspections of drywell steel at Quad Cities have not identified any significant coating or corrosion problems requiring repair of the torus." Please clarify what is meant by this statement.

In its response to RAI B.1.32 dated October 3, 2003, the applicant stated:

- (a) The Protective Coating Monitoring and Maintenance program is being credited for License Renewal to prevent/mitigate loss of material due to corrosion of steel structural components inside containment, including the accessible inside surfaces of the containment drywell and torus. In addition, the program does augment, but does not replace, inspections conducted under the ASME Section XI, Subsection IWE program (LRA Section B.1.26), the ASME Section XI, Subsection IWF

program (LRA Section B.1.27), and the structures monitoring program (LRA Section B.1.30).

(b) The scope of the program does not include monitoring and maintenance of anti-corrosion coatings applied to the sand pocket region of the drywell. There is no program that monitors the condition of the coatings in the sand pocket region of the drywell. However, UT inspections of the drywell shell of the bounding unit (Dresden Unit 3) in the sand pocket region are performed each refueling outage as part of the ASME Section XI, Subsection IWE program. These UT inspections ensure drywell shell thickness at these locations is maintained above the minimum allowable.

(c) The subject sentence in the third paragraph under "Operating Experience" inadvertently made reference to the torus. The sentence involves drywell steel and should have read as follows:

Inspections of the drywell steel at Quad Cities have not identified any significant coating or corrosion problems requiring repair of the drywell steel.

The additional information provided by the applicant in its RAI response confirms the staff's understanding of the scope and purpose of the Protective Coating Monitoring and Maintenance program. The staff accepts that the scope of the program does not include monitoring and maintenance of anti-corrosion coatings applied to the sand pocket region of the drywell.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.5.2.4 Aging Management Review of Plant-Specific Structures and Structural Components

In this section of the SER, the staff presents its evaluation of the applicant's aging management review of specific structures and structural components. To perform its evaluation, the staff reviewed the components listed in LRA Tables 2.4-1 through 2.4-16 to determine whether the applicant properly identified the applicable AMRs and AMPs needed to adequately manage the aging effects for the components. The staff also reviewed the "Aging Management Review Aid" submitted by the applicant as a supplement to the LRA. This element of the staff review involved identification of the aging effects for each component, ensuring that each aging effect was evaluated using the appropriate AMR in LRA Section 3, and that an appropriate AMP was credited for management of the aging effect. The results of the staff's review are provided below.

3.5.2.4.1 Primary Containment

Summary of Technical Information in the Application. The applicant's description of the primary containment (Dresden and Quad Cities) is in LRA Section 2.4.1. The applicant has defined "primary containment" to include not only the steel containment shell, but also all structures and structural components inside containment. The component groups requiring aging management review are identified in LRA Table 2.4-1. For each component group listed, LRA Table 2.4-1 specifies a reference to LRA Section 3 for the AMR results. For the primary containment component groups, the AMR results are provided in LRA Tables 3.5-1 and 3.5-2, with one exception: —walls, ceilings, and floors that serve as fire barriers reference LRA Table

3.3-1 (Reference No. 3.3.1.28). The applicant used the SRP-LR report format in LRA Table 3.5-1 to present its AMR for the containment components that are addressed in the GALL Report. Further evaluation of aging management, as recommended by GALL, is discussed in LRA Section 3.5.1.1. Aging management programs or evaluations that are different from those in GALL are described in LRA Section 3.5.1.2. In LRA Table 3.5-2, the applicant identified the containment component groups that are not addressed in the GALL Report and provided the following information: on (1) material, (2) environment, (3) aging effect(s)/mechanism(s), and (4) AMP(s).aging management program(s).

Utilizing the Dresden and Quad Cities Aging Management Review Aid (February 2003), the staff identified the following applicable materials for the primary containment, including the structures inside containment: as carbon steel, stainless steel, reinforced concrete, grout, lubrite base plates, polyurethane expansion foam, and various materials for seals, gaskets, and moisture barriers. The staff also identified the following applicable environments as (1) inside containment, (2) outside containment, (3) and inside containment, and exposed to aggressive environment.

Aging Effects

The LRA identified the following applicable aging effects:

- cracking, loss of material, and change in material properties for concrete components and grout
- cumulative fatigue, cracking, and loss of material for steel elements, penetrations, and hatches
- loss of seal for elastomers
- lock-up for beam seats
- hardening of drywell expansion foam

Aging Management Programs

The LRA credits the following AMPs for managing the identified aging effects:

- ASME Section XI, Subsection IWE Program
- 10 CFR Part 50, Appendix J Inspection Program
- Protective Coating Monitoring and Maintenance Program
- Structures Monitoring Program
- Fire Protection Program

A description of these AMPs is provided in LRA Appendix B. The applicant concluded that the effects of aging will be adequately managed by these AMPs, such that the intended functions will be maintained during the period of extended operation.

Staff Evaluation. This section provides the staff's evaluation of the applicant's AMR for the primary containment and the applicability of the AMPs credited to manage the aging effects.

Table 3.5-1 of this SER provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Table 3.5-1, for the components that are addressed in the GALL Report. Section 3.5.2.1 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, which do not require further evaluation. Section 3.5.2.2 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, for which the GALL Report recommends further evaluation.

The staff's evaluations of the aging management evaluations for the primary containment that are different from those described in the GALL Report, or are not addressed in GALL, are discussed below.

Aging Effects

Steel: Table 3.5-2 of the LRA, Reference No. 3.5.2.15, "Thermowells", states that stainless steel thermowells are installed in the torus. Section XI, Subsection IWE, of ASME is credited with managing the stainless steel/dissimilar metal welds for thermowells, inside or outside containment, for loss of material due to general galvanic pitting and crevice corrosion. The applicant was requested to (1) describe the location of all the stainless steel components and identify the specific environments to which they are exposed; (2) identify all aging effects/mechanisms that were evaluated, including those not requiring aging management, and provide the technical basis for each conclusion; and (3) discuss the technical basis for the selection of the AMP used to manage the applicable aging effects. This is part of RAI 3.5-16.

In response to the applicable part of RAI 3.5-16, the applicant stated the following:

- (1) The thermowells are installed in the suppression chamber shell. All are located below the waterline, with the exception of four thermowells at Quad Cities, two on each unit, that are located in the air space above the water line. The suppression chamber air space above the suppression chamber water level is made inert with nitrogen to maintain the oxygen content below 4% by volume during normal operation. The air temperature follows the normal, maximum operating suppression chamber water temperature of 95 F and the relative humidity is between 20 and 90%.

The suppression chamber air space environment encompasses the following NUREG-1801 environment description:

Moist Containment Atmosphere (air/nitrogen), steam, or demineralized water

The suppression chamber water environment encompasses the following NUREG-1801 environment description: 25-288 °C (77 ° – 550 °F) demineralized water.

- (2) All aging effects/mechanisms that were evaluated for the suppression chamber thermowells are described below along with the technical basis used to determine whether aging management was required. EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools" (EPRI Mechanical Tools), Appendix A, Tables 4-1 and 4-2 and Figures 1 and 2, were utilized to identify potential aging effects/mechanisms for the thermowells and are the bases for the following discussions.

Loss of material/general, pitting, and crevice corrosion: This is applicable to the thermowells installed in either the suppression chamber water or air space environments. While stainless steel itself is not susceptible to general corrosion, it was conservatively assumed to be an applicable aging mechanism for the installation due to the fact that thermowells are welded to carbon steel half-couplings, which are in turn welded to the suppression chamber shell.

Loss of material/galvanic corrosion: The stainless steel thermowells are welded to carbon steel half-couplings or sleeves, which are welded to the exterior of the suppression chamber shell. This dissimilar metal weld is outside the suppression chamber where an electrolytic environment does not exist. However, an electrolytic environment does exist between the half-coupling/sleeves and the thermowell. For this reason, this aging effect/mechanism is considered applicable to the thermowell installations.

Crack initiation and growth/SCC: This is not considered applicable to the thermowells installed in either the suppression chamber water or air space environments. Stress Corrosion Cracking (SCC) has been observed in high purity water at temperatures greater than 200 °F and dissolved oxygen levels greater than 100 ppb. The normal, maximum operating suppression chamber water temperature is 95 °F. Suppression chamber water quality is maintained within EPRI recommended levels. Therefore, suppression chamber thermowells are not susceptible to SCC.

- (3) The stainless steel thermowells installed in the suppression chamber are included in ASME Section XI, Subsection IWE ISI Program. This aging management program is credited with managing the loss of material due to corrosion for these thermowells. The program provides for the inspection of ASME Class MC pressure retaining components and their integral attachments and is also credited for managing the loss of material aging effects due to corrosion for NUREG-1801 Section II.B components with dissimilar metal welds.

The staff finds the applicant's AMR and selection of the AMP for thermowells installed in the suppression chamber shell to be acceptable, based on consistency with the guidance in the GALL Report for similar material and environment. Based on the information provided, the staff accepts the applicant's conclusion that the thermowells are not susceptible to SCC. This part of RAI 3.5-16 is resolved.

Miscellaneous Materials (expansion foam): In LRA Table 3.5-2, Reference No. 3.5.2.8, "Drywell Expansion Foam," the applicant referenced a plant-specific TLAA that is described in LRA Section 4.7.4. The polyurethane drywell expansion foam installed on the outside of the containment was originally evaluated for hardening due to radiation exposure assuming a 40-year operating life. As discussed in Section 6.2.1.2.1.1 of the Dresden UFSAR, this foam has caught fire twice in Dresden Unit 3 (January 20, 1986, and June 4, 1988). The staff requested the applicant, in RAI 3.5-10, to submit the following information for all four units:

- (a) Describe any other instances of fires or other degradation experiences related to the drywell expansion foam.
- (b) Describe the programs and procedures put in place to prevent future fires in the drywell expansion foam. If none, explain why they are not necessary.
- (c) Describe any investigations that determined whether there was any significant change in material properties due to the fires, or other operating experiences, that would prevent the foam from performing its intended function. If none, explain the technical basis for concluding that there has been no change in material properties.
- (d) Identify all the environments that the expansion foam may be exposed to, including leaking water, and discuss what effect each environment may have on the material properties of the foam.
- (e) Concerning the January 26, 1986, fire, Dresden UFSAR Section 6.2.1.2.1.1 states, "The polyurethane in the gap burned for several hours resulting in a postulated upper

bounding temperature of 500 degree F for both the steel containment and the primary containment shield wall." It also states, "Structural integrity of both the concrete and containment steel were determined not to be impaired to perform as designed in the event of a design basis accident (DBA)." Concerning the June 4, 1988, fire, it was determined that "this fire was bounded by the analyses conducted for the 1986 fire and no further analyses were conducted." The staff asked the applicant to provide a detailed technical basis demonstrating that the evaluation of the concrete and containment steel for the effects of the fires remains valid for the period of extended operation.

In response to RAI 3.5-10, the applicant stated the following:

- (a) The polyurethane foam is installed on the outside of the steel drywell containment vessel, but inside the surrounding concrete shield, providing an expansion gap between the steel and concrete surfaces. No other instances of degradation of Drywell Expansion Foam other than those discussed in the Dresden UFSAR could be found.
- (b) Procedures originally developed to prevent recurrence of these fires include Dresden Maintenance Procedure DMP 4100-1 and Dresden Administrative Procedure DAP 3-2, which have been superseded by, OPAA*201*004, "Fire Prevention For Hot Work". This new procedure still emphasizes the requirement for a Fire Watch during hot work (welding, cutting, grinding and open flame operations) for 30 minutes after completion or suspension of the hot work.
- (c) The fires were evaluated as part of the initial event and the results accepted by the NRC in "Safety Evaluation Report By The Office of Nuclear Reactor Regulation of The Expansion Gap Fire on January 20, 1986 at Dresden Station Unit 3" dated August 31, 1987. The foam's intended function(s) is "Expansion/Separation – Provides for thermal expansion and/or seismic separation". Test results from the burning of polyurethane foam samples showed that the residuals are easily crushed by finger pressure and would therefore allow the thermal expansion of the drywell liner for the period of extended operation. Additionally, Section 4.7.4 of the LRA provides the basis for concluding that no change in material properties is expected for the extended term of operation.
- (d) The expansion foam was evaluated as exposed to an "Outside Containment" environment. This environment is defined as: The Reactor Building (outside the drywell, torus, and steam tunnel) normal operating area temperatures range from 65 F to 103 F for Dresden and 65 F to 104 F for Quad Cities with relative humidity ranging between 20% and 90%. As discussed in LRA Section 4.7.4, this environment in addition to the expected radiation exposure will not affect the resilient characteristics of this polyurethane foam. This foam is not typically exposed to leaking fluid.
- (e) The original function of the foam was to provide separation between the drywell steel liner and the concrete as the concrete was poured. The remaining function of the foam is to allow thermal expansion of the steel liner. Test results from the burning of polyurethane foam samples showed that the residuals are easily crushed by finger pressure and would therefore allow the thermal expansion of the drywell liner for the period of extended operation. The structural integrity of the containment steel and surrounding concrete was not affected by the drywell fires. Temperatures experienced by the drywell liner fires never approached 850 /F, which is the minimum temperature that steel begins to lose tensile strength. The surrounding concrete was also not affected as concrete spalling does not occur below 1000 /F.

The staff finds the applicant's response acceptable and RAI 3.5-10 is resolved.

Fire Barrier Materials: In the LRA, Table 2.4-1 references LRA Table 3.3-1 for the AMR related to cracking and spalling and loss of material for concrete and reinforcement of

fire barrier walls, ceilings, and floors. The AMPs credited for these components are the Fire Protection and Structures Monitoring Programs. The discussion column on this item states that it is consistent with the GALL Report, with the following exception:

The exceptions to structural aging effects due to aggressive chemical attack, reaction with aggregates, freeze-thaw and corrosion of embedded steel are described in LRA Section 3.3.1.2.1. The exceptions to Fire Protection are described in LRA Section B.1.18.

Section 3.3.1.2.1 of the LRA states that no aging management is required to manage the following structural aging effects for concrete in inaccessible areas:

- cracking and spalling due to aggressive chemical attack
- cracking and spalling due to reaction with aggregates
- cracking and spalling due to freeze-thaw
- loss of material due to corrosion of embedded steel

The technical bases provided for these exceptions are the same as those described in LRA Sections 3.5.1.1.6 and 3.5.1.1.7. The staff's evaluation of these exceptions is included in SER Section 3.5.2.2.2. The staff concluded that these exceptions are acceptable.

The exceptions to the GALL Fire Protection AMP are described in LRA Section B.1.18. These exceptions primarily relate to the frequency of inspection of various fire protection component groups. With respect to concrete walls, floors, and ceilings that serve a fire barrier intended function, the inspection frequency is consistent with the Structures Monitoring AMP, which the applicant credits to manage aging of all concrete structural components, including those that serve a fire barrier intended function. Therefore, from the standpoint of structural integrity, the staff finds this acceptable. The staff review of the applicant's Fire Protection AMP is presented in SER Section 3.3.2.3.

The aging effects identified in the LRA for the primary containment are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs with managing the aging effects described above for the primary containment:

- ASME Section XI, Subsection IWE Program
- 10 CFR Part 50, Appendix J Inspection Program
- Protective Coating Monitoring and Maintenance Program
- Structures Monitoring Program
- Fire Protection Program

In the LRA, Section 3.5.1.2.9 discusses an exception to the GALL Report for evaluation of the ECCS suction header identified under Reference Nos. 3.5.1.12 and 3.5.1.14 in LRA Table 3.5-1. The applicant stated that this item is evaluated with GALL item V.D2.1-a, with the results

presented in Reference Nos. 3.2.1.2 and 3.2.1.4 in LRA Table 3.2-1. Table 3.2-1 references the Water Chemistry and One-Time Inspection Programs as the AMPs for these items. In accordance with GALL item II.B1.1.1-a, aging of the ECCS suction header should be managed by ASME Section XI, Subsection IWE. The applicant was requested in RAI 3.5-9 to (a) explain why the ECCS suction header was evaluated as part of the ECCS piping and not as part of the containment, and (b) submit a detailed technical basis demonstrating that an equivalent level of safety is achieved with the applicant's approach, when compared to Subsection IWE requirements.

In its response to RAI 3.5-9, the applicant stated the following:

NUREG-1801 addresses the ECCS Suction Headers in two locations. Item II.B.1.1.1-a addresses the Primary Containment (ASME Class MC components) and manages Loss of Material due to Corrosion. Item V.D2.1.a addresses Piping and Fittings, (generally ASME Class 2 components) and manages Loss of Material due to General, Pitting, and Crevice Corrosion.

The current design bases for the Dresden and Quad Cities ECCS Suction Headers classify these as ASME Class 2 components. This is reflected on boundary diagrams LR-DRE-—29 (drawing coordinates C-3 to C-6), LR-DRE—360-1 (drawing coordinates C-3 to C-6), LR-QDC—39-1 (drawing coordinates E-3 and E-7), and LR-QDC—81-9 (drawing coordinates E-3 and E-7). The ASME Code Class flags are defined on boundary diagrams LR-DRE—11-2 and LR-QDC—12-3. Since both NUREG-1801 line items provide an NRC-accepted method to manage the loss of material due to corrosion in carbon steel components, the Dresden and Quad Cities LRA selected the applicable NUREG-1801 line item based on current design bases. For this reason, the ECCS Suction Headers are managed by the Water Chemistry (B.1.2) and One-time Inspection (B.1.23) aging management programs.

Note: The ECCS Suction Header shown on boundary diagram LR-DRE—29 is shown in black. It should have been shown in green as an in-scope component.

The staff acknowledges the applicant's basis for the exception to GALL Item II.B1.1.1-a. Since the applicant has included the ECCS suction headers under V.D2.1 ECCS Piping and Fittings, and the staff has accepted the applicant's AMR for the ECCS, including the suction headers, RAI 3.5-9 is resolved.

The 10 CFR Part 50, Appendix J Inspection and Structures Monitoring Programs are considered common AMPs. The staff's evaluation of the common AMPs is in SER Section 3.0.3. The staff's evaluation of the ASME Section XI, Subsection IWE and the Protective Coating Monitoring and Maintenance Programs is in SER Section 3.5.2.3. The staff's evaluation of the Fire Protection AMP is in SER Section 3.3.2.3. The staff finds that the applicant has credited the appropriate AMPs with managing aging of the primary containment.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the primary containment will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5.2.4.2 Other Class I Structures

Summary of Technical Information in the Application. This section addresses the other Class 1

structures. The applicant's description of each structure and the component groups requiring AMR is in the LRA section and table shown in parentheses.

- reactor building (LRA Section 2.4.2 and Table 2.4-2)
- main control room and auxiliary electric equipment room (LRA Section 2.4.3 and Table 2.4-3)
- turbine building (LRA Section 2.4.4 and Table 2.4-4)
- diesel generator building (LRA Section 2.4.5 and Table 2.4-5)
- station blackout building and yard structures (LRA Section 2.4.6 and Table 2.4-6)
- isolation condenser pump house (Dresden only) (LRA Section 2.4.7 and Table 2.4-7)
- makeup demineralizer building (Dresden only) (LRA Section 2.4.8 and Table 2.4-8)
- radwaste floor drain surge tank (LRA Section 2.4.9 and Table 2.4-9)
- miscellaneous foundations (LRA Section 2.4.10 and Table 2.4-10)
- crib house (LRA Section 2.4.11 and Table 2.4-11)
- Unit 1 crib house (Dresden only) (LRA Section 2.4.12 and Table 2.4-12)

For each component group listed, LRA Tables 2.4-2 through 2.4-12 specify a reference to LRA Section 3 for the AMR results. The applicant used the SRP-LR report format in LRA Table 3.5-1 to present its AMR for the Class 1 structures components addressed in the GALL Report. Further evaluation of aging management, as recommended by GALL, is discussed in LRA Section 3.5.1.1. Aging management programs or evaluations that are different from those in GALL are described in LRA Section 3.5.1.2. In LRA Table 3.5-2, the applicant identified the Class 1 structures component groups that are not addressed in the GALL Report and provided the following information on material, environment, aging effect(s)/mechanism(s), and AMP(s).

Utilizing the Dresden and Quad Cities Aging Management Review Aid, the staff identified the applicable materials for Class 1 structures components as carbon steel; stainless steel; galvanized or coated carbon steel; aluminum; reinforced concrete; grout; concrete block; silicone rubber; polyethylene; and vapor barrier, coal tar pitch, rigid insulation, felt, gravel, or single-ply hypalon pavers for roofing. The staff also identified the applicable environments as outside containment, exposed to aggressive environment, indoor, outdoor, weather exposed, flowing water, exposed to water, ambient inside building, and fluid (water, fuel).

Aging Effects

The LRA identifies the following applicable aging effects:

- loss of material
- change in material properties
- cracking
- separation and water in-leakage
- hardening
- reduction in concrete anchor capacity

Tables 2.4-2 through 2.4-12 of the LRA reference LRA Section 3.5 for the AMR results, except for the following:

- boral and boraflex neutron absorbing sheets in chemically treated oxygenated water (LRA References 3.3.1.9 and 3.3.1.12)

- steel fire doors (LRA References 3.3.2.4 and 3.3.1.18)
- cementitious fire proofing and ceramic fiber fire wrap (LRA References 3.3.2.62 and 3.3.2.63)
- concrete block fire barriers (LRA Reference 3.3.2.129)
- fire barrier and flood barrier penetration seals (LRA Reference 3.3.1.18)
- stainless steel spent fuel storage racks in chemically treated oxygenated water (LRA Reference 3.3.1.11)
- fire barrier walls, ceilings and floors (LRA Reference 3.3.1.28)
- carbon steel piles exposed to soil and ground water (LRA Reference 3.3.2.207)

Aging Management Programs

The LRA credits the following AMPs for managing the identified aging effects:

- Structures Monitoring Program
- Masonry Wall Program
- RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," Program
- Water Chemistry Program
- Fire Protection Program
- Boraflex Monitoring Program

A description of these AMPs is provided in LRA Appendix B. The applicant concluded that the effects of aging will be adequately managed by these AMPs such that there is reasonable assurance that the intended functions will be maintained during the period of extended operation.

Staff Evaluation. This section provides the staff's evaluation of the applicant's AMR for other Class I structures and the applicability of the AMPs credited with managing the aging effects. Table 3.5-1 of this SER provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Table 3.5-1 for the components that are addressed in the GALL Report. Section 3.5.2.1 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, which do not require further evaluation. Section 3.5.2.2 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, for which the GALL Report recommends further evaluation.

The staff's evaluations of the aging management evaluations for the other Class 1 structures that are different from those described in the GALL Report, or are not addressed in GALL, are discussed below.

Aging Effects

Concrete: In entry 3.5.1.22 in LRA Table 3.5-1, the applicant identifies a number of exceptions to the GALL Report for Group 6 structures (water-control structures). These exceptions are discussed in LRA Sections 3.5.1.2.1 through 3.5.1.2.7.

In LRA Section 3.5.1.2.1, the applicant discussed an exception to aging of concrete due to settlement. The applicant stated the following:

The Dresden and Quad Cities licensing basis does not include a program to monitor concrete for settlement nor is a de-watering system in place. Dresden and Quad Cities structures are founded on rock or naturally compacted soil with no documented changes in groundwater conditions or a history of settlement. Cracks, distortion and increase in component stress level due to settlement are not applicable and no aging management is required.

The staff finds the applicant's explanation to be acceptable because there has been no requirement to monitor settlement as part of the licensing basis for all four units, and there are no de-watering systems in place.

In LRA Sections 3.5.1.2.2 through 3.5.1.2.7, the applicant states that the aging management program RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," Program (B.1.31) is credited for managing concrete in accessible areas for the following aging effects/mechanisms:

- loss of material and cracking due to freeze-thaw
- increase in porosity and permeability and loss of strength due to leaching of calcium hydroxide of concrete
- expansion and cracking due to reaction with aggregates
- loss of material due to abrasion and cavitation of concrete
- cracking, loss of bond, and loss of material (spalling, scaling) due to corrosion of embedded steel
- increase in porosity and permeability, cracking, and loss of material (spalling, scaling) due to aggressive chemical attack

The staff finds that this aspect of the applicant's AMR is consistent with the GALL Report, and therefore is acceptable. For the first three aging effects/mechanisms identified above, the applicant stated that no aging management is required for concrete in inaccessible areas. In LRA Sections 3.5.1.2.2 through 3.5.1.2.4, the applicant provides the following technical bases for this conclusion:

- Dresden and Quad Cities have documented evidence to show that the concrete air content is between 3 percent and 6 percent.
- Plant inspections did not show freeze-thaw degradation.
- Dresden and Quad Cities have documented evidence that the concrete used was constructed in accordance with the recommendations in ACI 201.2R-77 for durability and

with no evidence of reactive aggregates.

The staff finds this aspect of the applicant's AMR to be consistent with the GALL Report and therefore acceptable.

Section 3.5.1.2.5 of the LRA states that loss of material due to abrasion and cavitation of concrete in accessible areas is managed by the RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," Program. The applicant further stated that the Dresden and Quad Cities water flow velocity (3.68 ft/s) is less than the industry abrasion erosion threshold velocity of 4 ft/s, and also less than the industry cavitation threshold velocity of 25 ft/s. The applicant concluded that loss of material due to abrasion and cavitation of concrete in inaccessible areas is not applicable and no aging management is required. As discussed under GALL Item III A6.1-h, the staff expects that for Group 6 structures (water-control structures), loss of material due to abrasion and cavitation of reinforced concrete in a flowing water environment will be managed by the RG 1.127 program. This applies to all concrete—exterior above and below grade, foundation, and interior slab. In RAI 3.5-11, the staff requested that the applicant (1) clarify what is meant by "accessible" and "inaccessible" areas for all Group 6 components, (2) identify the reference for the stated industry abrasion erosion and cavitation threshold velocities, and (3) provide the technical basis for the reported Dresden and Quad Cities water flow velocity.

In response to RAI 3.5-11, the applicant stated the following:

- (1) For Group 6 Structures, the term inaccessible applies to those structures and portions of structures that are either buried or submerged under water where the confined area access or high flow rates make diver entrance unsafe without a dual unit outage.
- (2) Abrasion and cavitation are limited to concrete exposed to flowing water containing abrasives. Industry sources use an abrasion erosion threshold velocity for concrete of 4.0 feet per second (Ref.: EPRI TR-110025, Concrete Structural Aging References Manual of Nuclear Power Plants) and a cavitation threshold velocity for concrete of 25 fps when abrupt changes occur in closed conduits and 40 fps in continuously flowing water (Refs. EPRI TR-114881, Aging Effects for Structures and Structural Components (Structural Tools), Final Report and EPRI TR-103842, Class-I Structures - License Renewal Industry Report). Cavitation is not applicable for concrete structures continuously exposed to flowing water if the water velocity is less than these values.
- (3) The maximum water velocity in the crib houses for Dresden and Quad Cities is based on the velocity of the circulating water pump combined with the diesel generator cooling water pump, due to their close proximity and the reduced flow area in the intake tunnel where these pumps are located. The circulating water pump capacity is 157,000 gpm and the diesel generator cooling water pump capacity ranges from 1100 gpm to 1304 gpm. Flow area in the intake tunnel adjacent to the circulating water pump is conservatively 8 ft x 12 ft or 96 ft².

$$\text{Velocity in fps} = (158,304 \text{ gal/min}) \times (1 \text{ min}/60 \text{ sec}) \times (0.134 \text{ ft}^3/\text{gal}) / (96 \text{ ft}^2) = 3.68 \text{ fps} < 4.00 \text{ fps.}$$

Since underwater accessible areas will be inspected, any occurrences of abrasion erosion or cavitation will be detected in these areas. However, the staff is unclear about the applicant's justification that abrasion erosion and cavitation do not require aging management for inaccessible areas. Part of the definition of "inaccessible areas", in part (1) of the response, is "where...high flow rates make diver entrance unsafe without a dual unit outage." These would

appear to the areas most susceptible to abrasion erosion and possibly cavitation. The applicant was requested to quantify "high flow rates." In addition, it is unlikely that the water velocity is a uniform 3.68 ft/sec across the entire flow area in the intake tunnel, adjacent to the circulating water pump. The applicant was requested to consider a realistic velocity profile in estimating the maximum water velocity. In a letter dated December 5, 2003, the applicant stated that the inaccessible areas are better described as those areas where continuous flow makes diver entrance unsafe without a dual unit outage. The highest velocities experienced in the underwater structures will be in the individual circulating water bays, adjacent to the circulating water pumps. The 3.68 ft/sec flow velocity corresponds to the velocity at the pump suction centerline, which is considered to be a high value. The individual circulating water pump bays are accessible and will be inspected since they can be taken out of service during the applicable unit outage. Since the limiting locations for flow velocities and potential erosion effects are to be inspected, the inaccessibility of the areas of lower flow velocity is not detrimental to aging management. The staff finds the applicant's response acceptable. RAI 3.5-11 is resolved.

For Group 6 structures (water-control structures), LRA Section 3.5.1.2.6 indicates that cracking, loss of bond, and loss of material (spalling, scaling) due to corrosion of embedded steel of concrete is managed by RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants, only for accessible areas. Similarly, LRA Section 3.5.1.2.7 indicates that increase in porosity and permeability, cracking, and loss of material (spalling, scaling) due to aggressive chemical attack of concrete is managed by RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants, only for accessible areas. Sections 3.5.1.2.6 and 3.5.1.2.7 of the LRA indicate that aging management is not required for these aging effects/mechanisms in inaccessible areas because Dresden and Quad Cities ground-water test data show that the below-grade environment is not aggressive based on NUREG-1801 criteria (chlorides less than 500 ppm, sulfates less than 1500 ppm, and pH greater than 5.5); examination of representative samples of below-grade concrete, when excavated for any reason, is included as part of the Structures Monitoring Program; and to ensure conditions are maintained throughout the period of extended operation, the Structures Monitoring Program (B.1.30) will be enhanced to include monitoring of below-grade water chemistry to demonstrate that the environment remains nonaggressive.

As indicated in GALL Items III A6.1-d and e, for Group 6 structures (water-control structures), these aging effects/mechanisms are managed by the RG 1.127 program for all concrete. In the special case of water-control structures, the applicant's technical bases for excluding inaccessible areas from aging management may be applied only to concrete buried in the ground. In RAI 3.5-12, the staff requested that the applicant (a) define the term "inaccessible areas" as it relates to the subject aging effects/mechanisms in water-control structures and specifically discuss whether below-grade and below-water concrete in water-control structures is being excluded from aging management; and (b) if applicable, submit a detailed technical justification for not managing aging of below-grade/below-water concrete in water-control structures, in light of past industry operating experience indicating there is a significant potential for degradation.

In its response to RAI 3.5-12, the applicant stated the following:

- (a) The term inaccessible applies to those structures and portions of structures that are either buried or submerged under water where the confined area access makes diver entrance unsafe without a dual unit outage. The term accessible applies to those structures and portions of structures that are interior, above-grade exterior, or under water accessible.

- (b) Aging Management Reference 3.5.1.22 states that this aging management evaluation is "Consistent with NUREG 1801, with exception". The exceptions to NUREG-1801 are described in LRA sections 3.5.1.2.6 and 3.5.1.2.7. The technical bases for exceptions 3.5.1.2.6 and 3.5.1.2.7 apply to the below-grade and inaccessible under water environments.

This technical justification for Group 6 structures is the same as the evaluation for Groups 1, 2, and 3 structures as discussed under NUREG-1801, Items III A1, 2, 3.1-e and III A1, 2, 3.1-g. Dresden and Quad Cities ground water test data obtained during construction, in the 1980's, 1990 's, and 2000's shows that the below-grade environment is not aggressive based on NUREG-1801 criteria with chlorides less than 500 ppm, sulfates less than 1500 ppm, and pH greater than 5.5. The specified aging effects are not significant and no aging management is required of components in inaccessible areas. As recommended in the letter from Christopher I. Grimes to Alan Nelson dated 4/5/02, Subject: "Staff response to industry's proposed revisions of chapters II and III of generic aging lessons learned (GALL) report on aging management of concrete elements" that further evaluation of concrete components in inaccessible areas is not required for which non-aggressive environment can be demonstrated. Therefore, Exelon is in compliance with the Interim Staff Guidance (ISG) on concrete for inaccessible area concrete components. To ensure conditions are maintained throughout the period of extended operations, the Structures Monitoring Program (B.1.30) includes monitoring of below-grade water chemistry to demonstrate that the environment remains non-aggressive.

The applicant has not specifically addressed a key element of this RAI. The ultimate heat sink raw water is considered aggressive by its nature, and all concrete exposed to it needs to be managed for these aging effects/mechanisms. In light of past industry operating experience indicating there is a significant potential for degradation, the applicant was requested to specifically discuss whether below-water concrete in water-control structures is being excluded from aging management, and if applicable, submit a detailed technical justification for not managing aging of below-water concrete in water-control structures. The applicant was also requested to submit its AMR for concrete exposed to the ultimate heat sink raw water, and either identify the credited AMPs or submit a detailed technical justification for not managing the aging of concrete exposed to raw water. In a letter dated December 5, 2003, the applicant stated that all in-scope below-water concrete (submerged) exposed to the ultimate heat sink raw water environment will be managed for aging except the inaccessible common area in the crib house intake outside of the individual bays to the circulating water pumps where continuous flow makes diver entrance unsafe without dual unit outage. Aging management program B.1.31 provides for managing the aging effects of in-scope accessible concrete exposed to the ultimate heat sink raw water environment at Dresden and Quad Cities. The staff finds the applicant's response acceptable and considers RAI 3.5-12 resolved.

Steel: Under Reference No. 3.5.1.28 in LRA Table 3.5-1, the applicant identified an exception to the GALL Report for cracking due to crack initiation and growth due to SCC and loss of material due to crevice corrosion. This exception applies to the stainless steel liners in the Dresden and Quad Cities radwaste floor drain surge tanks. In LRA Section 3.5.1.2.8, the applicant states the following:

Stainless steel liners in the Dresden and Quad Cities floor drain surge tanks are not susceptible to cracking due to crack initiation and growth due to SCC or loss of material due to crevice corrosion and do not require aging management.

The floor drain surge tanks are vented and constructed of reinforced concrete with a stainless steel liner. The floor drain surge tank liner is not considered susceptible to SCC, since the tanks are vented (low service pressure), concentrated chlorides in the effluent are not expected, and the temperature of effluents would be ambient (less than threshold temperature of 140 degrees F for SCC). Stainless steel is susceptible to crevice corrosion given a sufficiently narrow crevice in the

presence of oxygen. Crevice corrosion most frequently occurs in joints, and connections, or points of contact between metals and nonmetals, such as gasket surfaces, lap joints, and under bolt heads where contaminants can concentrate. The stainless steel liner has all welded seams and plug welds for anchorage, with all welds ground smooth. Therefore, the occurrence of crevice corrosion in the tank liner is not expected due to its configuration.

In addition, the floor drain surge tank has a drain system installed between the liner and concrete that would intercept leakage from behind the liner plate weld seams and drain the leakage to the attached pump house room. There have been no documented corrective action requests related to aging associated with the stainless steel liner plate drains.

The staff finds the applicant's explanation to be acceptable and agrees that the stainless steel liners in the floor drain surge tanks do not require aging management.

In LRA Table 3.5-2 (Reference Nos. 1, 2, 6, and 16), the applicant identified loss of material/general corrosion as an aging effect/mechanism requiring management for the following galvanized or coated carbon steel components in the station blackout building and yard structures:

- bus duct covers
- bus duct supports
- dead end structures
- transmission towers

The applicant credited the Structures Monitoring Program as the AMP for these component groups. In Appendix B.1.30, Structures Monitoring Program, the applicant stated that the program will be enhanced to provide for inspections of structural steel in offsite power structural components. The staff finds the applicant's AMR for these components to be acceptable and agrees that the Structures Monitoring Program is an acceptable program to manage the identified aging effect.

Table 2.4-6 of the LRA references LRA Table 3.3-2, entry 3.3.2.207, for the AMR of carbon steel piles exposed to soil and ground water in the station blackout building (Dresden only). Section 2.4.6 of the LRA provides no description of the steel piles. In SER Section 2.4.6.2, the staff requested the applicant in part (c) of RAI 2.4.5 to describe the steel piles at Dresden and define intended functions and explain why the "Aging Management Ref" for the steel piles is 3.3.2.207, which is in LRA Section 3.3 for Auxiliary Systems. The applicant described the steel piles and revised the AMR reference. Consistent with past staff determinations, the applicant has concluded that no aging management is necessary for the steel piles. The staff accepts this assessment.

Elastomers/Roofing: In LRA Table 3.5-2 (Reference Nos. 3, 4, 7, 11, 12, and 13), the applicant identifies the following aging effects/mechanisms for elastomer materials that require management in various component groups for Class 1 structures:

- hardening cracking/elastomer degradation in silicone rubber used in caulking/sealants, door seals, and secondary containment boot seals
- change in material properties/loss of resiliency, loss of strength, loss of elasticity in silicone rubber caulking/sealants and polyethylene seismic gap filler

- separation and water in-leakage/weathering in vapor barrier, coal tar pitch, rigid insulation, felt, gravel, or single-ply hypalon pavers for roofing

The applicant credited the Structures Monitoring Program as the AMP for these component groups. In Appendix B.1.30, "Structures Monitoring Program," the applicant states that the program will be enhanced to provide for inspection parameter specificity for nonstructural joints, roofing, grout pads, and isolation gaps. The staff finds the applicant's AMR for these components to be acceptable and agrees that the Structures Monitoring Program is an acceptable program to manage the identified aging effects.

Aluminum New Fuel Storage Racks: In LRA Table 3.5-2 (Reference No. 3.5.2.10), the applicant stated that there are no viable aging effects for the aluminum new fuel racks in the indoor environment of the reactor building, and concluded that no AMP is required. The staff agrees with the applicant that no aging management is required for the aluminum new fuel racks.

Spent Fuel Storage Rack Materials: Table 2.4-2 of the LRA references LRA Table 3.3-1 for the AMR of the spent fuel storage racks and the neutron absorbers in the reactor building:

- reduction of neutron-absorbing capacity and loss of material for boral and boraflex neutron absorbing sheets in chemically treated oxygenated water (boral—LRA Reference 3.3.1.9; boraflex—LRA Reference 3.3.1.12)
- crack initiation and growth of stainless steel spent fuel storage racks in chemically treated oxygenated water (LRA Reference 3.3.1.11)

In LRA Table 3.3-1, Reference 3.3.1.12 identifies the Boraflex Monitoring AMP (LRA B.1.36) for managing reduction of neutron-absorbing capacity in boraflex, used at Quad Cities. The discussion column indicates that this AMP is consistent with the GALL Report. The staff finds this acceptable.

In LRA Table 3.3-1, Reference 3.3.1.11 identifies the Water Chemistry AMP (LRA B.1.2) for managing crack initiation and growth in stainless steel spent fuel storage racks. The discussion column indicates that this AMP is consistent with the GALL Report, with exceptions as noted in LRA B.1.2. The exceptions do not affect water chemistry monitoring of the spent fuel pool.

On the basis that the spent fuel storage racks are made of the same material as the spent fuel pool liner and are in the same environment, the applicant's AMP for the spent fuel pool liner (i.e., Water Chemistry AMP plus fuel pool water level monitoring) will also manage aging of the spent fuel storage racks. Any reduction in the spent fuel pool water level that is attributed to crack initiation and growth in the liner would be an indicator that crack initiation and growth may also be occurring in the spent fuel storage racks. The staff finds this acceptable.

Fire and Flood Barrier Materials: Tables 2.4-2 through 2.4-7, 2.4-11, and 2.4-12 of the LRA reference LRA Tables 3.3-1 and 3.3-2 for the AMR results for the following fire and flood barrier items:

- loss of material/wear for steel fire doors (LRA References 3.3.2.4 and 3.3.1.18)

- reduced fire protection capability for cementitious fire proofing and ceramic fiber fire wrap (LRA References 3.3.2.62 and 3.3.2.63) (based on applicant's response to an RAI related to LRA Section 2.3)
- cracking of concrete block fire barriers (LRA Reference 3.3.2.129)
- increased hardness and shrinkage of sealant for fire barrier and flood barrier penetration seals (LRA Reference 3.3.1.18)
- cracking and spalling and loss of material for concrete and reinforcement of fire barrier walls, ceilings, and floors (LRA Reference 3.3.1.28)

The applicant's exceptions to the GALL Fire Protection AMP are described in LRA Section B.1.18. These exceptions primarily relate to the frequency of inspection of the various fire protection component groups. The staff review of the applicant's Fire Protection AMP is presented in SER Section 3.3.2.3.

The aging effects identified in the LRA for the Class 1 structures are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs with managing the aging effects described above for Class 1 structures:

- Structures Monitoring Program
- Masonry Wall Program
- RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," Program
- Water Chemistry Program
- Fire Protection Program
- Boraflex Monitoring Program

The Structures Monitoring and Water Chemistry Programs are considered common AMPs. The staff's evaluation of the common AMPs is in SER Section 3.0.3. The staff's evaluation of the Masonry Wall Program and RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants, is in SER Section 3.5.2.3. The staff's evaluation of Fire Protection and Boraflex Monitoring is in SER Section 3.3.2.3. The staff finds that the applicant has credited the appropriate AMPs to manage the aging effects for the materials and environments associated with the Class 1 structures.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the Class 1 structures will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by

10 CFR 54.21(a)(3).

3.5.2.4.3 Station Chimney (LRA Section 2.4.13)

Summary of Technical Information in the Application. The applicant's description of the station chimney (Dresden and Quad Cities) is in LRA Section 2.4.13. The component groups requiring AMR are identified in LRA Table 2.4-13. For each component group listed, LRA Table 2.4-13 specifies a reference to LRA Section 3 for the AMR results. The AMR results are provided in LRA Tables 3.5-1 and 3.5-2. The applicant used the SRP-LR report format in LRA Table 3.5-1 to present its AMR for station chimney components addressed in the GALL Report. Further evaluation of aging management, as recommended by GALL, is discussed in LRA Section 3.5.1.1. In LRA Table 3.5-2, the applicant identified the station chimney component groups that are not addressed in GALL and provided information about material, environment, aging effect(s)/mechanism(s), and AMPs.

Utilizing the Dresden and Quad Cities Aging Management Review Aid (February 2003), the staff identified the applicable materials for Station Chimney components as carbon steel, reinforced concrete, concrete block, and silicone rubber. Utilizing the Review Aid the staff also identified the applicable environments as exposure to aggressive environment and weather exposed.

Aging Effects

The LRA identifies the following applicable aging effects for the station chimney components:

- loss of material
- change in material properties
- cracking

Table 2.4-13 of the LRA references LRA Section 3.5 for the AMR results for all components.

Aging Management Programs

The LRA credits the following AMPs for managing the identified aging effects:

- Structures Monitoring Program
- Masonry Wall Program

A description of these AMPS is provided in LRA Appendix B. The applicant concludes that the effects of aging will be adequately managed by these AMPs such that there is reasonable assurance that the intended functions will be maintained during the period of extended operation.

Staff Evaluation. This section provides the staff's evaluation of the applicant's AMR for the station chimney, and of the applicability of the AMPs credited with managing the aging effects. Table 3.5-1 of this SER provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Table 3.5-1 for the components that are addressed in the GALL Report. SER Section 3.5.2.1 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, which do not require further evaluation. Section 3.5.2.2 of this SER provides the staff's

evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, for which the GALL Report recommends further evaluation.

The staff's evaluations of the aging management evaluations for the station chimney that are not addressed in the GALL Report are discussed below.

Aging Effects

Elastomers: In LRA Table 3.5-2 (Reference No. 3.5.2.4), the applicant identified change in material properties/loss of resiliency, loss of strength, loss of elasticity in silicone rubber caulking/sealants as an aging effect/mechanism requiring management in the station chimney. The applicant credited the Structures Monitoring Program as the AMP for this component group. In Appendix B.1.30, Structures Monitoring Program, the applicant stated that the program will be enhanced to provide for inspection parameter specificity for nonstructural joints, roofing, grout pads, and isolation gaps. The staff finds the applicant's AMR for this component to be acceptable and agrees that the Structures Monitoring Program is an acceptable program to manage the identified aging effects.

Concrete Block: In LRA Table 3.5-2 (Reference No. 3.5.2.9), the applicant identified cracking/restraint, shrinkage, creep, and aggressive environment in concrete block masonry walls as aging effects/mechanisms requiring management in the station chimney. The applicant credited the Masonry Wall Program as the AMP for this component group. The staff finds the applicant's AMR for this component to be acceptable and agrees that the Masonry Wall Program is an acceptable program to manage the identified aging effects.

The aging effects identified in the LRA for the station chimney are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs to manage the aging effects described above for the station chimney:

- Structures Monitoring Program
- Masonry Wall Program

The Structures Monitoring Program is considered a common AMP. The staff's evaluation of the common AMPs is in SER Section 3.0.3. The staff's evaluation of the Masonry Wall Program is in SER Section 3.5.2.3.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the station chimney will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5.2.4.4 Cranes and Hoists

Summary of Technical Information in the Application. The applicant described the cranes and hoists (Dresden and Quad Cities) in LRA Section 2.4.14. Table 2.4-14 of the LRA lists the component groups and specifies the location of the AMR results in LRA Section 3. For cranes and hoists, the AMR results are provided in LRA Table 3.3-1, under Auxiliary Systems. The applicant used the SRP-LR report format in LRA Table 3.3-1 to present its AMR for cranes and hoists addressed in the GALL Report. Further evaluation of aging management, as recommended by GALL, is discussed in LRA Sections 3.3.1.1.6 and 4.7.1. The credited AMP, including any enhancements or exceptions to the comparable GALL program, is described in LRA Section B.1.15.

Utilizing the Dresden and Quad Cities Aging Management Review Aid, the staff identified the applicable materials for cranes and hoists as structural steel A-36, A-7, A-285, and A-759, and the applicable environment as air at 100 percent relative humidity and 49 °C (120 °F).

Aging Effects

The applicant identified the applicable aging effects for the cranes and hoists in LRA Table 3.3-1 (Reference Nos. 3.3.1.3 and 3.3.1.14) as cumulative fatigue damage and loss of material due to general corrosion and wear. Cumulative fatigue is a TLAA, addressed in LRA Section 4.7.1.

Aging Management Programs

The applicant credits the Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems (B.1.15) AMP for managing loss of material due to general corrosion and wear. A description of this AMP is provided in LRA Appendix B, Section B.1.15. The applicant concludes that loss of material due to general corrosion and wear will be adequately managed by this AMP such that there is reasonable assurance that the intended functions will be maintained during the period of extended operation.

Staff Evaluation. This section presents the staff's evaluation of the applicant's AMR for cranes and hoists, and the applicability of the AMP credited with managing the aging effects.

Aging Effects

Table 3.3-1 (Reference No. 3.3.1.3) of the LRA states that further evaluation of cumulative fatigue damage for cranes and hoists is provided in LRA Section 3.3.1.1.6. Section 3.3.1.1.6 of the LRA states that cumulative fatigue damage of load handling cranes is a TLAA, as defined in 10 CFR 54.3, and is evaluated in accordance with 10 CFR 54.21(c)(1). Section 4.7.1 of the LRA "Reactor Building Crane Load Cycles," documents the applicant's evaluation of this TLAA. On the basis that the number of load cycles expected over a 60-year operating life is significantly less than the initial design rating for full-load cycles, the applicant has concluded that this TLAA remains valid for the period of extended operation. The staff's detailed evaluation of this TLAA is provided in SER Section 4.7.

Table 3.3-1 (Reference No. 3.3.1.14) of the LRA states that loss of material due to general corrosion and wear of cranes, including bridges, trolleys, and rail systems, will be managed by

the AMP Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems, described in LRA Section B.1.15.

Based on information provided in LRA Section 2.4.14, the staff could not identify which "LRA Aging Management Ref No." is applicable to each of the crane/rail systems included in the scope of LRA 2.4.14. Also, it was unclear to the staff why cranes and hoists have been split into two groups, covered under different sections of LRA Section 2.0, and why all references to the AMR results point to LRA Section 3.3—Auxiliary Systems. In its response to RAI 2.4-9, the applicant listed all cranes and hoists that are in the license renewal scope and also listed all cranes and hoists that are not in the license renewal scope. The staff found the applicant's response to RAI 2.4-9 to be acceptable, from the standpoint of clarifying the scope.

The applicant also clarified the AMR of cranes and hoists in its response to RAI 2.4-9. Cranes and hoists related to refueling are included under auxiliary systems, while all other cranes and hoists within the scope of license renewal are included under structures. In all cases, the AMP Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems, described in LRA Section B.1.15, is credited with managing loss of material due to general corrosion and wear. The staff reviewed this AMP to ensure that all cranes and hoists are included in its scope. The AMP description in LRA Section B.1.15 addresses only load handling systems related to refueling. In a letter dated December 5, 2003, the applicant stated that the program scope is not restricted to cranes and hoists related to refueling but includes all cranes and hoists within the scope of license renewal. The staff finds the applicant's response adequate.

The aging effects identified in the LRA for the cranes and hoists are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the AMP Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems (B.1.15) with managing loss of material due to general corrosion and wear for cranes and hoists.

The staff's detailed evaluation of this AMP is provided in SER Section 3.3.2.3.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the cranes and hoists will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5.2.4.5 Component Supports Commodity Group

Summary of Technical Information in the Application. The applicant's description of the component supports commodity group (Dresden and Quad Cities) is in LRA Section 2.4.15.

The component groups requiring AMR are identified in LRA Table 2.4-15. For each component group listed, LRA Table 2.4-15 specifies a reference to LRA Section 3 for the AMR results. The applicant used the SRP-LR report format in LRA Table 3.5-1 to present its AMR for the component supports commodity group components addressed in the GALL Report. Further evaluation of aging management, as recommended by the GALL Report, is discussed in LRA Section 3.5.1.1. Aging management programs or evaluations that are different from those in GALL are described in LRA Section 3.5.1.2. In LRA Table 3-5-2, the applicant identified the component supports commodity group components that are not addressed in the GALL Report and provided information on material, environment, aging effect(s)/mechanism(s), and AMP(s).

Utilizing the Dresden and Quad Cities Aging Management Review Aid (February 2003), the staff identified the applicable materials for the component supports commodity group as carbon steel, low-alloy steel (yield strength 150 ksi), stainless steel, steel and nonsteel materials (e.g., lubrite plates), and nonmetallic materials (e.g., rubber). Utilizing the Review Aid, the staff identified the applicable environments as inside containment; outside containment; submerged (torus grade water); and 25–288 /C (77–550 /F) demineralized water.

Aging Effects

The LRA identifies the following applicable aging effects:

- loss of material
- cumulative fatigue damage
- cracking
- loss of mechanical function
- reduction or loss of isolation function

In most cases, LRA Table 2.4-15 references LRA Section 3.5 for the AMR results for all components. For some structural support members, LRA Table 2.4-15 references LRA Section 3.2, LRA Table 3.2-2 (Reference Nos. 3.2.2.79, 3.2.2.80, and 3.2.2.81).

Aging Management Programs

The LRA credits the following AMPs for managing the identified aging effects:

- Structures Monitoring Program
- ASME Section XI, Subsection IWF Program
- Bolting Integrity Program
- Water Chemistry Program
- One-Time Inspection

A description of these AMPs is provided in LRA Appendix B. The applicant concludes that the effects of aging will be adequately managed by these AMPs such that there is reasonable assurance that the intended functions will be maintained during the period of extended operation.

Staff Evaluation. This section presents the staff's evaluation of the applicant's AMR for the component supports commodity group and the applicability of the AMPs credited with managing the aging effects. Table 3.5-1 of this SER provides a summary of the staff's evaluation of

components, aging effects/mechanisms, and AMPs listed in LRA Table 3.5-1 for the components that are addressed in the GALL Report. Section 3.5.2.1 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, which do not require further evaluation. Section 3.5.2.2 of this SER provides the staff's evaluation of the aging management evaluations in the GALL Report that are relied on for license renewal, for which the GALL Report recommends further evaluation.

The staff's evaluations of the aging management evaluations for the component supports commodity group that are different from those described in the GALL Report, or are not addressed in GALL, are discussed below.

Aging Effects

Section 3.5.1.2.10 of the LRA discusses an exception to the GALL Report for XI.M18, Bolting Integrity, identified under Reference No. 3.5.1.32 of LRA Table 3.5-1. The applicant states that Dresden and Quad Cities recirculation piping loop component supports inside the containment have ASTM 193 Grade B7 high-strength low-alloy steel bolting, which will be managed by ASME Section XI, Subsection IWF (B.1.27). The applicable GALL item number is III.B.1.1.2-a, which identifies XI.M18, Bolting Integrity, as an acceptable AMP for high-strength low-alloy steel bolts (yield strength greater than 150 ksi) used in NSSS component supports. In RAI 3.5-13, the applicant was requested to provide the following information:

- (a) It is stated in LRA Section 3.5.1.2.10 that "the specification for ASTM 193 Grade B7 lists minimum yield strength of 105 ksi, with no upper yield strength installed." Clarify what is meant by the phrase "no upper yield strength installed."
- (b) Verify that the actual yield strengths of the Dresden and Quad Cities recirculation piping loop component support bolting do not exceed 150 ksi.
- (c) Clarify whether other Class 1, 2, 3 and MC component supports use high-strength low-alloy steel bolts. If so, describe the materials used and the corresponding AMP.

In its response to RAI 3.5-13, the applicant stated the following:

Exelon has reviewed LRA Section 3.5.1.2.10 and the following additional information is provided:

(a) Table 2, "Mechanical Requirements", found in ASTM A193, Standard Specification for Alloy-Steel and Stainless Steel Bolting Materials for High-Temperature Service, specifies a minimum yield strength of 105 ksi. No upper limit is specified in the ASTM standard. The phrase "no upper yield strength installed" means there is no upper yield strength mentioned in the ASTM standard.

(b) ASTM A193, Standard Specification for A193, Grade B7 material, specifies a maximum Brinell Hardness number of 321 HB for recirculation piping loop component support bolting that is less than 2-½ inch diameter. Based on ASTM A370, Standard Specification, Section 1, volume 01.01, a maximum Brinell Hardness number of 321 HB (interpolated between 319 HB and 327 HB) equates to a tensile strength of 153 ksi (interpolated between 152 ksi and 156 ksi). Therefore, the maximum yield strengths of the recirculation piping loop component support bolting are rounded to an approximate tensile strength of 150 ksi threshold value.

(c) Dresden UFSAR Section 3.9.3.1.1.3.3 and Quad Cities UFSAR Section 3.9.3.1.1.3 state that there are high strength bolts used in a friction type connection at the reactor skirt base. The material used for these high strength bolts is assumed to be ASTM A193, Grade B7 or equivalent.

ASME Section XI, Subsection IWF (B.1.27) aging management program inspects the bolting. There are no other documented uses of high strength bolting found on Class 1, 2, 3 and MC Component supports at Dresden and Quad Cities Nuclear Power Stations.

The staff finds that the applicant's response related to ASTM A193, Grade B7 bolting material is sufficient to establish that the upper limit on yield strength is less than 150 ksi; consequently, the additional inspections of XI.M.18 Bolting Integrity are not warranted for A193, Grade B7. However, in part (c) of its response, the applicant has assumed that the bolt material used in "a friction type connection at the reactor skirt base" is ASTM A193, Grade B7 or equivalent. The applicant was requested to confirm that assumption or commit to inspection in accordance with NUREG-1801, Program XI.M.18 Bolting Integrity. In a letter dated December 5, 2003, the applicant stated that it would commit to inspection in accordance with NUREG-1801, Program XI.M.18 Bolting Integrity since it could not confirm that the yield strength of the bolts would be less than 150 ksi. This is part of Commitment #12 in Appendix A of this SER. The staff finds the applicant's response acceptable and considers RAI 3.5-13 resolved.

Section 3.5.1.2.11 of the LRA discusses an exception to the GALL Report for the AMP XI.S3, ASME Section XI, Subsection IWF. This exception is identified under Reference No. 3.5.1.31 of LRA Table 3.5-1. The applicant proposes to manage aging of downcomer bracing by inspections performed under the applicant's AMP ASME Section XI, Subsection IWE (B.1.26). The applicable GALL item number is III.B1.3.1-a, which identifies ASME Section XI, Subsection IWF as an acceptable AMP for support members. The staff requested in RAI 3.5-14 that the applicant (1) describe any inspections and schedules that would be required under Subsection IWF that will not be performed under the applicant's proposed use of Subsection IWE and (2) provide the technical bases for any deviations from the requirements of Subsection IWF.

In its response to RAI 3.5-14, the applicant stated the following:

- (1) There are no inspections required by Subsection IWF that will not be performed by the use of Subsection IWE. Per the 1989 Edition and the 1992 Edition, with the 1992 Addenda of ASME Section XI, Table IWE-2500-1, Item E1.11, the Class MC integral attachments are subject to a General Visual Examination (as described in IWE-3510.1) prior to each Type A Test. Additionally, per Item E1.12, these integral attachments are subject to a VT-3 each inspection interval. Per the 1995 Edition, with the 1996 Addenda of ASME Section XI, Table IWF-2500-1, supports are subject to a VT-3 each inspection interval.
- (2) The bases for making this change is the comprehensive containment inservice inspection (CISI) which was recently mandated by the Nuclear Regulatory Commission final rulemaking per an amendment to the Code of Federal Regulations (10 CFR 50.55a). This rulemaking incorporates, by reference, the requirements of the 1992 Edition with the 1992 Addenda of the ASME Boiler and Pressure Vessel Code, Section XI, Division 1, Subsections IWE and IWL with specified modifications. The final rulemaking was published on August 8, 1996 and specified an effective date of September 9, 1996 as well as an expedited implementation of these requirements within five years of the effective date (September 9, 2001). In response, the Dresden and Quad Cities CISI program included these supports as part of the IWE examination boundary.

The staff finds the applicant's basis for conducting inspection of downcomer bracing under the IWE AMP (B.1.26) to be reasonable and acceptable. Thus, RAI 3.5-14 is resolved.

In Table 3.5-2 of the LRA, Reference No. 3.5.2.5, "Clevis Pins," identifies three different component groups (torus columns, vent systems, and ESF lines), two materials (carbon steel and stainless steel), and three environments (submerged in torus grade water, inside

containment and outside containment). For each of the three different component groups, at both Dresden and Quad Cities, the applicant was requested in RAI 3.5-15 to (1) identify all aging effects/mechanisms that were evaluated for each combination of material and environment, including those not requiring aging management; and (2) submit the technical basis for each aging management conclusion.

In its response to RAI 3.5-15, the applicant stated the following:

For evaluation of carbon steel and stainless steel materials, "inside or outside containment" is treated as one environment. Thus, as evaluated, there are two materials and two environments associated with each of the three different clevis pin component groups. These are

Carbon Steel - Submerged (torus grade water) inside or outside containment

Stainless Steel - Submerged (torus grade water) inside or outside containment.

The applicant provided further clarification by correcting entry 3.5.2.5 in LRA Table 3.5-2 to show the correct combinations of materials, environments, and aging effects for the clevis pins. In addition, the applicant corrected Table 2.4-15 to show the proper AMR references.

The staff finds that the applicant's response clarifies the AMR and the credited AMPs for the clevis pins. The applicant has identified cracking due to SCC as an applicable aging effect/aging mechanism for stainless steel clevis pins submerged in torus grade water and credited the Water Chemistry Program for aging management. The staff position is that some verification of the effectiveness of the Water Chemistry Program is necessary. In a letter dated December 5, 2003, the applicant stated that it will include inspection for SCC as part of its one-time inspection to validate the effectiveness of the Water Chemistry Program in managing the aging of stainless steel components in the torus. This is part of Commitment #23 of Appendix A of this SER. The staff finds the applicant's response acceptable and considers RAI 3.5-15 resolved.

In Table 3.5-2, Reference No. 3.5.2.14, "Support Members," states that stainless steel pipe support stanchions are used on the recirculation piping 28" lines at Dresden and Quad Cities. The applicant credited ASME Section XI, Subsection IWF (B.1.27) with managing the stainless steel support members, inside or outside containment, for loss of material due to pitting and crevice corrosion. In RAI 3.5-16, the applicant was requested to (1) describe the location of all the stainless steel components and identify the specific environments to which they are exposed; (2) identify all aging effects/mechanisms that were evaluated, including those not requiring aging management, and provide the technical basis for each conclusion; and (3) discuss the technical basis for the selection of the AMP used to manage the applicable aging effects.

In response to the applicable part of RAI 3.5-16, the applicant stated the following:

- (1) The stainless steel pipe support stanchions are located on the "A" and "B" Recirculation Pump suction and discharge piping, inside the drywell portion of the containment at both Quad Cities and Dresden. The lines are identified on boundary diagrams LR-QDC-35-2 and LR-QDC-77-2 at Quad Cities, and on LR-DRE-26-2 and LR-DRE-357-2 at Dresden. The line numbers are:

Quad Cities: 1-0201A-28"-A, 1-0202A-28"-A, 1-0201B-28"-A, 1-0202B-28"-A, 2-0201A-28"-A, 2-0202A-28"-A, 2-0201B-28"-A, 2-0202B-28"-A

Dresden: 2-0201A-28"-A, 2-0202A-28"-A, 2-0201B-28"-A, 2-0202B-28"-A, 3-0201A-28"-AM,

3-0202A-28"-AM, 3-0201B-28"-AM, 3-0202B-28"-AM

The specific environment assigned to the stainless steel pipe supports is "Inside Containment." The drywell is made inert with nitrogen to render the primary containment atmosphere non-flammable by maintaining the oxygen content below 4% by volume during normal operation. The drywell has an average temperature of 135 F during normal operations. The relative humidity in the drywell ranges from 20% - 90%.

- (2) All aging effects/mechanisms that were evaluated for the pipe support stanchions are described below along with the technical basis used to determine whether aging management was required.

Stainless Steel Pipe Support Stanchions

The aging effects degradation of stainless steel external surfaces in indoor/outdoor atmospheric environments is evaluated in EPRI 1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools" (EPRI Mechanical Tools) Appendix E, Table 4-1 and Figure 1.

Loss of material/crevice, pitting corrosion: This is the only aging effect/mechanism identified for stainless steel in EPRI 1003056.

- (3) The stainless steel pipe supports on the "A" and "B" Recirculation Pump suction and discharge lines inside the drywell are ISI Class 1 component supports. The ASME Section XI, Subsection IWF ISI Aging Management program is credited with managing the aging effect of loss of material due to corrosion for these stainless steel supports. This program provides for the inspection of ASME Class 1, 2, and 3 supports and is also credited for managing the loss of material due to corrosion for NUREG-1801 Section III.B1 component supports.

Since the applicant's use of the IWF AMP to manage loss of material for the stainless steel pipe support stanchions, used on the recirculation piping 28" lines at Dresden and Quad Cities, is consistent with the GALL Report, the staff considers RAI 3.5-16 resolved.

In the LRA Table 3.2-2 (Reference Nos. 3.2.2.79, 3.2.2.80, and 3.2.2.81) states that Water Chemistry (B.1.2) and One-Time Inspection (B.1.23) will be used to manage loss of material/pitting and crevice corrosion in carbon and stainless steel support members submerged in 25–288 °C (77–550 °F) demineralized water. The Water Chemistry Program will also be used to manage cracking/stress-corrosion cracking in stainless steel support members submerged in the same environment. In RAI 3.5-17, the staff requested the applicant to submit the following information:

- (a) Identify the specific supports covered by References 3.2.2.79, 3.2.2.80 and 3.2.2.81 and the plant-specific operating experience.
- (b) Explain why the ASME Section XI, Subsection IWF Program is not credited for aging management of these supports.
- (c) Explain the number, type, and location of the supports that will be included in the one-time inspection.
- (d) Explain why the supports covered by Reference 3.2.2.80 are not included in the one-time inspection.

In its response to RAI 3.5-17, the applicant stated the following:

Exelon has reviewed LRA Table 3.2-2, Aging Management References 3.2.2.79, 3.2.2.80, and 3.2.2.81, and following information is provided.

- (a) LRA Aging Management References 3.2.2.79, 3.2.2.80, and 3.2.2.81 discuss support members submerged in a torus water environment. The submerged supports in the Low Pressure Coolant Injection System (LPCI) at Dresden Station and the Residual Heat Removal System (RHR) at Quad Cities Station are addressed by these aging management references. All supports were evaluated for aging as a commodity group. No specific support numbers are cited by Aging Management References 3.2.2.79, 3.2.2.80, and 3.2.2.81. Generic supports are grouped by system, material type, and environment combination. A review of plant operating history did not reveal any loss of intended function for systems for which Suppression Pool/Torus Chemistry control exists.

The following are some plant specific operating experiences of Suppression Pool/Torus water chemistry. These examples demonstrate the effectiveness of the Suppression Pool/Torus water chemistry Aging Management Program (AMP).

- Dresden: Chemistry samples taken on the LPCI (shell) side of the 3A LPCI Heat Exchanger on 1/21/00 and again on 1/26/00 show that water conductivity, chloride concentration, and sulfate concentration are considerably higher than normal torus water chemistry conditions. The shell side chemistry concentrations are indicative of a service water in-leakage.
 - Dresden: Chemistry took the monthly Unit 2 torus water sample from the shell side of the 2B LPCI Heat Exchanger (8/17/00) and found out-of-specification concentrations of chlorides and sulfates as well as out-of-specification conductivity. On 8/19/00, the existence of a leak in the 2B LPCI Heat Exchanger was confirmed.
 - Quad Cities: Nuclear Oversight identified that the Station had been running with Unit 2 torus water at an elevated specific conductivity since October 1995. Readings had fluctuated above and below the 'goal' value (less than or equal to 3 mS/cm) but less than the limit (5 mS/cm).
 - Quad Cities: Unit 2 torus. On 7/2/96, a sample was found to be over the administrative limit for conductivity of 5.0 mmho. The conductivity was 5.6 mmho as compared to 4.6 mmho from the last sample (6/26/96). The results of an investigation indicated there was work in progress in the Unit 2 torus to replace an instrument air line hanger. The torus hatch was removed on 6/29/96 in preparation for the work to commence and this may have caused the water chemistry administrative limit to [be exceeded].
- (b) 10 CFR 50.55a does not require inspecting ASME Section XI, Subsection IWF supports that are associated with ASME Section XI, Subsection IWE. Supports in a submerged (torus water) environment are associated with ASME Section XI, Subsection IWE (components that are part of the reactor coolant pressure boundary) and do not require inspection in accordance with ASME Section XI, Subsection IWF.
- (c) A one-time inspection will be performed to verify the effectiveness of the torus water chemistry. One time inspection of HPCI torus suction check valves is credited for the one-time inspection of all submerged supports. The HPCI torus suction check valves and the supports have a similar environment and material condition. The HPCI torus suction check valves are carbon steel typically exposed to stagnant flow conditions but with occasional flow. The one-time inspection utilizes the Preventive Maintenance (PM) program to inspect check valves. The acceptance criteria for the HPCI check valves inspections are based on ASME Section XI, Examination Category B— 2 (Valve Body). Control of chemistry in accordance with EPRI guidelines (TR-103515) does not preclude loss of material due to general, crevice, or pitting corrosion at locations of stagnant flow conditions. This one-time inspection includes measures to verify the effectiveness of the Suppression Pool/Torus Chemistry and confirm the absence of loss of material in stagnant flow areas as required by NUREG 1801. Examinations are to be conducted in an area where typically stagnant flow is present but occasionally there is flow,

which will cause replenishment of the oxygen supply. Therefore, the one-time inspection of the Dresden and Quad Cities HPCI torus suction check valves is credited for verifying the effectiveness of the Suppression Pool/Torus Chemistry and confirming the absence of loss of material in stagnant flow areas.

- (d) EPRI TR-1003056, "Non-Class 1 Mechanical Implementation Guideline and Mechanical Tools, Revision 3" states that cracking due to Stress Corrosion Cracking (SCC) is not likely in a high purity environment below 200/F. The support members that are exposed to torus water do not reach temperatures above 200/F and, therefore, cracking due to SCC is less likely to occur in these support members. Control of torus water chemistry in accordance with EPRI guidelines (TR-103515) will provide high purity water and, therefore, provides assurance that the potential for SCC is minimized. Because of this, a one-time inspection of components in torus water environment for cracking due to SCC is not required to verify the effectiveness of the Suppression Pool/Torus water chemistry for Aging Management Reference 3.2.2.80.

The staff has identified the need for additional information and has also identified a discrepancy between the responses to RAI 3.5-15 and RAI 3.5-17. First, the applicant's response to RAI 3.5-15 stated the following:

The line item for Support Members in Table 2.4-15 incorrectly referenced 3.2.2.79, 3.2.2.80, and 3.2.2.81. These references should have been designated as aging management references for Support References. Aging Management References 3.5.1.29, 3.5.1.31, and 3.5.2.14 are correct. New Aging Management References should have included 3.5.2.17, 3.5.2.18, and 3.5.2.19, as shown below in Table 3.5-2.

In the RAI 3.5-17 response, part (a), there is no indication of the correction described in the RAI 3.5-15 response. The applicant was requested to clarify this.

Second, part (b) of the response to RAI 3.5-17 is not acceptable. The supports in question are not Class MC supports. The systems involved are most likely Class 2. In addition, the reference to "(components that are part of the reactor coolant pressure boundary)" appears to be misplaced. The applicant was requested to resubmit its justification for not crediting IWF.

Third, using only carbon steel HPCI torus suction check valves as the basis for the one-time inspection does not address the potential aging effects for stainless steel support members. The applicant was requested to describe how the one-time inspection will address aging effects for stainless steel support members.

Fourth, as previously stated in the evaluation of the response to RAI 3.5-15, the staff position is that some verification of the effectiveness of the Water Chemistry Program is necessary.

In a letter dated December 5, 2003, the applicant responded to the above questions. With respect to the first question, the applicant corrected the previous references. With respect to the second question, the applicant credited IWF for aging management References 3.5.1.31 and 3.5.2.14, which are applicable to structural members with a component intended function of "structural support" and for References 3.5.1.31, 3.5.2.5 and 3.5.2.23, which are applicable to clevis pins. With respect to the third question, the applicant believes that Torus Water Chemistry controls will be (1) sufficient to prevent the aging effects of loss of material due to general, crevice, and pitting corrosion in the carbon steel HPCI torus suction check valves and (2) will also be sufficient to prevent aging effects in stainless steel support members and components. Nevertheless, the applicant will provide a one-time inspection of selected stainless steel clevis pins in the submerged environment to confirm the effectiveness of Torus Water Chemistry controls in preventing the aging effect/mechanism of SCC. Where the

selected stainless steel clevis pins interface with uncoated carbon steel support members, the interfacing support members will also be inspected for the aging effect/mechanism of loss of material/galvanic corrosion. This is part of Commitment #23 of Appendix A of this SER. With respect to the fourth question, the applicant stated that it had responded in the preceding question that it would provide a one-time inspection of selected stainless steel clevis pins in the submerged environment to confirm the effectiveness of Torus Water Chemistry controls. This is also part of Commitment #23 of Appendix A of this SER. The staff finds the applicant's response acceptable and, therefore, considers RAI 3.5-17 resolved.

The aging effects identified in the LRA for the components support commodity group are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant has credited the following AMPs with managing the aging effects described above for the components support commodity group:

- Structures Monitoring Program
- ASME Section XI, Subsection IWF Program
- Bolting Integrity Program
- Water Chemistry Program
- One-Time Inspection Program

The Structures Monitoring, Bolting Integrity, Water Chemistry, and One-Time Inspection Programs are considered common AMPs. The staff's evaluation of the common AMPs is in SER Section 3.0.3. The staff's evaluation of ASME Section XI, Subsection IWF Program is in SER Section 3.5.2.3.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the components support commodity group will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.5.2.4.6 Insulation Commodity Group

Summary of Technical Information in the Application. The applicant's description of the insulation commodity group (Dresden and Quad Cities) is in LRA Section 2.4.16. The component groups requiring AMR are identified in LRA Table 2.4-16. For each component group listed, LRA Table 2.4-16 specifies a reference to LRA Section 3 for the AMR results. The applicant stated that all of the component groups are not addressed in the GALL Report and provided the AMR results in LRA Tables 3.2-2, 3.3-2 and 3.4-2. These tables identify the insulation commodity group components that are not addressed in the GALL Report and provide information on material, environment, aging effect(s)/mechanism(s), and AMPs.

Utilizing the Dresden and Quad Cities Aging Management Review Aid, the staff identified the applicable materials for insulation commodity group components as asbestos, fiberglass, NUKON quilted fiberglass, stainless steel mirror insulation, closed-cell foam, calcium silicate, stainless steel, aluminum, and aluminum jacketing. Utilizing the Review Aid, the staff also identified the applicable environments as air, moisture, humidity less than 100 /C (212 /F), and outdoor ambient conditions.

Aging Effects

The LRA identifies the following applicable aging effects for the insulation commodity group components:

- insulation degradation/loss of insulating characteristics
- insulation degradation/loss of jacket leak-tight integrity

LRA Table 2.4-16 references LRA Sections 3.2, 3.3, and 3.4 for the AMR results for all components.

Aging Management Programs

The LRA credits the Structures Monitoring Program for managing the identified aging effects. A description of this AMP is provided in LRA Appendix B. The applicant concludes that the effects of aging will be adequately managed by this AMP such that there is reasonable assurance that the intended functions will be maintained during the period of extended operation.

Staff Evaluation. This section presents the staff's evaluation of the applicant's AMR for the insulation commodity group and the applicability of the AMPs credited with managing the aging effects. The staff's evaluations of the aging management evaluations for the insulation commodity group that are not addressed in the GALL Report are discussed below.

Aging Effects

In the LRA Table 3.2-2 (Reference Nos. 3.2.2.44 and 3.2.2.45) and Table 3.4-2 (Reference No. 3.4.2.23) state that the Structures Monitoring Program is credited with managing two aging effects/mechanisms—(1) insulation degradation/loss of insulating characteristics for asbestos and fiberglass insulation, and (2) insulation degradation/loss of jacket leak-tight integrity for aluminum insulation jacketing. In LRA Appendix B.1.30, Structures Monitoring Program, the applicant states that the program will be enhanced as follows:

Program procedures will reference specific insulation inspection criteria for existing cold weather preparation and inspection procedures for outdoor insulation, and establish new inspections for various indoor area piping and equipment insulation.

The staff finds the applicant's AMR for these components to be acceptable and agrees that the Structures Monitoring Program is an acceptable program to manage the identified aging effects.

In the LRA Table 3.2-2 (Reference Nos. 3.2.2.46, 3.2.2.47 and 3.2.2.48), Table 3.3-2 (Reference Nos. 3.3.2.122 and 3.3.2.123) and Table 3.4-2 (Reference No. 3.4.2.22) provide the following technical justifications for concluding that there are no aging effects requiring management for six specific insulation groups:

- (1) The plant indoor environment is not conducive to promoting aging degradation of NUKON quilted fiberglass insulation.
- (2) Stainless steel mirror insulation materials are not subject to any viable aging mechanism in the absence of aggressive chemical species.
- (3) Stainless steel insulation jacketing materials are not subject to any viable aging mechanism in the absence of aggressive chemical species.
- (4) Closed-cell foam insulation is susceptible to degradation when exposed to UV light. The plant indoor environment is not conducive to promoting aging degradation of closed-cell foam insulation.
- (5) Aluminum is reactive but develops an oxide film that protects it from further corrosion. No viable aging effects exist in the indoor environment for aluminum insulation jacketing.
- (6) The plant outdoor environment is not conducive to promoting aging degradation of jacketed calcium silicate insulation.

The staff finds these justifications to be reasonable and acceptable.

The aging effects identified in the LRA for the isolation commodity group are consistent with industry operating experience for the materials and environments listed. The staff finds that all the plausible the aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

The applicant credited the Structures Monitoring Program with managing the aging effects described above for the insulation commodity group components. The Structures Monitoring Program is considered a common AMP. The staff's evaluation of the common AMPs is in SER Section 3.0.3.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the insulation commodity group will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review, the staff finds the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the current licensing basis for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.6 Electrical and Instrumentation and Controls

This section addresses the aging management of electrical and instrumentation and controls (I&C) components. The components have been divided into commodity groups as described in the following LRA sections:

- Cables and Connections (2.5.1.1)

- Bus Duct (2.5.1.2)
- High Voltage transmission Conductors and insulators (2.5.1.3)

As discussed in Section 3.0.1 of this SER, the components of the electrical and instrumentation and controls system group are included in two LRA Tables. LRA Table 3.6-1 consists of electrical and I&C components that are evaluated in the GALL report. LRA Table 3.6-2 consists of electrical and I&C components that are not evaluated in the GALL report.

3.6.1 Summary of Technical Information in the Application

In LRA Section 3.6, the applicant described its AMRs for the electrical and I&C commodity groups at Dresden and Quad Cities.

The results of the AMR for the electrical and I&C components or component groups are presented in LRA Section 2.5. AMR was performed to assure that the component groups, materials, environments and aging effects referenced in NUREG-1801 are applicable to Dresden and Quad Cities and that the aging management program described in NUREG-1801 is applicable to Boiling Water Reactors (BWR) or to both Boiling Water Reactors and Pressurized Water Reactors (BWR/PWR).

Not all electrical and I&C component types at Dresden and Quad Cities are listed in NUREG-1801, Volume 2. However, the aging management reviews presented in NUREG-1801, Volume 2 were applied to additional component types if the following criteria were satisfied:

- C constructed of the similar material as components in the NUREG-1801 line item
- C assigned the same component intended function as components in the NUREG-1801 line item
- C located in the same environment as components in the NUREG-1801 line item
- C have exhibited the same aging effects identified in the NUREG-1801 line item

Component types meeting these criteria have been included in the presentation of AMR results in Table 3.6-1, "Aging management evaluated in NUREG-1801 that are relied on for license renewal for electrical and instrumentation and control components."

The third column of the table shows the component types included in each evaluation line. "NUREG-1801 Components" are those that correspond exactly with component types in NUREG-1801, Volume 2. "Evaluated with NUREG 1801 Components" shows the component types that meet the criteria above and therefore share the same evaluation.

The applicant stated that Table 3.6-2, "Aging management review results for the electrical and instrumentation and control components that are not addressed in NUREG-1801," presents the AMR results for the remainder of the electrical and I&C components. These entries result from AMR where the component type, material, environment or aging effect/mechanism differs from NUREG-1801, Volume 2 line item entries. Table 3.6-2 includes a line reference number, component group, material, environment, aging effect/mechanism, aging management program and discussion.

3.6.2 Staff Evaluation

In Section 3.6 of the LRA, the applicant described its AMR for electrical and I&C component groups at Dresden and Quad Cities. The staff reviewed LRA Section 3.6 to determine whether the applicant has provided sufficient information to demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB throughout the period of extended operation, in accordance with the requirements of 10 CFR 54.21(a)(3), for electrical and I&C system components that are determined to be within the scope of license renewal and subject to an AMR.

The applicant referenced the GALL report in its AMR. The staff has previously evaluated the adequacy of the aging management of electrical and I&C system components for license renewal as documented in the GALL report. Thus, the staff did not repeat its review of the matters described in the GALL report, except to ensure that the material presented in the LRA was applicable, and to verify that the applicant had identified the appropriate programs as described and evaluated in the GALL report. The staff evaluated those aging management issues recommended for further evaluation in the GALL report. The staff also reviewed aging management information submitted by the applicant that was different from that in the GALL report or was not addressed in the GALL report. Finally, the staff reviewed the UFSAR supplement to ensure that it provided an adequate description of the programs credited with managing aging for the electrical and I&C system components.

Table 3.6-1 below provides a summary of the staff's evaluation of components, aging effects/mechanisms, and AMPs listed in LRA Section 3.6 that are addressed in the GALL report.

Table 3.6-1: Staff Evaluation Table for Dresden and Quad Cities Electrical Components Evaluated in the GALL Report

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Electrical equipment subject to 10 CFR 50.49 environmental qualification (EQ) requirements	Degradation due to various aging mechanisms	Environmental qualification of electrical components	B.1.35	See SER Section 4.4
Electrical cables and connections not subject to 10 CFR 50.49 EQ requirements	Embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced insulation resistance (IR); electrical failure caused by thermal/thermooxidative degradation of organics; radiolysis and photolysis (ultraviolet [UV] sensitive materials only) of organics; radiation-induced oxidation; moisture intrusion	Aging management program for electrical cables and connections not subject to 10 CFR 50.49 EQ requirements	B.1.33	Consistent with GALL. (See Section 3.6.2.3.1 below and audit report)

Component Group	Aging Effect/ Mechanism	AMP in GALL Report	AMP in LRA	Staff Evaluation
Electrical cables used in instrumentation circuits not subject to 10 CFR 50.49 EQ requirements that are sensitive to reduction in conductor insulation resistance (IR)	Embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced IR; electrical failure caused by thermal/thermooxidative degradation of organics; radiation-induced oxidation; moisture intrusion	Aging management program for electrical cables used in instrumentation circuits not subject to 10 CFR 50.49 EQ requirements	B.1.37	Consistent with GALL with exception (See Section 3.6.2.3.2 below and audit report)
Inaccessible medium-voltage (2 kV to 15 kV) cables (e.g., installed in conduit or direct buried) not subject to 10 CFR 50.49 EQ requirements	Formation of water trees, localized damage leading to electrical failure (breakdown of insulation); water trees caused by moisture intrusion	Aging management program for inaccessible medium-voltage cables not subject to 10 CFR 50.49 EQ requirements	B.1.38	Consistent with GALL (See Section 3.6.2.3.3 below)

The staff's review of the electrical and I&C system groups for the Dresden and Quad Cities LRA is contained within four sections of this SER. Section 3.6.2.1 is the staff review of components in the electrical and I&C systems that are consistent with GALL, as stated in the LRA, and do not require further evaluation. Section 3.6.2.2 is the staff review of components in the electrical and I&C systems that are consistent with GALL, as stated in the LRA, and GALL recommends further evaluation. Section 3.6.2.3 is the staff evaluation of aging management programs for electrical and I&C components. Section 3.6.2.4 contains an evaluation of aging management programs for plant specific components.

3.6.2.1 Aging Management Evaluations in the GALL Report that Are Relied on for License Renewal, Which Do Not Require Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL does not recommend further evaluation, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation. The staff also sampled component groups to determine whether the applicant had properly identified those component groups in GALL that were not applicable to its plants. The staff also identified several areas where additional information or clarification was needed.

On the basis of its review, the staff has verified the applicant's claim of consistency with the GALL report. The staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.6.2.2 Aging Management Evaluation in the GALL Report That Are Relied on for License Renewal, For Which GALL Recommends Further Evaluation

For component groups evaluated in GALL for which the applicant has claimed consistency with GALL, and for which GALL recommends further evaluation, the staff reviewed the applicant's evaluation to determine whether it adequately addressed the issues for which GALL recommended further evaluation. In addition, the staff sampled components in these groups to determine whether the plant-specific components contained in these GALL component groups were bounded by the GALL evaluation.

The GALL Report indicates that further evaluation should be performed for the electrical equipment subject to environmental qualification.

3.6.2.2.1 Environmental Equipment Subject to Environmental Qualification

Environmental qualification is a TLAA as defined in 10 CFR 54.3. TLAAs are required to be evaluated in accordance with 10 CFR 54.21 (c)(1). The staff reviewed the evaluation of this TLAA separately in Section 4.4 of this SER, following the guidance in Section 4.4 of the SRP-LR.

3.6.2.3 Aging Management Programs for Electrical and I&C Components

In SER Section 3.6.2.1, the staff determined that the applicant's AMRs and associated AMPs will adequately manage component aging in electrical and I&C systems. The staff then reviewed specific electrical and I&C system components to ensure that they were properly evaluated in the applicant's AMR.

To perform its review, the staff reviewed the components listed in LRA Table 2.5-1 to determine whether the applicant had properly identified the applicable AMRs and AMPs needed to adequately manage the aging effects for the components. This portion of the staff review involved identification of the aging effects for each component, ensuring that each aging effect was evaluated using the appropriate AMR in Section 3, and that management of the aging effect was captured in the appropriate AMP. The results of the staff's review are provided below.

The staff also reviewed the UFSAR supplements for the AMPs credited with managing aging in electrical and I&C system components to determine whether the program descriptions adequately describe the programs.

The applicant credited the following AMPs to manage the aging effects associated with electrical and I&C components:

- aging management program for electrical cables and connections not subject to 10 CFR 50.49 EQ requirements
- aging management program for electrical cables used in instrumentation circuits not subject to 10 CFR 50.49 EQ requirements
- aging management program for inaccessible medium-voltage cables not subject to 10 CFR

50.49 EQ requirements

The staff's evaluation of these AMPs is provided below.

3.6.2.3.1 Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification requirements

Summary of Technical Information in the Application. The AMP for electrical cables and connections not subject to 10 CFR 50.49 environmental qualification requirements manages cables and connections within the scope of license renewal that are subject to an adverse environment. It also identifies and manages cables and connections subject to an adverse localized environment. The aging management program for electrical cables and connections not subject to 10 CFR 50.49 environmental qualification requirements is a new program.

An adverse localized environment is a condition in a limited plant area that is significantly more severe than the specified service environment for a subject cable or connection. An adverse variation in environment is significant if it could appreciably increase the rate of aging of a component or have an immediate adverse effect on operability.

Cables and connections subject to an adverse environment are managed by inspection of a sample of these components. Selected cables and connections from accessible areas, which represent, with reasonable assurance, the cables and connections in adverse environments are inspected. They are inspected for signs of accelerated age-related degradation. Additional inspections, repair or replacement are initiated as appropriate.

Samples of cables and connections found to be located in adverse localized areas will be inspected prior to the period of extended operation, with an inspection frequency of at least once every 10 years. The scope of this program includes inspections of power, control and instrumentation cables and connections located in adverse localized areas, including the cables used in instrumentation circuits that are sensitive to reduction in conductor insulation resistance.

NUREG-1801 Consistency

The aging management program for electrical cables and connections not subject to 10 CFR 50.49 environmental qualification requirements is a new program. The program is scheduled for implementation prior to the period of extended operation. Program activities are consistent with the ten elements of aging program XI.E1, "Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," specified in NUREG-1801.

Operating Experience

This program is new. Therefore, no programmatic operating experience is available. However, existing activities provide for inspection of butyl rubber insulated, environmentally qualified cables in heater bays to assess aging of cable insulation. These cables are in a localized adverse environment. No adverse trends indicative of premature aging of cables have been identified. Cable failures, when identified, are subject to the station corrective action program. Operating experience does not indicate the presence of localized adverse environment or premature aging of cable insulation.

Conclusions.

The aging management program for electrical cables and connections not subject to 10 CFR 50.49 environmental qualification requirements provides reasonable assurance that aging effects are adequately managed so that the intended functions of these types of cables and connections are maintained during the period of extended operation.

Staff Evaluation. In Table 3.6-1, the applicant identifies embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced insulation resistance (IR), electrical failure caused by thermal/thermooxidative degradation of organics, radiolysis and photolysis (ultraviolet [UV] sensitive materials only) of organics, radiation-induced oxidation, moisture intrusion are the aging effects of cables and connections due to heat or radiation. The staff concurs with the aging effects identified by the applicant. These aging effects are consistent with the aging effects identified by the staff in the GALL report.

The applicant stated that the scope of this program includes inspections of power, control and instrumentation cables and connections located in adverse localized areas, including the cables used in instrumentation circuits that are sensitive to reduction in conductor insulation resistance. The staff finds that the aging management activity (LRA Table 3.6-1, Ref. No. 3.6.1.3) submitted by the applicant does not utilize the calibration approach for non-EQ electrical cables used in circuits with sensitive, low level signals. Instead, these cables are simply combined with all other non-EQ cables under the visual inspection activity. The staff believes, however, that visual inspection alone would not necessarily detect reduced insulation resistance (IR) levels in cable insulation before the intended function is lost. Exposure of electrical cables to localized environments caused by heat, radiation, or moisture can result in reduced IR. Reduced IR causes an increase in leakage of electrical currents between conductors and from individual conductors to ground. A reduction in IR is a concern for circuits with sensitive, low-level signals such as radiation monitoring and nuclear instrumentation since it may contribute to inaccuracies in the instrument loop.

The staff raised a question regarding the applicant's assumption that aging of these cables will initially occur on the outer jacket resulting in sufficient damage that visual inspection will be effective in detecting the degradation before IR losses lead to a loss of its intended function, particularly if the cables are also subject to moisture. The staff requested the applicant to provide a technical justification which will demonstrate that visual inspection will be effective in detecting damage before current leakage can affect instrument loop accuracy, or propose an alternate aging management activity (RAI 3.6-9). In its response dated October 3, 2003, the applicant stated that it will develop a program that is consistent with the NRC staff's Interim Staff Guidance (ISG) -15 issued on August 12, 2003, to address the staff's concern identified in RAI 3.6-9. ISG-15 included a revision of GALL AMP XI.E2, "Electrical cables not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits." The applicant committed that it will develop a program that is consistent with NUREG 1801 AMP XI.E2 to manage the aging of these cables. This program will be implemented prior to entering the period of extended operation. This is Commitment #37 in Appendix A of this SER. The staff finds that its concern is resolved since the applicant has committed to implement an AMP for cables used in instrument circuits that are sensitive to reduction in conductor insulation resistance consistent with ISG-15.

The applicant stated that the aging effects of fuse blocks will be managed by an AMP for

electrical cables and connections not subject to 10 CFR 50.49 EQ requirements. On March 4, 2003, the staff issued ISG-5 concerning identification and treatment of electrical fuse holders for license renewal. The ISG-5 specified that the aging management review for fuse blocks (metallic clamps) need to include the following aging stressors: fatigue, mechanical stress, vibration, chemical contamination and corrosion. While the staff agrees that the proposed AMP (B.1.33) will manage aging of insulation material for fuse holders, the AMP may not be effective in addressing the above mentioned aging stressors associated with fuse blocks (metallic clamps). The staff requested the applicant to provide a description of an aging management program, in accordance with the requirements of 10 CFR 54.21(a)(3), used to detect aging effects associated with aging stressors as discussed in the ISG-5, or provide justification why such a program is not needed (RAI 3.6-1).

In its response dated October 3, 2003, the applicant stated that it will continue to include fuse holders in an aging management program consistent with NUREG 1801 XI.E1. Additionally, it will follow the guidance contained in ISG-5 dated March 4, 2003, and identify those fuse holders that are not part of a larger assembly but support safety-related and non-safety-related functions in which the failure of a fuse precludes a safety function from being accomplished. Any fuses satisfying this criterion will be evaluated against the stressors listed in ISG-5 and an aging management program will be developed if the aging evaluation determines that one is necessary. The applicant stated that these fuses will be identified, the evaluation against the stressors completed, and the actions identified in the aging management program completed, if necessary, prior to entering the period of extended operation.

At the request of the staff, the applicant provided supplemental information on November 20, 2003. The applicant stated that a total of 708 fuse holders at Dresden and 724 fuse holders at Quad Cities require evaluation against the stressors identified in ISG-5. The 708 fuse holders at Dresden are located in 17 different SCRAM Solenoid Fuse Panels which are located in the reactor building (elevation 517 feet). The 724 fuse holders at Quad Cities are located in 25 different panels which are located in the reactor building (elevation 595 feet) and the turbine building (elevation 639 feet). The aging evaluation results for each stressor are described below.

Moisture

As stated in DOE Cable Aging Management Guideline (SAND 0944), Section 3.7.2.1.3, 3% of all low-voltage metal connector failures were identified as being caused by moisture intrusion. In each case, the source of moisture was precipitation. Based on the total number of reported connector failures in the DOE Cable AMG, moisture intrusion accounted for only 10 failures in all of the operating plants in the United States. The fuse holders at Dresden and Quad Cities Stations that require an AMR are protected from external sources of moisture by two barriers. For the first barrier, the panels in which the subject fuse holders are installed are located in rooms inside the reactor and turbine buildings, which do not see high relative humidity conditions. Based on plant walk downs, these panels are not located in areas which experience adverse localized temperature or humidity. These areas are protected from weather variations and are not subject to any significant temperature variations. As a second barrier, the fuse holders are located in closed enclosures. With regard to internal moisture (i.e., formation of condensation), a walk down revealed no signs of moisture/humidity in the area or any signs of moisture within the enclosures.

Chemical Contamination

The fuse holders are protected, as described above, by their location and enclosure. There are no sources of chemicals in the area or vicinity of the fuses, which was confirmed by the plant walk down inspections.

Oxidation and Corrosion

Fuse clips are made of copper or copper alloy plated with a corrosion resistant coating material to protect the base metal from oxidation and provide for low electrical resistance. The fuses experience no appreciable change in operating environment and are not located near heavy industrial or oceanic environments. Furthermore, the fuse holders evaluated are not near any humid areas. Based upon recent inspections of the Bussmann fuse blocks performed in September 2003, the surface condition of the fuse clips show no signs of corrosion and still retain their metal surface. Additionally, there was no evidence or trace of moisture. For these reasons, oxidation and corrosion are not applicable stressors.

Mechanical Stresses, Electrical Transients, Thermal Cycling, Fatigue

Mechanical stress due to forces associated with electrical faults and transients are mitigated by the fast action of circuit protective devices at high currents. However, mechanical stress due to electrical faults is not considered a credible aging mechanism since such faults are infrequent and random in nature.

The Quad Cities fuse holders associated with alternate feeds to switchgear (used during fire protection safe shutdown) are normally de-energized and do not experience frequent cycling. As such, they do not experience enough heat to damage the fuse blocks and connections.

The Dresden and Quad Cities fuse holder SCRAM solenoids stay energized during normal operation and also do not experience frequent cycling. The loading seen by these fuses are well below 60%. A 60% loading is identified as a critical value in NUREG-1760 for fuses as generating enough heat to damage the fuse blocks and connections. The SCRAM solenoids draw about 15 watts and the fuses are rated for 3 amps. Therefore, these fuses are lightly loaded. Inspection of a few samples did not reveal any age related degradation and the fuse clips did not exhibit any signs of degradation.

Vibration is induced in fuse holders by the operation of external equipment, such as compressors, fans, and pumps. Since there are no direct sources of vibration for the fuse holder panels, and the panels are mounted separately on their own support structure on concrete walls, vibration is not an applicable aging mechanism.

By design and their location, the fuse holders are not subject to aging effects associated with thermal cycling. The SCRAM solenoid fuses are very lightly loaded and will experience very insignificant temperature rise.

Wear/fatigue aging mechanism is caused due to repeated insertion and removal of fuses. The fuses evaluated are not subject to frequent manipulations. When these circuits need to be de-energized, power is removed at the safety-related power supplies. When manipulated, an inspection is performed that would identify any abnormal indication such as loose or corroded

fuse clips.

Fatigue may also be caused by frequent cycling of fuses when subject to significant loading, which would cause the clips to expand and contract and to experience fatigue failure. However, the subject fuses do not experience operational cycling during normal service due to the fact that they are lightly loaded, and therefore this is not a concern.

The applicant concluded that based on the aging evaluations of the stressors identified in ISG-5, evaluations presented in NUREG-1760, and the operating service conditions of the fuses in scope of this evaluation, no stressors are identified for these fuse blocks/clips that would require aging management.

On the basis of its review, the staff finds that the applicant adequately addressed the stressors identified in ISG-5 and agrees that no AMP is required.

GALL XI.E1 program requires visual inspection of cables and connections jacket anomalies, such as embrittlement, discoloration, cracking, or surface contamination. The description of B.1.33 and A.1.33 included inspection for signs of accelerated age related degradation. The staff requested the applicant to describe what would qualify as signs of accelerated age related degradation and explain how the requirements of GALL XI.E1 are met (RAI B.1.33-2). In its response dated October 3, 2003, the applicant clarified that age related degradation includes embrittlement, discoloration, cracking, and surface contamination. The applicant further stated that the terms embrittlement, discoloration, cracking, and surface contamination are used in the plant specific procedures that comprise the aging program described in B.1.33 to identify accelerated age related degradation. The staff finds that its concern is resolved.

The applicant stated that cables and connections subject to adverse environment are managed by inspection of sample of these components. The staff requested the applicant to provide the technical basis for selecting sample location/size consistent with GALL Program XI.E1 attribute number 3 on Parameters Monitored/Inspected; (1) Indicate whether the sample will include different type of cable insulations used in the plant; (2) Provide details about the samples of connections and fuse holders (RAI B.1.33-3). In its response dated October 3, 2003, the applicant stated that all accessible cables exposed to the localized adverse environments will be inspected. This is part of Commitment #33 of Appendix A of this SER. No effort will be made to segregate cables based on insulation material. All accessible fuse holders and terminal blocks insulating material located within localized adverse environments will be inspected. All accessible connections in the localized adverse environments will be inspected. The staff finds that its concern is resolved.

The LRA indicated that selected cables and connections from accessible areas, which represent, with reasonable assurance, the cables and connections in adverse environments are inspected. However, GALL XI.E1 specifies that selected cables and connections from accessible areas are inspected and [should] represent, with reasonable assurance, "all" cables and connections in adverse environments. The staff requested the applicant to clarify this difference (RAI B.1.33-4). In its response dated October 3, 2003, the applicant stated that for the cable aging management referenced in LRA Section B.1.33, there is no difference between NUREG-1801 requirements and the AMP commitments. Cable aging management referenced in B.1.33 AMP applies to all accessible non-EQ in-scope cables and connections in adverse environments. Based on its review, the staff finds that its concern is resolved.

The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. Since the GALL program is acceptable to the staff, the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also concludes that no AMP for fuse holder is required. The staff also reviewed the UFSAR Supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.6.2.3.2 Electrical Cables used in Instrumentation Circuits not subject to 10 CFR 50.49 EQ requirements that are sensitive to reduction in conductor Insulation Resistance

Summary of Technical Information in the Application. The applicant stated that sensitive instrumentation circuit cable insulations were reviewed for their resilience against temperature, radiation and moisture environments. All cable insulation materials were assessed to have 60-year temperature and radiation thresholds greater than the bounding plant environments for which cables and connections are installed. The specified aging effects are not expected and therefore, no aging management is required. However, the cables of sensitive instrumentation circuits not subject to 10 CFR 50.49 requirements will be managed for aging due to adverse localized environments, as they are included in cables that are managed for aging per Item 3.6.1.2 of LRA Table 3.6-1 and aging management program for Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (B.1.33).

Staff Evaluation. GALL Report contains an AMP specifically for cables with sensitive, low-level signals. However, Dresden and Quad Cities apply the Non-EQ Insulated Cables and Connections Aging Management Program to this area. The applicant claimed that the inspection required by this program would be effective in identifying visual indications of insulation deterioration caused by environmental conditions (e.g., embrittlement, cracking, melting, discoloration, and swelling). This approach is considered by the applicant to be consistent with GALL Report with one exception.

The aging management activity described in LRA Table 3.6-1, Ref. No. 3.6.1.3, does not utilize the calibration approach for non-EQ electrical cables used in circuits with sensitive, low level signals. Instead, these cables are simply combined with all other non-EQ cables under the visual inspection activity. The staff believes, however, that visual inspection alone would not necessarily detect reduced insulation resistance (IR) levels in cable insulation before the intended function is lost. Exposure of electrical cables to localized environments caused by heat, radiation, or moisture can result in reduced IR. Reduced IR causes an increase in leakage currents between conductors and from individual conductors to ground. A reduction in IR is a concern for circuits with sensitive, low-level signals such as radiation monitoring and nuclear instrumentation since it may contribute to inaccuracies in the instrument loop.

The staff raised a question regarding the applicant's assumption that aging of these cables will initially occur on the outer jacket resulting in sufficient damage that visual inspection will be effective in detecting the degradation before IR losses lead to a loss of its intended function,

particularly if the cables are also subject to moisture. The staff requested the applicant to provide a technical justification which will demonstrate that visual inspection will be effective in detecting damage before current leakage can affect instrument loop accuracy, or propose an alternate aging management activity (RAI 3.6-9). In its response dated October 3, 2003, the applicant stated that it will develop a program that is consistent with the NRC staff's Interim Staff Guidance (ISG) -15 issued on August 12, 2003, to address the staff's concern identified in RAI 3.6-9. ISG-15 included a revision of GALL AMP XI.E2, "Electrical cables not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits." The applicant committed that it will develop a program that is consistent with NUREG 1801 AMP XI.E2 to manage the aging of these cables. This program will be implemented prior to entering the period of extended operation. This is Commitment #37 in Appendix A of this SER. The staff finds that its concern is resolved since the applicant has committed to implement an AMP for cables used in instrument circuits that are sensitive to reduction in conductor insulation resistance consistent with ISG-15.

Aging Effects

In Table 3.6-1, the applicant identified embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced insulation resistance (IR), electrical failure caused by thermal/thermooxidative degradation of organics, radiation-induced oxidation, moisture intrusion as aging effects of cables and connections due to heat or radiation. The staff concurs with the aging effects identified by the applicant. These aging effects are consistent with the aging effects identified by the staff in the GALL report.

Aging Management Program

The applicant committed to develop a program that will be consistent with NUREG 1801 AMP XI.E2 to manage the aging of electrical cables used in instrumentation circuits not subject to 10 CFR 50.49 EQ requirements that are sensitive to reduction in conductor insulation resistance. This is Commitment #37 in Appendix A of this SER. The cables included within the scope of this program are the cables used in the following Nuclear Instrumentation Systems (NIS) and radiation monitoring systems: Source Range Monitors (SRM), Intermediate Range Monitors (IRM), Local Power Range Monitors (LPRM), Drywell High Range Radiation Monitors, Main Steam Line (MSL) Radiation Monitors, and Steam Jet Ejector (SJAE) Radiation Monitors.

By a letter dated December 22, 2003, the applicant provided the details of the program (ten attributes). The evaluation of the applicant's AMP focused on program attributes. To determine whether the applicant's AMP is adequate to manage the effect of aging so that the intended function will be consistent with CLB for the period of extended operation, the staff evaluated the following seven attributes: (1) scope of program, (2) preventive action, (3) parameter monitored or inspected, (4) detection of aging effects, (5) monitoring and trending, (6) acceptance criteria, and (7) operating experience. The staff's evaluation of the applicant's corrective action, confirmation process, and administrative controls is provided separately in Section 3.0.4 of the staff's safety evaluation.

[Scope of Program] This program applies to the cables used in sensitive instrumentation circuits with low level signals of the NIS which includes SRM, IRM, LPRM and Radiation Monitoring Systems which includes Drywell High Range Radiation Monitors, Main Steam Line Radiation Monitors, and Steam Jet Air Ejector Radiation Monitors. For the LPRM, SRM, and IRM systems,

the cables within the scope of this AMP are the cables between the detectors and main control room panel. For the radiation detectors within the scope of this program, the cables within the scope of this AMP are the cables between the detectors and the associated meters. The staff considers the scope of the program to be acceptable.

[Preventive Actions] This is a surveillance program and no actions are taken as part of this program to prevent or mitigate aging degradation. This is acceptable since the staff finds no need for such actions.

[Parameters Monitored/Inspected] Nuclear Instrumentation Systems:

(1) LPRM- Calibration surveillance testing being credited for the LPRM system. The full core LPRM calibration is performed per technical specification surveillance requirements. Per the implementing procedure, the LPRM's are verified to be within calibration. The acceptability of the LPRM cable/detectors/connectors is verified through this calibration. This calibration adjusts for loss in sensitivity of the circuit. The staff finds that this action to be acceptable because the review of calibrations and surveillances will provide reasonable assurance that age related degradation of the cables will be detected prior to loss of cable intended function.

(2) SRM- For the SRM system, the cables between the preamplifier and detectors are subject to Current/Voltage (I/V) testing. The I/V test data is used to calculate the cable insulation resistance. The I/V testing results will be indicative of reduced insulation resistance. These tests verify the insulation resistance of the cables inside the drywell, along with the operability of the detectors and connectors. A surveillance test of the SRM monitors is performed to verify the functionality of the SRM (indicate counts per cycle within a certain range or have proper signal to noise ratio) during core alterations (refueling). This surveillance test verifies the integrity of the SRM cable system. Cable and surveillance testing as recommended by ISG-15 is being credited for the SRM system.

(3) IRM - For the IRM system, the cables inside the drywell are subject to Current/Voltage (I/V) testing. The I/V test data is used to calculate the cable insulation resistance. The I/V testing results will be indicative of reduced insulation resistance. These tests verify the insulation resistance of the cables inside the drywell, along with the operability of the detectors and connectors. A surveillance response test will be performed for the IRM monitors from the preamplifier to the control room chassis by injecting simulated inputs into the preamplifier. This surveillance test will verify the integrity of the IRM cables between the preamplifier and control room chassis. Cable and surveillance testing as recommended by ISG-15 is being credited for the IRM system.

The staff finds that above testing is acceptable because those testing will determine cable insulation resistance (potential degradation).

Radiation Monitoring System

Drywell High Range Radiation Monitoring: In accordance with NUREG 1801, calibration surveillance testing is being credited for the Drywell High Range Radiation Monitors. The calibration required by technical specification surveillances will verify that the cables maintain adequate insulation resistance integrity to perform their intended function. In this calibration, a calibrated source is used to expose the detector to gamma radiation field, and verify that acceptable readings are measured on the corresponding meter. As recommended by ISG-15,

the applicant is committing to a once every 10 year review of the calibration results for cable aging degradation. The first review will be performed prior to entering the period of extended operation. This is Commitment #37 in Appendix A of this SER.

Main Steam Line Radiation Monitoring: In accordance with NUREG 1801, calibration surveillance testing is being credited for the entire MSLRM system. The calibration utilizes a source capable of producing photon energy in the range expected during normal and abnormal conditions. This check is performed with the entire system, including detectors, cables, and control room chassis, intact. This demonstrates that no detector or connecting cable degradation has occurred that could inhibit the system from performing its intended function. As recommended by ISG-15, the applicant is committing to a once every 10 year review of the calibration results for cable aging degradation. The first review will be performed prior to entering the period of extended operation.

Steam Jet Air Ejector Radiation Monitoring: In accordance with NUREG 1801, calibration surveillance testing is credited for the entire SJAERM system. The calibration utilizes a source capable of producing photon energy in the range expected during normal and abnormal conditions. This check is performed with the entire system, including detectors, cables, and control room chassis, intact. This demonstrates that no detector or connecting cable degradation has occurred that could inhibit the system from performing its intended function. As recommended by ISG-15, the applicant is committing to a once every 10 year review of the calibration results for cable aging degradation. The first review will be performed prior to entering the period of extended operation.

The staff finds that this action to be acceptable because the review of calibrations and surveillances will provide reasonable assurance that age related degradation of the cables will be detected prior to loss of cable intended function.

[Detection of Aging Effects:] The LPRM, Drywell High Range Radiation Monitors, Main Steam Line Radiation Monitors, and the Steam Jet Air Ejector Radiation Monitors are calibrated per the frequency specified in the technical specification. The normal calibration frequency specified in the technical specification provides reasonable assurance that severe aging degradation will be detected prior to loss of the cable intended function. A review of calibration results will be completed before the period of extended operation and every 10 years thereafter. This review may detect severe aging degradation prior to the loss of cable intended function. The staff finds that 10 year testing frequency is consistent with ISG-15.

The SRM and IRM cable systems inside the drywell are tested for insulation resistances. This test is a direct indication of condition of the insulation and will detect severe aging degradation prior to the loss of cable intended function. These cable systems are being tested every 24 months. The staff finds that 24 months testing frequency is acceptable.

The SRM surveillance test is performed every 24 months and will provides reasonable assurance that severe aging degradation will be detected prior to loss of the cable intended function. A review of the surveillance results will be completed before the end of the current term and every 10 years thereafter. This review may detect severe aging degradation prior to the loss of cable intended function.

The IRM surveillance test will be performed before the period of extended operation and every

24 months thereafter. The surveillance test will provides reasonable assurance that severe aging degradation will be detected prior to loss of the cable intended function. A review of the surveillance results will be completed before the period of extended operation and every 10 years thereafter. This review may detect severe aging degradation prior to the loss of cable intended function.

The staff finds that 10 year frequency of the review of surveillance test for SRM and IRM is acceptable because it is consistent with ISG -15.

[Monitoring and Trending] Trending actions are not included as part of this program because the ability to trend test results is dependent on the specific type of test chosen. Although not a requirement of NUREG 1801, calibration results will be trended once every 10 year, as recommended by ISG-15. The staff finds this to be acceptable.

[Acceptance Criteria] The LPRM, Drywell High Range Radiation Monitors, Main Steam Line Radiation Monitors, and the Steam Jet Air Ejector Radiation Monitors calibration results are to be within the acceptance criteria, as set out in the technical specifications surveillance calibration procedures. The staff finds this to be acceptable because surveillance or calibration activity ensures that cable intended function used in instrumentation circuits are maintained under all CLB design conditions during the period of extended operation.

The SRM and IRM cable systems test results and surveillance results are to be within the acceptance criteria, as set out in the testing and surveillance procedures. The staff finds this to be acceptable because testing and surveillance activity ensures that cable intended function used in instrumentation circuits are maintained under all CLB design conditions during the period of extended operation.

[Operating Experience] This is a new aging management program and therefore there is no programmatic operating experience. However, plant experience shows that when an equipment cannot be brought into calibration or when cable system tests indicate unacceptable results, further reviews will identify if the problem is attributable to the instrument, connector or cabling. The staff finds that the applicant has adequately addressed operating experience.

The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

Conclusions. On the basis of its review and audit of the applicant's program, the staff finds that those portions of the program for which the applicant claims consistency with the GALL program are consistent with the GALL program. In addition, the staff has reviewed the exceptions to the GALL program and finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB during the period of extended operation as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program as required by 10 CFR 54.21(d).

3.6.2.3.3 Inaccessible Medium Voltage Cable Not Subject to 10 CFR 50.49 EQ Requirements

Summary of Technical Information in the Application. The applicant stated that five medium-voltage power cables at Dresden are exposed to significant moisture and significant voltage

(subject to system voltage more than 25 percent of the time). Prior to the extended period of operation, these five medium-voltage power cables will be replaced with cables that are resistant to insulation degradation due to water treeing, and therefore, no aging management is required. The applicant stated that only Dresden has medium-voltage cables in the scope of license renewal that are routed in underground ducts.

Staff Evaluation. The applicant stated that no AMP is required for inaccessible medium-voltage (2kV to 15kV) cables (e.g., installed in conduit or direct buried) not subject to 10 CFR 50.49 EQ requirements.

The applicant determined that insulation degradation due to water treeing is not applicable to Quad Cities and, therefore, no AMP is required.

In Section 3.6.1.2.2, LRA indicates that five medium-voltage power cables at Dresden are exposed to significant moisture and significant voltage. The staff requested the applicant to identify these cables. The staff wanted to clarify whether the cable connecting the Station Blackout (SBO) diesel generator is included in this group. The staff requested the applicant to provide a discussion regarding the use of the SBO diesel generator including possible use of the SBO diesel generator to generate power during peak demands. Also, the staff requested the applicant to provide information regarding the replacement cables. (The staff has accepted submarine cables and lead sheathed cables for components not requiring a GALL XI.E3 program.) In addition, the staff requested the applicant to explain why this issue doesn't apply to Quad Cities. Additionally, the staff requested the applicant to provide a description of an aging management program (with ten attributes) to remove water from the cable manholes or provide a justification why such a program is not needed (RAI 3.6-3). In its response dated October 3, 2003, the applicant stated that the medium voltage cables that are exposed to significant moisture and significant voltage at Dresden Station are scheduled to be replaced prior to the extended period of operation (By letter dated November 20, 2003, this commitment was withdrawn in favor of a new program, B.1.38, see below). These are the power feed cables to the five (5) Dresden Station Service Water Pump motors. The motors are non-safety-related, but perform a function that demonstrates compliance with the NRC's regulation for Fire Protection (10 CFR 50.48). The service water pumps run continuously and are located in the crib house.

The Quad Cities Service water pumps are not credited in the station's fire protection program or required for other license renewal intended functions; therefore, their power feeds do not perform any license renewal intended functions.

The medium voltage cables connecting the SBO Diesel Generator (SBO DG) are not part of this group. The SBO DG bus feeder cables to the ESF buses are routed underground at Dresden and are routed overhead at Quad Cities. The SBO DG output cables are exempt from the NUREG 1801 XI. E3 program based on their duty cycles (not energized normally or less than 25% of the time). The power feeds from the SBO DG bus to the ESF buses are energized only during an SBO event or surveillances.

The SBO system is a non-safety-related, independent source of additional on-site emergency ac power. The SBO DG is designed to be started remotely or locally in the emergency mode under conditions of total or partial loss of offsite power. The SBO DGs are not used to generate power during peak demands.

Section 3.6.1.2.2 of LRA states that prior to the extended period of operation the five medium-voltage power cables will be replaced with cables that are resistant to insulation degradation due to water treeing and therefore do not require aging management per NUREG 1801 XI. E3 program. The plant modification process will be used to identify suitable replacement cables that are resistant to insulation degradation due to water treeing.

A program to remove water from the cable manholes is not required. At Dresden, the only medium voltage cables that perform an intended function in support of 10 CFR 54.4 and are energized more than 25 percent of the time will be replaced with cables that are resistant to insulation degradation due to water treeing. At Quad Cities there are no medium voltage cables installed in underground duct banks that perform intended functions that demonstrate compliance with 10 CFR 54.4.

The staff finds that the applicant did not identify the type of the replacement cables at Dresden. On November 20, 2003, the applicant stated that it has reevaluated its position with regards to the replacement of the five medium-voltage cables at Dresden. A review of the industry experience contained within EPRI TR 103834-P1-2, Effects of Moisture on the Life of Power Plant Cables and SAND96-0344, Aging Management Guideline for Commercial Nuclear Power Plants has determined that butyl rubber insulated medium-voltage cable has not experienced failure due to water treeing. Based on the lack of adverse industry experience and 30 plus years of continuous operating experience, the applicant believes that these cables will perform their intended functions for the period of extended operation. As such, the applicant does not intend on replacing the cables as stated in Section 3.6.1.2.2 of the Dresden and Quad Cities License Renewal Application. Rather, the applicant will manage these cables in accordance with NUREG-1801 XI.E3 aging management program. The applicant provided a new LRA section B.1.38 and A.1.38 that describes this new aging management program for Inaccessible Medium-Voltage Cables not Subject to 10 CFR 50.49 Environmental Qualification Requirements. This is part of Commitment #38 of Appendix A in this SER.

The applicant has reviewed all of the in-scope inaccessible medium-voltage cables that are installed in underground duct runs and as stated in the response to RAI 3.6.3 there are only five inaccessible in-scope medium voltage cables at Dresden that are exposed to significant moisture and that are energized more than twenty-five percent of the time. The diesel generator cooling water supply pump motors are 480 V ac, not 4160 V ac. For this reason, they are not considered medium-voltage cables. Additionally, the electrical loads referenced in Table 8.3-2 of the Quad Cities UFSAR represent the major diesel generator loading for both automatic and manual operation on loss of offsite power (LOOP). The loads listed in Table 8.3-2 are not required to achieve safe shutdown of a reactor in the event of a LOOP. LRA Section 2.3.3.16, Service Water system shows that for Quad Cities, the Service Water system is only in-scope, as specified in 10 CFR 54.4(a)(2), to preclude adverse effects on safety-related SSC's and for structural support. The Quad Cities Service Water system does not perform any intended function within the scope of License Renewal as specified in 10 CFR 54.4(a) (1) or (3). Therefore, the medium-voltage cable feeds to the Quad Cities service water pumps are not within the scope of License Renewal. On the basis of its review, the staff finds its concern for Quad Cities is resolved.

Aging Effects

The applicant identified the formation of water trees, localized damage leading to electrical

failure (breakdown of insulation); and water trees caused by moisture intrusion as the aging effects for inaccessible medium-voltage cables not subject to 10 CFR 50.49 requirements. The staff concurs with the aging effects identified by the applicant. These aging effects are consistent with the aging effects identified by the staff in the GALL report.

Aging Management Program

Dresden will implement an AMP for inaccessible medium-voltage cables not subject to 10 CFR 50.49 EQ requirements. The scope of the program is limited to five butyl rubber insulated inaccessible medium-voltage cables routed in underground duct banks that are at times exposed to significant moisture and are energized more than 25 percent of the time.

On November 20, 2003, the applicant provided the details of the program (10 attributes). The evaluation of the applicant's AMP focused on program attributes. To determine whether the applicant's AMP is adequate to manage the effect of aging so that the intended function will be consistent with CLB for the period of extended operation, the staff evaluated the following seven attributes: (1) scope of program, (2) preventive action, (3) parameter monitored or inspected, (4) detection of aging effects, (5) monitoring and trending, (6) acceptance criteria, and (7) operating experience. The staff's evaluation of the applicant's corrective action, confirmation process, and administrative controls is provided separately in Section 3.0.4 of the staff's safety evaluation.

[Scope of Program] This program applies to five inaccessible medium-voltage cables that feed the Dresden service water pumps. These cables are routed in underground duct banks that are at times exposed to significant moisture and are energized more than 25 percent of the time. At Dresden, adverse conditions are expected to be prevalent inside the duct bank that runs to the crib house. This duct bank is a continuous run without manholes. The ducts are sloped toward the crib house and during wet seasons, water collected in the ducts drains into the crib house. The staff considers the scope of the program acceptable.

[Preventive Actions] At Dresden, the duct bank is a continuous run without manholes. The ducts are sloped toward the crib house and during wet seasons water collected in the ducts drains into the crib house. The ducts will be inspected annually to verify that the crib house end of the ducts are not plugged with debris and that water can drain from the ducts. This is acceptable since the staff finds that these cables will be tested once every 10 years.

[Parameters Monitored or Inspected] Testing will be performed to provide an indication of the condition of the conductor insulation. The specific type of test will be determined prior to the initial test and is to be a proven test for detecting deterioration of the insulation system due to wetting, such as power factor, partial discharge, or polarization index, as described in EPRI TR-103834-P1-2, or other testing that is state-of-the-art at the time the test is performed. The staff finds this acceptable because it provides means for monitoring the applicable aging effects on the cable insulation.

[Detection of Aging Effects] The five Dresden inaccessible medium-voltage cables exposed to significant moisture and significant voltage will be tested at least once every 10 years. The first tests for license renewal will be completed prior to the period of extended operation. The staff finds a 10-year testing frequency is an adequate period to preclude failure of these cables since aging degradation is a slow process and the ducts will be inspected annually to verify that the

crib house end of the ducts are not plugged with debris and that water can drain from the ducts.

[Monitoring and Trending] Trending actions are not included as part of this program because the ability to trend test results is dependent on the specific type of test chosen. Test results that are trendable may be trended to provide additional information on the rate of degradation. The staff finds this to be acceptable.

[Acceptance Criteria] The acceptance criteria for each test will be defined by the specific type of test performed on the five butyl rubber insulated inaccessible medium-voltage cables. The staff finds this to be acceptable because the acceptance criteria is dependable on the test selected.

[Operating Experience] This is a new program and no plant experience exists to verify the effectiveness of this program. However, the five cables are butyl rubber insulated 4 kV cables which are less susceptible to water treeing than the cross-linked polyethylene or HMWPE insulation materials. A review of plant and industry experience determined that there has been no failure due to water treeing of butyl rubber cable installed in underground ducts. The staff finds that the applicant has adequately addressed operating experience.

The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program. On the basis of its review, the staff finds that the AMPs credited in the LRA for the inaccessible medium-voltage circuits will effectively manage or monitor the aging effects identified in the LRA.

Conclusion. The staff concludes that the applicant has adequately identified the aging effects and the AMP will be credited for managing the aging effects of cables used in inaccessible medium-voltage circuits at Dresden and that these cables will perform their intended function in accordance with the CLB during the period of extended operation as required by 10 CFR 54.21(a)(3). The staff also concludes that no AMP is required for Quad Cities. The staff also reviewed the UFSAR supplement for this aging management program and finds that it provides an adequate summary description of the program as required by 10 CFR 54.21(d).

3.6.2.4 Aging Management of Plant-Specific Components

The applicant credited one AMP to manage the aging effects associated with electrical and I&C components. The following sections provide the results of the staff's evaluation of the adequacy of aging management for plant specific electrical and instrumentation and control components.

3.6.2.4.1 Bus Duct

Summary of Technical Information in the Application. The applicant stated that bus ducts utilize a pre-assembled raceway (enclosure) design with conductors supported by electrical insulators. The bus ducts within the scope of license renewal are the bus ducts used for safety-related systems and those associated with 4160 V power feeds between the reserve auxiliary transformer (RAT) and switchgear. The function of the bus ducts is to electrically connect power supplies and load centers to deliver voltage and current. The function of the bus duct insulators is to support and insulate the bus bar conductors. Bus ducts were not evaluated in the GALL Report. The applicant identified embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced insulation resistance (IR); electrical

failure as the aging effects for the insulators in the bus ducts. The applicant further stated that those aging effects will be managed by a aging management program B.2.2, "Periodic Inspection of Non-Segregated Electrical Bus Ducts."

This program inspects the non-segregated bus ducts that connect the reserve auxiliary transformers to the 4160V ESF buses. They are normally energized, and therefore, the bus duct insulation material will experience temperature rise due to energization, which may cause age-related degradation during the extended period of operation. These bus ducts are in scope of license renewal but are not subject to 10 CFR 50.49 environmental qualification. These non-EQ, non-segregated bus ducts will therefore be inspected periodically during the period of extended operation. This inspection program considers the technical information and guidance provided in IEEE Standard P1205, "IEEE Guide for Assessing, Monitoring and Mitigating Aging Effects on Class 1E Equipment Used in Nuclear Power Generating Stations," SAND 96-0344, "Aging Management Guidelines for Commercial Nuclear Power Plants – Electrical Cable and Terminations," and EPRI-109619, "Guideline for the Management of Adverse Localized Equipment Environments."

The non-segregated bus duct internal components and materials are visually inspected under station inspection procedures for signs of aging degradation that indicate possible loss of insulating function. Repair or rework is initiated as required to maintain the operating functions of the bus ducts.

The inspection program for the non-EQ, non-segregated electrical bus ducts that connect the reserve auxiliary transformers to the 4160V ESF buses will provide reasonable assurance that the intended function of the non-EQ, non-segregated bus ducts will be maintained consistent with the CLB for the period of extended operation.

This is a new program and will be implemented prior to the period of extended operation. The applicant provided ten elements of the program in Appendix B, Section B.2.2.

Staff Evaluation. In the LRA Section 2.5.2, the applicant determined whether bus ducts meet the screening criteria of 10 CFR 54.21(a)(1)(i) and evaluated these components against 10 CFR 54.21(a)(1)(ii).

The applicant stated that the bus ducts utilize pre-assembled raceway (enclosure) design with internal conductors installed on electrically insulated supports. Bus ducts are constructed of various metals, polyester glass, PVC, and silicon caulk. Bus ducts at Dresden and Quad Cities includes the bus ducts used for safety-related systems and those associated with the 4160 V power feeds between the reserve auxiliary transformers and switchgear. Bus ducts electrically connect specified sections of an electrical circuit to deliver voltage or current to various equipment and components throughout the plant.

Aging Effects

The applicant identified embrittlement, cracking, melting, discoloration, swelling or loss of dielectric strength leading to reduced insulation resistance, electrical failure as the aging effects/mechanism for the bus ducts.

The aging effects identified in the LRA for the bus ducts are consistent with industry operating

experience for the materials and environments listed. The staff finds that all the plausible aging effects were identified and that the aging effects listed are appropriate for the combination of materials and environments specified.

Aging Management Programs

Dresden and Quad Cities have elected to implement an AMP to identify and manage potential aging degradation. This is a non-GALL program and will provide reasonable assurance that the bus ducts will continue to perform their intended function consistent with the CLB through the period of extended operation. LRA Table 3.6-2 indicates that polyester glass insulator associated with electrical bus ducts will be periodically inspected per AMP B.2.2. It is not clear whether all the components (i.e., bus bar, enclosure, insulators, etc.) are covered under this AMP. Industry operating experience, as documented in Information Notices (IN 2000-14, IN 1998-36, and IN 1989-64) and Licensee Event Reports (LERs: 26698002, 41095010, and 27596017), indicate several problems (i.e., loosening of splice plate bolts, degradation of Noryl insulation, insulation failure along with the presence of moisture or debris provided undesired phase to phase or phase to ground electrical tracking paths which resulted in catastrophic failure of the bus) associated with bus ducts. Additionally, most connections to non-segregated bus ducts are made by bolted connections.

The non-segregated bus ducts may be exposed to appreciable ohmic or ambient heating during operation and may experience loosening related to the repeated cycling of connected loads or of the ambient temperature environment (Refer to SAND 96-0344, page 4-38). The staff understands that the proposed AMP B.2.2 program will manage the aging degradation of insulation material. The staff requested the applicant to provide a discussion on how the other problems identified by the above INs and LERs and SAND 96-0344 will be managed by the AMP B.2.2 (RAI 3.6-4). In response to the Staff's RAI 3.6-4, the applicant on October 3, 2003, stated that the procedures that implement AMP B.2.2 visually inspect non-segregated bus duct internal components and materials. These include: insulation material, bus duct support pieces, gaskets, insulating boots, taped connections, and bus bar sleeves. This is part of Commitment #40 of Appendix A of this SER. Failure of connection tapes and bus bar sleeves would not prevent the bus duct from performing its intended function. However, these components are included with the scope of AMP B.2.2. The visual inspections check for evidence of water and dirt accumulation, presence of foreign material, and cracking / chipping of insulation. The description of AMP B.2.2 should have included this detail in the AMP description and in the evaluation Parameters Monitored/Inspected, and Detection of Aging Effects.

LRA Section B.2.2, Evaluation and Technical Basis Element (3) - "Parameters Monitored/ Inspected," should have read as follows: "Accessible normally energized non-segregated bus duct internal components are visually inspected for insulator and bus bar insulation material surface anomalies, such as embrittlement, discoloration, cracking, chipping, or surface contamination. Internal components such as insulation material, bus duct support pieces, gaskets, insulating boots, taped connections, and bus bar sleeves are inspected. The visual inspections also check for evidence of water and dirt accumulation and presence of foreign material."

The applicant stated that the failures identified in the referenced Information Notices and LERs caused by introduction of contaminants and moisture into the bus duct housing are addressed in AMP B.2.2. However, several of the IN's and LERs address inadequate design or inadequate

maintenance as causal factors. These are not valid aging effects and are not addressed by AMP B.2.2.

The information notices or LERs identified do not suggest any age related failures. On the contrary, the failures noticed for installed lives are much shorter than a 40-year plant life.

As noted in LER 26698002, failure was caused by the presence of condensation. AMP B.2.2 inspects for evidence of water and dirt accumulation.

LER 41095010 event suggests the reason to be the use of wrong penetration sleeve material. This failure mode is not a valid aging effect and is not addressed by AMP B.2.2.

LER 27596017 identifies PVC off gassing as the casual factor. AMP B.2.2 visually inspects insulation for degradation.

IN 89-64 suggests that failure was caused by water and debris. AMP B.2.2 inspects for evidence of water and dirt accumulation.

IN 98-36 identifies failure due to poor maintenance. This failure mode is not a valid aging effect and is not addressed by AMP B.2.2.

IN 2000-14 identifies failures of two bus ducts, which started when a PVC insulator over a splice joint overheated in turn causing heat induced failure on fiberglass insulation. AMP B.2.2 visually inspects insulation for degradation.

The non-segregated bus ducts at Dresden and Quad Cities subject to AMP B.2.2 do not experience bolt loosening caused by the repeated cycling of connected loads from appreciable ohmic or ambient heating during operation. The non-segregated phase bus ducts subject to AMP B.2.2 are the bus ducts that connect the Reserve Auxiliary Transformer to the 4 KV busses. They are normally energized and do not experience appreciable cyclical temperature swings as discussed in SAND 96-0344. Therefore, the issue of heating and cooling that would cause the bolting connections to loosen does not apply. Additionally, operating experience at both sites has indicated no such failures.

In summary, AMP B.2.2 provides reasonable assurance that the applicable aging effects are adequately managed. On the basis of its review, the staff finds that the visual inspection of bus ducts, bus bars, and internal supports will provide an indication of aging effects.

The staff noted however that the proposed program will not verify the bolted connections for proper torque. In its supplemental information dated December 12, 2003, the applicant stated that bronze and stainless steel bolting material are used for the bus bar bolted connections on the normally energized non-segregated bus duct. Bronze and stainless steel bolts are ideal for use with copper bus because both materials have nearly the same coefficients of thermal expansion as the copper bus bar. This prevents thermal stress from causing plastic deformation of the bolts, which is the primary cause of loose connections. EPRI TR104213 (Joint Maintenance and Application Guide) Tables 7-4 and 7-6 show no thermal stress for bronze or stainless steel bolts used with copper bus.

EPRI TR104213 Section 8.2 states the bolts should be inspected for evidence of overheating,

signs of burning or discoloration, and indications of loose bolts. The bolts should not be retorqued unless the joint requires service or the bolts are clearly loose.

Applicant's response to RAI 3.6-4 states that accessible normally energized non-segregated bus duct internal components are visually inspected for insulator and bus bar insulation material surface anomalies, such as embrittlement, discoloration, cracking, chipping, or surface contamination. Internal components such as insulation material, bus duct support pieces, gaskets, insulating boots, taped connections, and bus bar sleeves are inspected. This inspection will verify that there is no discoloration, cracking, chipping or surface contamination of the bus bar insulation material at the bolted connections. The absence of discoloration, cracking, chipping or surface contamination provides positive indication that the bolted connections are not loose and therefore, the intended function of the bus duct will be maintained during the period of extended operation.

Applicant stated in LRA Section B.2.2 that it has not experienced any bus bar insulation failures that would indicate that bolted connections have a creditable aging mechanism. Additionally, there is no industry experience that indicates loosening of properly designed and installed bus bar bolted connections is an industry problem for bus duct that is not overloaded. The reference to SAND 96-0344 page 4-38 used in RAI 3.6-4 does not apply to bus bar bolting. A review of the empirical data presented in SAND 96-0344 Section 3 shows only nine failures of medium voltage cable splices. None of the failures were due to thermal cycling; most were due to mechanical stress and failure of the insulation material.

In summary, there is no plant or industry operating experience that shows that there is a credible aging mechanism pertaining to the bus bar bolts; therefore, no aging management other than visual inspection is required. On the basis of its review, the staff's concern is satisfactorily resolved.

The evaluation of the applicant's AMP focused on program elements. To determine whether the applicant's aging management program is adequate to manage the effect of aging so that the intended function will continue to be performed consistent with CLB for the period of extended operation, the staff evaluated the following seven elements: (1) scope of program, (2) preventive action, (3) parameter monitored or inspected, (4) detection of aging effects, (5) monitoring and trending, (6) acceptance criteria, and (7) operating experience. The staff's evaluation of the applicant's corrective action, confirmation process, and administrative controls is provided separately in Section 3.0.4 of the staff's safety evaluation.

[Program Scope] This inspection program applies to the normally-energized non-segregated bus ducts within the scope of license renewal, not subject to the environmental qualification requirements of 10 CFR 50.49, which can be affected by elevated temperatures prior to the end of the extended period of operation. The staff was concerned about excluding bus ducts that are not normally energized from the scope of the program (RAI B.2.2-1). In response to RAI B.2.2-1, the applicant by a letter dated October 3, 2003, stated that there are non-segregated bus ducts within the scope of license renewal that are not normally energized. These are bus ducts connecting the diesel generator to the ESF busses and connecting safety-related buses. They are included in Section 2.5.1 of the license renewal application. These are not normally energized and are energized only for technical specification surveillance or emergency activities. They are only energized for very short durations during normal plant operation and are located inside (Reactor/Turbine/Diesel Generator/HPCI) buildings where the environment is

free from moisture, wind, and extreme ambient temperature differences. Therefore, thermal aging is not a concern for the bus duct insulators or sleeves. There are no other aging mechanisms applicable for these bus ducts. Periodic surveillance testing performed per technical specification verifies functionality of the bus ducts. Dresden and Quad Cities operating experience including experience from the non-segregated bus duct (Reserve Auxiliary Transformer to 4 KV Busses) inspections currently performed at Dresden and Quad Cities also confirm that no aging mechanisms apply for these bus ducts that would affect their intended function. On the basis of its review, the staff finds that thermal cycling for bolted connections is a concern for these bus ducts. The staff notes that EPRI TR104213 recommends inspection of bolted joints for evidence of overheating, signs of burning or discoloration, and indication of loose bolts (Section 8.2) regardless of bolt material.

LER 26698002 states that component failure was caused by the presence of condensation. For the bus ducts not normally energized, condensation could occur since the area is "not" air conditioned. Additionally, dust, debris and moisture can be introduced inside the bus duct during maintenance work around the vicinity with relaxed housekeeping practices.

By a letter dated December 22, 2003, the applicant stated that the non-energized non-segregated bus duct bus bars are tubular aluminum with bolted joint connectors that are torqued to 65 ft. lbs. Each joint connector is filled around the bolts/nuts with Duxseal and then taped to provide a smooth surface. The available drawings do not indicate the bolting material. The applicant believes based on discussion with the vendor that the bolts are zinc plated high strength steel or stainless steel. The vendor manual states that under normal operating conditions, no internal maintenance is required on the bus ducts. Additionally, EPRI TR104213 Section 8.2 states the bolts should be inspected for evidence of overheating, signs of burning or discoloration, and indications of loose bolts. The bolts should not be retorqued unless the joint requires service or the bolts are clearly loose.

The applicant stated that there are no credible aging effects concerning bus duct bolted connections that require management. However, the applicant will include these bus ducts in the B.2.2 (Periodic Inspection of Non-EQ, Non-Segregated Electrical Bus Ducts) inspection program to inspect 10% of the bus bar insulation splice material at the bolted connections for surface anomalies, such as embrittlement, discoloration, cracking, chipping, or surface contamination. This is part of Commitment #40 of Appendix A of this SER. The absence of insulation material surface anomalies, such as embrittlement, discoloration, cracking, chipping, and discoloration provides positive indication that the bolted connections are not loose and therefore, the intended function of the bus duct will be maintained during the period of extended operation. This inspection will verify that there are no insulation material surface anomalies, such as embrittlement, discoloration, cracking, chipping, and discoloration of the bus bar insulation splice material at the bolted connections. The inspection will also include a verification for the presence of dirt and moisture in the bus duct. This is part of Commitment #40 of Appendix A of this SER. The visual inspection will include as much of the insulation as can be seen in both directions beyond the location of the bolted material. The initial baseline inspections will be completed prior to the beginning of the period of extended operation. Follow-up inspections will be performed on a frequency not to exceed once every ten years. If degradation is found that could adversely effect the intended function of the bus bar, inspections will be expanded appropriately to determine the extent of condition. On the basis of its review, the staff finds that its concern is resolved.

[Preventive Actions] This is an inspection program only. This program does not prevent or mitigate aging degradation. This is acceptable since the staff finds no need for such actions.

[Parameters Monitored/Inspected] Accessible normally-energized nonsegregated bus duct internal components are visually inspected for insulation material surface anomalies, such as embrittlement, discoloration, cracking, chipping, or surface contamination. As a result of the staff's RAI 3.6-4, on October 3, 2003, the applicant provided a revision of this element as follows: "Accessible normally energized non-segregated bus duct internal components are visually inspected for insulator and bus bar insulation material surface anomalies, such as embrittlement, discoloration, cracking, chipping, or surface contamination. Internal components such as insulation material, bus duct support pieces, gaskets, insulating boots, taped connections, and bus bar sleeves are inspected. The visual inspections also check for evidence of water and dirt accumulation and presence of foreign material." This is part of Commitment #40 of Appendix A of this SER. The staff finds this to be acceptable since this inspection will verify that there is no discoloration, cracking, chipping or surface contamination of the bus bar insulation material at the bolted connections. The absence of discoloration, cracking, chipping or surface contamination provides positive indication that the bolted connections are not loose and therefore, the intended function of the bus duct will be maintained during the period of extended operation.

[Detection of Aging Effects] Non-segregated bus ducts are inspected at least once every 10 years for material surface anomalies which are precursors to any onset of insulation failure due to temperature or radiation degradation. Experience has shown that aging degradation is a slow process. This frequency is therefore adequate to preclude age-related failures of the conductor insulation. As a result of RAI B.2.2-2, the applicant stated that the program will be implemented prior to the period of extended operation. The staff finds that the 10-year inspection frequency is an adequate period to preclude failure of bus ducts because industry experience has shown that the aging degradation is a slow process.

[Monitoring and Trending] Trending is not included in this activity because the parameters inspected are difficult to quantify. The 10-year inspection frequency will however provide at least 2 data points within 20 years, which will permit some characterization of the rate of degradation. The staff finds this to be acceptable because the two data points will provide some characterization of the rate of degradation.

[Acceptance Criteria] The accessible non-segregated bus ducts are to be free from unacceptable visual indications. Unacceptable visual indications are duct insulation material surface anomalies which suggest that bus duct insulation degradation exists, which if left unmanaged, could lead to a loss of the intended function, as determined by an engineering evaluation. The staff finds that the acceptance criteria to be acceptable because an unacceptable visual indication will indicate bus duct insulation degradation and loose bolts.

[Operating Experience] No age-related bus duct insulation failures that would indicate aging to be a concern at Dresden or Quad Cities have been identified. However, industry experience indicates that high temperatures may cause degradation of electrical insulation materials. Some visual surface indications of high-temperature degradation in bus duct electrical insulation, such as color changes or surface cracking, have been observed in the industry. The staff finds that the applicant has adequately addressed operating experience.

The staff also reviewed the UFSAR supplement to determine whether it provides an adequate description of the program.

On the basis of its review, the staff finds that the AMPs credited in the LRA for the bus duct will effectively manage or monitor the aging effects identified in the LRA.

Conclusions. On the basis of its review of the applicant's program, the staff finds that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3). The staff also reviewed the UFSAR supplement for this AMP and finds that it provides an adequate summary description of the program, as required by 10 CFR 54.21(d).

3.6.2.4.2 High Voltage Electrical Switchyard Bus

Summary of Technical Information in the Application. Switchyard bus electrically connect specified sections of an electrical circuit to deliver voltage or current to various equipment and components throughout the plant. The switchyard bus is used in switchyards to connect two or more elements of an electrical power circuit such as active disconnect switches and passive transmission conductors. The material used for the switchyard bus is aluminum and iron. The staff notes that this component is missing from LRA Table 3.6-2.

Staff Evaluation. In the LRA Table 3.6-2, the staff did not find aging management review results for switchyard bus. The staff finds that change in material properties leading to increased resistance and heating due to oxidation, and cracking due to vibration are known to be potential aging effects/mechanism for the high voltage electrical switchyard bus. The staff requested the applicant to provide a description of aging management program, in accordance with the requirements of 10 CFR 54.21(a)(3), used to detect/manage above mentioned aging effects or provide a justification why such a program is not needed (RAI 3.6-7). In its response dated October 3, 2003, the applicant stated that the switchyard bus consists of aluminum tube, copper bar, aluminum conductors, and the necessary connections. Conductor connections are generally of the compression bolted category. The switchyard bus is located in an outside environment subject to ambient temperatures that normally range from -6 /F to 93 /F (referenced in section 9.4 of the Dresden & Quad Cities UFSAR). Copper and aluminum materials do not experience any appreciable aging effects in this environment. Additionally, connections are adequately designed and treated with corrosion inhibitors such as "No-oxide." For this reason, the switchyard bus is not susceptible to corrosion due to oxidation.

There are no credible sources of vibration in the switchyard bus at Dresden and Quad Cities stations that could result in fatigue or cracking. As such, this aging mechanism does not apply.

The staff finds that the applicant adequately addressed why these aging effects are not applicable aging effects at Dresden and Quad Cities.

Conclusions. On the basis of the staff's review of the information presented in the RAI 3.6-7 response, the staff concludes that switchyard bus has no aging effects that require management and will perform its intended function for the period of extended operation.

3.6.2.4.3 High Voltage Transmission Conductors

Summary of Technical Information in the Application. The high voltage transmission conductors within the scope of license renewal rule are those associated with the power feed from the switchyard to RATs. The function of the high voltage transmission conductors is to supply power to the plant systems through the RATs. Materials used for the high-voltage transmission conductors are aluminum conductor steel reinforced (ACSR).

Aging Effects

The applicant identified loss of material/corrosion as the aging effects/mechanism for the transmission conductors.

Aging Management Program

The applicant stated that the plant outdoor environment is not subject to heavy industry air pollution or saline environment. Aluminum is reactive, but develops an aluminum oxide film that protects it from further corrosion. Therefore, no aging management program is proposed.

Staff Evaluation. In LRA Table 3.6-2, Ref. No. 3.6.2.1, aging effect/mechanism for high voltage transmission conductors is identified as loss of material/corrosion. However, no aging management program for high voltage transmission conductors and connections is provided. The LRA states that “the plant outdoor environment is not subject to heavy industry air pollution or saline environment. Aluminum is reactive but develops an aluminum oxide film that protects it from further corrosion.” The staff finds that loss of conductor strength and vibration is a known potential aging effects/mechanism for transmission line conductors. The most prevalent mechanism contributing to loss of conductor strength of an aluminum conductor steel reinforced (ACSR) transmission conductor is corrosion which includes corrosion of steel core and aluminum strand pitting. For ACSR conductors, degradation begins as a loss of zinc from the galvanized steel core wires. Corrosion rate depend largely on air quality which includes suspended particles chemistry, SO₂ concentration in air, precipitation, fog chemistry, and meteorological conditions. Transmission conductor vibration (caused by wind loading) or sway could cause loss of material (wear) and fatigue.

The staff requested the applicant to provide a description of aging management program, in accordance with the requirements of 10 CFR 54.21(a)(3), used to detect/manage the aging effects discussed above or provide justification why such a program is not needed (RAI 3.6-8). In response to RAI 3.6-8, the applicant by letter dated October 3, 2003, stated that EPRI 1003057, License Renewal Electrical Handbook, discusses the aging of high voltage transmission conductors and concludes that the potential aging mechanism of corrosion does not produce any significant effects that would be of a concern for their intended function. Regarding high voltage transmission conductor strength, tests performed by Ontario Hydroelectric showed a 30% loss of composite conductor strength of an 80-year-old ACSR conductor due to corrosion. Using the example of a 4/0 ACSR conductor, EPRI 1003057 shows the ultimate strength and the National Electrical Safety Code (NESC) heavy load tension requirements of 4/0 ACSR are 8350 lbs. and 2761 lbs. respectively. The margin between the NESC Heavy Load and the ultimate strength is 5589 lb.; i.e., there is a 67% of ultimate strength margin. The Ontario Hydroelectric study showed a 30% loss of composite conductor strength in an 80-year-old conductor. In the case of the 4/0 ACSR transmission conductors, a 30% loss of

ultimate strength would mean that there would still be a 37% ultimate strength margin between what is required by the NESC and the actual conductor strength.

There is a set percentage of composite conductor strength established at which a transmission conductor is replaced. The NESC requires that tension on installed conductors be limited to a maximum of 60% of the ultimate conductor strength. The NESC also sets the maximum tension a conductor must be designed to withstand under various load requirements, which includes consideration of ice, wind and temperature. The applicant's design and installation practice limits the tension in the conductors such that it will not exceed a maximum of 50% of its rated tensile strength. Therefore, for a typical transmission conductor, there is ample design margin to offset the loss of strength due to corrosion and maintain the transmission conductor intended function through the extended period of operation. With respect to corrosion of steel core caused by loss of zinc coating or aluminum strand pitting corrosion, this is a very slow acting aging effect that is even slower for rural areas with generally less suspended particles and SO₂ concentrations in the air than urban or industrial areas. The transmission conductors at Dresden and Quad Cities do not see air particulates or contaminants as seen in urban or heavy industrial areas. Therefore, corrosion is not a credible aging mechanism for the intended function of Dresden and Quad Cities transmission conductors.

EPRI 1003057 also discusses the aging of high voltage transmission conductors and concludes that the potential aging mechanism of vibration does not produce any significant effects that would be of a concern for their intended function. Regarding wind loading induced vibration, wind loading is considered in the design and installation. Aging effect of loss of material and fatigue that could be caused by transmission conductor vibration or sway are not applicable in that they would not cause a loss of intended function for the extended period of operation. Experience has shown that the transmission conductors do not normally swing significantly. When they do swing due to a substantial wind, they do not continue to swing for very long once the wind has subsided. Wind loading that can cause a transmission line to sway is considered in the design and installation. Therefore, wind loading induced vibration and fatigue are not credible aging mechanisms, and will not cause a loss of intended function of the conductors at Dresden and Quad Cities.

The applicant concluded that the aging mechanism identified in the RAI are not significant for Dresden and Quad Cities transmission conductors in that they would not cause a loss of intended function for the period of extended operation.

The staff finds that the applicant adequately addressed why these aging effects (loss of conductor strength and vibration) are not applicable at Dresden and Quad Cities transmission conductors.

Conclusions. On the basis of the staff's review of the information presented in the RAI 3.6-8 response, the staff concludes that transmission conductors have no aging effects that require management and will perform their intended function for the period of extended operation.

3.6.2.4.4 High Voltage Insulators

Summary of Technical Information in the Application. High-voltage insulators within the scope of license renewal rule are those associated with the power feeds from the switchyard to reserve auxiliary transformers. The function of high voltage insulators is to support and insulate

the high voltage transmission conductors. Materials used for the high-voltage insulators are porcelain.

Aging Effects

The applicant identified no aging effects/mechanisms for the high-voltage insulators.

Aging Management Program

The applicant stated that the plant outdoor environment is not subject to heavy industrial air pollution or saline environment. Plant indoor and outdoor environments are not conducive to promoting aging degradation of porcelain components. Therefore, no aging management program is proposed.

Staff Evaluation. In the LRA Table 3.6-2, the aging effect/mechanism for porcelain insulator is indicated as "none." The LRA states that "the plant outdoor environment is not subject to heavy industrial air pollution or saline environment. Plant indoor and outdoor environment are not conducive to promoting aging degradation of porcelain components." The staff finds that surface contamination, cracking, and loss of material due to wear are the aging effect/mechanism. Various airborne materials such as dust, salt, and industrial effluents can contaminate insulator surfaces. A large buildup of contamination enables the conductor voltage to track along the surface more easily and can lead to insulator flashover.

Surface contamination can be a problem in areas where there are greater concentrations of airborne particles such as near facilities that discharge soot or near the sea coast where salt spray is prevalent. Porcelain is essentially a hardened, opaque glass. As with any glass, porcelain will crack or break when subjected to enough force. Cracks have also known to occur with insulators when the cement that binds the part together expands enough to crack the porcelain. This phenomenon is known as cement growth. Mechanical wear is an aging effects for strain and suspension insulators in that they are subject to movement. Movement of the insulators can be caused by wind blowing the supported transmission conductor, causing it to swing from side to side. If this swing is frequent enough, it could cause wear in the metal contact points of the insulator string and between an insulator and supporting hardware. The staff requested the applicant to provide a discussion why these aging effects/mechanism are not of concern for Dresden and Quad Cities (RAI 3.6-6). In response to RAI 3.6-6, the applicant by letter dated October 3, 2003, stated that the concerns identified in the RAI were evaluated and discussed as follows:

Surface Contamination

Regarding the potential for contamination of insulators, the buildup of surface contamination is gradual. In most areas, this contamination is washed away by rain or snow; the glazed insulator surface aids this contamination removal. A large buildup of contamination enables the conductor voltage to track along the surface more easily and can lead to insulator flashover. Surface contamination can be a problem in areas where there are greater concentrations of airborne particles such as near facilities that discharge soot or near a seacoast where salt spray is prevalent. Dresden and Quad Cities are located in areas where airborne particle concentrations are comparatively low, since they are not located in heavy industrialized areas. Any insignificant contamination would be washed away by the rainfall or snow, which is

seasonal in nature, and cumulative build up is not expected. There is no salt spray that can affect the insulators as Dresden and Quad Cities are not located near a seacoast. Therefore, surface contamination is not a credible event for the insulators at Dresden and Quad Cities.

Cracking/ Cracking of Cement Due to Cement Growth

Regarding HV porcelain insulator cracking, porcelain is essentially a hardened, opaque glass. As with any glass, if subjected to enough force it will crack or break. The most common cause for cracking or breaking of an insulator is being struck by an object (e.g., a rock or bullet). Cracking and breaking caused by physical damage is not an aging effect and is not subject to an AMR. Cracks have been known to occur with insulators when the cement that binds the parts together expands enough to crack the porcelain. This phenomenon, known as cement growth, occurs mainly because of improper manufacturing processes or materials, which make the cement more susceptible to moisture penetration, and the specific design and application of the insulator. Therefore, cracking due to cement growth is not an applicable aging effect for the HV switchyard insulators in the service conditions they are exposed to at Dresden and Quad Cities. Along with improper manufacturing, cracking would also be caused by severe temperature extremes or variation. The temperature extreme will be seasonal in nature and does not produce a cumulative effect for 60 years. Any temperature related failures would be manifested in a few years. The insulators are properly selected and specified for the expected conditions. This is a design consideration. In summary, the concern of cracking is either event driven or a design issue and is not an aging concern.

Loss of Material Due to Wear/ Mechanical Wear Due to Wind Blowing the Transmission Conductors

Regarding mechanical wear, this applies to suspension insulators in that they are subject to movement. Movement of the insulators can be caused by wind blowing the supported transmission conductor, causing it to swing from side to side. If this swinging is frequent enough, it could cause wear in the metal contact points of the insulator string and between an insulator and the supporting hardware. Although this mechanism is possible, experience has shown that the transmission conductors do not normally swing significantly. When they do swing due to a substantial wind, they do not continue to swing for very long once the wind has subsided. Wind loading that can cause a transmission line and insulators to sway is considered in the design and installation. Therefore, the loss of material due to wear is not considered a credible aging effect and will not cause a loss of intended function of the insulators at Dresden and Quad Cities. Therefore, loss of material due to wear is not an applicable aging effect for insulators.

The staff finds that the applicant adequately addressed why these aging effects (surface contamination, cracking, and loss of material due to wear) are not applicable at Dresden and Quad Cities.

Conclusions On the basis of the staff's review of the information presented by the applicant, the staff concludes that high-voltage insulators have no aging effects that require management and will perform their intended function for the period of extended operation.

3.6.2.4.5 Non-EQ Electrical Penetration Assemblies

Summary of Technical Information in the Application. The applicant did not provide an AMR of the electrical penetration assemblies.

Staff Evaluation. The staff requested the applicant to clarify whether there are any electrical penetrations that are not covered under EQ program (RAI 3.6-2). In response to the staff's RAI 3.6-2, the applicant on October 3, 2003, stated that at Dresden Station, all electrical penetrations are covered under the Environmental Qualification (EQ) program. At Quad Cities Station, all but three electrical related penetrations (1-X102B, 2-X100A, and 2-X105A) are part of the station EQ program. These three penetrations serve circuits (such as drywell booster fans and main steam line vibration monitoring instrumentation) that do not perform any electrical intended function.

As stated in Section 2.5.1.4 of the License Renewal Application, the intended function (electrical continuity) is managed by the EQ program. The mechanical and structural related intended functions of all electrical penetrations, including the three Quad Cities penetrations not included within the station EQ program, are addressed in Table 2.4-1 under Component Group "Containment Penetrations (Electrical)" and the associated aging management is discussed in Table 3.5-1, Aging Management Reference 3.5.1.3 of the application. The staff requested the applicant to provide details about these circuits (i.e., energized during shutdown only and power supply is disconnected during plant operation, etc.). The staff also requested the applicant to discuss why the aging of the insulation do not have any effect on the penetration damage curve so that penetration seal integrity is maintained as part of containment pressure boundary.

In its supplemental information dated December 5, 2003, the applicant stated that the drywell booster fans are continuously energized during plant operations. The circuit for these fans is protected by redundant 100 amp in-scope circuit breakers. The cables from the MCC to the penetrations and from the penetrations to the fans are in-scope and managed by aging management program B.1.33, "Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements." The conax penetration feed-through-modules are #2 AWG solid copper conductors insulated with polyimide film. The circuits are designed such that the 100 amp breakers are coordinated to clear all fault currents before the short circuit capacity of the #2 AWG feed-through-modules is exceeded thus preventing damage to the penetration seal integrity. There are no credible aging effects that reduce the short circuit capability of solid copper conductors. Short circuit capacity is based on the circular mills of the copper conductor.

The vibration Instrumentation circuits are low voltage, milliamp circuits protected by fuses. Fault currents are in the milliamp range and not severe enough to cause damage to the # 18 AWG feed-through-modules. The cables for these instrumentation circuits are in-scope and managed by aging management program B.1.33, "Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements."

The design of the Conax penetration module is a stainless steel tube that is sealed at both ends with polysulfone. Solid copper polyimide film insulated conductors passes through the stainless steel tube and are molded into the polysulfone seal at both ends to provide a leak proof seal. A visual inspection of the exposed polyimide film insulation will not provide any indication of the leak tightness of the penetration because the insulation cannot be visually inspected once it

passes into the polysulfone seal. The aging management programs that are used to manage the aging of the pressure boundary function are Containment ISI (B.1.26) and Containment leak rate test (B.1.28).

Identical Conax EQ penetrations are installed at the Dresden station. The Dresden Conax EQ penetrations are qualified for 60 years of normal and one-year accident/post accident conditions in accordance with IEEE 323-1983 requirements and NUREG-0588, Category I. The Quad Cities Conax penetrations are bounded by the environmental qualification reports approved for Dresden.

The applicant concluded that license renewal intended function of the Quad Cities Non-EQ penetrations will be maintained during the period of extended operation by using AMPs Containment ISI (B.1.26) and Containment Leak Rate Test (B.1.28).

On the basis of its review, the staff finds that three non-Class 1E penetrations at Quad Cities will not require an AMR.

Conclusions. On the basis of its review, the staff concludes that no AMR is required for Dresden since all penetrations are covered under EQ program. The staff also concludes that no AMR is required for Quad Cities Non-EQ penetrations and that the component intended function for Quad Cities will be maintained consistent with the CLB for the extended operation as required by 10 CFR 54.21(a)(3).

3.7 Conclusion for Aging Management

On the basis of its review of AMR results and AMPs, the staff concludes that actions have been identified and have been or will be taken to manage the effects of aging during the period of extended operation on the functionality of SCs subject to an AMR such that there is reasonable assurance with the CLB, as required by 10 CFR 54.21(a)(3).

THIS PAGE IS INTENTIONALLY LEFT BLANK

4. TIME-LIMITED AGING ANALYSES

4.1 Identification of Time-Limited Aging Analyses

This section addresses the identification of time-limited aging analyses (TLAAs). The applicant discusses the TLAAs in Sections 4.2 through 4.7 of the license renewal application (LRA). The staff's review of the TLAAs can be found in Sections 4.2 through 4.7 of this safety evaluation report (SER).

The TLAAs are plant-specific safety analyses that are based on an explicitly assumed 40-year plant life. Pursuant to Title 10, Section 54.21(c)(1), of the *Code of Federal Regulations* (10 CFR 54.21(c)(1)), the applicant for license renewal must provide a list of TLAAs, as defined in 10 CFR 54.3.

In addition, pursuant to 10 CFR 54.21(c)(2), an applicant must provide a list of plant-specific exemptions granted under 10 CFR 50.12 that are based on TLAAs. For any such exemptions, the applicant must provide an evaluation that justifies the continuation of the exemptions for the period of extended operation.

4.1.1 Summary of Technical Information in the Application

A list of potential generic TLAAs was assembled using the scope and methods for identifying TLAAs consistent with NUREG-1800, Nuclear Energy Institute (NEI) 95-10, the Statements of Consideration for 10 CFR Part 54, and prior license renewal applications. The current licensing basis (CLB) for the Dresden/Quad Cities Nuclear Power Station (D/QCNPS), including the updated final safety analysis report (UFSAR) and design-basis documents, was searched to identify plant-specific and unit-specific TLAAs. The resulting list of potential TLAAs was screened against the six 10 CFR 54.3(a) criteria and divided into the following general TLAA categories:

- neutron embrittlement of the reactor vessel and internals
- metal fatigue of the reactor vessel, internals, and primary coolant boundary piping and components
- environmental qualification of electrical equipment
- loss of prestress concrete containment tendons
- fatigue of the primary containment, attached piping, and components
- other plant-specific TLAAs

Information about the TLAAs in a category is described as to applicability, summary description, analysis, and disposition in accordance with 10 CFR 54.21(c)(1).

The applicant searched docketed correspondence, the operating licenses, and the UFSARs to identify any exemptions in effect, pursuant to 10 CFR 50.12. The applicant stated that the

identified exemptions were evaluated to determine if they involved TLAAs as defined in 10 CFR 54.3. No exemptions based on a TLAA as defined in 10 CFR 54.3 were identified.

4.1.2 Staff Evaluation

In LRA Section 4.1, the applicant identified the TLAAs applicable to Dresden and Quad Cities and discussed exemptions based on TLAAs. The staff reviewed the information to determine whether the applicant provided adequate information to meet the requirements of 10 CFR 54.21(c)(1) and 10 CFR 54.21(c)(2).

As indicated by the applicant, TLAAs are defined in 10 CFR 54.3 as analyses that meet the following six criteria:

- (1) involve systems, structures, and components within the scope of license renewal, as delineated in Section 54.4(a)
- (2) consider the effects of aging
- (3) involve time-limited assumptions defined by the current operating term (for example, 40 years)
- (4) were determined to be relevant by the licensee in making a safety determination
- (5) involve conclusions or provide the basis for conclusions related to the capability of the system, structure, and component to perform its intended functions, as delineated in Section 54.4(b)
- (6) are contained or incorporated by reference in the CLB

The applicant listed the TLAAs applicable to Dresden and Quad Cities, both jointly and individually, in Table 4.1-1 of the LRA. The staff reviewed the categorization of the TLAAs for conformance with Tables 4.1-2 and 4.1-3 in NUREG-1800 and potential TLAAs that were identified from the review of other license renewal applications.

4.1.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable list of TLAAs as required by 10 CFR 54.21(c)(1), and has confirmed that no 10 CFR 50.12 exemptions have been granted on the basis of a TLAA, as required by 10 CFR 54.21(c)(2).

4.2 Reactor Vessel and Internals Neutron Embrittlement

During plant service, neutron irradiation reduces the fracture toughness of ferritic steel in the reactor vessel beltline region of light-water nuclear power reactors. Areas of review to ensure that the reactor vessel has adequate fracture toughness to prevent brittle failure during normal and off-normal operating conditions are (1) upper-shelf energy (USE), (2) adjusted reference temperature (ART), (3) a low-pressure coolant injection (LPCI) reflood thermal shock analysis, (4) heatup and cooldown (pressure-temperature limit) curves, and (5) Boiling Water Reactor (BWR) Vessel and Internals Project (VIP) VIP-05 analysis for elimination of circumferential weld

inspection, and (6) analysis of the axial welds. The adequacy of the analyses for these six areas is reviewed for the period of extended operation.

The ART is defined as the sum of the initial (unirradiated) reference temperature (initial RT_{NDT}), the mean value of the adjustment in reference temperature caused by irradiation (delta RT_{NDT}), and a margin (m) term. The delta RT_{NDT} is the product of a chemistry factor (CF) and a fluence factor. The chemistry factor is dependent upon the amount of copper and nickel in the material and may be determined from tables in Regulatory Guide (RG) 1.99, Revision 2, or from surveillance data. The fluence factor is dependent upon the neutron fluence. The margin term is dependent upon whether the initial RT_{NDT} is a plant-specific or a generic value and whether the CF was determined using the tables in RG 1.99, Revision 2, or surveillance data. The margin term is used to account for uncertainties in the values of the initial RT_{NDT} , the copper and nickel contents, the fluence, and the calculation methods. Revision 2 of RG 1.99 describes the methodology to be used in calculating the margin term. The mean RT_{NDT} is the sum of the initial RT_{NDT} and the delta RT_{NDT} , without the margin term.

The ART values are used in the analysis for the adjusted reference temperature for the reactor vessel material because of neutron embrittlement, the pressure-temperature limits, and the reflood thermal shock. The mean RT_{NDT} values are used in the analysis of the circumferential weld examination relief and the axial weld failure probability.

4.2.1 Summary of Technical Information in the Application

The applicant described its evaluation of this TLAA in LRA Section 4.2, “Neutron Embrittlement of the Reactor Vessel and Internals.” In order to demonstrate that neutron embrittlement does not significantly impact BWR reactor pressure vessel (RPV) and vessel internals integrity during the license renewal term, the applicant included discussion of the following topics related to neutron embrittlement in LRA Section 4.2:

- reactor vessel materials upper-shelf energy reduction due to neutron embrittlement (LRA Section 4.2.1)
- adjusted reference temperature for reactor vessel materials due to neutron embrittlement (LRA Section 4.2.2)
- reflood thermal shock analysis of the reactor vessel (LRA Section 4.2.3)
- reflood thermal shock analysis of the reactor vessel core shroud and repair hardware (LRA Section 4.2.4)
- reactor vessel thermal limit analyses—operating pressure-temperature limits (LRA Section 4.2.5)
- reactor vessel circumferential weld examination relief (LRA Section 4.2.6)
- reactor vessel axial weld failure probability (LRA Section 4.2.7)

4.2.1.1 Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement

Appendix G of 10 CFR Part 50 requires that the predicted end-of-life Charpy USE for reactor vessel materials be at least 50 ft-lb, unless an approved analysis supports a lower value. The applicant determined the 54 effective full-power year (EFPY) fluence for the Dresden and Quad Cities reactor vessels using the methodology of NEDC-32983P, "General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluation," which was approved by the U.S. Nuclear Regulatory Commission (NRC) in a letter dated September 14, 2001, from Mr. S.A. Richards (NRC) to Mr. J.F. Klapproth (General Electric (GE)). The applicant performed one bounding fluence calculation for D/QCNPS and determined peak fluence at the vessel inner surface and at the 1/4 vessel thickness location (1/4T) for evaluating USE. Initial unirradiated test data are not available for the D/QCNPS reactor vessels to demonstrate a minimum 50 ft-lb USE using the standard methods. Therefore, the applicant evaluated the 54-EFPY USE by an equivalent margin analysis methodology approved by the NRC in NEDO-32205-A. The applicant used calculated 54-EFPY fluence and D/QCNPS surveillance capsule results for evaluating the 54-EFPY USE. The results are presented in LRA Tables 4.2.1-1 through 4.2.1-8. The results show that the percent reductions in USE for limiting beltline plates and welds for all four D/QCNPS units are less than the BWRVIP-74 equivalent margin analysis acceptance criteria. The applicant stated that a report summarizing the results of the equivalent margin analysis will be submitted for NRC approval by December 31, 2003. The applicant further stated that the 54-EFPY USE values will be managed in conjunction with the surveillance capsule results from the BWRVIP integrated surveillance program.

4.2.1.2 Adjusted Reference Temperature for Reactor Vessel Materials Due to Neutron Embrittlement

Neutron irradiation causes an increase in the ART of the RPV beltline materials. Tables 4.2.2-1 and 4.2.2-2 of the LRA provide the 54-EFPY peak fluence, shift in initial nil-ductility transition reference temperature (ΔRT_{NDT}), and ART, respectively, for Dresden and Quad Cities units. In these tables, the applicant provided the ΔRT_{NDT} and ART values only for one limiting material. The applicant stated that because of the refinement in the approved methodology used to calculate the 54-EFPY fluence, the material with the limiting ART is the axial weld, with the exception of Dresden Unit 3 where the axial weld and girth weld ART values are identical. The applicant further stated that the use of American Society of Mechanical Engineers (ASME) Code Case N-588 for Dresden Unit 3 causes the axial weld to become the limiting material. Therefore, data for a single limiting material were presented in LRA Tables 4.2.2-1 and 4.2.2-2.

4.2.1.3 Reflood Thermal Shock Analysis of the Reactor Vessel

In LRA, Section 4.2.3, the applicant stated the following:

The Dresden and Quad Cities UFSARs describe an end-of-life thermal shock analysis performed on the reactor vessels for a design basis LOCA followed by a low-pressure coolant injection. The effects of embrittlement assumed by this thermal shock analysis will change with an increase in operating period. This analysis satisfies the criteria of 10 CFR 54.3(a). As such, this analysis is a TLA.

Thermal shock analysis of the RPV considers a design-basis loss-of-coolant accident (LOCA) followed by an LPCI accounting for the effects of neutron embrittlement at the end-of-life (54 EFPYs). The original analysis has been superseded by an analysis for BWR-6 vessels that is

applicable to the D/QCNPS BWR-3 reactor vessels. The revised analysis assumes end-of-life material toughness, which in turn depends on end-of-life ART. The critical location for fracture mechanics analysis is at the 1/4T location. For this event, the peak stress intensity occurs at approximate 300 seconds after the LOCA. At that time, the temperature at 1/4T is approximately 204 °C (400 °F), which is much higher than the 54-EFPY ART of 40 °C (104 °F) for the limiting material of the D/QCNPS vessels. Therefore, the applicant indicated that the revised analysis is valid for the period of extended operation.

4.2.1.4 Reflood Thermal Shock Analysis of the Reactor Vessel Core Shroud and Repair Hardware

In LRA, Section 4.2.4, the applicant stated the following:

Radiation embrittlement may affect the ability of reactor vessel internals, particularly the core shroud and repair hardware, to withstand a low-pressure coolant injection (LPCI) thermal shock transient. Core shroud repair hardware was installed on the Dresden and Quad Cities core shrouds after 20 years of operation when cracks were found on the shroud. The analysis of core shroud strain due to reflood thermal shock is a TLA because it is part of the current license basis, supports a safety determination, and is based on the calculated lifetime neutron fluence.

The thermal shock analysis of D/QCNPS reactor vessel core shrouds considers the embrittlement effects of 54-EFPY fluence at the inside surface opposite to the midpoint of the fuel centerline where the core shroud receives the maximum irradiation. The applicant calculated 54-EFPY fluence for that location on the reactor vessel core shroud using the methodology of NEDC-32983P, which was approved by the NRC. The calculated 54-EFPY fluence at that location was 5.85×10^{20} n/cm². The applicant stated that the calculated thermal strain amplitude at the most irradiated location is 0.3 percent. The applicant further stated that according to the GE document Y1002A602, Revision 3, "304 Stainless Steel, Irradiated," October 16, 1985, the allowable value of the thermal strain for irradiation levels in excess of 1×10^{21} n/cm² and for this faulted event is at least 20 percent, which bounds the 0.3 percent thermal strain amplitude in Dresden and Quad Cities. Therefore, the applicant indicated that the peak thermal shock strain location is acceptable considering the embrittlement effects of a 60-year (54-EFPY) operating period.

4.2.1.5 Reactor Vessel Thermal Limit Analyses—Operating Pressure-Temperature Limits

The applicant used the ART of the limiting beltline material to determine the beltline pressure-temperature (P-T) limits to account for irradiation effect. The applicant stated that it will revise P-T limits for the four D/QCNPS units and submit them to the NRC for approval before the start of the extended period of operation using an approved fluence methodology. The applicant further stated that it will use ASME Code Cases N-640 and N-588 (Dresden Unit 3 only) for revising the P-T limits. The applicant will manage the P-T limits using approved fluence calculations when there are changes in the power of core design in conjunction with surveillance capsule results from the BWRVIP integrated surveillance program.

4.2.1.6 Reactor Vessel Circumferential Weld Examination Relief

The analysis in BWRVIP-05, "BWR Reactor Pressure Vessel Shell Weld Inspection Recommendations," showed that the failure rate of the reactor vessel shell axial weld is orders of magnitude greater than 40-year end-of-life circumferential weld failure rate. This analysis

has been used to justify relief from inspection of the circumferential welds. The circumferential weld examination relief analysis meets the requirements of 10 CFR 54.3(a) and is, therefore, a TLAA. The applicant presented the following data in LRA Table 4.2.6-1 for the circumferential welds of the Dresden vessels—mean values for copper and nickel contents for each vessel, mean 54-EFPY neutron fluence ($E > 1$ MeV), delta RT_{NDT} , and mean 54-EFPY RT_{NDT} . In LRA Table 4.2.6-1, the applicant also presented the 64-EFPY data for circumferential welds of a Babcock and Wilcox (B&W) vessel from Table 2.6-5 of the final safety evaluation report (FSER) for BWRVIP-05. In a letter dated April 17, 2003, from Mr. P.R. Simpson, Exelon Nuclear, to the NRC, the applicant sent corrections to LRA Table 4.2.6-1. The corrected values of delta RT_{NDT} and mean 54-EFPY RT_{NDT} are 44 °F and 54 °F for Dresden Unit 2, and 58 °F and 53 °F for Dresden Unit 3. The comparison of the corrected Dresden data with the BWRVIP-05 FSER data indicates that the Dresden 54-EFPY mean RT_{NDT} values are bounded by the 64-EFPY RT_{NDT} value of 129 °F for a B&W vessel. The applicant therefore indicated that the conditional failure probability of Dresden RPV circumferential welds is bounded by the corresponding NRC analysis results presented in the SER for BWRVIP-05. As indicated in LRA Section 4.2.6, this TLAA applies only to the two Dresden units because Dresden received relief from the reactor vessel circumferential weld examination for the remainder of the 40-year licensed operating period at the time the LRA was prepared. However, the applicant submitted a similar relief request for Quad Cities on May 16, 2003, which is currently being reviewed by the staff. The applicant was required to submit an update to LRA Section 4.2.6 to include the Quad Cities vessel circumferential weld examination relief analysis in accordance with 10 CFR 54.3(a) upon the staff's approval of the May 16, 2003, relief request. This was identified as Confirmatory Item 4.2.1.6. In response to Confirmatory Item 4.2.1.6, in a letter dated March 5, 2004, the applicant submitted a revision to the UFSAR supplement for the reactor vessel circumferential weld examination relief TLAA. The revised supplement refers to the documents related to RPV circumferential weld relief request extension for the license renewal term. The staff reviewed this supplement and found that it provides an adequate summary description regarding the evaluation of this TLAA. Therefore, Confirmatory Item 4.2.1.6 is closed.

4.2.1.7 Reactor Vessel Axial Weld Failure Probability

As discussed in the preceding paragraph, Dresden has followed the BWRVIP-05 results and received relief from the circumferential weld inspections for the remaining 40-year licensed operating period. Quad Cities never submitted for this relief. Therefore, the analysis for the reactor vessel axial weld failure probability is a TLAA only for the two Dresden units. For the extended operating period, the applicant presented the limiting axial weld 54-EFPY properties for Dresden Units 2 and 3 in LRA Table 4.2.7-1. In a letter, dated April 17, 2003, from Mr. P.R. Simpson, Exelon Nuclear, to the NRC, the applicant sent corrections to LRA Table 4.2.7-1. The corrected values of delta RT_{NDT} and mean 54-EFPY RT_{NDT} are 44 °F and 67 °F for both Dresden Units 2 and 3. The corrected data are compared with the corresponding data for a B&W vessel from Table 2.6-5 in the NRC SER for BWRVIP-05 and the data for the Clinton plant from the supplement for the SER. The applicant stated that the Dresden limiting axial weld chemistry, chemistry factor, and the mean 54-EFPY RT_{NDT} values are within the limits of the values assumed in the analysis performed by the NRC staff in the March 7, 2000, BWRVIP-05 SER Supplement and the 64-EFPY limits and values presented in Table 2.6-5 of the SER.

The determination of the failure frequency of the limiting axial weld assumes that essentially 100 percent (i.e., 90 percent) of the vessel axial welds are inspected. However, because of

various obstructions within the Dresden reactor vessels, the actual inspection can include less than 90 percent of axial welds. The applicant performed an analysis for the current 40-year operating period to assess the effect on the probability of fracture of the vessel axial welds because of the actual inspection performed. The analysis indicated that the conditional probabilities of failure because of a low-temperature over-pressurization event are very small, 3.89×10^{-8} and 5.07×10^{-8} on a per year basis for Dresden Units 2 and 3, respectively. The analysis results show that the calculated unit-specific axial weld conditional failure probabilities at 54 EFPYs are less than the failure probabilities calculated by the NRC staff for a B&W-fabricated vessel, presented in Table 2.6-5 of the BWRVIP-05 SER at 64 EFPYs, and the limiting Clinton values found in Table 3 of the SER Supplement. The applicant, therefore, indicated that the probability of failure of an axial weld at Dresden will provide adequate margin above the probability of failure of a circumferential weld, in support of relief from inspection of circumferential welds, for the extended operating period.

4.2.2 Staff Evaluation

4.2.2.1 Reactor Vessel Materials Upper-Shelf Energy Reduction Due to Neutron Embrittlement

Section IV.A.1a of Appendix G of 10 CFR Part 50 requires, in part, that the RPV beltline materials have Charpy USE values in the transverse direction for base metal and along the weld for weld material of no less than 50 ft-lb (68J) throughout a facility's license period, unless it is demonstrated in a manner approved by the Director, Office of Nuclear Reactor Regulation, that lower values of Charpy USE will ensure margins of safety against fracture equivalent to those required by Appendix G of Section XI of the ASME Code.

By letter dated April 30, 1993, the Boiling Water Reactor Owners Group (BWROG) submitted a topical report entitled "10 CFR Part 50 Appendix G Equivalent Margins Analysis for Low Upper Shelf Energy in BWR-2 Through BWR-6 Vessels," to demonstrate that BWR RPVs could meet margins of safety against fracture equivalent to those required by Appendix G to the ASME Code, Section XI, for Charpy USE values less than 50 ft-lb. In a letter dated December 8, 1993, the staff concluded that the topical report demonstrated that the evaluated materials (including BWR/3-6 plates, Non-Linde SAW welds, and electroslag welds (ESW)) have the margins of safety against fracture equivalent to Appendix G of ASME Code Section XI, in accordance with Appendix G of 10 CFR Part 50. In that report, the BWROG derived through statistical analysis the unirradiated USE values for materials that originally did not have documented unirradiated Charpy USE values. Using these statistically derived Charpy USE values, the BWROG predicted the end-of-license (40 years of operation) USE values in accordance with RG 1.99, Revision 2. According to this RG, the decrease in USE is dependent upon the amount of copper in the material and the neutron fluence at the 1/4T depth predicted for the material. The BWROG analysis determined through an equivalent margins analysis (EMA) methodology that the minimum allowable Charpy USE value in the transverse direction for base metal and along the weld for weld material was 35 ft-lb.

General Electric updated the projected USE values for BWR RPV materials out to 54 EFPY in Electric Power Research Institute (EPRI) report TR-113596, "BWR Vessel and Internals Project BWR Reactor Pressure Vessel Inspection and Flaw Evaluation Guidelines," BWRVIP-74, September 1999. The staff's review and approval of EPRI TR-113596 is documented in a letter from Mr. C.I. Grimes to Mr. C. Terry dated October 18, 2001. The analysis in EPRI TR-113596 determined the reduction in the unirradiated Charpy USE resulting from neutron

irradiation using the methodology in RG 1.99, Revision 2. Using this methodology, and a correction factor of 65 percent for conversion of the longitudinal properties to transverse properties, the lowest Charpy USE value for all BWR/3-6 plates was projected to be 45 ft-lb. The correction factor for specimen orientation in plates is based on NRC Branch Technical Position MTEB 5-2. Using the RG methodology, the lowest Charpy USE value for BWR non-Linde 80 submerged arc welds was projected to be 43 ft-lb. According to EPRI TR-113596, the percent reductions in Charpy USE for the limiting BWR/3-6 beltline plates and BWR non-Linde 80 submerged arc welds are 23.5 percent and 39 percent, respectively.

Since the analysis in EPRI TR-113596 is a generic analysis, the applicant submitted plant-specific information in LRA Tables 4.2.1-1 through 4.2.1-4 for Dresden Units 2 and 3, and in LRA Tables 4.2.1-5 through 4.2.1-8 for Quad Cities Units 1 and 2, to demonstrate that the beltline materials of the D/QCNPS RPVs meet the criteria in the EPRI report at the end of the license renewal period. The tables include the information as specified in Tables B-4 and B-5 of EPRI TR-113596. In request for additional information (RAI) 4.2.1(a), the staff noted the applicant's statement that it has performed one bounding 54-EFPY fluence calculation for Dresden and one for Quad Cities and then determined the corresponding 54-EFPY 1/4T fluence. Therefore, it was expected that the applicant used the same 54-EFPY 1/4T fluence for limiting beltline plate and weld material at both Dresden units. However, the data presented in Tables 4.2.1-1 through 4.2.1-4 indicate that the applicant used two different values for the limiting beltline materials for Dresden—a fluence value of 3.9×10^{17} n/cm² for the limiting plate and weld at Unit 2 and for the limiting plate at Unit 3, and a value of 2.9×10^{17} n/cm² for the limiting weld at Unit 3. A similar apparent discrepancy was present in LRA Tables 4.2.1-5 through 4.2.1-8 for Quad Cities. In addition to this discrepancy, there appeared to be another discrepancy between the peak fluence data for Quad Cities in LRA Sections 4.2.1 and 4.2.2. Tables 4.2.1-5 through 4.2.1-7 of the LRA for Quad Cities list 2.9×10^{17} n/cm² as the 54-EFPY 1/4T fluence, whereas LRA Table 4.2.2-2 for Quad Cities lists 3.9×10^{17} n/cm² as the 54-EFPY 1/4T fluence. A similar discrepancy existed between LRA Sections 4.2.1 and 4.2.2 for the 1/4T fluence data for Dresden. In RAI 4.2.1(a), the staff requested the applicant to explain these apparent discrepancies in the peak fluence data and provide revised tables as appropriate.

In response to RAI 4.2.1(a) in a letter dated October 3, 2003, the applicant explained that the statement about the bounding 54-EFPY fluence calculation in LRA Section 4.2.1 meant that one neutron transport (flux) calculation was prepared that bounds both Dresden and Quad Cities. However, based upon the different operating bases for the four units with regard to the time period of operation at two different power levels, one before the extended power uprate (EPU) and one after EPU, a unit-specific fluence was calculated for each of the four units. From these calculations, it can be seen that, using the bounding flux with the plant-specific pre-EPU and EPU periods of operation, the peak RPV fluence at 54 EFPY is the same (5.7×10^{17} n/cm² at the RPV inside surface and 3.9×10^{17} n/cm² at the 1/4T) for all four units, when rounding is applied. The staff has reviewed these values and found them acceptable.

The peak EPU fluence on the vessel is located at approximately 82 inches above the bottom of active fuel and is applied to the lower-intermediate shell and axial welds. Additionally, axial flux distribution factors are applied to different elevations (by shell) in the beltline region. For the lower shell, the peak fluence is adjusted by the axial flux distribution factor based on an elevation approximately 42 inches above the bottom of active fuel, which represents the lower to lower-intermediate girth weld. The axial flux distribution factor for this location is 0.71. The applicant stated that it applied this factor for calculating the peak pre-EPU fluence for the lower

to lower-intermediate shell girth weld and all lower shell materials. In a followup question to RAI 4.2.1(a), the staff requested the applicant to describe how the pre-EPU axial flux profile compares with the EPU axial flux profile. The staff also requested that the applicant submit information about how the axial flux distribution factor was used in calculating the peak-EPU fluence for the lower to lower-intermediate shell girth weld and all lower shell materials. This was identified as Confirmatory Item 4.2.1(a).

In a letter dated April 9, 2004, the applicant referred to Figure 2 in a letter from Exelon to NRC, "Additional Information Regarding Request for License Amendment for Pressure-Temperature Limits," dated July 31, 2003. This figure shows the pre-EPU and EPU axial flux distribution at the inside surface of the reactor pressure vessel. The pre-EPU and EPU axial flux distribution profiles are different, since the pre-EPU flux peaks at an elevation higher than the mid-plane, whereas the EPU flux peaks at the mid-plane. The applicant stated that for determining the peak 54-EFPY surface fluences at the lower shell plate material, lower shell welds and the lower to lower-intermediate shell girth weld, the axial flux distribution factor of 0.71 is applied for pre-EPU and 0.74 is applied for EPU conditions. The staff has independently verified the axial flux distribution factors using the data presented in the figure mentioned above and also verified the peak surface fluences for the lower shell and associated welds as calculated by the applicant. The staff finds the response acceptable because the applicant has used appropriate axial flux distribution factors for calculating the peak 54-EFPY surface fluence for the lower to lower-intermediate shell girth weld and all lower shell materials when determining the limiting materials. Therefore, Confirmatory Item 4.2.1(a) is closed.

In response to RAI 4.2.1(a), the applicant also provided the following explanation for the apparent discrepancies in the 54-EFPY fluence data for calculating the limiting beltline materials USE values presented in LRA Tables 4.2.1-1 through 4.2.1-8. In calculating the USE percent decrease for the limiting beltline material (plate or weld) of each unit, a combination of the applied fluence and the percentage of copper of each material is considered. Both the limiting plate and limiting weld materials for Dresden Unit 2 are in the lower-intermediate shell, thereby using the same fluence. The limiting plate material for Dresden Unit 3 also occurs in the lower-intermediate shell, thereby using the same fluence as that used for the Dresden 2 materials. However, the Dresden 3 limiting weld material with respect to the limiting USE percent decrease occurs in the lower to lower-intermediate girth weld because of the higher copper content, which offsets the higher fluence and lower copper content of the weld materials in the other shells. The Dresden Unit 3 lower to lower-intermediate girth weld sees a different (and lower) fluence than the lower-intermediate shell materials.

For Quad Cities Unit 1, the limiting plate and limiting weld materials with respect to 54-EFPY USE values occur in the lower shell, where the fluence is lower. In Quad Cities Unit 2, the limiting plate material is in the unit's lower shell, while the limiting weld material occurs in the lower-intermediate shell where the fluence is higher. The staff has independently verified the percentage of copper contents given in LRA Tables 4.2.1-1 to 4.2.1-8 for the limiting beltline USE materials with the corresponding data in the NRC Reactor Vessel Integrity Database (RVID). The staff accepts this explanation for the differences in the 54-EFPY fluence data for limiting beltline materials USE values because these values are determined by the different combinations of copper content and applied fluence for different beltline materials at D/QCNPS.

In further responding to RAI 4.2.1(a), the applicant provided the following explanation for the differences between the peak fluence data presented in LRA Sections 4.2.1 and 4.2.2 for Dresden and Quad Cities. The values presented in LRA Tables 4.2.2-1 and 4.2.2-2 represent the peak RPV fluence, both at the surface and at the 1/4T locations. As noted above, an axial flux distribution factor is applied to the lower shell, thereby reducing the fluence (both surface and 1/4T) for the associated materials. The values for ΔRT_{NDT} and ART provided in these tables represent the limiting materials based upon the fluence values presented. The staff finds the applicant's explanation for the differences in fluence values acceptable because the fluences presented in Section 4.2.1 are for the limiting beltline material USE values, whereas those presented in Section 4.2.2 are for the limiting beltline material ΔRT_{NDT} and ART values.

The data for copper content in the limiting beltline plate and limiting beltline weld material presented in LRA Section 4.2.1 appear to be different from the data presented in Appendix F to the Dresden UFSAR. For example, LRA Table 4.2.1-2 lists 0.24 percent copper for the Dresden Unit 2 limiting beltline weld material, whereas Table 22 in Appendix F lists a maximum copper content of 0.21 percent for Dresden Unit 2. In RAI 4.2.1(b), the staff requested the applicant to resolve this apparent discrepancy. This was identified as Confirmatory Item 4.2.1.

In response to RAI 4.2.1(b), in a letter dated October 3, 2003, the applicant provided the following explanation:

For the beltline region, Table 21 (Shell Course 57—Lower Shell) and Table 22 (Shell Course 58—Lower-Intermediate Shell) of the Dresden FSAR gives values actual chemical analysis of these materials. Tables 21 and 22 contain the chemical analysis for electroslag welds contained in the original FSAR. Since the original publication of the FSAR, the accepted best estimate chemistry for Electroslag Weld (ESW) materials used in B&W vessels accepted by the NRC staff is 0.24% Cu and 0.37% Ni. These values are reported in BAW-2258, "Evaluation of RT_{NDT} , USE and Chemical Composition of Core Region Electroslag Welds for Dresden Units 2 and 3," Framatome Technologies, January 1996, and were previously accepted by the NRC in its review of pressure temperature (P-T) limit curve report GE-NE-B13-02057-04R1a. Exelon submitted reactor vessel chemistry values to the NRC in July 1998 in response to Generic Letter 92-01, Supplement 1. The information provided in that response is included in NRC database RVID.

The staff accepts the applicant's response because, as mentioned above, the staff has verified the percentage of copper content given in LRA Tables 4.2.1-1 to 4.2.1-8 for the limiting beltline USE materials with the corresponding data in RVID. Therefore, Confirmatory Item 4.2.1 is closed.

In RAI 4.2.1(c), the staff requested the applicant to provide all fluence data for all welds and plates in the beltline and specify which one is bounding with respect to the RPV USE evaluation. In response to RAI 4.2.1(c), in a letter dated October 3, 2003, the applicant provided 54-EFPY surface fluences and 54 EFPY 1/4T fluences for all the beltline material but identified materials that are bounding with respect to the RPV material ART values at 54-EFPY. The applicant also needed to identify the USE for all beltline materials at 54-EFPYs and to identify the limiting materials for each unit. This was identified as Open Item 4.2.1(c). Information was provided by the applicant in a letter dated April 9, 2004. The staff has reviewed this information and confirmed the limiting beltline materials for each unit. The staff also confirmed the USE for all four units and has reviewed the analysis for the material with the lowest Charpy USE, as described below.

The applicant's April 9, 2004, letter indicated that all beltline materials, except for the ESWs in Quad Cities Unit 2, will have predicted Charpy USE greater than 35 ft-lb, the minimum allowable USE based on the generic BWR equivalent margins analysis documented in BWROG topical report entitled, " 10 CFR Part 50 Appendix G Equivalent Margin Analysis for Low Upper Shelf Energy in BWR/2 Through BWR-6 Vessels." Therefore, all beltline materials, except for the ESW in Quad Cities Unit 2, meet the margins of safety against fracture equivalent to those required by Appendix G of Section XI of the ASME Code.

The applicant reevaluated the USE value for Quad Cities Unit 2 ESW using all electroslag weld material surveillance test results from Quad Cities Unit 2, and performed a plant-specific EMA for the Quad Cities Unit 2 ESW. General Electric report GE-NE-0000-0027-0575-01, Revision 0, "The Upper Shelf Energy Evaluation for RPV Electroslag Welds at Quad Cities Unit 2," issued March 5, 2004, and included in the applicant's April 9, 2004 letter, contains this analysis. Using the limiting surveillance capsule 18 data and the methodology in RG 1.99, Revision 2, the predicted Charpy USE for the ESWs welds is 34.2 ft-lb, which is below the minimum established in the generic BWROG topical report. The applicant's plant-specific EMA was performed using methods and criteria contained in RG 1.161, "Evaluation of Reactor Pressure Vessels with Charpy Upper-Shelf Energy less than 50 Ft-Lb." and Appendix K of ASME Code, Section XI. Appendix K and RG 1.161 provide acceptance criteria and evaluation procedures for determining acceptability for operation of a reactor vessel when the vessel metal temperature is in the upper shelf range. The methodology is based on the principles of elastic-plastic fracture mechanics. Flaws will be postulated in the reactor vessel at locations of predicted low upper shelf Charpy impact energy, and the applied J-integral for these flaws will be calculated and compared with the J-integral fracture resistance of the material to determine acceptability. The applicant's analysis showed that the applied J-integral of the postulated flaws and the J-integral material fracture resistance with a minimum USE of 32.4 ft-lb satisfies the criteria of Appendix K of the ASME Code, Section XI and RG 1.161.

The analysis methods in Appendix K of the ASME Code initially followed the methodology in RG 1.161. The analysis methods in Appendix K of the ASME Code, Section XI were changed in the 1995 Addenda to the 1995 Edition. The analysis method in the 1995 Addenda to the 1995 Edition of the ASME Code changed the method of calculating the contribution to the applied J-integral because of a radial thermal gradient. This change was incorporated into the ASME Code to more accurately represent the contribution to the applied J-integral due to a radial thermal gradient. The applicant's analysis was performed using the earlier analysis method, i.e., the methods contained in RG 1.161. The staff confirmed the EMA using the analysis methods in both Appendix K to the ASME Code, Section XI, 1995 Addenda to the 1995 Edition, and the earlier analysis method in RG 1.161. This analysis included the effects of the extended power uprate condition. Since the limiting end of extended life USE for Quad Cities Unit 2 ESW exceeds the minimum value of 32.4 ft-lb demonstrated in the applicant's plant-specific EMA, the staff concludes that all beltline materials, including the ESW in Quad Cities Unit 2 RPV meet the margins of safety against fracture equivalent to those required by Appendix G of Section XI of the ASME Code. Therefore Open Item 4.2.1(c) is closed.

4.2.2.2 Adjusted Reference Temperature for Reactor Vessel Materials Due to Neutron Embrittlement

The applicant calculated the 54-EFPY fluences for the Dresden and Quad Cities reactor vessels using the methodology of NEDC-32983P. Because this methodology is approved by

the NRC, the calculated 54-EFPY fluences are acceptable. The applicant provided the results for one bounding calculation and determined the peak surface fluence of 5.7×10^{17} n/cm² and peak 1/4T fluence of 3.9×10^{17} n/cm² for all four D/QCNPS vessels. Using the calculated peak 1/4T fluence, the applicant determined the 54-EFPY delta RT_{NDT} and ART values for all the beltline materials according to RG 1.99, Revision 2. From all the 54-EFPY ART values, the applicant identified the limiting ART value and listed it in LRA Tables 4.2.2-1 and 4.2.2-2 as the 54-EFPY ART for both Dresden and Quad Cities. These limiting ART values are for axial welds. In RAI 4.2.2(a), the staff requested the applicant to explain how it determined that the weld in which it calculated the neutron fluence bounds all the other welds in Dresden/Quad Cities. In response to RAI 4.2.2(a), the applicant provided the same explanation for determining peak fluence that it had provided in response to RAI 4.2.1(a). The staff finds the applicant's response acceptable because it has checked the applicant's calculations for peak fluence and found them accurate.

In further responding to RAI 4.2.2(a), the applicant presented data for 54 EFPY 1/4T peak fluence and 54 EFPY ART for all beltline welds in Dresden and Quad Cities. The ESW in the lower-intermediate shell is a bounding weld material, one with the highest 54 EFPY ART, for each of the four Dresden and Quad Cities units. The staff has independently verified the identification of the bounding beltline material and its 54 EFPY ART at the 1/4 T location. The staff accepts the applicant's response because the staff has verified it using the peak fluence data provided by the applicant and the percentage of copper and nickel contents, initial RT_{NDT}, and margin data provided in the RVID. The applicant noted that the ART for the Dresden Unit 3 ESW material is 0.4 °F less than that for the girth weld (lower to lower-intermediate weld) material. However, using ASME Code Case N-588, which allows a different application of K₁ for girth weld materials, the limiting material for Dresden Unit 3 is the ESW material, which is explained in more detail in the response to RAI 4.2.2 (c).

In RAI 4.2.2(b), the staff requested the applicant to submit the 54-EFPY delta RT_{NDT} and ART values along with initial RT_{NDT} for all the beltline materials of the four D/QCNPS reactor vessels. In response to RAI 4.2.2(b), in a letter dated October 3, 2003, the applicant provided the requested information in a table form for each of the four Dresden and Quad Cities units. The staff finds the response acceptable because the information submitted by the applicant (percentage of copper and nickel, initial RT_{NDT}, and margin term) is consistent with the data presented in the RVID and confirms the limiting materials.

The applicant stated that because of the refinement in the approved methodology used to calculate the 54-EFPY fluence, the material with the limiting ART is the axial weld, with the exception of Dresden Unit 3, where the axial weld and girth weld ART values are identical. The applicant invoked ASME Code Case N-588 for Dresden Unit 3 which causes the axial weld to become the limiting material. In RAI 4.2.2(c), the staff requested the applicant to identify the refinement mentioned here and explain how this makes the axial weld a material having the limiting ART. The staff also requested the applicant to explain how the use of ASME Code Case N-588 makes the axial weld the limiting material for Dresden Unit 3.

In response to RAI 4.2.2(c), in a letter dated October 3, 2003, the applicant stated that as can be seen in the ART tables submitted in response to RAI 4.2.2(b), the ART for the Dresden Unit 3 girth weld material is 104.16 °F and the ART for the axial ESW material is 103.8°F. The detailed explanation and calculated basis for the use of the ESW material as the limiting material is provided in GE-NE-0000-0002-9600-01a, Revision 0, and is explained in the GE

Report. Because the calculated value of K_{Im} is reduced for a girth weld because of the implementation of ASME Code Case N-588 (circumferentially oriented defect for a circumferential weld), the axial weld bounds the P-T curve beltline region requirements. The applicant also submitted the stress intensity calculations for both axial and girth welds at 54 EFPYs to demonstrate that by using ASME Code Case N-588 the axial weld has the most limiting temperature for the P-T curves in the beltline region. The results of the axial and girth weld calculations show that for a pressure of 1105 psig at 54 EFPYs, the allowable temperature (T) value for the axial weld (146.5 °F) bounds the value for the girth weld (51 °F). The staff finds the response acceptable because the applicant has invoked ASME Code Case N-588, which has been approved by the staff as documented in the safety evaluations dated February 4, 2000 (ML003680441) for Quad Cities and August 25, 2000, (ML003745769) for Dresden.

4.2.2.3 Reflood Thermal Shock Analysis of the Reactor Vessel

The applicant stated that the original D/QCNPS reflood thermal shock analysis has been superseded by an analysis for BWR-6 vessels that is applicable to the D/QCNPS BWR-3 reactor vessels. In RAI 4.2.3(a), the staff requested the applicant to explain why the BWR-6 analysis is applicable to the BWR-3 reactor vessel at D/QCNPS. In response to RAI 4.2.3(a), in a letter dated October 3, 2003, the applicant stated that the BWR-6 evaluation determined the maximum stress intensity in the vessel wall as a function of vessel wall thickness and time after a design-basis LOCA. As shown in Figure G2214-1 of Appendix G to the ASME Code, Section XI, 1998 Edition through 2000 Addenda, the stress intensity is a function of vessel wall thickness. The original analysis used a recirculation line break, while the BWR-6 analysis was based on a main steam line break event, which is considered to bound the recirculation line break. In addition, the analysis used a vessel thickness similar to Dresden and Quad Cities vessels. Therefore, the BWR-6 analysis is applicable to the Dresden and Quad Cities reactor vessels. The staff finds the applicant's explanation for applicability of an analysis for BWR-6 vessels to the D/QCNPS reactor vessels to be acceptable because the analysis for BWR-6 vessels bounds the recirculation line break event and it uses a vessel wall thickness similar to BWR-3 vessels.

The revised analysis assumes end-of-life material toughness, which in turn depends on end-of-life ART. The critical location for fracture mechanics analysis is at the 1/4T location. For the reflood thermal shock analysis of the reactor vessel, the peak stress intensity occurs at approximate 300 seconds after the LOCA. At that time, the temperature at 1/4T is approximately 204 °C (400 °F), which is much higher than the 54-EFPY ART 40 °C (104 °F) for the limiting material of the D/QCNPS vessels. Therefore, the staff concurs with the applicant that the revised thermal shock analysis of the D/QCNPS vessels is valid for the period of extended operation.

4.2.2.4 Reflood Thermal Shock Analysis of the Reactor Vessel Core Shroud and Repair Hardware

In the thermal shock analysis of D/QCNPS reactor vessel core shrouds, the applicant considered the location on the inside surface of the core shroud opposite to the midpoint of the fuel centerline as a location most susceptible to damage during an LPCI thermal shock transient because it receives the maximum irradiation. The 54-EFPY fluence at this location is 5.85×10^{20} n/cm² (greater than 1 MeV). This fluence is calculated using the methodology of

NEDC-32983P, which was approved by the NRC. In RAI 4.2.3(b), the staff requested the applicant to confirm whether the effect of extended power uprates, which is incorporated at D/QCNPS, is accounted for in the calculation of the 54-EFPY fluence.

In response to RAI 4.2.3(b), in a letter dated October 3, 2003, the applicant confirmed that the fluence used to determine the 54-EFPY shroud fluence was calculated using extended power uprate conditions. The staff finds the response acceptable because the calculations for the 54-EFPY shroud fluence take into account the effect of extended power uprates that are implemented at D/QCNPS.

The applicant calculated the maximum thermal shock stress and the corresponding thermal strain at the location on the inside surface of the shroud receiving the maximum irradiation. The staff questioned the validity of this analysis. The reflood thermal shock would produce high tensile stresses on the outside surface of the core shroud, and these stresses would penetrate only to a small depth into the shroud wall. Thus, it appears that the outside surface of the core shroud could be the location most susceptible to damage during an LPCI thermal shock transient. In RAI 4.2.4-a, the staff requested the applicant to respond to the following three items:

- (1) Provide an evaluation of strain at the outside surface of the core shroud, exposed to 54-EFPY fluence, during an LPCI thermal shock transient.
- (2) What is the impact of strain rate associated with the LPCI thermal shock transient on the measured and calculated strains in the core shroud?
- (3) The applicant compared the calculated strain range with the measured values of percent reduction in area for annealed Type 304 stainless steel irradiated to 1×10^{21} n/cm² (E>1 MeV) and indicated that the analysis results represent a considerable margin of safety. Provide the bases for concluding that the calculated strains at both the inside and outside surfaces of the shroud should be compared with the measured value of percent uniform strain for annealed Type 304 stainless steel irradiated to 1×10^{21} n/cm² (greater than 1 MeV).

In response to RAI 4.2.4-a(1), in a letter dated October 3, 2003, the applicant submitted the calculation of the thermal shock strain for the LPCI transient described in the original analysis. That analysis is based on a linear elastic thermal stress analysis and assumes that a low-pressure coolant of 49 °C (120 °F) is injected on a shroud at a temperature of 282 °C (540 °F). The calculated thermal shock strain is 0.55 percent at the outside surface. However, the effects of the thermal shock transient are very localized, and the majority of the material is at the higher temperature where the ductility is sufficient to accommodate the thermal shock strain and prevent brittle fracture. The staff finds the response acceptable because the localized thermal shock strain at the outside surface of the core shroud would be accommodated by the surrounding material at the higher temperature, thus preventing brittle fracture. This is further discussed in the next paragraph.

In response to RAI 4.2.4-a(2), in a letter dated October 3, 2003, the applicant stated that the thermal strains in the core shroud are calculated based on a linear elastic thermal stress analysis, which is a bounding calculation. The heat transfer coefficient is assumed to be infinite (making the calculation independent of strain rate), and therefore the outside surface of

the shroud is considered to be at the fluid temperature 49 °C (120 °F). The applicant also stated that at the fluence levels experienced by the shroud, the material will continue to exhibit ductile behavior. As discussed above, the effect of the thermal shock transient is very localized, and the majority of the material is at the higher temperature where the ductility is sufficient to prevent brittle fracture. Even assuming the strain rate has a significant effect, the increased strain rate is still not sufficient to result in brittle fracture. The effect of strain rate during the LPCI thermal shock event can be accounted for by assuming that the material yield strength is increased (an effect also produced by increased fluence). At fluence levels up to 1×10^{21} n/cm² (which would represent the increased yield strength), Type 304 stainless steel exhibits sufficient ductility to preclude brittle fracture. The staff accepts the applicant's assertion that Type 304 stainless has sufficient ductility at fluence levels up to 1×10^{21} n/cm² because it is consistent with the data presented in a report by Mr. J.N. Kass, "Effect of Neutron Irradiation at 288°C (550°F) on Reactor Component Materials for BWR-6," NEDO-20243, 74NED2, 1974. Kass reports that at a temperature of 288 °C and neutron fluence of 1×10^{21} n/cm² (>1MeV), Type 304 stainless steel experiences a 32 percent reduction in area. The staff accepts the applicant's response because the core shroud will have sufficient ductility during the LPCI transient during the extended period of operation to preclude brittle failure.

In response to RAI 4.2.4-a(3), in a letter dated October 3, 2003, the applicant stated that the strain associated with the reflood thermal shock event is very localized and is constrained by the surrounding bulk material. As such, it is similar to the triaxial stress condition present in the neck region (where the area reduction is taking place) during a tensile test. The percent reduction in area is a measure of this triaxial stress state and, as such, is the most appropriate property for evaluating the effect of thermal shock on the shroud. Therefore, a comparison with uniform elongation is not appropriate in this case. At lower values of temperature or neutron fluence, the percent reduction in area is generally higher. The staff accepts the applicant's reasoning that the strain associated with the reflood thermal shock event is very localized and, therefore, reduction in area is the most appropriate property for evaluating the effect of thermal shock on the shroud.

4.2.2.5 Reactor Vessel Thermal Limit Analyses—Operating Pressure-Temperature Limits

The applicant plans to calculate vessel P-T limit curves for 60 years (54 EFPYs) using an approved fluence methodology for D/QCNPS and submit them to the NRC for approval before the start of the extended period of operation. The applicant will place the approved P-T limit curves in the D/QCNPS technical specifications. The applicant plans to use ASME Code Cases N-640 and N-588 (Dresden Unit 3 only) which have been approved by the staff as documented in safety evaluations dated February 4, 2000 (ML003680441) for Quad Cities and August 25, 2000 (ML003745769) for Dresden. ASME Code Case N-640 allows the use of reference fracture toughness K_{Ic} , as found in Appendix A to ASME Code Section XI, in lieu of reference fracture toughness K_{Ia} , as found in Figure G-2210-1 in Appendix G to ASME Code, Section XI for the development of P-T limit curves. Reference fracture toughness K_{Ic} is based on the lower bound of static crack-initiation critical (reference) values of K_I measured as a function of temperature. As found in Appendix G, K_{Ia} is based on the lower bound of static, dynamic, and crack arrest critical values of K_I measured as a function of temperature. As mentioned above, the use of ASME Code Case N-588 for Dresden Unit 3 causes axial weld of the reactor vessel to become the limiting material. The applicant stated that it will manage the P-T limits using approved fluence calculations when there are changes in the power of core design in conjunction with surveillance capsule results from the BWRVIP integrated

surveillance program. The staff finds the applicant's plan to manage the P-T limits acceptable because the change in P-T curves will be implemented by the license amendment process (i.e., modifications of technical specifications) and will meet the requirements of 10 CFR 50.60 and Appendix G of 10 CFR Part 50.

4.2.2.6 Reactor Vessel Circumferential Weld Examination Relief

Section 4.2.6 and Appendix A.3.1.6 to the LRA discuss inspection of the D/QCNPS RPV circumferential welds. These sections of the LRA indicate that the applicant will use an approved technical alternative in lieu of ultrasonic testing (UT) of RPV circumferential shell welds. The technical alternative is discussed in the staff's final SER of the BWRVIP-05 report, which is enclosed in a July 28, 1998, letter to Mr. C. Terry, the BWRVIP Chairman. In this letter, the staff concluded that since the failure frequency for circumferential welds in BWR plants is significantly below the criterion specified in RG 1.154, "Format and Content of Plant-Specific Pressurized Thermal Shock Safety Analysis Reports for Pressurized Water Reactors," and below the core damage frequency (CDF) of any BWR plant, the continued inspection would result in a negligible decrease in an already acceptably low value, and, therefore, elimination of the inservice inspection (ISI) for RPV circumferential welds is justified. The staff's letter indicated that BWR applicants may request relief from inservice inspection requirements of 10 CFR 50.55a(g) for volumetric examination of circumferential RPV welds by demonstrating that (1) at the expiration of the license, the circumferential welds satisfy the limiting conditional failure probability for circumferential welds in the evaluation, and (2) the applicants have implemented operator training and established procedures that limit the frequency of cold over-pressure events to the frequency specified in the report. The letter indicated that the requirements for inspection of circumferential RPV welds during an additional 20-year license renewal period would be reassessed, on a plant-specific basis, as part of any BWR LRA. Therefore, the applicant must request relief from inspection of circumferential welds during the license renewal period per 10 CFR 50.55a.

Section A.4.5 of the BWRVIP-74 report indicates that the staff's SER of the BWRVIP-05 report conservatively evaluated the BWR RPVs to 64 EFPYs, which is 10 EFPYs greater than what is realistically expected for the end of the license renewal period. The NRC staff used the mean RT_{NDT} value for materials to evaluate failure probability of BWR circumferential welds at 32 and 64 EFPYs in the staff SER dated July 28, 1998. The mean RT_{NDT} value is defined as the sum of the initial (unirradiated) reference temperature (initial RT_{NDT}) and the mean value of the adjustment in reference temperature caused by irradiation (ΔRT_{NDT}); it does not include a margin (m). The neutron fluence used in this evaluation was the neutron fluence at the clad-weld (inner) interface.

Since the staff analysis discussed in the BWRVIP-74 report is a generic analysis, the applicant submitted plant-specific information to demonstrate that the Dresden beltline materials meet the criteria specified in the report. To demonstrate that the Dresden vessels have not become embrittled beyond the basis for the technical alternative, the applicant, in LRA Table 4.2.6-1, supplied a comparison of 54-EFPY material data of the limiting Dresden circumferential welds with that of the 64-EFPY reference case in Appendix E to the staff's SER of the BWRVIP-05 report. The Dresden material data include the amounts of copper and nickel, chemistry factor, neutron fluence, ΔRT_{NDT} , initial RT_{NDT} , and mean RT_{NDT} of the limiting circumferential weld at the end of the renewal period. The staff has verified the data for the amounts of copper and nickel contents and the initial RT_{NDT} values for Dresden Unit 2 and 3 beltline materials by

comparing them with the corresponding data in the RVID. The 54-EFPY mean RT_{NDT} values for Dresden Units 2 and 3 are 54 °F and 53 °F, respectively. The staff has checked the applicant's calculations for the 54-EFPY mean RT_{NDT} values for the Dresden circumferential welds using the data presented in LRA Table 4.2.6-1 and found them to be accurate. These 54-EFPY mean RT_{NDT} values for Dresden Units 2 and 3 are bounded by the 64-EFPY mean RT_{NDT} value of 129.4°F used by the NRC for determining the conditional failure probability of a circumferential girth weld. The 64-EFPY mean RT_{NDT} value from the staff SER dated July 28, 1998, is for a B&W weld because B&W welded the girth welds in the Dresden vessels. Since the Dresden 54-EFPY mean RT_{NDT} values are less than the 64-EFPY value from the staff SER dated July 28, 1998, the staff concludes that the Dresden RPV conditional failure probabilities are bounded by the NRC analysis.

The applicant stated that the procedures and training used to limit cold over-pressure events will be the same as those approved by the NRC when Dresden requested to use the BWRVIP-05 technical alternative for the current term, but it did not explicitly cite a document that supports this statement. In RAI 4.2.6, the staff requested the applicant to provide specific reference(s) in the LRA and the UFSAR Supplement that include the applicant's request to use the BWRVIP-05 technical alternative for the current license term and the NRC approval of that request. In response to RAI 4.2.6, in a letter dated October 3, 2003, the applicant stated that the procedure and training requirements identified in the Dresden request to use the BWRVIP-05, technical alternative were identified in "Dresden Letter JMHLTR 99-0078 from J. M. Heffley (Commonwealth Edison (ComEd)) to NRC, 'Relief Request for Alternative Weld Examination of Circumferential Reactor Pressure Vessel Shell Welds,'" dated July 26, 1999, attached to Dresden ISI Relief Request No. CR-18. The NRC approval of this relief request and associated procedure and training requirements was provided in the document, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Alternative to Inspection of Reactor Pressure Vessel Circumferential Welds, Dresden Power Station, Units 2 and 3," attached to the NRC letter from Mr. A.J. Mendiola to Mr/ O.D. Kingsley (ComEd), Dresden, "Authorization for Proposed Alternative Reactor Pressure Vessel Circumferential Weld Examinations," (Task Action Commitment Nos. MA6228 and MA6229), dated February 25, 2000. The applicant further stated that LRA Section 4.2.6 and associated UFSAR Supplement Section A.3.1.6, Reactor Vessel Circumferential Weld Examination Relief, should have referenced the request letter identified above. By letter dated March 5, 2004, the applicant provided revisions to the UFSAR Supplements A.3.1.6 for Dresden and Quad Cities which clarified that the application for relief was extended to the period of extended operation. The staff finds the response acceptable because the applicant identified the requested references.

With respect to Quad Cities, the applicant submitted its request for relief from the circumferential welds examination requirements for the remainder of the 40-year licensed operating period by letter dated May 16, 2003. This relief was approved by the NRC staff by SER dated April 29, 2004. However, the applicant did not provide an evaluation of the basis for extending this relief through the end of the period of extended operation, as was done for Dresden. The applicant submitted an extension of the relief request for all four units through the period of extended operation. The staff will review the basis for extending this relief through the end of the period of extended operation for all four units as the staff completes its review of the applicant's February 23, 2004 submittal.

The staff finds that the applicant's evaluation for this TLAA is acceptable because the Dresden 54-EFPY conditional failure probabilities for the RPV circumferential welds are bounded by the

NRC analysis in the staff SER dated July 28, 1998, and Dresden will be using procedures and training to limit cold over-pressure events during the period of extended operation. This analysis satisfies the evaluation requirements of the staff SER dated July 28, 1998. The applicant has provided this request for relief for the extended period of operation by letter dated February 23, 2004 for Dresden and Quad Cities and will be reviewed by the staff in accordance with 10 CFR 50.55a. The staff finds the UFSAR Supplement (LRA Appendix A.3.1.6) for Dresden and Quad Cities acceptable because it includes the necessary information regarding the evaluation of this TLAA.

4.2.2.7 Reactor Vessel Axial Weld Failure Probability

In its July 28, 1998, letter to Mr. C. Terry, the BWRVIP Chairman, the staff identified a concern about the failure frequency of axially oriented welds in BWR RPVs. In response to this concern, the BWRVIP supplied evaluations of axial weld failure frequency in letters dated December 15, 1998, and November 12, 1999. The staff's SER on these analyses is enclosed in a March 7, 2000, letter to Mr. C. Terry. The SER indicates that the RPV failure frequency because of failure of the limiting axial welds in the BWR fleet at the end of 40 years of operation is below 5×10^{-6} per reactor year, given the assumptions about flaw density, distribution, and location described in this SER. Because the results apply only for the initial 40-year license period of BWR plants, applicants for license renewal must submit plant-specific information applicable to 60 years of operation.

The BWRVIP identified the Clinton and Pilgrim reactor vessels as the reactor vessels with the highest mean RT_{NDT} in the BWR fleet. The mean RT_{NDT} values were determined using the neutron fluence at the clad/weld interface and did not include a margin term. The staff confirmed this conclusion about the highest mean RT_{NDT} in the SER enclosed in the March 7, 2000, letter by comparing the information in the BWRVIP analysis and the information in the RVID for all BWR RPV axial welds. The results of the staff and BWRVIP calculations are presented in Table 4.2-1. The staff calculations used the basic input information for Pilgrim, with three different assumptions for the initial RT_{NDT} . The calculations of the actual Pilgrim condition used the docketed initial RT_{NDT} of $-44\text{ }^{\circ}\text{C}$ ($-47\text{ }^{\circ}\text{F}$) and a mean RT_{NDT} of $20\text{ }^{\circ}\text{C}$ ($68\text{ }^{\circ}\text{F}$). A second calculation, listed as "Mod 1" in Table 4.2-1, uses an initial RT_{NDT} of $-18\text{ }^{\circ}\text{C}$ ($0\text{ }^{\circ}\text{F}$) and a mean RT_{NDT} of $47\text{ }^{\circ}\text{C}$ ($116\text{ }^{\circ}\text{F}$) consistent with the BWRVIP calculations. A third calculation, with an initial RT_{NDT} of $-19\text{ }^{\circ}\text{C}$ ($-2\text{ }^{\circ}\text{F}$) and a mean RT_{NDT} of $46\text{ }^{\circ}\text{C}$ ($114\text{ }^{\circ}\text{F}$), was chosen to identify the mean value of RT_{NDT} required to provide a result which closely matches the RPV failure frequency of 5×10^{-6} per reactor year. The vessel failure frequency is the product of conditional failure probability, or $P(F/E)$, and the low-temperature over pressurization (LTOP) event frequency. The LTOP frequency is the frequency of the transient occurring, determined as 10^{-3} per reactor year in the evaluation. Since Pilgrim was not identified within the RVID as one of the limiting plants, the SER states that the axial welds for the Clinton reactor vessel are the limiting welds for the BWR fleet, and vessel failure probability determined for Clinton should bound those for the BWR fleet.

Table 4.2-1. Comparison of Results from Staff and BWRVIP Calculations

Plant	Initial RT_{NDT} ($^{\circ}\text{F}$)*	Mean RT_{NDT} ($^{\circ}\text{F}$)	Vessel Failure Freq.	
			Staff	BWRVIP
Clinton	-30	91	2.73E-6	1.52E-6

Pilgrim	-48	68	2.24E-7	-----
Mod 1 **	0	116	5.51E-6	1.55E-6
Mod 2 ***	-2	114	5.02E-6	-----

* °C = 0.56 x (°F – 32)

** A variant of Pilgrim input data, with initial RT_{NDT} = 0°F

*** A variant of Pilgrim input data, with initial RT_{NDT} = -2°F

Since the BWRVIP analysis was generic, the applicant submitted plant-specific information in LRA Section 4.2.7 to demonstrate that the Dresden beltline materials meet the criteria specified in the March 7, 2000, SER. The Dresden vessels were fabricated by B&W, and its axial welds are ESW. To demonstrate that the Dresden vessels have not become embrittled beyond the basis for the staff and BWRVIP analyses, the applicant submitted the following information in LRA Table 4.2.7-1:

- a comparison of the amounts of copper and nickel, chemistry factor, neutron fluence, delta RT_{NDT}, initial RT_{NDT}, and mean RT_{NDT} of the limiting axial welds at the end of the renewal period to the reference cases in the BWRVIP and staff analyses
- estimates of the conditional failure probability of the Dresden RPVs at the end of the license renewal term based on the comparison of the mean RT_{NDT} for the limiting axial welds and the reference cases

Table 4.2.7-1 of the LRA includes data for two reference cases, 64-EFPY data for a limiting B&W vessel (from Table 2.6-5 in the March 7, 2000, SER) and Clinton data from Table 4.2-1. The data in LRA Table 4.2.7-1 show that the mean RT_{NDT} values for Dresden Units 2 and 3 are equal to 19 °C (67 °F), and these values are smaller than the corresponding values for Clinton and the limiting B&W vessel. The staff verified the data for chemical composition and initial RT_{NDT} for all the axial welds in the two Dresden vessels by comparing them with the corresponding data in RVID maintained by the NRC and confirmed the identification of the most limiting axial weld as presented in LRA Table 4.2.7-1. The staff checked the applicant's calculations for mean RT_{NDT} values following Equation 2 of RG 1.99, Revision 2, and found them to be accurate.

The vessel failure frequency calculated by the SER for BWRVIP-05 and its supplement assumes that essentially 100 percent of the axial welds can be inspected. According to 10 CFR 50.55.a(g)(6)(ii)(A)(2), "essentially 100 percent" as used in Table IWB-2500-1 means more than 90 percent of the examination volume of each weld, where the reduction in coverage results from interference by another component, or part geometry. However, the actual inspection at Dresden can include less than 90 percent of the axial welds. Therefore, the applicant performed an analysis to calculate the conditional probability of vessel failure, taking into account the actual limited inspection of axial welds at Dresden. The results show that the conditional probability of vessel failure at 54 EFPYs because of an LTOP event is very small, 3.89×10^{-8} and 5.07×10^{-8} for Dresden Units 2 and 3, respectively. These values of the conditional probability of failure of Dresden axial welds are smaller than the corresponding values calculated by the NRC staff in the SER at 64 EFPYs and the limiting Clinton values found in Table 4.2-1 of this SER. In RAI 4.2-7, the staff requested the applicant to confirm whether the analysis was performed as part of relief from 100 percent axial and/or elimination

of circumferential inspection. The staff also requested the applicant to discuss the impact of 54 EFPYs of operation on the probability of vessel failure. In response to RAI 4.2-7, in a letter dated October 3, 2003, the applicant stated that this analysis was performed to demonstrate that the reliability of the Dresden RPVs remained extremely high considering actual inspection coverage. The actual inspection coverage could not meet the “essentially 100 percent” coverage because of inspection limitations caused by obstructions with internal components and attachments. The analysis did not include the circumferential welds since they had been previously eliminated from the inspection plan in accordance with BWRVIP-05. The applicant also stated that the failure probabilities quoted in the question were determined using the predicted fluence at the end of 60 years of operation (54 EFPYs). The staff finds the response acceptable because the failure probabilities listed in LRA Table 4.2.7-1 were calculated taking into account the actual inspection coverage and the predicted 54-EFPY fluence.

This axial weld failure probability analysis is required to be performed as a license renewal action item in accordance with the staff FSER of EPRI report TR-113596 (BWRVIP-74) and compliance with the license renewal rule (10 CFR Part 54) enclosed in an October 18, 2001, letter from Mr. C.I. Grimes to Mr. C. Terry. This action item, as stated in the staff’s March 7, 2000, letter to Mr. C. Terry, requires the license renewal applicant to monitor axial beltline weld embrittlement. One acceptable method is to determine that the mean RT_{NDT} of the limiting axial beltline weld at the end of the extended period of operation is less than the values specified in Table 1 of this FSER. Therefore this evaluation applies to Dresden Units 2 and 3, as well as to Quad Cities Units 1 and 2. In addition, Dresden and Quad Cities have the same mean RT_{NDT} , because the initial RT_{NDT} , chemical composition, and 54-EFPY surface fluence are the same for the limiting beltline axial welds at Quad Cities and Dresden. Therefore, for Quad Cities and Dresden plants, the mean RT_{NDT} for the limiting beltline axial welds at 54-EFPYs is equal to 19 °C (67 °F). A comparison of the mean RT_{NDT} value of 33 °C (91 °F) for the Clinton axial weld from Table 4.2-1 of this SER with the Dresden and Quad Cities value of 19 °C (67 °F) shows that the NRC analysis of the Clinton axial welds bounds the Dresden and Quad Cities welds. The applicant should confirm that Quad Cities Units 1 and 2 have a mean value of 19 °C (67 °F) and address this TLAA of the axial welds for Quad Cities in the UFSAR Supplement. This was identified as Confirmatory Item 4.2.2. In response to Confirmatory Item 4.2.2, in a letter dated March 25, 2004, the applicant compared the limiting axial weld 54-EFPY properties for Quad Cities 1 and 2 against the corresponding limiting values calculated by the NRC in the SER for BWRVIP-05 at 64 EFPY and the limiting Clinton values taken from Table 2.6-5 in the March 7, 2000, supplement to the SER. The applicant confirmed that the limiting axial welds at Quad Cities Units 1 and 2 have a mean 54 EFPY RT_{NDT} of 19°C (67°F), which is less than the value of 33°C (91°F) for Clinton. The comparison also shows that the conditional vessel failure probabilities for Quad Cities Units 1 and 2 are equal to 2.08×10^{-7} and 5.27×10^{-7} , respectively. These failure probabilities are less than the corresponding value for Clinton listed in Table 4.2-1 of this SER. The staff finds the applicant’s evaluation for this TLAA acceptable because the conditional probability of failure of Quad Cities Unit 1 and 2 limiting axial welds at 54 EFPY is smaller than the corresponding values calculated by the NRC staff in the SER for BWRVIP-05 at 64 EFPY and the limiting Clinton values found in the March 7, 2000, supplement to the SER.

In a letter dated March 5, 2004, the applicant submitted a revision to the UFSAR supplement for the reactor vessel axial weld failure probability. The staff reviewed this supplement and found that it provides an adequate summary description regarding the evaluation of this TLAA. Therefore, Confirmatory Item 4.2.2 is closed.

The staff finds that the applicant's evaluation for this TLAA is acceptable because the conditional probability of failure of Dresden and Quad Cities axial welds at 54 EFPYs is smaller than the corresponding values calculated by the NRC staff in the SER at 64 EFPYs and the limiting Clinton values found in the March 7, 2000, SER. The staff finds the UFSAR Supplement (LRA Appendix A.3.1.7) to be acceptable because it includes the necessary information regarding the evaluation of this TLAA.

4.2.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i) that the analyses remain valid for the period of extended operation, which includes the extended power uprate conditions, for the reflood thermal shock analysis of the reactor vessel and the reflood thermal shock analysis of the reactor vessel core shroud and repair hardware TLAAs. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the reflood thermal shock analysis of the reactor vessel and the reflood thermal shock analysis of the reactor vessel core shroud and repair hardware TLAA evaluations for the period of extended operation, as required by 10 CFR 54.21(d).

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(ii), that the analyses have been projected to the end of the period of extended operation, which includes the extended power uprate conditions, for the reactor vessel materials' USE reduction due to neutron embrittlement, adjusted reference temperature for reactor vessel materials due to neutron embrittlement, reactor vessel thermal limit analyses, reactor vessel circumferential weld examination relief, and the reactor vessel axial weld failure probability TLAAs. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the reactor vessel material' USE reduction because of neutron embrittlement, adjusted reference temperature for reactor vessel materials because of neutron embrittlement, reactor vessel thermal limit analyses, reactor vessel circumferential weld examination relief, and the reactor vessel axial weld failure probability TLAA evaluations for the period of extended operation, as required by 10 CFR 54.21(d).

Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.3 Metal Fatigue

A metal component subjected to cyclic loading at loads less than the static design load may fail because of fatigue. Metal fatigue of components may have been evaluated based on an assumed number of transients or cycles for the current operating term. The validity of such metal fatigue analysis is reviewed for the period of extended operation. NUREG-1801 identifies fatigue aging-related effects that require evaluation as possible TLAAs pursuant to 10 CFR 54.21(c). Each of these is summarized in NUREG-1800 and presented in Section 4 of the LRA.

4.3.1 Summary of Technical Information in the Application

The applicant discussed the design requirements for components of the reactor coolant system (RCS) at Dresden and Quad Cities. The reactor vessel, reactor vessel internals, and the reactor coolant pressure boundary (RCPB) piping and components were designed and fabricated in accordance with the requirements for Class 1 components stated in ASME Boiler and Pressure Vessel Code, Section III, 1965 Edition and 1965 Summer Addenda. Other safety-related piping and fittings were designed and fabricated in accordance with the requirements of United States of America Standard (USAS) B31.1, "Power Piping Code," ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C. The fatigue analyses of both the reactor coolant loop and attached piping were performed in accordance with the requirements for ASME Code, Section III, Class 1 components.

4.3.1.1 Reactor Vessel Fatigue Analyses

In Section 4.3.1 of the LRA, "Reactor Vessel Fatigue Analyses," the applicant stated that the original pressure vessel stress report included ASME Code Section III fatigue analyses of the reactor vessel components based on a set of design-basis duty cycles, which are listed in Table 3.9-1 of the Dresden and Quad Cities UFSARs. The analyzed components consisted of the vessel support skirt, shell, upper and lower heads, closure flanges, nozzles and penetrations, and closure studs. The original 40-year analyses demonstrated that the cumulative usage factors (CUFs) for the critical components are below the ASME Code, Section III limiting value of 1.0. A reanalysis was performed for reactor vessel CUFs as part of EPU implementation at all four Dresden and Quad Cities units. A subset of the bounding reactor vessel components was evaluated as a part of this reanalysis. The current bounding-case analysis (worst CUFs for all four reactor vessels) lists the following values for the 40-year CUFs for the limiting components:

- shroud support 0.820
- support skirt 0.862
- feedwater nozzle (safe end) 0.748
- closure studs 0.750

The original code analysis of the reactor vessel included fatigue analyses of the feedwater nozzles and the control rod drive hydraulic system return line nozzles. These nozzles were found to be susceptible to cracking caused by a number of factors, including rapid thermal cycling. The control rod drive hydraulic system return line nozzles were therefore capped and removed from service. A reanalysis was also performed on the feedwater nozzles and modifications implemented to reduce or eliminate the effects of the high thermal cycling.

The applicant stated that the fatigue of the reactor vessel, including the support skirt, shell, upper and lower heads, closure assembly, nozzles and penetrations, and nozzle safe ends, will be managed by the Metal Fatigue of Reactor Coolant Pressure Boundary Aging Management Program (Metal Fatigue AMP). The program is discussed in Section B.1.34 of the LRA. All governing reactor vessel fatigue analyses have been reviewed to establish a bounding set of reactor locations for inclusion in the Metal Fatigue AMP. Eight locations where the 40-year CUFs are expected to exceed the threshold value of 0.4 will be included in the program. These locations are listed in Table 4.3.1-1 of the LRA and include the four locations listed in the bullets above. The other locations are on the recirculation outlet nozzle, the recirculation

inlet nozzle, the core spray nozzle, and the vessel shell. These components were selected because they are listed in NUREG/CR-6260. The feedwater nozzle safe end was also selected because it is one of the components listed in NUREG/CR-6260.

The applicant stated that Dresden and Quad Cities have installed programs to track thermal and pressure cycles and to assess their effect on vessel fatigue. The requirements from these procedures will be incorporated into the Metal Fatigue AMP. All necessary plant transient events will be tracked to ensure that the CUF remains less than 1.0 for all monitored components. In the event that the CUF for any component is projected to exceed 1.0 during the period of extended operation, appropriate corrective action will be taken in accordance with the Exelon Corrective Action Program. This program is discussed in Section B.2.1 of the LRA.

4.3.1.2 Fatigue Analysis of the Reactor Internals

In Section 4.3.2 of the LRA, "Fatigue Analysis of Reactor Vessel Internals," the applicant stated that a review of the CLBs for Dresden and Quad Cities identified only two fatigue analyses of reactor vessel internals.

In Section 4.3.2.1 of the LRA, "Low Cycle Thermal Fatigue Analysis of the Core Shroud and Repair Hardware," applicable to Quad Cities only, the applicant identified in the CLB an evaluation for low-cycle mechanical fatigue of the core shroud and the rod stabilizers in the core shroud repair hardware because of a cold feedwater transient. The CUF for the core shroud was found to be negligible, while the CUF for the rod stabilizers for a 40-year plant life was calculated as less than 0.11. The applicant indicated that the design of the core shroud support hardware for fatigue effects is valid for the period of extended operation, in accordance with 10 CFR 54.21(c)(1)(i).

In Section 4.3.2.2 of the LRA, "High-Cycle Flow-Induced Vibration Fatigue Analysis of Jet Pump Riser Braces," applicable to Dresden Unit 2 only, the applicant identified core flow or single recirculation loop operation as a cause of significant vibration levels of reactor vessel internal components. To address this concern, the Dresden Unit 2 reactor vessel internals were instrumented and tested for vibration levels during startup of the plant. Limiting criteria were established such that vibration stress levels were assured to remain below material endurance limits over the life of the plant. Various operating conditions were evaluated, including those associated with increased core flow and transient unbalanced flow conditions. The limiting components were found to be the jet pump riser braces. Although reactor internals are not code pressure boundary components, the evaluation of the Dresden Unit 2 jet pump riser braces used methods and fatigue curves similar to those of ASME Code, Section III, Class 1 fatigue analyses.

The applicant stated that the EPU analyses found that Dresden and Quad Cities reactor internal components, with the exception of the Dresden Unit 2 jet pump riser braces, can operate at EPU conditions for the period of extended operation without exceeding the original design vibration criteria or developing increased vibration levels because of recirculation pump vane passing frequencies. The EPU project evaluated possible effects of the power uprate and found that, with some possible exceptions, including the Dresden Unit 2 riser braces, the stress ranges of the reactor internals would remain within the original endurance limit.

The EPU evaluation of flow-induced vibration of reactor internals found that the Dresden Unit 2 jet pump riser braces might be damaged by the recirculation pump vane passing frequency vibration if operation is permitted in the maximum extended load line limit analysis region. Operation in this region might produce fatigue cracks and failure in the riser braces at Dresden Unit 2 only. The Dresden Unit 2 jet pump riser braces are susceptible to resonance effects, whereas the jet pump riser braces at Dresden Unit 3 and Quad Cities have shown no such effects and therefore present no concern.

The applicant stated in the LRA that the Dresden Unit 2 riser braces will be repaired or replaced before the start of the period of extended operation, and, pursuant to 10 CFR 54.21(c)(1)(ii), will be qualified for the period of extended operation.

4.3.1.3 ASME Code, Section III, Class 1 Reactor Coolant Pressure Boundary Piping and Component Fatigue Analysis

The applicant stated in Section 4.3.3.1 of the LRA, "ASME Section III Class 1 Reactor Coolant Pressure Boundary Piping and Component Fatigue Analysis," that the Dresden Unit 3 recirculation system piping is the only RCPB piping that was analyzed for fatigue per ASME Code, Section III, Class 1 rules at either Dresden or Quad Cities. The Dresden Unit 3 recirculation piping was replaced under the Generic Letter (GL) 88-01 intergranular stress-corrosion cracking mitigation program. The analysis included portions of the connected shutdown cooling system, the low-pressure coolant injection system, the isolation condenser system, and the reactor water cleanup system. All other Class 1 piping at both plants was initially designed to USAS B31.1, 1967 Edition.

The applicant stated that, in accordance with 10 CFR 54.21(c)(1)(iii), the Dresden Unit 3 RCPB piping will be managed by the Metal Fatigue AMP. This program is described in Section B.1.34 of the LRA. The program will monitor CUFs through the cycle-based fatigue monitoring option. All Dresden Unit 3 RCPB piping fatigue analyses have been evaluated to establish a bounding set of piping locations for inclusion in the Metal Fatigue AMP. All locations where the 40-year CUFs are expected to exceed a threshold value of 0.4 will be included in the AMP. The ASME Code, Section III, Class 1 analyses for the Dresden Unit 3 recirculation line and attached large-bore piping replacement inside the drywell show calculated CUFs at seven locations that exceed the 0.4 threshold. These locations are listed in Table 4.3.3.3-1 of the LRA. All applicable plant transient events will be tracked to ensure that the CUF remains less than the ASME Code, Section III, Class 1 fatigue limit of 1.0 at the monitored locations. In the event the CUF at a location is predicted to exceed 1.0 before 60 years of operation, the applicant stated that the necessary corrective action will be taken in accordance with the Exelon Corrective Action Program, described in Section B.2.1 of the LRA. The required implementing actions will be completed before the period of extended operation. The requirements of these procedures will also be incorporated into the Metal Fatigue AMP.

4.3.1.4 Reactor Coolant Pressure Boundary Piping and Components Designed to USAS B31.1, ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C

In Section 4.3.3.2 of the LRA, "Reactor Coolant Pressure Boundary Piping and Components Designed to USAS B31.1, ASME Section III Class 2 and 3, or ASME Section VIII Class B and C," the applicant stated that the RCPB and non-RCPB piping for the Dresden and Quad Cities

units, including the portions of the main steam and safety relieve valve (SRV) discharge lines inside the drywell, was designed to USAS B31.1 except for the replaced RCPB piping in Dresden Unit 3, described in Section 4.3.3.1 of the LRA. None of these codes requires explicit fatigue analysis. However, the RCPB and non-RCPB piping within the scope of license renewal that is designed to USAS B31.1 or ASME Code, Section III, Classes 2 and 3 requires the application of a stress reduction factor to the allowable thermal bending stress range if the number of full-range cycles exceeds 7000. The applicant also stated that, with the exception of containment vent and process bellows, no components within the scope of license renewal designed to ASME Code, Section III or Section VIII require design, or were designed, for thermal cycling. This applies to the reactor recirculation pumps, which were designed per ASME Code, Section III, Class C (1965), and the Quad Cities residual heat removal (RHR) system heat exchangers, which were designed to ASME Code, Section III, Class C (1996) requirements on the shell side and Section VIII on the tube side. The RHR system includes no TLAAAs other than the piping design for USAS B31.1 stress range reduction factors.

The applicant indicated that the assumed thermal cycle count for the analyses can be approximated by the thermal-cycles used in the reactor vessel fatigue analysis. These thermal cycles are listed in UFSAR Table 3.9-1. The total count of all these listed thermal cycles is less than 2200 over the 40-year plant life. For the 60-year extended operating period, the number of assumed operating cycles would be increased to 3300, considerably less than the 7000-cycle threshold in USAS B31.1. In accordance with 10 CFR 54.21(c)(1)(i), the applicant indicated that the existing piping analyses within the scope of licence renewal containing assumed thermal-cycle counts are valid for the period of extended operation.

4.3.1.5 Fatigue Analysis of the Isolation Condenser

In Section 4.3.3.3 of the LRA, "Fatigue Analysis of the Isolation Condenser," the applicant stated that the Dresden isolation condensers (which provide core cooling when the reactor vessel becomes isolated from the main turbine and the main condenser) were initially designed for 280 thermal isolation operations. The ASME Code, Section III, Class 1 fatigue analysis of the critical components of the condensers determined that the 40-year CUF is below the ASME Code Section III limiting value of 1.0.

Based on the number of reactor scrams experienced since the start of operation and the number of recorded isolation operations, the applicant determined that the number of expected isolation condenser operations would be 181 through the 60-year extended period of operations. This projected cycle count is below the 280 isolation condenser operating design limit. On this basis the applicant indicates that, according to 10 CFR 54.21(c)(1)(i), the design fatigue analysis remains valid through the period of extended operation.

4.3.1.6 Effects of Reactor Coolant Environment on Fatigue Life of Components and Piping (Generic Safety Issue 190)

In Section 4.3.4 of the LRA, the applicant described the actions taken to address the issue of environmentally assisted fatigue. Generic Safety Issue (GSI) 190 addresses the effects of reactor coolant environment on fatigue life of components and piping. Although GSI 190 is resolved, Section 4.3.1.2 of NUREG-1800 states that for license renewal, the applicant's consideration of the effects of coolant environment on component fatigue life is an area of review.

The applicant stated that plant-specific calculations will be performed for Dresden and Quad Cities for the following fatigue sensitive component locations identified in NUREG/CR-6260 for older vintage BWRs:

- reactor vessel (lower head to shell transition)
- feedwater nozzle
- recirculation system (RHR return line tee)
- core spray system (nozzle and safe end)
- residual heat removal line (tapered transition)
- limiting Class 1 location in a feedwater line

This list does not specifically include the feedwater line reactor core isolation cooling (RCIC) tee location identified in NUREG/CR-626, because Dresden does not have an RCIC system and the RCIC tee location in Quad Cities is located in the outside containment in the Class 2 portion of the feedwater line. However, the applicant has committed to evaluate for each plant the limiting Class 1 feedwater piping location as stated above.

The applicant stated that for each location listed above, detailed environmental fatigue calculations will be performed using the appropriate Fen relationships from NUREG/CR-6583 "Effects of LWR Coolant Environments on Fatigue Design Curves of Carbon and Low-Alloy Steels," for carbon and alloy steels and those from NUREG/CR-5704 "Effects of LWR Coolant Environments on Fatigue Design Curves of Austenitic Stainless Steels," for stainless steel, as appropriate for the material. These calculations will be completed before the period of extended operation, and appropriate corrective action will be taken if the resulting end-of-life CUF values exceed 1.0. The applicant also stated that it reserves the right to modify this position in the future, based on the results of ongoing industry activities on this topic, subject to NRC approval before changes in this position.

4.3.2 Staff Evaluation

4.3.2.1 Reactor Vessel Fatigue Analysis

The applicant has identified CLB fatigue analyses associated with the reactor vessels as TLAAs, in conformance with the provisions of 10 CFR 54.21(c)(1) and the components listed in the appropriate tables in NUREG-1801. The applicant listed the 40-year bounding CUFs associated with these TLAAs and indicated that the CUFs for several locations exceeded a threshold value 0.4. These locations therefore have the potential to exceed the limiting value of 1.0 during the period of extended operation. The staff reviewed these locations and determined that they conform to the locations or components listed in NUREG-1801. The applicant has therefore committed to monitor, as part of the Metal Fatigue AMP, eight locations where the CUFs are expected to exceed the threshold value during the 40-year plant life. This is Commitment #34 in Appendix A of this SER. The applicant stated that as part of the Metal Fatigue AMP, all necessary plant transient events will be tracked and the CUFs calculated, to verify that the CUF remains less than 1.0 for all monitored components and locations. In the event that the CUF for any component is projected to exceed 1.0 before 60 years of operation, the applicant commits to take appropriate corrective action in accordance with the Exelon Corrective Action Program, described in Section B.2.1 of the LRA. This is Commitment #39 in Appendix A of this SER. The staff finds this acceptable because, pursuant to 10 CFR 54.21(c)(1)(iii), the applicant has provided assurance that an adequate margin of safety for the

reactor vessel will be maintained for the period of extended operation, as reflected in its commitment to meet the ASME Code, Section III, Class 1 fatigue analysis criterion associated with the Metal Fatigue AMP, or to implement corrective actions associated with the Exelon Corrective Action Program. The applicant's supplements for the Dresden and Quad Cities UFSARs regarding the reactor vessel fatigue analyses are provided in Section A.3.2.1 of the respective LRAs. The staff has reviewed these supplements and finds them acceptable because they provide a reasonable summary of the information presented in Section 4.3.1 of the LRA.

4.3.2.2 Fatigue Analysis of the Reactor Internals

The staff has reviewed the sections of the LRA pertaining to the fatigue of reactor internals. Based on a 40-year highest CUF of 0.11 for Quad Cities core shrouds and core shroud repair, the staff concurs with the applicant that the design of core shroud repair hardware for fatigue effects is valid for the period of extended operation, in accordance with the requirements of 10 CFR 54.21(c)(1)(i).

In RAI 4.3.2.2, the staff requested that the applicant provide justification why vibration levels resulting from conditions such as increased core flow or single recirculation loop operation do not cause concerns for fatigue of jet pump riser braces or other internal components at Dresden Unit 3 or Quad Cities, similar to those at Dresden Unit 2. The applicant stated in its response that the potential for flow-induced vibration of reactor internals at Dresden and Quad Cities was evaluated as part of the EPU. The EPU analyses indicated that, except for the Dresden Unit 2 jet pump riser braces, the Dresden and Quad Cities plants can operate at the increased flow associated with EPU conditions for a 60-year plant life without exciting the safety-related reactor internal components above their established vibration limits during balanced (dual loop) recirculation flow operation and without developing resonance problems because of vane passing frequency excitation. The EPU analyses also considered single recirculation loop operation and indicated that, with the existing flow restrictions that apply to single recirculation loop operation, there is no resonance problem because of vane passing frequency excitation at EPU operating conditions. The exception involving the Dresden Unit 2 jet pump riser braces occurs because these braces were designed differently from the Dresden Unit 3 and Quad Cities jet pump riser braces. In accordance with LRA Section 4.3.2.2, the applicant committed to repair or replace the Dresden Unit 2 jet pump riser braces before the period of extended operation. This is Commitment #48 in Appendix A of this SER. The applicant also stated in LRA Section 4.3.2.2 that the repaired or replaced braces will be qualified for the period of extended operation, in accordance with the requirements of 10 CFR 54.21(c)(1)(ii). The staff finds this acceptable because it will provide a margin of safety for the Dresden Unit 2 braces similar to that of Dresden Unit 3 and Quad Cities.

The applicant's supplements for the Dresden and Quad Cities UFSARs regarding the fatigue analyses of reactor vessel internals are provided in Section A.3.2.2 of the respective LRAs. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.3.2 of the LRA.

4.3.2.3 ASME Code, Section III, Class 1 Reactor Coolant Pressure Boundary Piping and Component Fatigue Analysis

The applicant has identified CLB ASME Code, Section III, Class 1 fatigue analyses associated with the recirculation piping system at Dresden Unit 3 as TLAAs, in conformance with the provisions of 10 CFR 54.21(c)(1) and the piping components listed in the appropriate tables in NUREG-1801. The applicant listed the 40-year CUFs for several components which exceeded a threshold value of 0.4. The CUFs of these components therefore have the potential of exceeding the limiting value of 1.0 during the period of extended operation. The staff reviewed these locations and determined that they conform with components listed in NUREG-1801. Pursuant to 10 CFR 54.21(c)(1)(iii), the applicant has therefore committed to monitor, as part of the Metal Fatigue AMP, seven components where the CUFs are expected to exceed the threshold value during the 40-year plant life. This is Commitment #34 in Appendix A of this SER. The applicant stated that as part of the Metal Fatigue AMP, all necessary plant transient events will be tracked and the CUFs calculated, to verify that the CUF remains less than 1.0 for all monitored components. In the event that the CUF for any component is projected to exceed 1.0 before 60 years of operation, the applicant commits to implement appropriate corrective actions in accordance with the Exelon Corrective Action Program, described in Section B.2.1 of the LRA, before the period of extended operation. This is Commitment #39 in Appendix A of this SER. The staff finds this acceptable because the applicant has provided assurance that an adequate margin of safety for the recirculation piping system at Dresden Unit 3 will be maintained for the period of extended operation, as reflected in its commitment to meet the ASME Code, Section III, Class 1 fatigue analysis criterion within the Metal Fatigue AMP or to implement corrective actions associated with the Exelon Corrective Action Program.

The applicant's supplement for the Dresden UFSAR regarding the recirculation piping system fatigue analyses is provided in Section A.3.2.3.1 of the LRA. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.3.3.1 of the LRA.

4.3.2.4 Reactor Coolant Pressure Boundary Piping and Components Designed to USAS B31.1, ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C

The applicant indicated that RCPB piping systems other than the recirculation piping at Dresden Unit 3 were designed to the requirements of USAS B31.1, 1967 Edition, or ASME Code, Section III, Classes 2 and 3. These codes consider fatigue implicitly in the design calculations by applying stress range reduction factors to the allowable stress range to account for cyclic thermal conditions. The applicant approximated the number of cycles over a 40-year plant life by the thermal cycles used in the reactor vessel fatigue analysis. These thermal cycles are listed in UFSAR Table 3.9-1. For a 60-year plant life, the total count of all these listed thermal cycles is less than 3300. This is substantially less than the 7000 cycle limit in USAS B31.1 or ASME Code, Section III, Classes 2 and 3. The staff therefore finds that the applicant has demonstrated that an adequate margin of safety for the RCPB piping systems at Dresden Unit 2 and Quad Cities designed to USAS B31.1 or ASME Code, Section III, Classes 2 and 3 will be maintained for the period of extended operation, because the margin conforms with accepted industry practice. The staff concludes that the applicant has demonstrated that

the existing analyses will remain valid for the period of extended operation in accordance with 10 CFR 54.21(c)(1)(i).

The applicant's supplement for the Dresden and Quad Cities UFSAR regarding the RCPB piping system fatigue analyses is provided in Section A.3.2.3.2 of the LRA. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.3.3.2 of the LRA.

4.3.2.5 Fatigue Analysis of the Isolation Condenser

In Section B.1.34, the applicant stated that as an enhancement to the Metal Fatigue AMP the program will provide for tracking of fatigue stress cycles for the Dresden isolation condensers. In RAI 4.3.3.3, the staff requested that the applicant provide an explanation of why this enhancement to the AMP does not conflict with the disposition of this item stated in Section 4.3.3.3 of the LRA. (The applicant indicated that the fatigue analysis remains valid for the period of extended operation, in accordance with 10 CFR 54.21(c)(1)(i).)

The applicant stated that the isolation condensers are included in the manual cycle counting option of the FatiguePro monitoring program of the Metal Fatigue AMP because RCPB piping locations associated with the condenser have predicted CUFs greater than 0.4. Because the thermal transients associated with the isolation condensers can affect the CUFs of these locations, the applicant has conservatively elected to include the isolation condenser locations in the monitoring program. In accordance with 10 CFR 54.21(c)(1)(iii), the staff finds this acceptable because cycle monitoring of the isolation condensers as proposed by the applicant will provide assurance that the margin of safety of the condensers and associated piping will be maintained for the period of extended operation, in conformance with the CLB design requirements of the condensers.

The applicant's supplement for the Dresden UFSAR regarding the isolation condenser fatigue analysis is provided in Section A.3.2.3.3 of the LRA. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.3.3.3 of the LRA.

4.3.2.6 Effects of Reactor Coolant Environment on Fatigue Life of Components and Piping (Generic Safety Issue 190)

GSI-166, "Adequacy of the Fatigue Life of Metal Components," raised concerns regarding the conservatism of the fatigue curves used in the design of the RCS components. Although GSI-166 was resolved for the current 40-year design life of operating components, the staff identified GSI-190, "Fatigue Evaluation of Metal Components for 60-Year Plant Life," to address license renewal. The NRC closed GSI-190 in December 1999, with the following conclusion:

The results of the probabilistic analyses, along with the sensitivity studies performed, the iterations with industry (NEI and EPRI), and the different approaches available to the licensees to manage the effects of aging, lead to the conclusion that no generic regulatory action is required, and that GSI-190 is closed. This conclusion is based primarily on the negligible calculated increases in core damage frequency in going from 40 to 60 year lives. However, the calculations supporting resolution of this issue, which included consideration of environmental effects, and the nature of age-related degradation indicate the potential for an increase in the frequency of pipe breaks as

plants continue to operate. Thus, the staff concludes that, consistent with existing requirements in 10 CFR 54.21, licensees should address the effects of coolant environment on component fatigue life as aging management programs are formulated in support of license renewal.

The applicant has committed to evaluate the component locations listed in NUREG/CR-6260, that are applicable to an older vintage BWR plant for the effect of the environment on the fatigue life of the components, not including the RCIC tee located on the feedwater line. This is Commitment #48 in Appendix A of this SER. The applicant justified this on the basis that there is no RCIC system at Dresden and therefore this component does not exist at Dresden, and that at Quad Cities this tee is located in the Class 2 portion of the feedwater line. However, the applicant stated that for both plants, alternate limiting Class 1 locations on the feedwater piping will be evaluated for environmental fatigue effects.

The applicant stated that for each location, detailed environmental fatigue calculations will be performed using the appropriate Fen relationships from NUREG/CR-6583, "Effects of LWR Coolant Environments on Fatigue Design Curves of Carbon and Low-Alloy Steels," for carbon and alloy steels, and those from NUREG/CR-5704, "Effects of LWR Coolant Environments on Fatigue Design Curves of Austenitic Stainless Steels," for stainless steel, as appropriate for the material. These calculations will be completed prior to the period of extended operation, and appropriate corrective action will be taken if the resulting end-of-life CUF values exceed 1.0. The staff finds this acceptable because it concurs with the staff position on environmental effects on metal fatigue of Class 1 components.

The applicant also stated that it reserves the right to modify this position in the future, based on the results of ongoing industry activities on this topic, subject to NRC approval prior to changes in this position. The staff concurs with this statement since any licensee always has the option of submitting a license amendment that would be subject to review and approval by the staff.

In RAI 4.3.4, the staff requested that the applicant identify the alternate limiting Class 1 feedwater piping locations and provide the calculated CUF for these locations. In response, the applicant stated that the entire Class 1 portion of a feedwater line was structurally modeled, based on the bounding geometry for all eight feedwater loops (two loops per unit), and a fatigue analysis was performed using ASME Code, Section III, NB-3600 methodology. The results of the fatigue analysis determined that the location with the highest fatigue usage (CUF=0.0859, not including environmental effects) was at the tee joining a riser pipe to a header (Node 15a in the structural model). This location will be used to perform plant-specific environmental fatigue calculations. (This location is different from the reactor vessel feedwater nozzle location specified in NUREG/CR-6260, since this location will be separately evaluated for environmental effects.) The staff finds this acceptable because the selection of the limiting location was performed in accordance with the basis for selection of the locations for older vintage BWR plants, stated in NUREG/CR-6260 for a similar portion of the feedwater lines.

In accordance with 10 CFR 54.21(d), the applicant has included a section addressing the effects of reactor coolant environment on fatigue life of components and piping (Issue 190) in the UFSAR Supplement Section A.3.2.4 for Dresden and for Quad Cities. The applicant has committed to perform plant-specific calculations for environmental effects on the fatigue life of the components listed in NUREG/CR-6260 and the limiting location on the feedwater line, and take appropriate corrective actions if the resulting projected end-of-life CUF values exceed 1.0. This is Commitment #48 in Appendix A of this SER. The calculations will include appropriate environmental fatigue effect factors from NUREG/CR-6583 and NUREG/CR-5704. The

applicant also stated in the UFSAR Supplement that it reserves the right to modify this position in the future, based on the results of ongoing industry activities on this topic, subject to NRC approval prior to changes in this position. The staff concurs with this statement since any licensee always has the option of submitting a license amendment that would be subject to review and approval by the staff. The staff finds this supplement acceptable because it provides a reasonable summary of the information presented in Section 4.3.4 of the LRA.

4.3.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i), that the analyses remain valid for the period of extended operation for the low-cycle thermal fatigue analysis of the core shroud and repair hardware; the reactor coolant pressure boundary piping and components designed to USAS B31.1, ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C; and the fatigue analysis of the isolation condenser TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description, as required by 10 CFR 54.21(d), of the low-cycle thermal fatigue analysis of the core shroud and repair hardware; the reactor coolant pressure boundary piping and components designed to USAS B31.1, ASME Code, Section III, Classes 2 and 3, or ASME Code, Section VIII, Classes B and C; and the fatigue analysis of the isolation condenser TLAA evaluations for the period of extended operation.

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(ii), that the analyses have been projected to the end of the period of extended operation for the high-cycle flow-induced vibration fatigue analysis of jet pump riser braces and the effects of reactor coolant environment on fatigue life of components and piping TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the high-cycle flow-induced vibration fatigue analysis of jet pump riser braces and the effects of reactor coolant environment on fatigue life of components and piping TLAA evaluations for the period of extended operation, as reflected in the license condition required by 10 CFR 54.21(d).

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(iii), that the effects of aging on the intended functions will be adequately managed for the period of extended operation for the reactor vessel fatigue analyses and the ASME Code, Section III, Class 1 reactor coolant pressure boundary piping and component fatigue analysis TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the reactor vessel fatigue analyses and the ASME Code, Section III, Class 1 reactor coolant pressure boundary piping and component fatigue analysis TLAA evaluations for the period of extended operation, as required by 10 CFR 54.21(d).

Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.4 Environmental Qualification

4.4.1 Environmental Qualification Program TLAA

The NRC has established nuclear station environmental qualification (EQ) requirements in Criterion 4 of Appendix A to 10 CFR Part 50 and 10 CFR 50.49. The latter specifically requires that an EQ Program be established to demonstrate that certain electrical components located in “harsh” plant environments (that is, those areas of the plant that could be subject to the harsh environmental effects of a LOCA, high-energy line breaks (HELBs), or post-LOCA radiation) are qualified to perform their safety function in those harsh environments after the effects of inservice aging. Also, 10 CFR 50.49 requires that the effects of significant aging mechanisms be addressed as part of EQ. For the purpose of license renewal, only those components with a qualified life of 40 years or greater would require TLAAAs.

The staff has reviewed LRA Section 4.4, “Environmental Qualification of Electrical Equipment” in which the applicant described the technical bases and justification for why the Dresden and Quad Cities EQ Programs, together with other plant programs and processes, adequately manages the effects of aging on the intended function(s) of electrical components for the period of extended operation. The staff reviewed this section of the LRA to determine whether the applicant had demonstrated that the effects of aging on the intended function(s) of the electrical equipment will be adequately managed through the Dresden and Quad Cities EQ Programs, together with other programs and processes, during the period of extended operations, as required by 10 CFR 54.21(c)(1)(iii).

4.4.1.1 Summary of Technical Information in the Application

The Dresden and Quad Cities EQ Programs are established to demonstrate that certain electrical components located in an environment that is subject to a LOCA, HELB, or post-LOCA radiation are qualified to perform their safety function after inservice aging. The Dresden and Quad Cities EQ Programs comply with the requirements of 10 CFR 50.49(e)(5) for aging considerations that affect functionality and make provisions to replace the components or establish ongoing qualification when the demonstrated qualified life has expired. The EQ-related equipment is identified in a controlled equipment database with a qualification binder that is maintained with records on performance specifications, electrical characteristics and environmental conditions.

The Dresden and Quad Cities EQ Programs manage thermal, radiation and cyclic aging as applicable for all electrical components within the scope of 10 CFR 50.49 and for components that are presently qualified in accordance with the DOR guidelines. Compliance with 10 CFR 50.49 provides evidence that the component will perform its intended functions during and after a design-basis event after experiencing the effects of inservice aging.

Under 10 CFR 54.21(c)(1)(iii), the Dresden and Quad Cities EQ Programs, which implement the requirements of 10 CFR 50.49 (as further clarified by the DOR guidelines, NUREG-0588, and RG 1.89, Revision 1), are viewed as an AMP for license renewal. Aging evaluations of electrical components in the Dresden and Quad Cities EQ Programs that specify qualification of at least 40 years are TLAAAs. Reanalysis will be applied to EQ components now qualified for the current operating term of 40 years.

The reanalysis of an aging evaluation may be performed to extend the qualification by reducing margin or excess conservatism incorporated in the prior evaluation. Reanalysis of an aging evaluation to extend the qualification of a component may be performed as part of the EQ Program. While a component life-limiting condition may be result from thermal, radiation, or cyclical aging, the vast majority of component aging limits are based on thermal conditions. Conservatism may exist in aging evaluation parameters, such as the assumed ambient temperature of the component, unrealistically low activation energy, or in the application of a component as de-energized instead of energized. The important attributes of reanalysis will include analytical methods, data collection and conservative reduction methods, underlying assumptions, acceptance criteria, and corrective actions (if acceptance criteria are not met), as discussed below.

Analytical Methods: The analytical models used in the reanalysis of an aging evaluation are the same as those previously applied during the previous evaluation. The Arrhenius methodology is an acceptable thermal model for performing an aging evaluation. The analytical method used for a radiation aging evaluation demonstrates qualification for the total integrated dose (that is, normal radiation dose for the projected installed life plus accident radiation dose). For license renewal, one acceptable method of establishing the 60-year normal radiation dose is to multiply the 40-year normal radiation dose by 1.5 (that is, 60 years/40 years). The result is added to the accident radiation dose to obtain the total integrated dose for the component. For cyclical aging, a similar approach may be used. Other models may be justified on a case-by-case basis.

Data Collection and Reduction Methods: Reducing excess conservatism in the component service conditions (for example, temperature, radiation, and cycles) used in the previous aging evaluation is the chief method used for a reanalysis. Temperature data used in an aging evaluation should be conservative and based on plant-design temperatures or on actual plant temperature data. When used, plant temperature data can be obtained in several ways, including monitors used for technical specification compliance, other installed monitors, measurements made by plant operators during rounds, and temperature sensors on large motors (while the motor is not running). When used, a representative number of temperature measurements is conservatively evaluated to establish the temperatures used in an aging evaluation. Plant temperature data may be used in an aging evaluation in different ways, such as (1) directly applying the plant temperature data in the evaluation, or (2) using the plant temperature data to demonstrate conservatism when using plant-design temperatures for an evaluation. Any changes to material activation energy values as part of a reanalysis are justified on a case-specific basis. Similar methods of reducing excess conservatism in the component service conditions used in prior aging evaluations may be used for radiation and cyclical aging.

Underlying Assumptions: EQ component aging evaluations contain sufficient conservatism to account for most environmental changes occurring because of plant modifications and events. When unexpected adverse conditions are identified during operational or maintenance activities that affect the normal operating environment of a qualified component, the affected EQ component is evaluated and appropriate corrective actions are taken, which may include changes to the qualification bases and conclusions.

Acceptance Criteria and Corrective Actions: The reanalysis of an aging evaluation could extend the qualification of the component. If the qualification cannot be extended by

reanalysis, the component is maintained, replaced, or requalified prior to exceeding the period for which the current qualification remains valid. A reanalysis is performed in a timely manner (that is, sufficient time is available to maintain, replace, or requalify the component if the reanalysis is unsuccessful).

Environmental Qualification of Electrical Components: As stated in LRA Section B.1.35, the Environmental Qualification of Electrical Components AMP is implemented through station procedures and predefined tasks. The Dresden and Quad Cities EQ Programs comply with 10 CFR 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants." All EQ equipment is included within the scope of license renewal. The program provides for maintenance of the qualified life for electrical equipment important to safety within the scope of 10 CFR 50.49. Program activities establish, demonstrate, and document the level of qualification, qualified configuration, maintenance, surveillance, and replacement requirements necessary to meet 10 CFR 50.49. Qualified life is determined for equipment within the scope of the EQ Program, and appropriate actions such as replacement or refurbishment are taken prior to or at the end of the qualified life of the equipment so that the aging limit is not exceeded.

NUREG-1801 Consistency: The Environmental Qualification of Electrical Components AMP is consistent with the 10 elements of AMP X.E1, "Environmental Qualification (EQ) of Electrical Components," specified in NUREG-1801.

Operating Experience: The Environmental Qualification of Electrical Components AMP provides for consideration of operating experience to reconcile qualification bases and conclusions, including the equipment qualified life. Operating experience and information related to systems, equipment, or components, as reported through NRC bulletins, notices, circulars, generic letters, and Part 21 notifications, are evaluated for applicability. The evaluations are documented and corrective actions are identified. Operating experience has demonstrated that the program manages aging as required by 10 CFR 50.49. When problems have been identified through industry or plant-specific experience, corrective actions have been taken to prevent recurrence.

4.4.1.2 Staff Evaluation

The staff reviewed the information in Section 4.4 of the LRA to determine whether the applicant has demonstrated that the effects of aging on the intended function(s) of electrical components will be adequately managed through its existing program, together with other plant programs/processes, during the period of extended operation as required by 10 CFR 54.21(c)(1)(iii).

The applicant's program activities establish, demonstrate, and document the level of qualification, qualified configuration, maintenance, surveillance, and replacement requirements necessary to meet 10 CFR 50.49. Qualified life is determined for equipment within the scope of the EQ Program and appropriate actions, replacement, or refurbishment are taken prior to or at the end of qualified life of the equipment so that aging limits or acceptable margins are not exceeded. In response to RAI 4.3-0, the applicant committed to the following (Commitment #49 in Appendix A of this SER) in a letter dated October 3, 2003:

The Dresden/Quad Cities license renewal evaluations were based upon the plant environmental conditions associated with EPU implementation. Prior to the period of extended operation, the Environmental Qualification (EQ) Binders for components within the scope of 10 CFR 50.49 will be updated to include environmental conditions associated with EPU implementation together with an extended operating period of 60 years.

The applicant's Environmental Qualification of Electrical Components AMP provides reasonable assurance that aging effects are adequately managed so that the intended functions of components within the scope of 10 CFR 50.49 are maintained during the period of extended operation.

The staff also reviewed the UFSAR Supplement for this TLAA and concluded that it provided an adequate summary description of the TLAA to satisfy the requirement of 10 CFR 54.21(d).

4.4.1.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(iii), that the effects of aging on the intended function(s) will be adequately managed for the period of extended operation for the EQ of electrical equipment TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the EQ of electrical equipment TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.4.2 Generic Safety Issue 168, "Environmental Qualification of Low-Voltage Instrumentation and Control (I&C) Cables"

4.4.2.1 Summary of Technical Information in the Application

The applicant states that NRC guidance for addressing GSI-168 "Environmental Qualification of Low Voltage Instrumentation and Control (I&C) Cables," for license renewal is contained in the June 2, 1998, NRC letter to NEI. In the letter, the NRC states:

"With respect to addressing GSI-168 for license renewal, until completion of an ongoing research program and staff evaluations the potential issues associated with GSI-168 and their scope have not been defined to the point that a license renewal applicant can reasonably be expected to address them at this time. Therefore, an acceptable approach described in the Statement of Consideration is to provide a technical rationale demonstrating that the current licensing basis for environmental qualification pursuant to 10 CFR 50.49 will be maintained in the period of extended operation. Although the Statement of Consideration also indicated that an applicant should provide a brief description of one or more reasonable options that would be available to adequately manage the effects of aging, the staff does not expect an applicant to provide the options at this time."

This is consistent with the above NRC guidance, no additional information is required to address GSI-168 in a license renewal application at this time.

4.4.2.2 Staff Evaluation

GSI-168, "Environmental Qualification of Low Voltage Instrumentation and Control (I&C) Cables," was developed to address environmental qualification of electrical equipment. The

staff guidance to the industry (letter dated June 2, 1998, from Mr. C.I. Grimes (NRC) to Mr. D.J. Walters (NEI) states the following:

- GSI-168 issues have not been identified to a point that a license renewal applicant can be reasonably expected to address these issues, specifically at this time
- An acceptable approach is to provide a technical rationale demonstrating that the CLB for EQ will be maintained in the period of extended operation.

For the purpose of license renewal, as discussed in the Statements of Consideration (60 FR 22484, May 8, 1995), there are three options for addressing issues associated with a GSI:

- If the issue is resolved before the renewal application is submitted, the applicant can incorporate the resolution in the LRA.
- An applicant can submit a technical rationale that demonstrates that the CLB will be maintained until some later point in the period of extended operation, at which time one or more reasonable options would be available to adequately manage the effects of aging.
- An applicant can develop a plant-specific AMP that incorporates the resolution of the aging issue.

On May 2, 2003, the staff issued NRC Regulatory Issue Summary (RIS) 2003-09, "Environmental Qualification of Low-Voltage Instrumentation and Control Cables," providing the results of the staff's technical assessment of GSI-168 following completion of the NRC-sponsored cable test research. The staff concluded that typical I&C cable qualification test programs include numerous conservative practices that collectively provide a high level of confidence that the installed I&C cables will perform their intended functions during and following design-basis events, as required by 10 CFR 50.49. These conservative practices continue to support the current use of a single prototype test specimen during qualification testing, and as such, a successful test provides a high level of confidence that these cables will be able to perform their safety functions during and following design-basis events. However, I&C cable LOCA test failures during the NRC-sponsored research program indicate that the original margin and conservatism inherent in the qualification process have been reduced. Therefore, licensee awareness of the operating service environments (temperature, radiation, and moisture) is essential to ensure that the operating conditions in nuclear power plants do not exceed the qualification parameters that were assumed during qualification testing.

RIS 2003-09 further states that licensees that have addressed license renewal recognize that knowledge of the operating service environments is essential to extending the qualified life of I&C cables. Where measured environmental service conditions are less severe than those used in the original qualification and when the cables are not degraded, the licensee assessed the difference between the operating environment and the original qualification environment to extend the qualified life of the cables to 60 years by reanalysis. This approach, based on the Arrhenius methodology, has been found acceptable by the staff during its review of license renewal applications.

In response to RAI 4.4-1, the applicant provided the following in a letter dated October 3, 2003:

Exelon performed an analysis for all EQ-related equipment and has qualified all low-voltage I&C cables for 60 years of service without lowering the original environmental service conditions. No measured environmental service conditions were used in the analysis, but the qualification files have not been updated to support 60-year life. For Dresden and Quad Cities, the EQ TLAA ensures the effects of aging will be adequately managed for the period of extended operation per the provision of 10 CFR 54.21(c)(1)(iii). Therefore, with respect to GSI-168, Section 4.4 of the application should have stated: "Adherence to the EQ program and use of current EQ process for Dresden and Quad Cities stations will provide reasonable assurance through the extended period of operation that the equipment qualification will be maintained in compliance with the applicable NRC requirements."

The staff finds that the applicant has adequately addressed the issues associated with GSI-168 for license renewal because the applicant will continue to manage the effects of aging through the EQ Program for the period of extended operation.

4.4.2.3 Conclusions

On the basis of its review, the staff concludes that the applicant has adequately addressed the issues associated with GSI-168 for license renewal as required by 10 CFR 54.21(c)(1)(iii). The staff has also reviewed the UFSAR Supplement and the staff concludes the applicant has provided an adequate description of its evaluation of this TLAA for the period of extended operation as required by 10 CFR 54.21(d).

4.5 Loss of Prestress in Concrete Containment Tendons

None of the Dresden or Quad Cities containments have prestress tendons. As such, this topic is not a TLAA.

4.6 Fatigue of Primary Containment, Attached Piping, and Components

The applicant stated in Section 4.6 of the LRA that the cyclic loads acting on the primary containment and the attached piping and components include reactor building interior temperature variation during the heatup and cooldown of the RCS, a LOCA, annual outdoor temperature variations, thermal loads on containment penetrations because of high-energy piping lines (such as steam and feedwater lines), seismic loads, and pressurization resulting from periodic Type A integrated leak rate tests.

The metal containments, penetration sleeves (including dissimilar metal welds), and penetration bellows may be designed in accordance with the requirements of Section III of the ASME Boiler and Pressure Vessel Code. If a plant's code of record requires a fatigue analysis, then this analysis may be a TLAA and must be evaluated in accordance with 10 CFR 54.21(c)(1) to ensure that the effects of aging on the intended functions will be adequately managed for the period of extended operation.

The adequacy of the metal containment, penetration sleeves, and penetration bellows is reviewed for the period of extended operation. Section 4.3 of this SER includes a separate review of the fatigue analysis of the pressure boundary of process piping.

The primary containments at Dresden and Quad Cities were designed in accordance with ASME Code Section III, 1965 Edition with Addenda up to and including Winter 1965. Subsequent to the original design, elements of the Dresden and Quad Cities containments were

reanalyzed in response to discoveries of unevaluated loads because of assumed pressure and temperature cycles resulting from SRV discharge and design-basis LOCA events. This reevaluation was performed under Mark I Containment Program plant-unique analyses and reported in plant unique analysis reports (PUARs).

The applicant also stated the following:

In the absence of hydrodynamic loads, fatigue is not a concern in containment design except at penetrations or other stress concentration areas. The licensing and design basis documents do not reflect the existence of any fatigue analyses for the drywell or its penetrations. However, the drywell process bellows, including replacement bellows for Quad Cities, were specified for a finite number of operating cycles.

4.6.1 Summary of Technical Information in the Application

4.6.1.1 Fatigue Analysis of the Suppression Chamber, Vents and Downcomers

The applicant stated that the Dresden and Quad Cities PUARs describe the fatigue analyses of the suppression chambers and suppression chamber (torus) vents, including the vent headers and downcomers. The analyses assumed a limited number of SRV actuations during the plant transients, based on a survey of plant data extrapolated to 40 years. Each SRV actuation was assumed to result in one thermal, one pressure, and five dynamic load cycles.

The applicant listed the transients and corresponding design cycles used for the fatigue analysis of the suppression chamber shells and the associated welds, as well as the suppression chamber vent headers, downcomers, and associated welds for both Dresden and Quad Cities. Table 4.6-1 of the LRA lists the calculated CUFs exceeding 0.4 for a 40-year period of operation for each component and associated weld. The worst-location CUF is 0.92, located at the intersection of the vent headers and the downcomers.

For most shell, vent, and penetration locations, the predicted 40-year CUF is less than 0.666. In accordance with 10 CFR 54.21(c)(1)(i), the fatigue analyses of these locations remain valid because the CUFs for the period of extended operation will be less than 1.0. However, the applicant stated that a CUF of 0.666 provides no analytical or event margin. The applicant stated that the validation will therefore be applied to locations with calculated 40-year CUFs less than 0.4. The locations where this threshold value is expected to be exceeded will be included in the Metal Fatigue AMP, in accordance with 10 CFR 54.21(c)(1)(iii). These locations, listed in Table 4.6.1-2 of the LRA, consist of the suppression chamber weld and the vent header at the downcomer-vent header intersection (for Dresden Units 2 and 3) and the suppression chamber shell (for Quad Cities Units 1 and 2). These locations represent or bound all other locations for both plants. All necessary plant transients will be tracked to ensure that the CUF remains less than 1.0 for all monitored components. In the event fatigue usage is predicted to exceed 1.0 for any component before 60 years of operation, appropriate action will be taken in accordance with the Exelon Corrective Action Program, described in Section B.2.1 of the LRA. The required implementing actions will be completed prior to the period of extended operation.

4.6.1.2 Fatigue Analysis of Safety Relief Valve Discharge Piping Inside the Suppression Chamber, External Suppression Chamber Attached Piping, and Associated Penetrations

The applicant stated that the PUARs for each site describe the fatigue analyses of the SRV discharge lines and their penetrations through the vent lines, the suppression chamber (torus) shell and the attached piping systems, and the T-quenchers inside the suppression chamber. These analyses assume a limited number of SRV actuations throughout the 40-year life of the plant and are therefore TLAAs.

The fatigue analysis of the external torus attached piping and Class 2/3 SRV discharge lines assumed 800 SRV actuations with 5 cycles per actuation for a 40-year plant life. Other thermal cycles resulting from normal operating conditions were considered to have a negligible effect. The analysis indicated that these lines would have a CUF less than 0.5 at the end of 40 years of operation.

The SRV discharge line-vent line penetrations and associated sections of the SRV discharge lines are classified as Class MC components. The fatigue analyses of these components were based on 110 isolation events, each with 2 actuations. The analyses show maximum CUFs of 0.09 for Dresden and 0.18 for Quad Cities.

The fatigue calculations of the Class MC penetration components and attachments assumed 220 SRV actuations of 5 dynamic cycles each, plus 4050 cycles caused by condensation oscillation or chugging. The alternating stress intensity corresponding to the total sum of these cycles was determined. These analyses did not calculate the CUFs. Instead, the applicant specified that the alternating stress intensity at the highest stress location should be smaller than that corresponding to the assumed number of cycles. This, in effect, ensures that the CUF will be less than 1.0 for the entire period of plant operation. This concept is applicable only with the stress monitoring option of the Metal Fatigue AMP, evaluated in Section 3.1.2.3.9 of this SER.

To address concerns associated with potential plugging and unacceptable head loss, the emergency core cooling system (ECCS) suction strainers were replaced with larger units at both Dresden and Quad Cities. This replacement required revised stress and fatigue analyses. The fatigue analyses of these penetrations were based on the generic Mark I owners group analysis for 40-years of plant life. For Dresden Unit 2, the highest calculated CUF for these components is 0.142. For Dresden Unit 3, the highest CUF for these components is 0.0832. For Quad Cities, the highest calculated CUF for these components is 0.3087.

The highest 40-year CUFs for the suppression pool shell attached piping, SRV discharge lines, and penetrations are listed in Table 4.6.2-1 of the LRA. The applicant stated that the Metal Fatigue AMP, described in Section B.1.34 of the LRA, will include all locations where the 40-year CUF exceeds the threshold value of 0.4. Since only the SRV load cases contribute to fatigue of these components during normal operation, the contribution to the CUF at a particular location resulting from the number of SRV actuations will be monitored to ensure that it does not exceed 1.0 minus the CUF contribution from a postulated LOCA plus operating based events.

4.6.1.3 Drywell-to-Suppression Chamber Vent Line Bellows Fatigue Analyses

The applicant stated that Mark I containment designs include a drywell-to-suppression chamber vent line. A bellows assembly is provided at the penetration of the vent line to the suppression chamber. The bellows allows differential movement of the vent system and suppression chamber without developing significant interaction loads. The fatigue analyses of these bellows are included in the Mark I Containment Long-Term Program plant-unique analysis.

Dresden and Quad Cities have external vacuum breakers which include 24-in. bellows. There are differences between the bellows configurations at the two plants, but the effect of these differences in the overall vent system analysis was found to be insignificant. At Quad Cities, these bellows were included in the vent system analysis. At Dresden, these bellows were evaluated as part of the penetrations. The applicant referenced an NRC SER which concluded that the owners' comparison of the Dresden external vacuum breakers to the stress criteria of ASME Code, Section III, Subsection NC, 1977 Edition with Summer 1977 Addenda, demonstrated that the fatigue usage factors in the vacuum breakers and their attachments (and at Dresden, their penetrations) are bounded by other analyzed locations and therefore are not limiting. The SER therefore concluded that the design was adequate.

The applicant stated that the analysis of the vent line bellows was based on a total of 150 thermal and internal pressure-load cycles for the 40-year life of the plant and are therefore adequate for fatigue, since they have a rated capacity of 1000 cycles at maximum displacement. The number of load cycles for the period of extended operation is 225, which is less than 25 percent of the rated capacity. The applicant indicated that, pursuant to 10 CFR 54.21(c)(1)(i), the fatigue adequacy of the bellows is valid for the period of extended operation.

4.6.1.4 Primary Containment Process Penetration Bellows Fatigue Analysis

The applicant stated in Section 4.6.4 of the LRA that at Dresden and Quad Cities the only containment process piping expansion joints subject to significant thermal expansion and contraction are those between the drywell shell penetrations and process piping. Thermal cycles on the bellows are imposed by thermal cycles experienced by the attached piping. The assumed thermal-cycle count can be approximated by the thermal cycles used in the reactor vessel fatigue analysis, which are listed in Table 3.9-1 of the UFSAR. The total count of all these cycles is 2200 for a 40-year plant life. For a 60-year plant life, the number of thermal cycles for the piping penetration bellows analyses increases to 3300. The bellows are designed for 7000 operating cycles, corresponding to the design code for the piping. The applicant indicated that, pursuant to 10 CFR 54.21(c)(1)(i), the containment penetration bellows fatigue analysis remains valid for the period of extended operation.

4.6.2 Staff Evaluation

The staff has reviewed the technical information in Section 4.6 of the LRA regarding fatigue of primary containment, attached piping, and components. In RAI 4.6, the staff requested justification for the statement that "in the absence of hydrodynamic loads, fatigue is not a concern in containment design, except at penetrations or other stress concentration areas." The applicant stated that the primary containments for Dresden and Quad Cities were initially designed in accordance with ASME Code, Section III, 1965 Edition, with Addenda up to and

including Winter 1965. These containments are Mark I containments that were originally designed to stress limits without requiring fatigue analyses (Class B vessels). The discovery of significant hydrodynamic loads caused by SRV discharges and small, intermediate and design basis pipe break discharges into the torus suppression pool, for which the containment had not been initially analyzed, was identified as an unresolved safety issue by the NRC, requiring the reanalysis of the torus, vents, and torus attached piping and internal structures, including fatigue analysis at limiting locations. The generic suppression pool hydrodynamic load definition and structural assessment techniques that were to be used to design plant modifications necessary to restore the Mark I containments were described in NUREG-0661, "Safety Evaluation Report—Mark I Containment Long Term Program." This report specified a long-term program to establish the structural and mechanical elements that were to be analyzed in a plant unique analysis. The long-term program plant-unique analyses for Dresden and Quad Cities were reported in a PUAR for each plant, which demonstrated that all applicable Mark I criteria in NUREG-0661 had been met. The NRC staff performed a post-implementation audit review of the PUARs and concluded that with the required containment modifications, the original design margins of the containment had been restored. The staff has reviewed this response and concludes that the applicant has provided satisfactory justification for the statement questioned in RAI 4.6.

The applicant's supplement for the Dresden and Quad Cities UFSARs regarding containment fatigue is provided in Section A.3.4 of the LRA. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.6 of the LRA.

4.6.2.1 Fatigue Analysis of the Suppression Chamber, Vents, and Downcomers

The staff has reviewed the technical information in Section 4.6.1 of the LRA regarding the fatigue TLAA of the suppression chamber, vents, and downcomers. The staff has also reviewed the applicant's disposition of this TLAA and finds it acceptable because the applicant has selected a threshold limit of $CUF=0.4$ for 40 years of operation as a criterion for determining if the fatigue analyses performed under the Dresden and Quad Cities PUARs will remain valid for the period of extended operation. The staff concurs with the applicant that this criterion will provide additional analytical or event margin over the minimum CUF value of 0.666 for the period of extended operation. Those locations not exceeding the threshold criterion will therefore remain valid for the period of extended operation, in accordance with 10 CFR 54.21(c)(1)(i). In accordance with 10 CFR 54.21(c)(1)(iii), for locations where the CUF exceeds the criterion above, the staff finds the applicant's commitment to manage the effects of fatigue for the period of extended operation with the Metal Fatigue AMP (B.1.34) acceptable because it will provide assurance that the monitored CUF at a location will not exceed the ASME Code, Section III CUF limit of 1.0. If the CUF is projected to exceed this limit the applicant has committed to take appropriate corrective action, as stated in Section 4.6.1 of the LRA, in accordance with the Exelon Corrective Action Program (described in Section B.2.1 of the LRA). This is Commitment #39 in Appendix A of this SER.

The applicant's supplement for the Dresden and Quad Cities UFSARs regarding the suppression chamber, vents, and downcomers fatigue TLAA is provided in Section A.3.4.1 of the LRA. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.6.1 of the LRA.

4.6.2.2 Fatigue Analysis of Safety Relief Valve Discharge Piping Inside the Suppression Chamber, External Suppression Chamber Attached Piping, and Associated Penetrations

The staff has reviewed the technical information in Section 4.6.2 of the LRA regarding the fatigue TLAA of the SRV discharge piping inside the suppression chamber, the external suppression chamber attached piping, and the associated piping penetrations. The staff has also reviewed the applicant's disposition of this TLAA and finds it acceptable because the applicant has selected a threshold limit of CUF=0.4 for 40 years of operation as a criterion for determining if the fatigue analyses performed under the Dresden and Quad Cities PUARs will remain valid for the period of extended operation. The staff concurs with the applicant that this criterion will provide additional analytical or event margin over the minimum CUF value of 0.666 for the period of extended operation. Those locations on the inside or outside of the piping not exceeding the threshold criterion will therefore remain valid for the period of extended operation, in accordance with 10 CFR 54.21(c)(1)(i). In accordance with 10 CFR 54.21(c)(1)(iii), for locations where the CUF is projected to exceed the criterion above, the staff finds the applicant's commitment to manage the effects of fatigue for the period of extended operation with the Metal Fatigue AMP (B.1.34) acceptable because the AMP will provide assurance that the monitored CUF at a location will not exceed the ASME Code, Section III CUF limit of 1.0. This is Commitment #34 of Appendix A of this SER. The staff also finds acceptable that the applicant will use the cycle counting capability of the Metal Fatigue AMP to monitor the number of SRV lifts for the SRV discharge piping penetration components and welds. This will implicitly assure that the CUF of these components will remain less than 1.0 for the period of extended operation.

In RAI 4.6.2, the staff requested that the applicant state what corrective action will be taken if the SRV lifts exceed the number required to ensure that the CUF at a location remains less than 1.0. In its response, the applicant stated that a condition report is required to be generated when the number of cycles approaches or exceeds the design allowable number. This procedure, along with site implementing procedures, will be revised to ensure that a condition report will be generated before exceeding any design allowable cycle limit. This will allow appropriate corrective or mitigating actions to be taken before the number of SRV lifts exceeds the number required to ensure that the CUF remains less than 1.0. Corrective actions could include reanalysis of the CUF with more refined techniques or plant modifications as appropriate. The staff finds the response acceptable because it conforms to current industry practice.

The applicant's supplement for the Dresden and Quad Cities UFSARs regarding the fatigue TLAA of the SRV discharge piping inside the suppression chamber, the external suppression chamber attached piping, and the associated penetrations is provided in Section A.3.4.2 of the LRA. The staff has reviewed this supplement and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.6.2 of the LRA.

4.6.2.3 Drywell-to-Suppression Chamber Vent Line Bellows Fatigue Analyses

The staff has reviewed the technical information in Section 4.6.3 of the LRA regarding the fatigue TLAA of the drywell-to-suppression chamber vent line bellows. The staff has also reviewed the applicant's disposition of this TLAA and finds it acceptable because the applicant has demonstrated that in accordance with 10 CFR 54.21(c)(1)(i), the rated cyclic capacity of the

drywell-to-suppression chamber vent line bellows is adequate for the number of pressure and temperature cycles expected during the period of extended operation.

The applicant's supplement for the Dresden and Quad Cities UFSARs regarding the fatigue TLAA of the drywell-to-suppression chamber vent line bellows is provided in Section A.3.4.3 of the LRA. The staff has reviewed this supplement and finds it acceptable because it reflects the information presented in Section 4.6.3 of the LRA.

4.6.2.4 Primary Containment Process Penetration Bellows Fatigue Analysis

The staff has reviewed the technical information in Section 4.6.4 of the LRA regarding the fatigue TLAA of the primary containment process penetration bellows. The staff has also reviewed the applicant's disposition of this TLAA and finds it acceptable because the applicant has demonstrated that in accordance with 10 CFR 54.21(c)(1)(i), the rated cyclic capacity of the drywell-to-shell vent line bellows is adequate for the number of thermal cycles expected during the period of extended operation.

The applicant's supplement for the Dresden and Quad Cities UFSARs regarding the fatigue TLAA of the primary containment process penetration bellows is provided in Section A.3.4.3 of the LRA. The staff has reviewed the supplemental section and finds it acceptable because it provides a reasonable summary of the information presented in Section 4.6.3 of the LRA.

4.6.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i) and 10 CFR 54.21(c)(1)(iii), that the analyses remain valid for the period of extended operation. Further, the effects of aging on the intended functions will be adequately managed for the period of extended operation for the fatigue analysis of the suppression chamber, vents, and downcomers and the fatigue analysis of safety relief valve discharge piping inside the suppression chamber, external suppression chamber attached piping, and associated penetrations TLAAs. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the fatigue analysis of the suppression chamber, vents, and downcomers and the fatigue analysis of safety relief valve discharge piping inside the suppression chamber, external suppression chamber attached piping, and associated penetrations TLAA evaluations for the period of extended operation, as required by 10 CFR 54.21(d).

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i), that the analyses remain valid for the period of extended operation for the drywell-to-suppression chamber vent line bellows and the primary containment process penetration bellows fatigue analysis TLAAs. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the fatigue analysis of the drywell-to-suppression chamber vent line bellows fatigue analyses and the primary containment process penetration bellows fatigue analysis TLAA evaluations for the period of extended operation, as required by 10 CFR 54.21(d).

Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7 Other Plant-Specific Time-Limited Aging Analyses

4.7.1 Reactor Building Crane Load Cycles

4.7.1.1 Summary of Technical Information in the Application

The applicant stated that the reactor building overhead cranes at Dresden and Quad Cities were designed to meet the design fatigue loading requirements of the Crane Manufacturers Association of America (CMAA) Specification 70, Class A1. This evaluation of expected cycles over a 40-year plant life is the basis of a safety determination and is therefore a TLAA.

The applicant stated that the reactor building overhead crane is designed for 100,000 loading cycles. The weldments are categories B and C, which permit a stress range of 28,000–33,000 psi. The maximum allowable stress in the girders with rated load is 17,600 psi and the minimum stress (no load) is approximately 2,400 psi. The maximum stress range in the girders will not exceed 15,200 psi. Because the maximum stress permitted in other weldments is 14,000 psi, they have a smaller range and better fatigue resistance than the girders. According to the applicant these ranges are satisfactory for approximately 2 million loading cycles. This would be equivalent to approximately 50,000 125-ton loads per year handled in the center of the span over a 40-year period.

The applicant estimated that these cranes will see fewer than 5000 cycles at rated capacity and a larger number of cycles at significantly less than rated capacity. For this reason, the applicant indicated that fatigue life is not significant to the operation of this equipment.

4.7.1.2 Staff Evaluation

The reactor building cranes are designed to CMAA-70 Class A1. Based on its review of the design evaluations the staff concurs with the applicant that all components are qualified for 100,000 loading cycles (i.e., 100,000 lifts at rated capacity). The staff also concurs with the applicant's estimate of the maximum stress ranges of 15,200 psi and 14,000 psi for the reactor building overhead cranes and the weldments respectively. The 40-year estimated cycles equal most 5000 rated-capacity load cycles, or up to 7500 if extended to a 60-year life. The 60-year, 7,500-cycle estimate remains a small fraction of the 100,000 cycle minimum design. Therefore, fatigue life is not significant to the operation of this equipment and remains valid for the period of extended operation. The applicant has provided a satisfactory validation of 10 CFR 54.21(c)(1)(i).

4.7.1.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i) that the analyses remain valid for the reactor building crane load cycles TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the reactor building crane load cycles TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7.2 Metal Corrosion

4.7.2.1 Corrosion Allowance for Power-Operated Relief Valves

4.7.2.1.1 Summary of Technical Information in the Application

The applicant stated in Section 4.7.2.1 of the LRA, "Corrosion Allowance for Power Operated Relief Valves," that power-operated relief valves (PORVs) were installed at Quad Cities in 1995 to replace the main steam line electromagnetic relief valves. The specification for the PORVs is cited in the Quad Cities UFSAR Section 5.2.2. These valves were designed with a corrosion allowance for 40 years of operation. The evaluation of the effects of corrosion on these PORVs is based on a predicted corrosion rate for the plant lifetime and is therefore a TLAA. The applicant stated that because the valves were installed more than 20 years into the current license, the corrosion rate and allowance remain applicable for the period of extended operation.

4.7.2.1.2 Staff Evaluation

The staff concurs with the applicant that the 40-year PORVs corrosion rate and the corrosion allowance remain valid since the remaining life of the PORVs will exceed the period of extended operation. The staff concludes that, in accordance with 10 CFR 54.21(c)(1)(i), the applicant has demonstrated that the margin against excessive corrosion which is specified for 40-year plant life will be maintained during the period of extended operation.

In RAI 4.7.2.1, the staff requested that the applicant include a section in the supplement to the UFSARs regarding the corrosion allowance TLAA for PORVs. In its response dated December 17, 2003, the applicant provided supplemental Section A.3.5.2.3 and committed to include it in the UFSARs supplements. Subsequently, the staff reviewed page A-57 of the applicant's submittal dated March 5, 2004 and found that Section A.3.5.2.1 of the UFSAR Supplement clarified that the corrosion allowance for the Quad Cities, Unit 2 PORVs were evaluated and found to be valid for the period of extended operation. The staff finds this acceptable.

4.7.2.1.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i) that the analyses remain valid for the corrosion allowance for PORV TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the corrosion allowance for PORV TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7.2.2 Degradation Rates of Inaccessible Exterior Drywell Plate Surfaces

4.7.2.2.1 Summary of Technical Information in the Application

In Section 4.7.2.2 of the LRA, the applicant stated that the Mark I containment design (all four units) includes an inaccessible "sand pocket" around the drywell. The applicant recognized that

the potential for degradation of the containment exists because of conditions that allow the introduction of water into the annulus (expansion gap) between the containment and the primary containment shield wall. Water can be introduced from leakage of the refuel cavity past the refueling bellows drain line expansion joints during refueling or because of the introduction of water at other drywell penetrations. This water migrates to the sand pocket under the bottom elevation of the containment and then passes through the sand pocket drain lines. The applicant explains that if the drain lines become clogged, the water remains in the sand pocket and creates an environment that may be corrosive to the containment steel plates.

In response to GL 87-05, "Potential Degradation of Mark I Drywell," Dresden and Quad Cities projected corrosion rates for the steel drywell plates in this area and determined that the wall thickness was sufficient for the remainder of the 40-year license period. The applicant's evaluation of the remaining life of the drywell steel thickness based on a specified corrosion rate is a TLAA.

Also in response to GL 87-05, the applicant stated that it performed an inspection of the drain lines on all four units to detect leakage in the pocket region. As a result of these actions, the applicant determined that the sand pocket drains were clogged on Dresden Unit 3 and performed an evaluation of actual plate thickness on this unit. The applicant also stated that the design of the Dresden Unit 3 containment vessel is such that margin exists between the required shell thickness and the actual thickness of the steel plate provided. A reevaluation of the required shell thickness in the region of the sand pocket was performed based on loads and data compatible with the original certified containment vessel stress report by Chicago Bridge & Iron Company. It was determined that the thickness of the plates in the sand pocket region may be reduced to approximately 0.25 in. below the nominal and still be within ASME Code allowable stress limits.

Actual UT thickness measurements were made of the Dresden Unit 3 drywell steel plate at the sand pocket level. All thickness measurements were on the high side (above the nominal 1.0625 in.). The measurements were taken during the 18th year of operation for Dresden Unit 3. In response to GL 87-05, the applicant stated that it made conservative estimates of corrosion rates that might occur. Starting with the minimum as-found steel plate thickness of 1.08 in. and assuming a corrosion rate of 0.01 in. per year, the applicant indicated that 27 years of service would remain before the effects of corrosion on stresses would become significant. The corrosion rate was based upon a worst-case rate of 10 mils per year (mil/y) for fresh river water.

The final response to GL 87-05 indicated that the amount of moisture found in the sand pocket drains at Quad Cities was negligible in comparison to that at Dresden Unit 3 and that it was not expected that any corrosion occurred on either unit. The final response also indicated that there was no reason to expect adverse thickness of the drywell liner on Dresden Unit 2. However, the Dresden Unit 3 plate thickness estimates were used to bound Dresden Unit 2 and both units at Quad Cities. The conservatively analyzed years of service life ($18 + 27 = 45$) would not be sufficient for the extended license period.

Based on the above findings, the applicant used the provision of 10 CFR 54.21(c)(1)(ii) (i.e., the projected analysis will be valid during and to the end of the extended period of operation), to state the following:

The corrosion rate assumptions used in the calculation will be confirmed by a UT inspection prior to the period of extended operation. The inspection will be performed at Dresden and the results will be used to revise the corrosion calculation and validate that an acceptable wall thickness will remain to the end of the 60 year license operating period.

4.7.2.2.2 Staff Evaluation

The staff has identified the following three principal concerns regarding the applicant's analysis:

- failure to address the preventive measures that would alleviate the root cause of the problem (i.e., preventing water leakage from refueling canal)
- sole dependence on Dresden Unit 3 examinations for monitoring the condition of the drywell shell in the other units
- no consideration of potential drywell shell corrosion in the inaccessible portion of the straight portion of the drywell

In Section 4.7.2.2.1 of this SER, the applicant recognized the root cause and stated the following:

The potential for degradation of the containment exists due to conditions that allow the introduction of water into the annulus (expansion gap) between the containment and the primary containment shield wall. Water can be introduced due to leakage of the refuel cavity past the refueling bellows drain line expansion joints during refueling or due to the introduction of water at other drywell penetrations. This water migrates to the sand pocket under the bottom elevation of the containment and then passes through the sand pocket drain lines.

The applicant explained that if the drain lines become clogged, the water remains in the sand pocket and creates an environment that may be corrosive to the containment steel plates.

In RAI 2.4-3, the staff requested information regarding the aging management of refueling seals through which the water has leaked in the past and is likely to leak during the extended period of operation. The applicant provided the following partial response:

The refueling seals (the drywell-to-reactor building refueling) seal and the reactor pressure vessel (RPV)-to-drywell refueling are not safety-related, and they are not relied upon to remain functional during design basis events to ensure (i) the integrity of the reactor coolant pressure boundary, (ii) the capability to shutdown the reactor and maintain it in a safe shutdown condition, or (iii) the capability to prevent or mitigate potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 50.67(b)(2), or 100.11. Thus, the refueling seals are not brought into scope of license renewal by 10 CFR 54.4(a)(1).

The staff reviewed the applicant's response and identified the following potential concerns resulting from the water leakage through the drywell-to-refueling (DR) seal:

- corrosion of the steel shell between the straight portion of the drywell and the containment shield wall
- corrosion of the steel shell in the sand pocket areas

A small amount of water leakage may be absorbed by the insulation in the annulus space and may not affect the sand cushion areas. However, this moisture accumulation could corrode the

drywell shell plate. The applicant's TLAA addresses only the corrosion of the shell in the sand pocket areas. The steel shell in the annulus area is inaccessible for direct inspection.

Based on industry-wide and plant-specific operating experience with the performance of the DR seal, the staff believes that managing the performance of this seal will minimize the potential for corrosion in both these areas. Accordingly, to complete its review, the staff requested the applicant to provide the following supplemental information:

- the methodology for managing the potential corrosion of the drywell shell in the inaccessible annulus areas.
- justification for not managing the DR seal as a preventive measure against corrosion of the drywell shell plate.

In its response, the applicant emphasized that no operating experience records were found to support an assumption that water had actually accumulated in this area and that related wall thinning had actually occurred. However, the applicant also agreed that, "Potential corrosion that could lead to wall thinning of the annulus areas of the drywell shell can be postulated based upon an assumption of moisture accumulation in the annulus space." The applicant also discussed the industry experience related to corrosion of the cylindrical portion of the drywell, and proposed the following monitoring program:

Exelon proposes that a monitoring program be instituted for the Dresden Unit 3 inaccessible annulus areas to ensure that potential corrosion has not occurred. As previously described, Dresden Unit 3 is considered the limiting case for potential drywell corrosion among the four Dresden and Quad Cities units.

The program will consist of inspection of a sample of locations in the cylindrical and upper spherical areas of the drywell, using ultrasonic measurements of the drywell shell thickness made from accessible areas of the drywell interior. A minimum of four sample locations will be selected in each 90-degree quadrant of the drywell. At least one of the four sample locations will be performed in the spherical portion of the drywell below the annulus region in proximity to the location of the 1986 drywell liner fire.

A baseline inspection will be performed prior to the period of extended operation. A follow-up inspection consisting partly of the same locations and partly of variable locations will be based on the operating experience records, Exelon believes no detrimental corrosion has or will occur on the exterior of the cylindrical portion of the drywell shell. Regardless, Exelon proposes that a monitoring program be instituted for the Dresden Unit 3 inaccessible annulus areas to ensure that potential corrosion does not occur. As previously described, Dresden Unit 3 is considered the limiting case for potential drywell corrosion among the four Dresden and Quad Cities units.

As the same location will allow trending of wall thickness data, variable locations will allow flexibility to ensure that wall thickness integrity is maintained during the period of extended operation. The follow-up inspection will be used to determine whether any corrosion is occurring and that any observed corrosion rate will not threaten drywell integrity during the extended 60-year plant life. The results of the inspections will undergo an engineering evaluation to determine if further follow-up inspections are warranted, or if more locations in the accessible drywell liner interior should be monitored.

These inspections will be added to LR program B.1.26, ASME Section XI, Subsection IWE, for Dresden 3.

This is part of Commitment #26 of Appendix A of this SER. The staff finds the proposed monitoring program acceptable, as it will ensure that any corrosion occurring in the inaccessible areas of the cylindrical and spherical portions of the drywell will be monitored and trended, and corrective actions will be taken to ensure the integrity of the drywell during the extended period of operation.

Regarding the second concern, the staff reviewed the applicant's detailed response to RAI 3.5-5, which includes a table showing the UT measurements of the Dresden Unit 3 shell during the inspections performed in 1988, 1997, 1998, 2000, and 2002. The staff finds the applicant's justification for not performing periodic UT examination for the remaining three units acceptable, provided the applicant has in place a surveillance program to periodically verify the performance of sand-pocket drains in all units. The measured shell wall thickness in Dresden Unit 3 (based on the table) is well within the 10 percent allowable reduction of Subsection IWE of the ASME Code. However, the 0.25 in. allowable corrosion limit (about 25 percent of the shell thickness), which has been established as the long-term acceptance criterion, appears to be excessive. To address this concern regarding the corrosion of the drywell steel plate and to complete its review, the staff requested the following supplemental information:

- clarification of whether the performance of sand drains is (and will be) monitored at every outage on all four units.
- clarification of where the engineering evaluation performed to set the 0.25 in. (below the nominal thickness of the shell) criterion incorporates the effects of discontinuities and stress concentration under all load combinations. Provide a summary of the calculations performed.
- the procedures used for re-coating any corroded steel areas.

In its response, the applicant provided the following information about the drywell liner surveillance program:

- Dresden and Quad Cities conduct a surveillance of the drywell liner drains once per operating cycle to make sure that there is no leakage from the drywell liner sand pocket drain lines on all four units. The surveillance is conducted during refueling operations when the refueling cavity is flooded and the potential for water leakage exists. These surveillances are conducted under the direction of Quad Cities Technical Specification 0820-11, "Surveillance of Dryer Separator Pool, Spent Fuel Pool, and Drywell Liner Drains," and Dresden Quad Technical Specifications 1600-06, "Drywell Liner Leakage Inspection." Both site procedures have been credited for aging management and are included under aging management program B.1.26, ASME Code, Section XI, Subsection IWE.
- In response to a follow-up question from the staff, the applicant also stated that the Dresden inspection procedure currently includes steps to ensure that the sand pocket drains are clear. A similar requirement will be added to the Quad Cities procedure. This is part of Commitment #26 of Appendix A of this SER.
- As stated in the response to RAI 3.5-5(b), the reference to a minimum required plate thickness of 0.25 in. below nominal at the sand pocket region is based on information contained in Section 6.2.1.2.1.2 of the Dresden UFSAR. The calculation took the existing

design loads and load combinations from the original certified containment vessel stress report generated by Chicago Bridge & Iron Company, and used those cases to calculate the minimum required thickness. Normal operating, refueling, and accident loads were included in the calculation using ASME Code Case N-284 stress allowable limits.

- As stated in the applicant's response to RAI 3.5-5(b), initial thickness measurements supported the conclusion that significant corrosion was not occurring in the drywell steel plate at the sand pocket region. All measurements to date at Dresden Unit 3 have remained within the 10 percent limit below nominal of Subsection IWE of the ASME Code (most measurements are still above nominal wall thickness). Evaluations performed following the fire in 1986 concluded that the zinc chromate primer coat on the outer shell surface was intact following the fire, and that no corrosion had taken place. No recoating activities have been performed on the drywell exterior. Any recoating activities performed on the drywell interior are performed using proper procedures. No recoating activities performed to date are related to corrosion of the sand pocket region.

With the procedural commitment to inspect the sand pocket drains in all four units of Dresden and Quad Cities, and to explicitly describe the procedure for evaluating the corroded areas, when found, the staff finds the applicant's response acceptable. This is Commitment #50 in Appendix A of this SER.

A review of the UT measurement table provided as part of the applicant's response to RAI 3.5-5 indicates that within two digits after the decimal points, there is no consistency in the measured results. Some measurements taken at the same locations (e.g., locations 157.5.1.1A and 202.5.1.1A) show an increase in thicknesses in subsequent years, after the 1988 measurements. To complete its review, the staff requested the following supplemental information regarding these measurements:

- Provide the basis for selecting the locations where the UT measurements are taken. State whether the measurement locations indicated in the table have shown visual evidence of corrosion, or if they are in close proximity to the corroded areas.
- One location, 337.5.1.2B, shows gradually decreasing thickness, with a total reduction in thickness of 0.18 in. Although the minimum thickness is still close to the nominal thickness, indicate if this reduction implies a 0.18 in corrosion of the shell at that location between 1988 and 2002.
- State whether the nominal thickness of 1.0625 in. is the same for the drywell shells in all four units.
- Provide the permissible tolerances of the nominal shell thickness in the as-delivered condition. Indicate if the records of the actual as-delivered thicknesses are available.
- Provide a discussion of the accuracy of the UT measurements.

In response, the applicant provided the following additional information for evaluating the existing corrosion in the Dresden Unit 3 sand pocket areas:

- The UT measurements are taken at various locations around the floor of the Dresden Unit 3 drywell in the sand pocket region. This area was chosen in 1988 as the most likely area to experience potential corrosion resulting from the presence of moisture (Reference 1). The drywell floor is a poured concrete slab that fills the bottom portion of the steel enclosure to an elevation of 502'-4" (refer to elevation view of the containment sand pocket, Figure 6.2-9 of Dresden UFSAR). The slab was divided into sectors and measurement locations were selected at random within each sector. The process used a standard statistical sampling basis. Certain portions of the floor slab are inaccessible because of equipment mounted on the floor. These locations are therefore not part of the measurement population. This sampling approach was described in detail in the August 1988 letter from ComEd (W.E. Morgan) to the NRC.
- The shell was made accessible for measurement by drilling 2.5 in. core holes in the concrete at 22 accessible measurement locations. The holes range in depth from 1 to 3 feet, and are capped during normal plant operation. The UT probe is inserted into each hole to provide the thickness measurement. No visual inspection of the shell is possible because of the slab inside the steel liner and the sand pocket outside the steel liner.
- Evaluations performed following the fire in 1986 concluded that the zinc chromate primer coat on the outer shell surface was intact following the fire, and that no corrosion had taken place.
- The point in question had an abnormally high reading in the 1988 measurements. In the Reference 1 submission, it was speculated that one non-standard plate section could have been substituted in the drywell shell, resulting in thickness measurements exceeding the nominal tolerance on the high side at some locations. However the recent measurements from 1997-2002 have been relatively consistent at all of these locations and do not provide indication of progressive wall thinning.
- The drywell shell thickness varies throughout the structure. The nominal thickness of 1.0625 in. in the sand pocket region applies to Dresden, and bounds the Quad Cities nominal thickness of 1.25 in. in the same area.
- No as-delivered thickness measurements are available. Based upon normal mill tolerances for 1-1/16 in. plate a range from 1.0525 in. to 1.1755 in. could be expected.
- The initial UT measurements in 1988 were performed with an instrument calibrated to 0.020 in., using a carbon steel standard ranging in thickness from 0.25 in. to 2.0 in. (as described in the August 1988 letter). The instrumentation in use for current UT measurements should attain comparable accuracy. Per current Exelon ultrasonic measurement procedures, UT instrumentation for material thickness measurements is calibrated to an accuracy of 2 percent, which is the same accuracy that was used in 1988.

This response provides the process used in evaluating the findings of corrosion in the sand pocket areas of Dresden Unit 3. The staff has reviewed this response and finds the sampling and measurement calibration process used in the evaluation to be acceptable, as the TLAA based on these initial findings will be continued through the period of extended operation, and will ensure the integrity of the containment drywells at Dresden and Quad Cities.

In Section A.3.5.2.1 (UFSAR Supplement) of the LRA, the applicant summarized this TLAA and reiterated that the calculations will be revised for the realistic environment and for a full 60-year design life in accordance with 10 CFR 50.54.21(c)(1)(ii). The staff finds the UFSAR Supplement adequate.

4.7.2.2.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(ii), that the analyses have been projected to the end of the period of extended operation for the degradation rates of inaccessible exterior drywell plate surfaces TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the degradation rates of inaccessible exterior drywell plate surfaces TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7.2.3 *Galvanic Corrosion in the Containment Shell and Attached Piping Components due to Stainless Steel Emergency Core Cooling System Suction Strainers*

4.7.2.3.1 Summary of Technical Information in the Application

In Section 4.2.7.3 of the LRA, the applicant stated that suction strainers at Dresden and Quad Cities were replaced with larger stainless steel strainers, to address potential plugging and unacceptable head loss concerns. This modification created direct contact between the carbon steel support flanges and the stainless steel strainer components through uncoated bolt holes in the carbon steel flanges, resulting in galvanic corrosion effects. The evaluation of the effects of galvanic corrosion on the ECCS suction strainer flanges is based on a predicted corrosion rate for the plant lifetime and is therefore a TLAA. The calculation of the corrosion effects on the support flanges assumes a corrosion rate of 4 mil/y and a design life of 33 years, which is not sufficient to encompass the entire period of extended operation.

4.7.2.3.2 Staff Evaluation

In RAI 4.7.2.3(a), the staff requested that the applicant describe (1) the nature of the TLAA calculations and the basis for the assumed corrosion rate of 4 mil/y for 33 years used in the calculation, and to (2) substantiate that this is a bounding corrosion rate for all foreseeable conditions in both plants, including any credible nonstandard water chemistry conditions.

The applicant stated that calculations were performed to evaluate and qualify the bolted flange connections between the ECCS suction strainers and the associated torus penetration nozzles. During an earlier NRC review of the modifications associated with the replacement of the suction strainers, the NRC identified a concern that the calculations did not sufficiently account for the effects of galvanic corrosion. These calculations were revised to include a corrosion allowance in the determination of the stresses at the bolt circles in the existing carbon steel flanges, in accordance with ASME Code, Section III, Subsection NC, 1977 Edition with Summer 1997 Addenda.

The corrosion rate (4 mil/y) was obtained from *Uhlig's Corrosion Handbook*, 2nd Edition, a standard industrial reference source on corrosion. The revised calculation did not include any specific consideration of nonstandard water chemistry conditions. However, the subject strainers are located within the suppression chambers of the respective units. Water quality is maintained within strict limits and sampled quarterly in accordance with plant procedures. It is sampled frequently enough to allow prompt identification and correction of any nonstandard water chemistry conditions capable of increasing corrosion of the flanges. The staff finds the applicant's justification acceptable because it conforms with standard industry practice.

In RAI 4.7.2.3(b), the applicant was requested to show how the location of a single ultrasonic inspection, to confirm the assumptions used in the corrosion rate calculations will be selected, and how it will represent the most aggressive corrosion conditions in both plants. The applicant stated that UT inspections will be performed on a randomly selected flange in each Dresden unit. Initial thickness measurements will be made at two to four adjacent bolt locations on the flange. Separate thickness measurements at the same locations will be made in a subsequent outage to establish the actual corrosion rate. The applicant also stated that this method of selection is acceptable to provide assurance that the results are representative of the most aggressive corrosion conditions at both plants because (1) the water chemistries are similar at each site and are required to be maintained within limits established by the same procedures, (2) the strainers at both plants were installed in approximately the same time frame (1997/1998), and (3) the strainer flange configurations are similar at both plants. The staff finds that the applicant has provided a reasonable procedure for determining corrosion rates, and has provided adequate justification to show that the corrosion rates will be similar for all ECCS strainer flanges at both plants.

In RAI 4.7.2.3(c), the applicant was requested to state the corrective measures that will be taken in the event that the revised galvanic corrosion calculation indicates that an unacceptable reduced flange wall thickness will be reached before the end of the period of extended operation. The applicant stated that in this event, the Exelon Corrective Action Program will be used to develop appropriate corrective actions, among which are the inspection of additional flanges, establishment of root causes and corrective actions including periodic UT inspections of the affected flanges, and implementation of possible modifications and/or replacement of the affected flanges and/or interfacing components. The staff finds this acceptable because the applicant has made a commitment to take appropriate measures in the event that galvanic corrosion is determined to potentially affect the structural integrity of the strainer flanges and suppression chamber attachments. This is Commitment #50 in Appendix A of this SER.

The staff has also reviewed Section A.3.5.2.2 in the supplement to the Dresden and Quad Cities UFSARs. The section does not reflect the applicant's commitment to take appropriate measures in the event that galvanic corrosion is determined to potentially affect the structural integrity of the strainer flanges and suppression chamber attachments. In RAI A.3.5.2.2, the applicant was requested to include the commitment to take the appropriate measures in the supplement to the UFSARs. The applicant stated in its response to the RAI, dated December 17, 2003, that a statement will be added to the UFSAR section stating that in the event that the measured galvanic corrosion rate will not ensure acceptable thickness to the end of the 60-year licensed operating period, appropriate corrective action will be identified and implemented to maintain the structural integrity of the strainer flanges. With this additional information, the staff finds Section A.3.5.2.2 acceptable, because it provides a reasonable summary of the information presented in Section 4.7.2.3 of the LRA.

4.7.2.3.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(ii), that the analyses have been projected to the end of the period of extended operation for the galvanic corrosion in the containment shell and attached piping components caused by stainless steel emergency core cooling system suction strainers TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the galvanic corrosion in the containment shell and attached piping components caused by stainless steel emergency core cooling system suction strainers TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7.3 Crack Growth Calculation of a Postulated Flaw in the Heat Affected Zone of an Arc Strike in the Suppression Chamber Shell

4.7.3.1 Summary of Technical Information in the Application

The applicant reported in the LRA that arc strikes found during 1990 in the Dresden and Quad Cities suppression chamber walls were evaluated using a common analysis. The evaluation included crack growth calculations that assumed 850 load cycles resulting from SRV and other operations over 40 years of plant life. A further evaluation in 1997 determined that the depth of the arc strike at Dresden was not sufficient to warrant any final repairs. Assuming an operating limit of 850 SRV load cycles, the applicant indicated that no further action was warranted. The applicant performed an ultrasonic measurement at Quad Cities that it claimed validated that no flaw existed in the heat-affected zone of the original arc strike. The applicant performed an evaluation and determined that further repairs or inspections were not warranted.

The LRA noted that the number of SRV actuations used in the Quad Cities containment analysis is 550 for 40 years compared to the 850 actuations assumed for the flaw evaluation. The applicant stated that the expected number of SRV actuations from the year that the flaw was repaired (1990) to the end of the extended operating period in 2032 would be at most $(550/40) \times (2032-1990) = 577.5$, which is less than the 850 actuations assumed for flaw evaluation. Therefore, the applicant indicated that the evaluation remains valid for Quad Cities for the extended period of operation.

The LRA noted that the number of SRV actuations used in the Dresden containment analysis is 300 for 40 years compared to the 850 actuations assumed for the flaw evaluation. The current license for Dresden Unit 3 will expire in 2011, and the Dresden flaw was repaired in 1991. The applicant stated that the expected number of SRV actuations from the year the flaw was repaired to the end of the extended operating period in 2031 would be at the most $(300/40) \times (2031-1991) = 300$, which is less than the 850 actuations assumed for the flaw evaluation. Therefore, the applicant indicated that the evaluation remains valid for Dresden for the extended period of operation.

4.7.3.2 Staff Evaluation

Per 10 CFR 54.21(c)(1), applicants for license renewal must demonstrate that TLAAAs have been projected through the end of the period of extended operation and remain valid for the period of extended operation. Alternatively, the applicant may demonstrate that the effects of aging that are applicable to the components evaluated by the TLAAAs will be managed during the period of extended operation. The applicant stated that the crack growth calculations for arc strikes will project through the end of the period of extended operation.

The staff reviewed the information provided in the LRA and in a letter dated August 7, 2003, requested that the applicant clarify information provided on this TLAA. In RAI 4.7.3, the applicant was requested to clarify if flaws were actually detected or were only postulated flaws, to clarify if ASME Code Section XI fracture mechanics methodology and acceptance criteria were used for evaluation of crack growth, and to describe any alternative method and acceptance criteria that were used.

In a letter dated October 3, 2003, the applicant responded to the staff's request for additional information. The response to the RAI indicated that the flaws were largely of a postulated nature and were assigned to bound possible damage at the arc strikes. In many cases, further ultrasonic examination indicated that no flaws were detected at the locations of concern. The applicant further responded that fracture mechanics evaluation applied the acceptance criteria of the ASME Code as defined in NUREG-0661, "Safety Evaluation Report, Mark 1 Containment Long Term Program, Resolution of Generic Technical Activity." Because the applicant applied the methodology of the ASME Code which has been previously approved by the staff, the staff finds the response acceptable.

4.7.3.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i) that the analyses remain valid for the crack growth calculation of a postulated flaw in the heat-affected zone of an arc strike in the suppression chamber shell TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the crack growth calculation of a postulated flaw in the heat-affected zone of an arc strike in the suppression chamber shell TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7.4 Radiation Degradation of Drywell Shell Expansion Gap Polyurethane Foam

4.7.4.1 Summary of Technical Information in the Application

The applicant describes the analysis of radiation degradation of the drywell shell expansion gap polyurethane foam in Section 4.7.4 of the LRA. The drywell shell is described as being largely enclosed within the structural and shielding concrete of the reactor building. To accommodate thermal expansion of the drywell, compressible foam was used to form an expansion gap between the concrete and the drywell shell. An analysis performed by the applicant evaluated the increase in external compressive loads on the drywell exterior from additional compression

of this foam for normal, refuel, and accident conditions. The effect on this analysis of a postulated increase in the foam stiffness resulting from a radiation dose is a TLAA.

The applicant stated that the polyurethane foam material was chosen for its resistance to the environmental conditions likely to exist during its service life and with characteristics such that the effects of compression during a LOCA resulting in thermal expansion of the drywell would not exceed ASME Code allowable limits. Test results established that there was no detectable change in resilience below 10^8 rads. The original design considered the effects of a 40-year lifetime dose of 2.5×10^7 rads on the foam material. Thus, the applicant stated that the resilient characteristics of the polyurethane foam will remain intact during the 40-year design life.

The LRA indicated that a 20-year increase in the design lifetime to 60 years, combined with approved increases in power rating, would conservatively result in a total radiation exposure of 4.2×10^7 rads which is less than the 10^8 rads qualified radiation exposure. Therefore, the applicant indicated that material properties will remain within the limits assumed by the original design analysis, in accordance with the aging assumptions assumed by the original design, for the 60-year extended operating period.

4.7.4.2 Staff Evaluation

Per 10 CFR 54.21(c)(1), applicants for license renewal must demonstrate that TLAA's for license renewal have been projected through the end of the period of extended operation for their facilities, remain valid for the period of extended operation, or demonstrate that the effects of aging that are applicable to the components evaluated by the TLAA's will be managed during the period of extended operation.

The staff reviewed the information provided in the LRA and in a letter dated August 7, 2003, requested additional information from the applicant related to the test methods used and factors considered in determining the radiation stability of the polyurethane (RAI 4.7.4). In a letter dated October 3, 2003, the applicant responded, noting that the irradiation testing of the polyurethane foam was conducted more than 30 years ago and that additional information on the tests is not available. For justification that the tests provide a satisfactory basis for predicting of the acceptable dose within the required uncertainty limits, the applicant relied on the test results showing no predictable loss of resiliency below 10^8 rads and the predicted end of life exposure to be 4.2×10^7 rads. The staff identified that the polyurethane foam radiation limit was previously reviewed by the staff in an SER, and the limit is considered part of the applicant's CLB. The staff finds the applicant's analysis acceptable because the analysis has been projected through the end of the period of extended operation and remains within the limits established in the applicant's CLB.

Based on the review of the LRA and the applicant's response to RAI 4.7.4, the staff found that the analysis performed to evaluate the effects of extended life on the radiation degradation of the drywell shell expansion gap polyurethane foam is appropriate and provides a basis for concluding that the safety margins established and maintained during the current operating period will be maintained during the extended period of operation.

4.7.4.3 Conclusions

On the basis of its review, the staff concludes that the applicant has provided an acceptable demonstration, pursuant to 10 CFR 54.21(c)(1)(i) that the analyses remain valid for the radiation degradation of drywell shell expansion gap polyurethane foam TLAA. The staff also concludes that the UFSAR Supplement contains an appropriate summary description of the radiation degradation of drywell shell expansion gap polyurethane foam TLAA evaluation for the period of extended operation, as required by 10 CFR 54.21(d). Therefore, the staff has reasonable assurance that the safety margins established and maintained during the current operating term will be maintained during the period of extended operation, as required by 10 CFR 54.21(c)(1).

4.7.5 High-Energy Line Break Postulation Based on Fatigue Cumulative Usage Factor

This issue is included only because it is listed as a possible TLAA in NUREG-1800. Neither the Dresden nor the Quad Cities postulated break locations are based on a fatigue usage factor criterion, nor are any break locations based on any other evaluation of fatigue effects. This is not a TLAA for either Dresden or Quad Cities.

4.8 Conclusion for Time-Limited Aging Analyses

The staff has reviewed the information in Section 4 of the LRA. On the basis of its review, the staff concludes that the applicant has provided an adequate list of TLAAs, as defined in 10 CFR 54.3. Further, the staff concludes that the applicant has demonstrated that the TLAAs (1) will remain valid for the period of extended operation, as required by 10 CFR 54.21(c)(1)(i), (2) have been projected to the end of the period of extended operation, as required by 10 CFR 54.21(c)(1)(ii), or (3) the aging effects will be adequately managed for the period of extended operation, as required by 10 CFR 54.21(c)(1)(iii). In addition, the staff concludes that there are no plant-specific exemptions in effect that are based on TLAAs, as required by 10 CFR 54.21(c)(2). On this basis, the staff has reasonable assurance that the aging effects associated with the structures and components subject to TLAAs will perform their intended functions in accordance with the CLB during the period of extended operation, as required by 10 CFR 54.21(a)(3).

5. REVIEW BY THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

The NRC staff issued its safety evaluation report (SER) with open items related to the renewal of operating licenses for Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2, on February 12, 2004. On April 14, 2004, the applicant presented its license renewal application, and the staff presented its review findings, to the ACRS Plant License Renewal Subcommittee. The staff reviewed the applicant's comments on the SER and completed its review of the license renewal application. The staff's evaluation is documented in this SER that was issued by letter dated July 23, 2004.

During the 515th meeting of the ACRS, September 9-11, 2004, the ACRS completed its review of the Dresden and Quad Cities license renewal application and the NRC staff's SER. The ACRS documented its findings in a letter to the Commission dated September 16, 2004. A copy of this letter is provided on the following pages of this SER Section. The Committee recommended approval of the license renewal application with the inclusion of two conditions. The staff's response to these recommendations is discussed below.

With regard to operating experience at extended power uprate (EPU) levels, the Committee noted that Dresden and Quad Cities have limited operating time at EPU levels and the staff should, prior to entering the period of extended operation, require that the applicant conduct an evaluation of operating experience at all four units and at other BWR plants operating at EPU levels. The letter also noted that all license renewal applicants that plan to operate during the license renewal period at EPU levels that are substantially higher than experienced in the bases supporting their license renewal applications should conduct similar evaluations of operating experience at EPU levels. Exelon will perform such an evaluation and will submit this evaluation to the NRC for review and approval prior to entering the period of extended operation. This is Commitment #51 in Appendix A of this SER.

With regard to the steam dryers being in the scope of license renewal for Dresden and Quad Cities, the Committee noted that the applicant had not provided appropriate justification for their exclusion. The steam dryers are not safety related, but structural failure can cause pieces to pass through safety related components, and could cause them to fail to operate properly. The staff agrees with this recommendation and the applicant has now included the steam dryers into the scope of license renewal for the Dresden Units 2 and 3 and Quad Cities Units 1 and 2, as discussed in Section 2 of this SER. This is also consistent with the requirement in 10 CFR 54.4(a)(2) for structures, systems, and components within the scope of license renewal. The staff is currently working with the industry to develop generic guidance in this area. The aging management program would be the NRC approved Boiling Water Reactor Vessel Internals Program (BWRVIP) Steam Dryer Inspection and Evaluation Guidelines as approved by the staff. Exelon has committed to follow this NRC/Industry effort and has committed to that, if the BWRVIP Steam Dryer Inspection and Evaluation Guideline is not approved by the staff, then a plant-specific aging management program will be submitted to the NRC for review and approval by December 22, 2007, which is 2 years before the first Dresden unit enters the period of extended operation. This is part of Commitment #9 in Appendix A of this SER.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001

ACRSR-2091

September 16, 2004

The Honorable Nils J. Diaz
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 2005-0001

SUBJECT: REPORT ON THE SAFETY ASPECTS OF THE LICENSE RENEWAL
APPLICATION FOR THE DRESDEN 2 AND 3 AND QUAD CITIES 1 AND 2
NUCLEAR POWER STATIONS

Dear Chairman Diaz:

During the 515th meeting of the Advisory Committee on Reactor Safeguards, September 9-11, 2004, we completed our review of the license renewal application for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 Nuclear Power Stations and the final Safety Evaluation Report (SER) prepared by the NRC staff. Our Plant License Renewal Subcommittee also reviewed this matter during a meeting on April 14, 2004. During our review, we had the benefit of discussions with representatives of the NRC staff and Exelon Generation Company, LLC (Exelon). We also had the benefit of the documents referenced.

RECOMMENDATIONS AND CONCLUSION

1. With the inclusion of the conditions in Recommendations 2 and 3, the application for license renewal for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 should be approved.
2. The staff should require that, prior to entering the period of extended operation, Exelon conduct an evaluation to ensure that operating experience at extended power uprate (EPU) levels is properly addressed by the aging management programs. The staff should review and approve this evaluation.
3. The steam dryers should be included in the scope of license renewal for Dresden and Quad Cities.
4. The staff should develop guidance to apply Recommendations 2 and 3 to future boiling water reactor (BWR) license renewal applications.

BACKGROUND AND DISCUSSION

This report fulfills the requirement of 10 CFR 54.25, which states that the ACRS review and report on all license renewal applications. Dresden Units 2 and 3 and Quad Cities Units 1 and 2 are General Electric BWR/3 plants, with Mark 1 containments. Exelon requested renewal of

their operating licenses for 20 years beyond the current license terms, which expire on December 22, 2009, for Dresden Unit 2 and January 12, 2011, for Dresden Unit 3, and December 14, 2012, for both Quad Cities units. The Dresden units were designed with isolation condensers for core isolation cooling whereas the Quad Cities units have the more typical reactor core isolation cooling system. The Dresden units have a separate shutdown cooling system whereas Quad Cities units have the more typical arrangement in which shutdown cooling is achieved as an operational mode of the residual heat removal system.

Dresden Units 2 and 3 share the site and surrounding areas with Unit 1, a dual-cycle BWR that has been placed in a safe storage condition until Units 2 and 3 are ready for decommissioning. Unit 1 systems, structures, and components (SSCs) which support the operation of Units 2 and 3 are included in the scope of license renewal.

The final SER documents the staff's review of the information submitted by Exelon, including commitments that were necessary to resolve open items identified by the staff in the initial SER. The staff reviewed the completeness of the applicant's identification of SSCs that are within the scope of license renewal; the integrated plant assessment process; the applicant's identification of the plausible aging mechanisms associated with passive, long-lived components; the adequacy of the applicant's aging management programs; and the identification and assessment of time-limited aging analyses (TLAAs) requiring review.

The staff also conducted several inspections at Exelon's engineering offices and at the Dresden and Quad Cities sites to verify the adequacy and implementation of the methodology described in the application. During our Plant License Renewal Subcommittee meeting on April 14, 2004, the staff presented a well structured and effective overview of its inspections and audits.

Dresden and Quad Cities have been approved for an EPU to 2957 MWt. The EPU increased power output by 17% at both Dresden units and 17.8% at both Quad Cities units. Shortly after operating at the EPU level, Quad Cities Unit 2 experienced unexpected high moisture carryover, which was caused by a damaged steam dryer. The applicant repaired the dryer and the unit was returned to service. Shortly thereafter, similar damage was identified in Unit 1 and then again in Unit 2. The applicant has since chosen to operate Quad Cities Units 1 and 2 at pre-EPU power levels until the root cause of the dryer damage can be determined.

Dresden and Quad Cities have limited operating time at the EPU levels and during that period, several problems believed to be associated with the EPU have occurred at Quad Cities. Most notable is the steam dryer damage, but other problems with limit and pressure switches have also occurred. After operation at the higher power level (2957 MWt), but prior to entering the period of extended operation, the staff should require that the applicant conduct an evaluation of operating experience at all four units and at other plants operating at EPU levels, to ensure that this experience has been properly addressed by the aging management programs. The staff should review and approve this evaluation.

Such an evaluation should be required of all license renewal applicants that plan to operate during the license renewal period at EPU levels that are substantially higher than experienced in the bases supporting their license renewal applications. Such an evaluation is consistent with the intent of 10 CFR 54.17(c) that substantial operating experience be reflected in the bases supporting the license renewal application. Current operating experience at EPU levels is limited and an understanding of the impact of operation at such levels on plant components is

only now beginning to develop. A recent BWR Owners Group (BWROG) survey of EPU plants has identified component failures, potential decreases in time between failures, unexpected increases in component wear, and a significant number of events, which are all directly attributable to EPUs. It is therefore important that the staff require, after sufficient plant-specific operating experience is available at the EPU level but before entering the period of extended operation, that license renewal applicants ensure applicable operating experience at EPU levels has been properly addressed by aging management programs. The staff should also provide guidance in this area.

During our review, we questioned why certain SSCs were not included in the scope and, in all but one case, the applicant provided appropriate justification for the exclusions. That case was the steam dryers at these plants. Although the dryers are not safety related, structural failure at Quad Cities caused pieces to pass down the main steamlines and some of these pieces were found on the turbine stop valve screens. These pieces passed through the Main Steam Isolation Valves (MSIVs), which are safety related components, and could have caused these valves to fail to operate properly. Since the MSIVs are safety related, this meets the criteria for inclusion of the steam dryers in the scope of license renewal in accordance with 10 CFR 54.4(a)(2). The steam dryers at Dresden and Quad Cities should be included in scope even if an analysis demonstrates that future failures are unlikely. Further, steam dryers for all BWRs seeking license renewal should be within scope based on 10 CFR 54.4(a)(2). The staff should develop guidance on this topic so that the NRC position on this matter is clearly understood by the industry.

The applicant performed a comprehensive aging management review of all SSCs that are within the scope of license renewal. The application describes 48 aging management programs for license renewal, which include existing, augmented, and new programs. As with other applicants, we encouraged Exelon to establish a schedule for implementing license renewal commitments well ahead of the beginning of the license renewal period to preclude placing an unreasonable demand on applicant and NRC resources.

Aging degradation of reactor vessel internals has been an ongoing problem in BWRs. The applicant has committed to programs developed by the BWR Vessel and Internals Project (BWRVIP) to manage these problems. We questioned if the clamping device installed in 1995 to mitigate core shroud cracking had been evaluated for the period of extended operation. The applicant has committed to follow the BWRVIP-76 program, as approved by the staff, to manage aging effects on the core shroud and other hardware. The staff is currently reviewing this program and will evaluate the adequacy of the recommended inspection intervals in light of the accumulating evidence of fluence, strength, and surface effects on cracking of (for example) 316L and the lack of comparable data for XM-19 and X750.

In 1994, Dresden experienced a failure due to corrosion of the carbon steel piping to the instrument air receiver. We questioned whether this corrosion was an ongoing aging effect. The staff responded that this piping has been replaced with stainless steel and that the air receiver was replaced with one having epoxy coating applied to the interior. The moisture separator drain trap was also modified. These modifications should reduce moisture accumulation and corrosion. The applicant has also instituted a periodic blowdown program and no subsequent failures have occurred.

In the license renewal application, Exelon has identified the components that are supported by TLAAs. Their review of the TLAAs shows that the analyzed components have sufficient margin to operate for the period of extended operation.

We reviewed the Reactor Vessel Upper Shelf Energy for limiting plates and welds for all four units. All are acceptable for the period of extended operation, including the most limiting weld at Quad Cities Unit 2, which was found acceptable based on a plant-specific equivalent margins analysis. We are satisfied with the staff's review of the applicant's data and calculations.

The staff is currently reviewing BWRVIP-116, "BWR Integrated Surveillance Program Implementation for License Renewal." The applicant has agreed to a license condition to notify the NRC, before entering the period of extended operation, of their decision to implement either the staff-approved BWRVIP integrated surveillance program (ISP) or a staff-approved plant-specific ISP.

On the basis of our review of the final SER, we agree with the staff's conclusion that all open and confirmatory items have been appropriately closed. We also concur with all three license conditions requiring the applicant to take certain actions before beginning the period of extended operation.

With the inclusion of commitments to perform an evaluation of operating experience at the EPU levels before entering the period of extended operation and to include steam dryers in the scope of license renewal, the application for license renewal for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 should be approved.

Sincerely

/RA/

Mario V. Bonaca
Chairman

References:

1. U.S. Nuclear Regulatory Commission, "Safety Evaluation Report Related to the License Renewal of the Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2," July 2004.
2. Exelon Generation Company, "License Renewal Application for Dresden Nuclear Power Station (DNPS), Units 2 and 3, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2," January 2003.
3. U.S. Nuclear Regulatory Commission, "Safety Evaluation Report with Open Items Related to the License Renewal of the Dresden Nuclear Power Station, Unit 2 and 3 and Quad Cities Nuclear Power Station, Unit 1 and 2." February 2004.
4. U.S. Nuclear Regulatory Commission Inspection Reports 50-237,249/03-04 and 50-254,265/03-04, NRC License Renewal Scoping/Screening Inspection Report, September 15, 2003.
5. U.S. Nuclear Regulatory Commission Inspection Report 50-237,249/03-10, NRC Aging Management Program Inspection Report, December 5, 2003.
6. U.S. Nuclear Regulatory Commission Inspection Report 50-254,265/03-14, NRC Aging Management Program Inspection Report, December 5, 2003.

7. Electric Power Research Institute, "BWR Vessel and Internals Project BWR Core Shroud Inspection and Flaw Evaluation Guidelines (BWRVIP-76)," January 2000.
8. Electric Power Research Institute, "BWRVIP-116: BWR Vessel and Internals Project Integrated Surveillance Program (ISP) Implementation for License Renewal," July 2003.

6. CONCLUSIONS

The staff reviewed the license renewal application for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2, in accordance with Commission regulations and the NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," dated July 2001. The standards for issuance of renewed license are provided in Title 10, Section 54.29, of the *Code of Federal Regulations* (10 CFR 54.29).

On the basis of its evaluation of the application, as discussed above, the staff concludes that the requirements of 10 CFR 54.29(a) have been met, and all open items and confirmatory items of this safety evaluation report have been resolved.

The staff notes that any requirements of Subpart A of 10 CFR Part 51 are documented in the final plant-specific supplement to the Generic Environmental Impact Statements issued on June 29, 2004 for Dresden, and June 30, 2004, for Quad Cities.

THIS PAGE IS INTENTIONALLY LEFT BLANK

APPENDIX A COMMITMENTS FOR LICENSE RENEWAL

During the review of the Dresden/Quad Cities Nuclear Power Station (D/QCNPS) license renewal application (LRA) by the U.S. Nuclear Regulatory Commission (NRC) staff, the applicant made commitments related to aging management programs (AMPs) to manage aging effects of structures, systems, and components (SSCs) before the period of extended operation. The following table lists these commitments, along with the implementation schedule and the source of the commitment.

THIS PAGE IS INTENTIONALLY LEFT BLANK

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
1) ASME Code, Section XI Inservice Inspection, Subsections IWB, IWC, and IWD	Existing program is credited. Both Dresden and Quad Cities will be implementing RI-ISI and its alternative inspections for Class 1 and 2 piping within the scope of license renewal. The requirements of ASME Code, Section XI will be implemented in accordance with 10 CFR 50.55(a).	A.1.1	Prior to the period of extended operation	LRA Section B.1.1; Response to RAI 3.1-25 and RAI B.1.1, letter RS-03-181, dated October 3, 2003
2) Water Chemistry	Existing program is credited. The program will be enhanced to provide increased sampling to verify corrective actions are taken to address abnormal chemistry conditions. The Quad Cities procedure for turbine building sample panel collection will be revised to assure maintenance of the integrity of chemistry samples.	A.1.2	Prior to the period of extended operation	LRA Section B.1.2
3) Reactor Head Closure Studs	Existing program is credited.	A.1.3	Ongoing	LRA Section B.1.3
4) BWR Vessel ID Attachment Welds	Existing program is credited	A.1.4	Ongoing	LRA Section B.1.4
5) BWR Feedwater Nozzle	Existing program is credited. The program will be enhanced to implement the recommendations of Revision 1, Version A of report GE-NE-523-A71-0594-A, Revision 1, which was approved by the NRC staff.	A.1.5	Prior to the period of extended operation	LRA Section B.1.5; Response to Supplemental RAI B.1.5, letter RS-03-223, dated November 21, 2003
6) BWR Control Rod Drive Return Line Nozzle	Existing Program is Credited	A.1.6	Ongoing	LRA Section B.1.6

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
7) BWR Stress Corrosion Cracking	Existing program is credited. The program will be enhanced to include an additional ultrasonic examination of the Quad Cities Unit 2 reactor vessel head crack (detected in 1990) to verify that the relevant indication has remained essentially unchanged. The examination will be completed by the end of 2018 (plus or minus 2 years).	A.1.7	End of 2018 (plus or minus 2 years)	LRA Section B.1.7; Response to Supplemental RAI 3.1-1, letter RS-03-235, dated December 17, 2003
8) BWR Penetrations	Existing program is credited.	A.1.8	Ongoing	LRA Section B.1.8

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
9) BWR Vessel Internals	<p>Existing program is credited. The program will be enhanced as follows:</p> <p>(1) Additional inspections will be performed when new inspection techniques and tooling are developed, incorporated into applicable BWRVIP document(s), and approved by the NRC.</p> <p>(2) Dresden and Quad Cities agree to perform inspections of the top guide similar to inspections of the control rod drive housing guide tube. However, Exelon reserves the right to modify the above agreed upon inspection program should the BWRVIP-26 be revised in the future.</p> <p>(3) The steam dryers will be in the scope of license renewal for Dresden and Quad Cities for 10CFR54.4(a)(2). The aging effect that needs to be managed is cracking. The aging management program will be the NRC approved BWRVIP Steam Dryer Inspection and Evaluation Guideline. If the BWRVIP Steam Dryer Inspection and Evaluation Guideline is not approved by the NRC in a timely manner, then a plant specific aging management program will be submitted to the NRC for review and approval by December 22, 2007, which is 2 years before the first Dresden unit enters the period of extended operation.</p>	A.1.9	As approved by the NRC	LRA Section B.1.9; Response to RAIs 4.2-BWRVIPs and B.1.9, letter RS-03-181, dated October 3, 2003; responses to Supplemental RAIs 4.2-BWRVIP and B.1.9(d), letter RS-03-223, dated November 21, 2003; RS-04-080, dated May 27, 2004; RS-04-145, dated October 8, 2004

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
10) Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS)	An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of CASS reactor internal components within the scope of license renewal. A component specific evaluation for the loss of fracture toughness will be included. For those components where the loss of fracture toughness may affect the function of the component, an inspection will be performed as part of the ISI program.	A.1.10	Prior to the period of extended operation	LRA Section B.1.10
11) Flow-Accelerated Corrosion	Existing program is credited. The program will be enhanced to include portions of the main steam and the reactor vessel head vent systems that are within the scope of license renewal.	A.1.11	Prior to the period of extended operation	LRA Section B.1.11, response to RAI 3.1-18, letter RS-03-181, dated October 3, 2003

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
12) Bolting Integrity	<p>Existing program is credited. The program will be enhanced to do the following:</p> <p>(1) Credit periodic in-service Inspection piping and component preventive maintenance inspections, system engineering walkdowns, and routine walkdowns to inspect for leakage and visual indications of loose bolts; trend walkdown results</p> <p>(2) Manage the loss of preload for closure bolting in the reactor vessel system, recirculation pumps, reactor recirculation valves, reactor vessel head vent valves, and the reactor pressure boundary portion of all other systems.</p> <p>(3) Credit periodic inspections of the closure bolting in accordance with the ASME Code Section XI requirements.</p> <p>(4) Inspect bolted joints of diesel generator system components, component bolted joint inspections in high-humidity/moisture areas (pump vaults), and reactor vessel-to-ring girder bolting.</p> <p>(5) Enhance implementing procedure to reference NUREG-1339.</p>	A.1.12	Prior to the period of extended operation	LRA Section B.1.12; response to Supplemental RAI 3.5-13, letter RS-03-227, dated December 5, 2003; response to RAI 3.1-13, letter RS-03-181, dated October 3, 2003; response to Supplemental RAI 3.1-13, letter RS-03-223, dated November 21, 2003; response to RAI B.1.12(d), letter RS-03-181, dated October 3, 2003

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses				
Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
13) Open-Cycle Cooling Water Program	Existing program is credited. The program will be enhanced to include periodic inspections of cooling water pump internal linings, additional heat exchangers and sub-components, external surfaces of various submerged pumps, components in the high humidity/moisture environments of the pump vaults, and piping. At Dresden only, periodic visual inspections will be performed of strainer internals in the CCSW supply line to the main control room HVAC.	A.1.13	Prior to the period of extended operation	LRA Section B.1.13; response to Supplemental RAI B.1.13(a), letter RS-03-235, dated December 17, 2003
14) Closed-Cycle Cooling Water Program	Existing program is credited. The program will be enhanced to provide monitoring of specific parameters in accordance with EPRI TR-107396 guidance. This will include provisions for monitoring parameters such as pH, specific gravity, freeze point, reserve alkalinity, percent glycol and suspended solids in glycol based systems as appropriate. At Dresden, the program will include monitoring of pH and ammonia in the diesel generator jacket water.	A.1.14	Prior to the period of extended operation	LRA Section B.1.14
15) Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems	Existing program is credited. The program will be enhanced to include specific inspections for rail wear and proper crane travel on the rails, and for corrosion of crane structural components.	A.1.15	Prior to the period of extended operation	LRA Section B.1.15

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
16) Compressed Air Monitoring	Existing program is credited. The program will be enhanced to include periodic inspections on those portions of the instrument air distribution piping in the scope of license renewal. The program will also include additional air sample points representative of the in-scope piping. Additionally, at Dresden only, periodic blowdowns will be provided of the instrument air receiver tanks.	A.1.16	Prior to the period of extended operation	LRA Section B.1.16; response to Supplemental RAI B.1.16-01, letter RS-04-073, dated May 18, 2004
17) BWR Reactor Water Cleanup System	Existing program is credited.	A.1.17	Ongoing	LRA Section B.1.17

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
18) Fire Protection	<p>Existing program is credited. The program will be enhanced as follows:</p> <p>(1) Specific guidance will be provided to check fire doors for wear and holes in skin. At Quad Cities only, the program will be revised to include the requirement to check fire door clearances.</p> <p>(2) Periodic inspections will be performed for corrosion on the external surfaces of piping and components for the carbon dioxide systems; and for the external surfaces of the Dresden halon system.</p> <p>(3) Specific guidance will be provided for examining the fire pumps and the Dresden isolation condenser makeup pump diesel fuel supply systems for leaks during pump tests.</p> <p>(4) Periodic capacity tests will be performed on the Dresden isolation condenser diesel-driven makeup pumps.</p> <p>(5) At Dresden, frequency of inspections will be provided for fire doors and spill barriers.</p> <p>(6) The program will be revised to perform a visual inspection (VT-1 or equivalent) on a 10% sample population of each type of fire seal on a refueling outage frequency. Additionally, the program will be revised to expand the sample population by 10% if any of the inspected seals are found to have abnormal degradation that could prevent the seal from performing its intended function.</p>	A.1.18	Prior to the period of extended operation	LRA Section B.1.18; response to Supplemental RAI B.1.18-01, letter RS-03-222, dated November 20, 2003; NRC Aging Management Program Audit Report, dated April 23, 2004

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
19) Fire Water System	<p>Existing program is credited. The program will be enhanced as follows:</p> <p>(1) Periodic non-intrusive wall thickness measurements will be provided of selected portions of the fire water system.</p> <p>(2) Periodic inspections will be performed on the external surfaces of submerged fire pumps, outdoor fire hydrants, and outdoor transformer deluge system components.</p> <p>(3) Sampling of sprinklers will be performed in accordance with NFPA 25, "Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems."</p>	A.1.19	Prior to the period of extended operation	LRA Section B.1.19
20) Above-ground Carbon Steel Tanks	<p>Existing program is credited. The program will be enhanced as follows:</p> <p>(1) Periodic system engineer walkdowns will be performed on the nitrogen storage tanks utilizing stand-alone procedures.</p> <p>(2) At Quad Cities, a one-time UT thickness inspection will be performed of the aluminum condensate storage tank or demineralized water storage tank.</p> <p>(3) At Dresden, periodic internal/external inspections of the aluminum storage tanks will be performed, and periodic UT thickness inspections will be performed of the bottoms will be performed</p>	A.1.20	Prior to the period of extended operation	LRA Section B.1.20; responses to Supplemental RAIs B.1.2 and B.1.20, letter RS-03-222, dated November 20, 2003; NRC Aging Management Program Inspection Report 05000237/2003010(DRS); 05000249/2003010(DRS); 05000254/2003014(DRS); 05000265/2003014(DRS), dated December 5, 2003

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
21) Fuel Oil Chemistry	Existing program is credited. The program will be enhanced to include inspection of the fuel oil storage tank interiors for corrosion during regularly scheduled tank cleanings.	A.1.21	Prior to the period of extended operation	LRA Section B.1.21; response to RAI B.1.21, letter RS-03-180, dated October 3, 2003
22) Reactor Vessel Surveillance	Existing program is credited. The program will be enhanced as follows: (1) The Integrated Surveillance Program (ISP) for the license renewal period (in accordance with proposed BWRVIP-116) will be implemented when approved by the NRC. (2) If BWRVIP-116 is not approved, a plant-specific surveillance plan will be provided for the license renewal period in accordance with Appendices G and H to 10 CFR Part 50	A.1.22	Prior to the period of extended operation	LRA Section 3.1.1.1.4, LRA Section B.1.22, response to RAI B.1.22, letter RS-03-181, dated October 3, 2003; response to Supplemental RAI B.1.22, letter RS-03-223, dated November 21, 2003

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
23) One-Time Inspection	<p>One-time inspection sampling will be performed on the following:</p> <ul style="list-style-type: none"> (1) at Dresden, spent fuel pool cooling and demineralizer system components for corrosion in stagnant locations (2) condensate and torus water components for corrosion in stagnant locations (3) compressed gas system piping components for corrosion (4) compressed gas system flexible hoses for age related degradation (5) lower sections of carbon steel fuel oil and lubricating oil tanks for reduced thickness (6) fuel oil and lubricating oil piping and components for corrosion (7) control room ventilation, EDG ventilation, SBO building ventilation, reactor building ventilation, and standby gas treatment system components for loss of material (8) HPCI lubrication oil hoses for age related degradation (9) non-safety-related vent and drain components for age related degradation (10) 10 CFR 54.4(a)(2) components for corrosion (11) piping exposed to containment atmosphere for loss of material (12) torus saddle supports to confirm condition of drywell radial beam lubrite baseplates 	A.1.23	Prior to the period of extended operation	<p>LRA Sections 3.2.1.1.3, 3.2.1.1.5, 3.5.1.1.6, and B.1.23; response to Supplemental RAI B.1.23-2.1, letter RS-04-014 dated January 26, 2004; response to RAIs 3.5-7 and 3.1-9, letter RS-03-201 dated October 3, 2003; response to Supplemental RAI 3.1-21(b), letter RS-03-223, dated November 21, 2003; response to Supplemental RAIs B.1.2, B.1.2-1, and 3.1-21(a), letter RS-03-238, dated December 22, 2003; responses to Supplemental RAIs 3.5-15 and 3.5-17, letter RS-03-227, dated December 5, 2003; letter RS-04-046, dated December 25, 2004</p>

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
24) Selective Leaching of Materials	A sample of components that are made of susceptible materials will be visually inspected for evidence of selective leaching. The sample will be expanded if failed conditions are identified.	A.1.24	Prior to the period of extended operation	LRA Section B.1.24
25) Buried Piping and Tanks Inspection	Existing program is credited. The program will be enhanced as follows: (1) A one-time visual inspection will be performed on the external surface of a section of buried ductile iron fire main piping (including a mechanical joint). (2) A one-time internal UT of one buried steel tank per site will be performed. (3) At Quad Cities, periodic leakage checks will be performed on buried carbon steel fuel oil storage tanks.	A.1.25	Prior to the period of extended operation	LRA Section B.1.25; response to RAI B.1.25, letter RS-03-181, dated October 3, 2003; response to Supplemental RAI B.1.25-1, letter RS-04-046, dated March 25, 2004

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
26) ASME Code, Section XI, Subsection IWE	<p>Existing program is credited. The program will be enhanced as follows:</p> <p>(1) The program will be based on the latest edition and addenda, which is approved by the NRC 12 months prior to the end of the current 120-month inspection interval.</p> <p>(2) The program will be updated in accordance with 10 CFR 50.55(a).</p> <p>(3) Additional inspections of the Dresden Unit containment shell for corrosion will be provided.</p> <p>(4) Requirements will be provided in Quad Cities procedures to ensure that sand pocket drains are clear.</p> <p>(5) The pressurized testing methodology will be credited for managing the aging of bellows.</p>	A.1.26	Prior to the period of extended operation	Response to RAI B.1.26, letter RS-03-180, dated October 3, 2003; responses to Supplemental RAIs 2.4-3, 3.5-5, 4.7.2.2-1, and 4.7.2.2-02, letter RS-03-227, dated December 5, 2003; response to Supplemental RAI B.1.27, letter RS-04-046, dated March 25, 2004; LRA Section B.1.26, response to RAI 3.5-6, letter RS-03-227, dated December 5, 2003

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
27) ASME Code, Section XI, Subsection IWF	Existing program is credited. The program will be enhanced to include inspection of Class MC component supports consistent with NUREG-1801, Chapter III, Section B1.3. The ASME Code, Section XI, Subsection IWF program will manage the aging of the following Class MC supports: (1) Biological Shield to Containment Stabilizer (2) RPV Male Stabilizer Attached to Outside of Drywell Shell (3) RPV Female Stabilizer and Anchor Rods (4) Suppression Chamber Ring Girder Vertical Supports and Base Plates (5) Suppression Chamber Saddle Supports and Base Plates (6) Suppression Chamber Seismic Restraints and Base Plates (7) Vent Header Vertical Column Supports	A.1.27	Prior to the period of extended operation	LRA Section B.1.27; Open Item 3.5.2.3.2.2-1; response to RAI 3.5-7, letter RS-03-180, dated October 3, 2003; response to Supplemental RAI 2.4-2, letter RS-03-0227, dated December 5, 2003; response to Supplemental RAI B.1.27, letter RS-04-046, dated March 25, 2004
28) Appendix J of 10 CFR Part 50,	Existing program is credited.	A.1.28	Ongoing	LRA Section B.1.28
29) Masonry Wall Program	Existing program is credited.	A.1.29	Ongoing	LRA Section B.1.29

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
30) Structures Monitoring Program	<p>Existing program is credited. The program will be enhanced to add the following which will be implemented prior to the period of extended operation:</p> <p>(1) inspections of structural steel components in secondary containment, flood barriers, electrical panels and racks, junction boxes, instrument panels and racks, and offsite power structural components and their foundations, and the Quad Cities discharge canal weir as part of the ultimate heat sink</p> <p>(2) periodic reviews of chemistry data on below-grade water to confirm that the environment remains non-aggressive for aggressive chemical attack of concrete or corrosion of embedded steel</p> <p>(3) inspection of a sample of non-insulated indoor piping external surfaces at locations immediately adjacent to periodically inspected piping supports and inspection of standard components such as snubbers, struts, and spring cans.</p> <p>(4) program reference to specific insulation inspection criteria for existing cold weather preparation and inspection procedures for outdoor insulation, and the establishment of new inspections for various indoor area piping and equipment insulation</p> <p>(5) inspection parameters for non-structural joints, roofing, grout pads and isolation gaps</p> <p>(6) Extension of inspection criteria to the structural</p>	A.1.30	Prior to the period of extended operation	LRA Sections B.1.30, 3.3.1.2.1, 3.5.1.1.7, 3.5.1.2.6, and 3.5.1.2.7; response to Supplemental RAI B.1.30, letter RS-03-227, dated December 5, 2003; response to Supplemental RAI B.1.27, letter RS-04-046, dated March 25, 2004; response to Open Item 3.5.2.3.2-1, letter RS-04-057, dated April 9, 2004 and letter RS-04-088 dated June 22, 2004, teleconference summary dated July 13, 2004.

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
31) RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants	Existing program is credited. The program will be enhanced to add the following: (1) monitoring of crib house concrete walls and slabs with an opposing side in contact with river water (2) inspection for structural integrity of concrete and steel components and identification of specific types of components to be inspected (3) periodic monitoring of the Dresden discharge outfall concrete structure (4) at Quad Cities, periodic inspections of the concrete of the discharge flume/canal and the weir gate in the discharge canal	A.1.31	Prior to the period of extended operation	LRA Section B.1.31; response to Supplemental RAIs 3.5-12 and B.1.31, letter RS-03-227, dated December 5, 2003
32) Protective Coating Monitoring and Maintenance Program	Existing program is credited. The program will be enhanced as follows: (1) visual inspection of Service Level I coatings near sumps or screens associated with the emergency core cooling system (2) pre-inspection review of previous reports so that trends can be identified for the program (3) analysis of coating failures to determine reasons for failures	A.1.32	Prior to the period of extended operation	LRA Section B.1.32

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
33) Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	A program will be developed that is consistent with NUREG-1801 AMP XI.E1 for electrical cables and connections installed in adverse localized environments not subject to 10 CFR 50.49 environmental qualification requirements.	A.1.33	Prior to the period of extended operation	LRA Section B.1.33; response to RAI B.1.33-3, letter RS-03-177, dated October 3, 2003
34) Metal Fatigue of Reactor Coolant Pressure Boundary	Existing program is credited. The program will be enhanced to utilize the EPRI-licensed FatiguePro computer program for monitoring fatigue at bounding locations for reactor pressure vessel, Class I piping, torus, torus vents, and torus attached piping and penetrations, SRV discharge lines, and the Dresden isolation condenser.	A.1.34, A.3.4	Prior to the period of extended operation.	LRA Sections 4.3.1, 4.3.2, 4.3.3.1, 4.6.1, 4.6.2 and B.1.34; response to RAI B.1.34, letter RS-03-180, dated October 3, 2003
35) Environmental Qualification (EQ) of Electrical Components	Existing program is credited.	A.1.35	Ongoing	LRA Section B.1.35
36) Boraflex Monitoring	Existing program is credited.	A.1.36	Ongoing	LRA Section B.1.36

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
37) Electrical Cables Not Subject to 10 CFR 50.49 Environmental Requirements Used in Instrument Circuits	A program will be developed to manage aging of cables in sensitive instrumentation circuits with low-level signals in the Nuclear Instrumentation Systems and Radiation Monitoring Systems. The program will include a review of calibration and surveillance results, and cable testing every 24 months (SRM, IRM circuits) for cable aging degradation before the period of extended operation and every 10 years thereafter. This program applies to the cables of the Nuclear Instrumentation Systems which includes source range monitors, intermediate range monitors, local power range monitors, and Radiation Monitoring Systems which includes drywell high range radiation monitors, main steam line radiation monitors, and the steam jet air ejector radiation monitors.	A.1.37	Prior to the period of extended operation	LRA Section B.1.37; Responses to RAIs 3.6-9 and B.1.33-1, letter RS-03-177, dated October 3, 2003; response to Supplemental RAI 3.6-09, letter RS-03-238, dated December 22, 2003
38) Inaccessible Medium-Voltage Cables Not Subject to 10 CFR 50.49 Environmental Requirements	At Dresden, a new condition monitoring program will be provided in accordance with NUREG-1801, AMP XI.E3 to manage aging of five inaccessible medium-voltage cables feeding the service water pumps. The cables will be tested at least once every ten years. The end of the cribhouse duct bank will be inspected annually to verify that the duct run is not plugged with debris.	A.1.38	Prior to the period of extended operation	LRA Section B.1.38; Response to Supplemental RAI 3.6-3, letter RS-03-222, dated November 20, 2003
39) Corrective Action Program	Existing program is credited.	A.2.1	Ongoing	LRA Section B.2.1

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
40) Periodic Inspection of Non-EQ, Non-Segregated Electrical Bus Ducts	<p>A program will be developed and implemented to periodically inspect non-segregated bus ducts that connect the reserve auxiliary transformers (RATs) to 4160V ESS buses, the non-segregated bus ducts that connect the EDG to the ESS buses, and, for Dresden only, the non-segregated bus ducts that connect ESS buses. The bus duct internal components and materials will be visually inspected for signs of aging degradation. The program will include the following:</p> <p>(1) inspection of accessible normally energized non-segregated bus duct internal components such as insulation materials, bus duct support pieces, gaskets, insulating boots, taped connections, and bus bar sleeves for material surface anomalies for non-segregated bus duct that connects the RATs to the 4160V ESS buses</p> <p>(2) inspection of bus bar insulation material at the accessible bolted connections of the non-segregated bus duct that connects the RATs to the 4160V ESS buses</p> <p>(3) inspection of 10% of the splice insulation material at the bolted connections (including all visible insulation in both directions beyond the location of the bolted connection splice insulation inspected) for the non-segregated bus duct that connects the EDG to the ESS buses and, for Dresden only, the non-segregated bus duct that</p>	A.2.2	Prior to the period of extended operation	LRA Section B.2.2; response to RAI 3.6-4, letter RS-03-177, dated October 3, 2003; responses to Supplemental RAIs 3.6-4, 3.6-7, and B.2.2-01, letter RS-03-227, dated December 5, 2003; response to Supplemental RAI B.2.2-1, letter RS-03-238, dated December 22, 2003.

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
41) Periodic Inspection of Ventilation System Elastomers	Existing program is credited. The program will be enhanced to include inspection of aging of all elastomers, flexible boots, access door seals and gaskets, filter seals and gaskets, and RTV silicone used as a duct sealant, in the components of the SBO ventilation and Reactor Building ventilation systems for Dresden, and the SBO ventilation and EDG Room ventilation systems for Quad Cities. The inspections will be performed to detect cracking, loss of material, and other evidence of aging. Tests of seals for hardening will be included if evidence of aging is found.	A.2.3	Prior to the period of extended operation	LRA Section B.2.3; letter RS-03-235, dated December 17, 2003
42) Periodic Testing of Drywell and Torus Spray Nozzles	Existing program is credited.	A.2.4	Ongoing	LRA Section B.2.4

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
43) Lubricating Oil Monitoring Activities	Existing program is credited. The program will be enhanced to include those components exposed to an environment of lubricating oil in the following systems: (1) the reactor core isolation cooling system (Quad Cities only) (2) the main generator hydrogen seal oil system (Quad Cities only) (3) the high pressure coolant injection system (4) the emergency diesel generator and auxiliaries system (5) the station blackout diesel system (6) the electro-hydraulic control system	A.2.5	Prior to the period of extended operation	LRA Section B.2.5; Response to RAI B.1.23-2, letter RS-03-180, dated October 3, 2003; Supplemental RAIs B.1.23-02.3 and B.1.23-02.4, letter RS-04-014, dated January 26, 2004

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
44) Heat Exchanger Test and Inspection Activities	<p>An aging management program will be developed and implemented for heat exchangers in the scope of license renewal that are not tested and inspected by the Open-Cycle Cooling Water System and Closed-Cycle Cooling Water System aging management programs.</p> <p>Specifically, for the Dresden isolation condensers, the augmentation activities identified in NUREG-1801, lines IV.C1.4-a and IV.C1.4-b to manage loss of material and cracking will also be included in this aging management program, and will provide the following:</p> <ul style="list-style-type: none"> (1) temperature and radioactivity monitoring of the shell-side (cooling) water (2) eddy current testing of the tubes (3) visual inspections of the channel head, tube sheets, and internal surfaces of the shell 	A.2.6	Prior to the period of extended operation	LRA Section B.2.6; response to Supplemental RAI 3.1-11, letter RS-03-223, dated November 21, 2003; response to Supplemental RAI 3.1-11, letter RS-03-238, dated December 22, 2003
45) Generator Stator Water Chemistry Activities	Existing program is credited.	A.2.7	Ongoing	LRA Section B.2.7
46) Periodic Inspection of Plant Heating System	An aging management program will be developed and implemented to inspect components in the Plant Heating system once before the end of the current operating term and periodically at intervals not to exceed once every 5 years during the period of extended operation.	A.2.8	Prior to the period of extended operation	LRA Section B.2.8; Response to RAI B.1.23, letter RS-04-046, dated March 25, 2004

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
47) Time-Limited Aging Analysis (TLAA) - Neutron Embrittlement of the Reactor Vessel and Internals	Revised P-T limits will be prepared and submitted to the NRC for approval prior to the start of the extended period of operation using an approved fluence methodology for Dresden and Quad Cities.	A.3.1.5	Prior to the period of extended operation	LRA Section 4.2.5; response to RAI 4.3.0, letter RS-03-180, dated October 3, 2003
48) TLAA - Metal Fatigue	<p>The Dresden Unit 2 jet pump riser braces will be repaired or replaced prior to the period of extended operation.</p> <p>Plant-specific calculations will be performed for applicable locations identified in NUREG/CR 6260, "Application of NUREG/CR-5999 Interim Fatigue Curves to Selected Nuclear Power Plant Components," for older-vintage BWR plants, to assess potential effects of reactor coolant on component fatigue life in accordance with 10 CFR 54.21(c)(1)(ii). Exelon reserves the right to modify this position in the future based on the results of industry activities currently underway, or based on other results of improvements in methodology, subject to NRC approval prior to changes in this position.</p>	<p>A.3.2.2.1</p> <p>A.3.2.4</p>	<p>Prior to the period of extended operation</p> <p>Prior to the period of extended operation</p>	<p>LRA Section 4.3.2.2; response to RAI 4.3.0, letter RS-03-180, dated October 3, 2003; response to RAI 4.3.2.2, letter RS-03-180, dated October 3, 2003</p> <p>LRA Section 4.3.4; response to Supplemental RAI 4.3.4, letter RS-03-235, dated December 17, 2003</p>

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
49) TLAA - Environmental Qualification of Electrical Equipment	A reanalysis will be applied to EQ components now qualified for the current operating term of 40 years. The EQ Binders for components within the scope of 10 CFR 50.49 will be updated to include environmental conditions associated with EPU implementation together with an extended operating period of 60 years.	A.3.3	Prior to the period of extended operation	LRA Section 4.4; response to RAI 4.3.0, letter RS-03-180, dated October 3, 2003
50) TLAA - Other Plant-Specific TLAA's	<p>The corrosion rate assumptions used in the calculation of the drywell steel plate remaining thickness at the sand pocket level will be confirmed by a Dresden Unit 3 UT inspection prior to the period of extended operation. The results will be used to revise the associated corrosion calculation and validate that an acceptable wall thickness will remain to the end of the 60-year licensed operating period.</p> <p>The corrosion rate assumptions used in the calculation of the ECCS Suction strainer flange remaining thickness will be confirmed by an ultrasonic inspection. One bounding inspection will be performed and results will be used to validate the corrosion rate for both sites. Based upon the results of the inspection, a revised galvanic corrosion calculation will be performed to ensure acceptable wall thickness to the end of the 60-year licensed operating period.</p>	<p>A.3.5.2.1</p> <p>A.3.5.2.2</p>	<p>Prior to the period of extended operation</p> <p>Prior to the period of extended operation</p>	<p>LRA Section 4.7.2.2</p> <p>LRA Section 4.7.2.3</p>

Appendix A - D/QCNPS Commitment List Associated with Renewal of the Operating Licenses

Item Number	Commitment	UFSAR Supplement Location (LRA App. A)	Implementation Schedule	Source
51)BWR Operating Experience - EPU levels	Exelon will perform an evaluation of operating experience at extended power uprate (EPU) levels prior to the period of extended operation to ensure that operating experience at EPU levels is properly addressed by the aging management programs. The evaluation will include the Dresden and Quad Cities units and other plants operating at EPU levels. Exelon will submit this evaluation to the NRC for review prior to entering the period of extended operation for each facility.	---	Prior to the period of extended operation	RS-04-145, dated October 8, 2004

APPENDIX B CHRONOLOGY

This appendix contains a chronological listing of correspondence between the U.S. Nuclear Regulatory Commission (NRC) staff and Exelon Generation Company, LLC (Exelon), related to the NRC staff's review, under Title 10, Part 54, of the *Code of Federal Regulations* (10 CFR Part 54), of Exelon's license renewal application (LRA) for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2. All documents, with the exception of those containing proprietary information, have been placed in the Commission's Public Document Room, at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland, and are available electronically from the Public Electronic Reading Room found on the Internet at <http://www.nrc.gov/reading-rm.html>. From this site, the public can gain access to the NRC's Agencywide Documents Access and Management System (ADAMS), which provides text and image files of the NRC's public documents in the Publicly Available Records (PARS) component of ADAMS. The ADAMS accession numbers for each document are included below.

- January 3, 2003 Letter from Mr. Jeffrey A. Benjamin, Exelon Generating Company, LLC (Exelon) to the NRC, submitting the application for the renewal of the operating licenses for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2 (Accession No. ML030090203)
- January 24, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the Notice of Receipt and Availability of the application for the renewal of the operating licenses for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2 (Accession No. ML030240603)
- February 7, 2003 Letter from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the Aging Management Review Aid and revised table links between LRA Chapters 2 and 3 (Accession No. ML030500245)
- February 26, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the Notice of Acceptance for Docketing and Opportunity for Hearing associated with the application for the renewal of the operating licenses for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2 (Accession No. ML030570654)
- April 17, 2003 Letter from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the Corrected Fluence Tables for Dresden Nuclear Power Station, Units 2 and 3, associated with LRA (Accession No. ML031190598)
- May 5, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding revision to the NRC's review schedule (Accession No. ML031260004)

July 21, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the first set of Request for Additional Information (RAIs) associated with the LRA (Accession No. ML032020080)

July 21, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the second set of Request for Additional Information associated with the LRA (Accession No. ML032020170)

August 4, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the third set of Request for Additional Information associated with the LRA (Accession No. ML032180267)

August 4, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the fourth set of Request for Additional Information associated with the LRA (Accession No. ML032180382)

August 7, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding the fifth set of Request for Additional Information associated with the LRA (Accession No. ML032310093)

September 9, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding a Supplemental Request for Additional Information associated with the LRA (Accession No. ML032530371)

October 3, 2003 Letter (RS-03-177) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested additional information (Accession No. ML032810579)

October 3, 2003 Letter (RS-03-178) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested additional information (Accession No. ML032810563)

October 3, 2003 Letter (RS-03-179) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested additional information (Accession No. ML032810692)

October 3, 2003 Letter (RS-03-180) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested additional information (Accession No. ML032820273)

October 3, 2003 Letter (RS-03-181) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested additional information (Accession No. ML032810682)

October 15, 2003 Letter (RS-03-201) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested additional information (Accession No. ML033010396)

October 20, 2003 Letter from the NRC to Mr. John L. Skolds, Exelon, forwarding an Inspection-related Open Item associated with the LRA (Accession No. ML032940056)

November 14, 2003 E-mail from T. Kim to A. Fulvio

November 20, 2003 Letter (RS-03-222) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML033320342)

November 21, 2003 Letter (RS-03-223) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML033360714)

December 5, 2003 Letter (RS-03-227) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML033500404)

December 12, 2003 Letter (RS-03-232) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML033580647)

December 17, 2003 Letter (RS-03-235) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML033580635)

December 22, 2003 Letter (RS-03-238) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML033640630)

January 26, 2004 Letter (RS-04-14) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML040340487)

February 3, 2004 Letter (RS-04-020) from Mr. Patrick R. Simpson, Exelon, to the NRC, Consolidated List of Commitments for License Renewal (Accession No. ML040420164)

March 5, 2004 Letter (RS-04-039) from Mr. Patrick R. Simpson, Exelon, to the NRC, Amendment to the Application for Renewed Operating Licenses for Dresden and Quad Cities Nuclear Power Stations (Accession No. ML040711186)

March 25, 2004 Letter (RS-04-046) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting the requested supplemental information (Accession No. ML040900466)

April 9, 2004 Letter (RS-04-057) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting responses to the draft SER Open Items and Confirmatory Items (Accession No. ML041070456)

April 23, 2004 Audit Report Related to the License Renewal Application for Dresden Nuclear Power Station and Quad Cities Nuclear Power Station

May 18, 2004 Letter (RS-04-073) from Mr. Patrick R. Simpson, Exelon, to the NRC, submitting supplemental information (Accession No. ML041480178)

May 27, 2004 Letter (RS-04-080) from Mr. Keith R. Jury, Exelon, to the NRC, License Renewal Commitment for Scoping of Steam Dryers and the Dresden and Quad Cities Nuclear Power Stations (Accession No. ML041550270)

June 22, 2004 Letter (RS-04-088) from Mr. Patrick R. Simpson, Exelon to the NRC, submitting supplemental information (Accession No. ML041820207)

June 29, 2004 Final Supplement 17 to the Generic Environmental Impact Statement Regarding License Renewal for Dresden Nuclear Power Station, Units 2 and 3 (Accession Number ML041830675)

June 30, 2004 Final Supplement 16 to the Generic Environmental Impact Statement Regarding License Renewal for Quad Cities Nuclear Power Station, Units 1 and 2 (Accession No. ML041830462)

July 13, 2004 Summary of telephone conference held on July 13, 2004, between the U.S. Nuclear Regulatory Commission and the Exelon Generation Company Regarding the Resolution of Open Item 3.5.2.3.2-1 and Confirmatory Item 3.0.3.14.2-1

September 16, 2004 In a letter (signed by M. Bonaca), the Advisory Committee on Reactor Safeguards provided its conclusions and recommendations on the renewal of the operating licenses for Dresden and Quad Cities (Accession No. ML042610045)

October 8, 2004 Letter (RS-04-145) from Mr. Keith R. Jury, Exelon, to the NRC, Additional Commitments for License Renewal

APPENDIX C PRINCIPAL CONTRIBUTORS

<u>NAME</u>	<u>RESPONSIBILITY</u>
T. Kim	Project Manager
R. Auluck	Project Manager
W. Burton	Project Manager
B. Wong	Project Manager
H. Ashar	Mechanical Engineering
S. Bailey	Mechanical Engineering
T. Chan	Management Supervision
K. Chang	Technical Support
K. Corp	Technical Support
K. Coyne	Quality Assurance
P. Y. Chen	Technical Support
S. Coffin	Management Supervision
B. Elliot	Materials Engineering
J. Fair	Mechanical Engineering
T. Ford	Reactor Systems
G. Galletti	Quality Assurance
R. Goel	Plant Systems
M. Hartzman	Civil Engineering
G. Hatchett	Plant Systems
R. Hernandez-Figueroa	Plant Systems
J. Honcharik	Materials Engineering
N. Iqbal	Plant Systems
V. Klco	Plant Systems
T. Koshy	Electrical Engineering
P.T. Kuo	Management Supervision
A. Lee	Mechanical Engineering
S. Lee	Management Supervision
J. Lehning	Plant Systems
Y. Li	Mechanical Engineering
L. Lund	Management Supervision
J. Ma	Mechanical Engineering
K. Manoly	Management Supervision
R. McNally	Mechanical Engineering
C. Munson	Civil Engineering
M. Murphy	Chemical Engineering
Q. Nguyen	Technical Support
A. Pal	Electrical Engineering
P. Patnaik	Materials Engineering
P. Prescott	Quality Assurance
J. Rajan	Civil Engineering
M. Razzaque	Reactor Systems
D. Shum	Plant Systems
J. Strnisha	Mechanical Engineering

A. Stubbs	Plant Systems
D. Terao	Management Supervision
D. Thatcher	Management Supervision
H. Wagage	Plant Systems
H. Wang	Technical Support
S. Weerakkady	Management Supervision
L. Wheeler	Environmental Project Manager
B. Wong	
C. Wu	Mechanical Engineering

CONTRACTORS

<u>Contractor</u>	<u>Technical Area</u>
Argonne National Laboratory	Reactor Vessel, Internals, Reactor Coolant System, and Auxiliary Systems
Brookhaven National Laboratory	Containment, Structures, and Component Supports
Information Systems Laboratories	Fire Protection and Aging Management Programs
Pacific Northwest National Laboratory	Engineered Safety Features and Steam/Power Conversion Systems

APPENDIX D REFERENCES

This appendix lists the references used in preparing the safety evaluation report associated with the license renewal application for the Dresden Nuclear Power Station, Units 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2.

AMERICAN CONCRETE INSTITUTE (ACI)

ACI 301, "Specifications for Structural Concrete for Buildings"

ACI 318-63, "Building Code Requirements for Reinforced Concrete"

AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME)

ASME Boiler and Pressure Vessel Code, July 1989

ASME Boiler and Pressure Vessel Code, Section III, Rules for Construction of Nuclear Power Plant Components (through Summer 1979 addenda)

ASME Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components

ASME Boiler and Pressure Vessel Code, Section XI, Appendix G (1995 edition through 1996 addenda)

AMERICAN SOCIETY FOR TESTING AND MATERIALS (ASTM)

ASTM A307, "Standard Specification for Carbon Steel Bolts and Steels, 60,000 psi Tensile Strength"

ASTM A325, "Standard Specification for Structural Bolts, Steel, Heat-Treated, 120 ksi and 105 ksi Minimum Tensile Strength"

ASTM A490, "Standard Specification for Heat-Treated Steel Structural Bolts, 150ksi Minimum Tensile Strength"

ASTM D975-1981, "Standard Specification for Diesel Fuel Oils"

AMERICAN WATER WORKS ASSOCIATION (AWWA)

AWWA C203, "AWWA Standard for Coal-Tar Protective Coatings and Linings for Steel Water Pipelines - Enamel and Tape - Hot Applied," 1966

BOILING WATER REACTOR VESSEL AND INTERNALS PROJECT (BWRVIP)

BWRVIP-05, "BWR RPV Shell Weld Inspection Recommendations," September 1995

BWRVIP-18, "Core Spray Internals Inspection and Flaw Evaluation Guidelines," July 1996

BWRVIP-25, "BWR Core Plate Inspection and Flaw Evaluation Guidelines," October 1999

BWRVIP-26, "Top Guide Inspection and Flaw Evaluation Guidelines," December 1996

BWRVIP-27, "Standby Liquid Control System/Core Plate IP Inspection and Flaw Evaluation Guidelines," April 1997

BWRVIP-38, "Shroud Support Inspection and Flaw Evaluation Guidelines," September 1997

BWRVIP-41, "BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines," October 1997

BWRVIP-47, "BWR Lower Plenum Inspection and Flaw Evaluation Guidelines," December 1997

BWRVIP-48, "Vessel ID Attachment Weld Inspection and Flaw Evaluation Guidelines," March 1998

BWRVIP-49, "Instrument Penetration Inspection and Flaw Evaluation Guidelines," March 1998

BWRVIP-74, "BWR Reactor Pressure Vessel Inspection and Flaw Evaluation Guidelines," September 1999.

BWRVIP-75, "Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules (NUREG-0313)," October 1999

BWRVIP-76, "BWR Core Shroud Inspection and Flaw Evaluation Guidelines," December 1999

BULLETINS (BL)

NRC BL-80-11, "Masonry Wall Design," May 1980

CODE OF FEDERAL REGULATIONS

10 CFR 50.34, "Contents of application; technical information," Section (a)(1)

10 CFR 50.48, "Fire Protection"

10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants"

10 CFR 50.55a, "Codes and Standards"

10 CFR 50.60, "Acceptance Criteria for Fracture Prevention Measures for Light water Nuclear Power Reactors for Normal Operation"

10 CFR 50.61, "Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events"

10 CFR 50.62, "Requirements for Reduction of Risk from Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants"

10 CFR 50.63, "Loss of All Alternating Current Power"

10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"

10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants"

10 CFR Part 50, Appendix G, "Fracture Toughness Requirements"

10 CFR Part 50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements"

10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions"

10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants"

10 CFR Part 100, "Reactor Site Criteria"

ELECTRIC POWER RESEARCH INSTITUTE (EPRI)

EPRI NP-5461, "Component Life Estimation: LWR Structural Materials Degradation Mechanisms," September 1987

EPRI NP-5769, "Degradation and Failure of Bolting in Nuclear Power Plants," Vols. 1 and 2, Project 2520-7, 1998

EPRI NSAC/202-L, "Recommendations for an Effective Flow-Accelerated Corrosion Program"

EPRI TR-103515, "BWR Water Chemistry Guidelines," BWRVIP-29

EPRI TR-103840 "BWR Containment License Renewal Industry Report; Revision 1" July 1994

EPRI TR-103842, "Class I Structures Industry Report"

EPRI TR-104873, "Methodologies and Processes to Optimize Environmental Qualification Replacement Internals," February 1996

EPRI TR-105747, "Guidelines for Reinspection of BWR Core Shrouds," BWRVIP-07, February 1996

EPRI TR-105759, "An Environmental Factor Approach to Account for Reactor Water Effects in Light Water Reactor Pressure Vessel and Piping Evaluations"

EPRI TR-106092, "Evaluation of Thermal Aging Embrittlement for Cast Austenitic Stainless Steel Components in LWR Coolant Systems," September 1997

EPRI TR-106740, "BWR Core Spray Internals and Flaw Evaluation Guidelines," BWRVIP-18, July 1996

EPRI TR-107079, Revision 2, "BWR Core Shroud Inspection and Flaw Evaluation Guidelines," BWRVIP-01, October 1996

EPRI TR-107285, "BWR Top Guide Inspection and Flaw Evaluation Guidelines," BWRVIP-26, December 1996

EPRI TR-107286, "BWR Standby Liquid Control System/Core Plate Inspection and Flaw Evaluation Guidelines," BWRVIP-27, April 1997

EPRI TR- 107396, "Closed Cooling Water Chemistry Guidelines," October 1997

EPRI TR-107515, "Evaluation of Thermal Fatigue Effects on Systems Requiring Aging Management Review for License Renewal for the Calvert Cliffs Nuclear Power Plant"

EPRI TR-107521, "Generic License Renewal Technical Issues Summary," April

EPRI TR-107943, "Environmental Fatigue Evaluations of Representative BWR Components"

EPRI TR-108705, "BWR Vessel and Internals Project, Technical Basis for Inspection Relief for BWR Internal Components with Hydrogen Injection"

EPRI TR-108727, "BWR Lower Plenum Inspection and Flaw Evaluation Guidelines," BWRVIP-47, December 1997

EPRI TR-108728, "BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines," BWRVIP-41, October 1997

EPRI TR-108823, "BWR Shroud Support Inspection and Flaw Evaluation Guidelines," BWRVIP-38, September 1997

EPRI TR-108724, "Vessel ID Attachment Weld Inspection and Flaw Evaluation Guidelines," BWRVIP-48, February 1998

EPRI TR-110356, "Evaluation of Environmental Thermal Fatigue Effects on Selected Components in a Boiling Water Reactor Plant"

EPRI TR-112214, "BWR Vessel and Internals Project, Proceedings: BWRVIP Symposium, November 12-13, 1998"

EPRI TR-113596, "BWR Vessel and Internals Project BWR Reactor Pressure Vessel Inspection and Flaw Evaluation Guidelines"

EPRI TR-114232, "BWR Core Shroud Inspection and Flaw Evaluation Guidelines," BWRVIP-76, November 1999

EPRI TR-113596, "BWR Vessel and Internals Project BWR Reactor Pressure Vessel Inspection and Flaw Evaluation Guidelines," BWRVIP-74, September 1999

EPRI TR-107396, "Closed Cooling Water Chemistry Guidelines"

GENERIC LETTERS (GLs)

NRC GL 85-20, "Resolution of Generic Issue 69: High Pressure Injection/Makeup Nozzle Cracking in Babcock and Wilcox Plants," November 11, 1985

NRC GL 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," 1989

NRC GL 88-11, "NRC Position on Radiation Embrittlement of Reactor Vessel Materials and Its Impact on Plant Operations," July 12, 1988

NRC GL 88-14, "Instrument Air Supply System Problems Affecting Safety-Related Equipment," August 8, 1988

NRC GL 89-13, "Service Water System Problems Affecting Safety-Related Equipment," July 18, 1989

NRC GL 90-05, "Guidance for Performing Temporary Non-Code Repair of ASME Code Class 1, 2, and 3 Piping," June 1990

NRC GL 91-17, "Resolution of Generic Safety Issue 29: Bolting Degradation or Failure in Nuclear Power Plants," October 1991

NRC GL 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity," May 18, 1995

NRC GL 92-08, "Thermo-Lag 330-1 Fire Barriers," December 1992

NRC GL 96-04, "Boraflex Degradation in Spent Fuel Pool Storage Racks," June 26, 1996

GENERIC SAFETY ISSUES (GSIs)

GSI-166, "Adequacy of the Fatigue Life of Metal Components"

GSI-168, "Environmental Qualification of Electrical Components"

GSI-190, "Fatigue Evaluation of Metal Components for 60-Year Plant Life"

INFORMATION NOTICES (INs)

NRC IN 87-67, "Lesson Learned from Regional Inspections of Licenses Actions in Response to IE Bulletin 80-11," December 31, 1987

NRC IN 91-46, "Degradation of Emergency Diesel Generator Fuel Oil Deliver Systems," July 1991

NRC IN 92-20, "Inadequate Local Leak Rate Testing," March 1992

INSPECTION AND AUDIT REPORTS

NRC Inspection Report 50-237/03-04(DRS); 50-249/03-04(DRS); 50-254/03-04(DRS); 50-265/03-04(DRS), "Dresden Nuclear Power Station, Quad Cities Nuclear Power Station, NRC License Renewal Scoping/Screening Inspection, September 15, 2003

NRC Inspection Report 50-237/03-10(DRS); 50-249/03-10(DRS); 50-254/03-14(DRS); 50-265/03-14(DRS), "Dresden Nuclear Power Station, Quad Cities Nuclear Power Station, NRC License Renewal Aging Management Program Inspection, December 5, 2003

INSTITUTE OF ELECTRICAL AND ELECTRONICS ENGINEERS (IEEE)

ANS/IEEE Std. 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Storage Batteries for Generating Stations and Substations"

IEEE Std. 323-1974, "Qualifying Class 1E Equipment for Nuclear Power Generating Stations," 1974

IEEE 43-1974, "Recommended Practice for Testing Insulation Resistance of Rotating Machinery"

IEEE 95-1977, "Recommended Practice for Insulation Testing of Large AC Rotating Machinery with High Direct Voltage"

NATIONAL FIRE PROTECTION ASSOCIATION (NFPA)

NFPA-25, "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems"

NUCLEAR ENERGY INSTITUTE

NEI 95-10, Revision 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54—The License Renewal Rule," August 2001

NUREG REPORTS

NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," November 1979

NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants," July 1980

NUREG-0619, "BWR Feedwater Nozzle and Control Rod Drive Return Line Nozzle Cracking, Resolution of Generic Technical Activity A 10," November 1980

NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980

NUREG-1275, Volume 3, "Operating Experience Feedback Report—Service Water System Failure and Degradations," March 1993

NUREG-1339, "Resolution of Generic Safety Issue 29: Bolting Degradation or Failure in Nuclear Power Plants," June 1990

NUREG-1526, "Lessons Learned from Early Implementation of Maintenance Rule at Nine Nuclear Power Plants," June 1995

NUREG-1568, "License Renewal Demonstration Program: NRC Observations and Lessons Learned," December 1996

NUREG-1800, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants," April 2001

NUREG-1801, Generic Aging Lessons Learned Report, July 2001

NUREG/CR-5704, "Effects of LWR Coolant Environment on Fatigue Design Curves of Austenitic Stainless Steels," April 1999

NUREG/CR-6260, "Application of NUREG/CR-5999, 'Interim Fatigue Curves to Selected Nuclear Power Plant Components,'" March 1995

NUREG/CR-6335, "Fatigue Strain-Life Behavior of Carbon and Low-Alloy Steels, Austenitic Stainless Steels, and Alloy 600 in LRA Environments," August 1995

NUREG/CR-6384, "Literature Review of Environmental Qualification of Safety-Related Electric Cables," Vol. 1, Brookhaven National Laboratory, prepared for the NRC, April 1996

NUREG/CR-6583, "Effects of LWR Coolant Environments in Fatigue Design Curves of Carbon and Low-Alloy Steels," March 1998

REGULATORY GUIDES (RGs)

NRC RG 1.46, Revision 0, "Protection Against Pipe Whip Inside Containment," withdrawn August 11, 1985

NRC RG 1.89, Revision 1, "Environmental Qualification of Certain Electrical Equipment Important to Safety for Nuclear Power Plants," June 1984

NRC RG1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," May 1988

NRC RG 1.154, "Format and Content of Plant-Specific Pressurized Thermal Shock Safety Analysis Reports for Pressurized Water Reactors"

NRC RG DG 1.188, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"

U.S. DEPARTMENT OF ENERGY (DOE)

SAND 93-7070.UC-523, "Aging Management Guideline for Commercial Nuclear Power Plants - Heat Exchangers" July 1984

SAND 96-0344, "Aging Management Guideline for Commercial Nuclear Power Plants - Electrical Cables and Terminations," United States Department of Energy

USA STANDARDS INSTITUTE (USASI)

ANSI USAS B31.1.0, "USA Standard Code for Pressure Piping," 1968

ANSI USAS B31.7, "USA Standard Code for Pressure Piping, Nuclear Power Piping," 1968

USAS B31.7, "Nuclear Power Piping"

Exelon Controlled Documents

Desktop Guide, Revision 2, "Scoping & Screening of Systems, Structures and Components"

GE-NE-LRTI-2000, Revision 6, "Technical Instruction for Exelon Dresden/Quad Cities License Renewal Project - Scoping and Screening of Systems, Structures and Components for License Renewal"

LRTI-16, Revision 0, "Identification of Non Safety Related Structures and Components Which Spatially or Structurally Interact With Safety Related Systems"

PP-DRE Revision 03 SBO, "Systems and Structures Relied Upon to Demonstrate Compliance with 10 CFR 50.63 (Station Blackout) Dresden Station – Units 2 and 3"

PP-DRE-QDC Revision 02 AP, "Active/Passive Classification and Intended Function Determination of Structures and Components"

PP-DRE-QDC Revision 01 SPACES, "Scoping and Screening Position Paper for Electrical Components based on Electrical Spaces Approach for Aging Management Review"

PP-QDC Rev.03 SBO, "Systems and Structures Relied Upon to Demonstrate Compliance with 10CFR50.63 (Station Blackout) Quad Cities Station – Units 1 and 2"

PP-QDC-DRE Rev 00 IN, "Treatment of Pipe/Equipment Insulation During Scoping and Screening Systems for License Renewal"