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Duke Energy
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October 16, 2000

Mr. David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
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U.S. Nuclear Regulatory Commission
Washington, DC 20555

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Subject: Comments on draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"; draft "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR); and draft Generic Aging Lessons Learned (GALL) Report
65FR53047, dated August 31, 2000

Dear Mr. Meyer:

Duke Energy offers the attached comments relative to the solicitation for public comments regarding DG-1104, "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants" and the draft GALL report.

Duke has been involved in the activities of the Nuclear Energy Institute related to license renewal of nuclear power plants, and agrees with NEI's comments on these draft license renewal implementation documents. In addition, Duke is providing the attached comments for consideration by the NRC Staff. These comments are intended to supplement those provided by NEI and are based on the Duke experience with the Oconee license renewal review.

Please address any questions to Jeff Thomas at (704) 382-5826.

Thank you for the opportunity to provide these comments.

Very truly yours,

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Draft Implementation Documents For License Renewal Duke Comments

1. Scoping/Screening Methodology

The Scoping/Screening methodology discussed in Standard Review Plan (SRP) Section 2.1 does not currently acknowledge the use of a broader, more comprehensive scoping approach. SRP Section 2.1 should clearly state that "system scoping is not required in conjunction with a commodity approach or plant spaces approach to the integrated plant assessment." Experience with the Oconee license renewal indicates a need to make this understanding clear to reviewers of renewal applications.

2. Identification of Aging Effects

The process to identify those aging effects that require aging management during the period of extended operation is described in SRP Appendix A.1. Currently, this process does not discuss the necessary distinction between "aging effects that cause degradation" and "aging effects that cause degradation that could result in loss of structure or component intended function(s)." Thus, the criteria contained in SRP Appendix A.1 are overly broad, and are not linked to intended function, which could result in the implementation of new aging management programs and activities prematurely. Duke believes that the discussion in SRP Appendix A.1.1 needs to be revised to clearly state the expectations for identification of aging effects that require management during the period of extended operation; *i.e.*, those that cause degradation that could result in loss of structure or component intended function. This revised discussion in Appendix A.1.1 should then be applied to all listings in the GALL report to confirm that identified aging effects could result in a loss of intended function if left unmanaged during the period of extended operation.

3. Aging Management Program Descriptions

The process to describe and demonstrate the effectiveness of aging management programs is contained in SRP Appendix A.1.2. Duke believes that the guidance contained in this appendix needs to be clarified. Specifically, the guidance for "Detection of Aging Effects" and "Monitoring and Trending" needs to be revised to clearly state the expectations for each of the four types of aging management programs. Duke's experience during the Oconee license renewal effort indicates the importance of having a clear understanding of the intent of each program attribute prior to describing the aging management programs. Once the descriptions of the attributes are clearly established in Appendix A.1.2, they should then be applied to every program described in the GALL report.

Currently, there are program descriptions in the GALL report that do not fully address each attribute. For example, the operating experience provided in the GALL program descriptions typically states that the effect has occurred and, thus, that the program is needed. However, the guidance in Appendix A.1.2 provides that operating experience should provide objective evidence of program effectiveness. The "Detection of Aging Effects" and "Monitoring and Trending" portions of many program descriptions are unclear. In addition, there are programs in

the GALL report that contain requirements that are beyond the requirements contained in the regulations and ASME Codes. These additional requirements appear to be offered without appropriate technical justification. In this regard, we believe: (1) the GALL report program descriptions need to be re-written to better reflect the attributes contained in SRP Appendix A.1.2, and (2) technical references providing the foundation for additional requirements need to be provided, as appropriate.

In summary, Duke suggests that each program in the GALL report contain two distinct discussions. The first would be a clear description of "what" the program is; the second would be "why" the program is effective. The Oconee license renewal safety evaluation report (NUREG-1723) presents the credited aging management programs and activities in this manner. Clear program descriptions in the GALL report are one essential requirement for a future applicant to utilize the GALL report as part of its application.

4. Applicant Process to Utilize the GALL Report

A better explanation of how license renewal applicants are expected to use and cross-reference the GALL report in plant-specific license renewal applications needs to be provided. As currently drafted in both the GALL report and in the SRP, the expectations are not clear on this most important point. Duke is unsure of exactly what actions are required to be taken in order to certify that an existing, plant-specific program matches the corresponding program described in the GALL report, and what statement should be included in the application itself. A clear statement of the process to compare its plant-specific programs to those in the GALL report is a second essential requirement for a future applicant to utilize the GALL report as part of its application.

5. Contents of Chapter 3 of the Application

Chapter 3 of a license renewal application will contain the results of the plant aging management review. This chapter of the application will identify the aging management programs relied upon to manage aging for the period of extended operation. As these programs may be used in multiple sections of Chapter 3, the descriptions and demonstrations are provided in Appendix B of the application.

At the same time, the "Areas of Review" portion of each section of draft SRP Chapter 3 contains headings for four types of program reviews: (1) "Aging Management Programs Evaluated in the GALL Report that are Relied on for License Renewal;" (2) "Further Evaluation of Aging Management as Recommended in the GALL Report;" (3) "Aging Management Programs or Evaluations that are Different from those Described in the GALL Report;" and (4) "Components or Aging Effects that are not Addressed in the GALL Report."

As stated above, the current contents of Chapter 3 of the application include a listing of the credited aging management programs. In order to identify those programs that fit into each of the four types of program reviews described above, clear guidance must be provided. The guidance should cover situations where a single program may fit under heading (3) and (4), and where the QA requirements for nonsafety-related components must be reviewed, as well as

requirements for new components or aging effects. Clear guidance needs to be provided for all possible situations where a program may fit under multiple headings. As an alternative, it may be appropriate to simply have two headings: (1) "Aging Management Programs Evaluated in the GALL Report that are Relied on for License Renewal," and (2) "Further Evaluation of Aging Management Programs Recommended/Required," and not attempt to subdivide those programs that require further staff review evaluation any further. This alternative would simplify the process for both the applicant as well as the staff reviewer. Clarifying the expectations for this portion of Chapter 3 of the application is a third essential requirement for a future applicant to utilize the GALL report as part of its application.