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# Union of Concerned Scientists

October 6, 2000

Chief - Rules and Directives Branch  
Division of Administrative Services  
Nuclear Regulatory Commission  
Washington, DC 20555-0001

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**SUBJECT: COMMENTS ON THE DRAFT REGULATORY GUIDE, DRAFT STANDARD REVIEW PLAN, AND DRAFT GENERIC AGING LESSONS LEARNED (GALL) REPORT FOR NUCLEAR POWER PLANT LICENSE RENEWAL**

Good Day:

As solicited in the *Federal Register* notice of August 31, 2000 (Vol. 65, No. 170), I submit the attached comments on behalf of the Union of Concerned Scientists.

Sincerely,

David A. Lockbaum  
Nuclear Safety Engineer

Attachment: as stated

cc: Raj Anand ([rka@nrc.gov](mailto:rka@nrc.gov))  
Chris Grimes ([cig@nrc.gov](mailto:cig@nrc.gov))

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ADM03  
ERIDS-03  
Add Raj Anand (RKA)  
Steve Koenick  
(SSKA)

## UCS Comments on Draft GALL Report et al

1. UCS attended the public workshop conducted by the NRC staff on September 25, 2000. After the preliminary opening remarks, Mr. Yung Liu of the Argonne National Laboratory made the first formal presentation. Apparently, ANL had been contracted by NRC to evaluate reformatting the Generic Aging Lessons Learned (GALL) report. Mr. Liu outlined the results of ANL's evaluation. Mr. Liu displayed—but did not provide copies of—a proposed revamped table for the GALL report. The revamped table purportedly saves paper by eliminating many of the existing columns in the table. Some of the columns are eliminated by combining information with information in other columns. Other columns, such as references, are just eliminated. UCS finds references very useful and would not want to see this valuable information discarded or relocated.

While the format, style, and font size of the GALL report are clearly within the purview of the NRC staff, it is outrageous that the NRC staff would ask the public to review and comment on one draft GALL report (ADAMS session no. ML003742594) while concurrently contracting for a substantial revision of that document. This act amounts to 'bait and switch.' The NRC staff has a self-imposed deadline of August 31, 2000 for seeking public comments. In order to meet that artificial deadline, the NRC staff apparently released for public comment a premature draft of the GALL report it intends to issue. Thus, the public will be reviewing a draft report that the NRC has no real intention of issuing.

The NRC staff should not place schedule ahead of quality. The NRC staff should wait until it has developed a draft GALL report it can support and then publish that document for public comment. The public has a right to review and comment on the document the NRC intends to issue, not the document the NRC staff hurriedly puts out just to meet some silly deadline.

2. Section 3.2 of Draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Plant Operating Licenses," needs to be more explicit. It specifies that the license renewal application documents may be mechanically or photographically reproduced. However reproduced, the documents ultimately end up on the NRC's Agencywide Document Access and Management System (ADAMS). Members of the public can (with a certain amount of good karma) download the documents and print out copies for purposes of review/comment. A color printer is not standard equipment. Thus, this regulatory guide should specify that the original documents may be in color, but that no essential information shall be lost when the document is output to a black & white printer.
3. The NRC is presently attempting to risk-inform various things. For example, there's an initiative on risk-informing special treatment requirements. If adopted, this initiative would enable plant owners to classify components by safety significance and by safety class (i.e., safety related or non-safety related). It is not clear from the draft regulatory guide, the draft standard review plan, or the draft GALL report how the agency will reconcile a plant getting a non-risk informed license extension under GALL-like provisions with subsequent substantial changes to that plant's licensing bases.
4. The *Federal Register* notice posed the question, "Did the NRC staff provide sufficient credit for existing [aging management] programs in the draft GALL report?" UCS believes that the evidence shows NRC is giving too much credit for existing aging management programs. For example, the NRC's Office of the Inspector General released a report dated August 29, 2000, "NRC's Response to the February 15, 2000, Steam Generator Tube Rupture at Indian Point Unit 2 Power Plant," concluded:

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OIG determined that the NRC and nuclear industry had long-standing concerns about the loss of integrity of steam generator tubes used on PWRs due to a variety of degradation mechanisms. Degradation problems particular to Westinghouse Model 44 steam generators resulted in all plants with this model steam generator replacing their steam generators, except IP2. The NRC has also been long aware of steam generator tube and other problems at IP2. Nevertheless, the NRC did not conduct a technical review of the July 29, 1997, IP2 steam generator inspection report when it was submitted to NRR.

This OIG report for IP2 and other examples clearly demonstrate the difference between having an aging management program and having an effective aging management program. The NRC staff should not simply assume that any applicant's aging management programs are effective.

5. The draft GALL report specifies ten attributes or elements that are to be addressed for each aging management program. One of these elements, Monitoring and Trending, defines the inspection method, frequency, and sample size that provide reasonable assurance of timely detection of aging effects. During the September 25, 2000, workshop, Ms. Tammy Bloomer of the NRC staff made a formal presentation on the use of one-time inspections as an acceptable surrogate for periodic inspections. The license renewal application submitted by the owner of the Hatch nuclear plant (which generally conformed with the concepts specified in the draft GALL report) specified one-time inspections for many components. The NRC staff is giving too much credit for one-time inspections. The first of the two license renewals granted by the NRC thus far does not enter the renewal period for over a decade. None, or at least very few, of the one-time inspections have yet been conducted. Thus, the NRC has little to no evidence to support its bold assumption that one-time inspections will verify lack of aging. If, on the other hand, the one-time inspections reveal far more aging than is expected or permissible, all of the license renewals granted in the meantime will have been upon invalid bases. The NRC staff must judiciously accept one-time inspections. In addition, the NRC staff must consider whether selective one-time inspections should be performed now rather than waiting more than a decade to confirm well-intended guesses.