



NUCLEAR ENERGY INSTITUTE

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January 18, 2000

Mr. Christopher I. Grimes, Chief
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: License Renewal Issue No. 98-0102, "Screening Equipment That Is Kept In Storage"

PROJECT NUMBER: 690

Dear Mr. Grimes:

This is a response to your February 11, 1999 letter that identified a potential generic issue regarding excluding equipment from an aging management review because it is "active" per the rule but is kept in storage.

The letter cites an example involving pump motors and switchgear that are stored on-site but relied on to comply with 10 CFR Part 50, Appendix R. Specifically, the Appendix R analysis credits the installation of these components in a time frame that results in achieving cold shutdown in 72 hours. For purposes of license renewal, these components are in scope; however, pursuant to 10 CFR 54.21(a)(1), pump motors and switchgear are considered active and not subject to an aging management review. The NRC staff position is that the exclusions identified in the rule assumes the equipment is installed in the plant and thus challenged by routine operation or periodic testing. Absent these challenges, the equipment must be subjected to an aging management review.

The issue is focused on non-installed equipment that is credited in analyses required by regulation, like the Appendix R analysis. As such, it is our position that the equipment is part of the current licensing basis and must be available to perform its intended function. While there is no specific generic guidance for maintaining this equipment, licensees do perform inspections, tests and maintenance activities to ensure the equipment will perform its intended function when called upon to do so. Therefore, for license renewal, the equipment is considered active and not subject to an aging management review.

If you have any questions please call.

Sincerely,

A handwritten signature in black ink that reads "Douglas J. Walters". The signature is written in a cursive, flowing style.
Douglas J. Walters



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