

APPENDIX B, TABLE B.2.11

DISPOSITION OF NEI COMMENTS
ON CHAPTER 2 OF SRP-LR

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Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-1	General	NEI 95-10 should be added as a reference in each section.	This provides the reviewer with insight to the industry recommended process.	NEI 95-10 <u>is included</u> as a reference in the SRP-LR, Section 2.1, "Scoping and Screening Methodology." The SRP-LR was not revised to address this comment.
S-2-2	2.1.3 Item 3	In the second sentence replace "accident" with "events." Remove the sentence beginning with "however, events such as fire," and the next sentence and replace with "Design basis events are defined as conditions of normal operations, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure the functions in 54.4(a)(1). See the Branch Technical position beginning on page A.1-1 of the SRP-LR, specifically the design basis event discussion on page A.1-2 in the second paragraph of item 6."	Events not specifically identified in 50.49(b)(1)(ii) are listed – fire, floods, storms, earthquakes, tornadoes and hurricanes. The paragraph should correlate exactly with the definition in 50.49(b)(1)(ii). Additionally SSCs required for compliance with the commission's regulations for fire protection are in scope under 54.4(a)(3).	The word "accident" was replaced by the word "event"; since for a population of events accidents would be a subset of it per 10 CFR 50.49(b)(1)(ii). Fire, floods, storms, earthquakes, tornadoes, and hurricanes are further <u>examples</u> of design basis events and /or anticipated operational occurrences currently used in NUREG-0800 but not addressed in Chapter 15 (Accident Analysis). This is consistent with the definition in §50.49(b)(1)(ii). The SRP-LR, Section 2.1.3, third bulleted-paragraph was revised to address this comment as stated in above paragraph.
S-2-3	2.1.3	Delete item 4.	The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping."	While the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-3 (cont.)			Further, the guidance in item 4 focuses on drawing "attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." These evaluations are not parts of the CLB. Staff review of these documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation systems. The IPE and IPEEE reports do not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as appropriate. The staff is already reviewing these latter documents, which provide more current information than that which may be contained in the IPE and IPEEE reports.	vulnerabilities (e.g. results of an IPE or IPEEE)." The comment addresses the content of the 4th paragraph in section 2.1.3 of the SRP-LR which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB. The SRP-LR was not revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-4	2.1.3	Delete item 5.	<p>The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." Staff review of the probabilistic documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation systems. The IPE and IPEEE reports do not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as</p>	<p>See NRC disposition of NEI comment S-2-3 in this Appendix B, Table B.2.11.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-4 (cont.)			appropriate. The staff is already reviewing these latter documents which provide more current information than that which may be contained in the IPE and IPEEE reports.	
S-2-5	2.1.3.1	Add the following as the last sentence in the first paragraph of 2.1.3.1: "Usually plants will already have a list of those systems, structures, and components identified for compliance with other regulations in the plants CLB that contain identical scoping criteria, such as NRC Regulatory Guide 1.29 or 10CFR100, Appendix A."	This change gives credit to work already completed by the applicant and reviewed and approved by the NRC under 10 CFR Part 50. Such credit would make the staff review more efficient. The NRC staff indicated agreement with a change containing this concept at a public meeting about the SRP-LR on July 18, 2000.	LR applicants can rely on pre-existing lists of SSCs identified for compliance with other regulations to demonstrate §54.4(a) requirements have been satisfied. The SRP-LR, Section 2.1.3.1 was revised to address this comment by adding a sentence to the 1 st paragraph.
S-2-6	2.1.3.1.2	Revise the last paragraph of Section 2.1.3.1.2 to read: "It is important to note that the scoping criterion under 10 CFR 54.4(a)(2) specifically applies to those functions 'identified in paragraph (a)(1)(i), (ii), and (iii)' of 10 CFR 54.4 and does not apply to those functions identified in 10 CFR 54.4(a)(3)."	The last paragraph states, " <i>On the basis of the staff's experience to date, it is important to clarify that the scoping criterion under 10 CFR 54.4(a)(2) specifically applies to those functions 'identified in paragraph (a)(1)(i), (ii), and (iii)' of 10 CFR 54.4. An applicant need not extend this requirement to the scoping criteria under 10 CFR 54.4(a)(3), as is discussed below.</i> " The way this is written (<i>On the basis of the staff's experience...</i>) it implies that staff judgement was necessary to determine that §54.4(a)(2) does not apply to §54.4(a)(3) and that based on staff judgement this could	The rule as written is clear in that the scoping requirements of 10 CFR 54.4(a)(2) do not need to be extended into the scoping criteria of 10 CFR 54.4(a)(3). The SRP-LR, Section 2.1.3.1.2 , was revised to address this comment by revising the last paragraph.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-6 (cont.)			change (...to date...) in the future. As the regulation is clear, there is no judgement necessary.	
S-2-7	2.1.3.1.3	In the third paragraph remove "and operate within." Also in the fifth paragraph remove "or operation within."	The regulation does not state "demonstrate compliance with and operation within the Commission's regulations."	10 CFR 50.54(a)(3) includes within the scope of the rule all "SSCs relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations" for the five specific cases listed. The SRP-LR, Section 2.1.3.1.3, 3 RD and 5 th paragraphs were revised to address this comment to align their wording with that of the regulation.
S-2-8	2.1.3.1.3	In the third full paragraph excluding the quote, remove "based on the applicant's design specifications for the diesel,"	The example in this paragraph regarding the diesel goes beyond the rule and conflicts with other sections of the SRP-LR when it refers to the design specifications for the diesel. The 3rd paragraph further down has more appropriate wording,"that is, whose functions were credited in the analysis or evaluation."	See NRC disposition of NEI comment S-2-7 in this Appendix B, Section B.2.11. The SRP-LR, Section 2.1.3.1.3, 3 RD full paragraph was revised to address this comment to align its wording with that of the regulation.
S-2-9	2.1.3.1.3	Restate the third sentence of fifth paragraph to read: "For example, if a nonsafety-related diesel generator is only relied upon to remain functional to demonstrate compliance with the Commission SBO regulations, an applicant need not consider the following SSCs:"	This comment clarifies provides a firmer statement.	See NRC disposition of NEI comment S-2-7 in this Appendix B, Table B.2.11. The SRP-LR, Section 2.1.3.1.3, 5 th paragraph was revised to address this comment to align its wording with that of the regulation.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-10	2.1.3.2.1	Revise the last paragraph of Section 2.1.3.2.1 to read: "10 CFR 54.21(a)(1)(i) explicitly excludes instrumentation, such as pressure transmitters, pressure indicators, and water level indicators, from an aging management review. The applicant does not have to identify pressure retaining boundaries of this instrumentation because 10 CFR §54.21(a)(1)(i) excludes this instrumentation without exception, unlike pumps and valves. Further, instrumentation is sensitive equipment and degradation of the pressure retaining boundary of the instrumentation would be readily determinable by the extensive surveillance and testing. If an applicant determines that certain structures and components listed in Table 2.1-5 as meeting 10 CFR 54.21(a)(1)(i) does not meet that requirement for its plant, the reviewer reviews the applicant's basis for that determination.	<p>The last paragraph of Section 2.1.3.2.1 states: <i>"10 CFR 54.21(a)(1)(i) explicitly excludes instrumentation, such as pressure transmitters, pressure indicators, and water level indicators, from an aging management review. If an applicant determines that certain structures and components listed in Table 2.1-5 as meeting 10 CFR 54.21(a)(1)(i) do not meet that requirement for its plant, the reviewer reviews the applicant's basis for that determination."</i></p> <p>The same paragraph in the SRP-LR Working Draft, September 1997, stated: "10 CFR 54.21(a)(1)(i) explicitly excludes instrumentation, such as pressure transmitters, pressure indicators, and water level indicators, from an aging management review. The applicant does not have to identify pressure retaining boundaries of this instrumentation because 10 CFR §54.21(a)(1)(i) excludes this instrumentation without exception, unlike pumps and valves. Further, instrumentation is sensitive equipment and degradation of the pressure retaining boundary of the instrumentation would be readily determinable by the extensive surveillance and testing."</p>	<p>Instrumentation like pressure transmitters, pressure indicators, and water level indicators is excluded from being subject to aging management review by 10 CFR 54.21(a)(1)(i). In addition, their pressure retaining boundaries do not have to be identified per the staff's position since degradation can be determined by an applicant's surveillance and testing records.</p> <p>The SRP-LR, Section 2.1.3.2.1, last paragraph was revised to address this comment to align its wording with that of the staff's position.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-10 (cont.)			<p>REFERENCE: Letter from Dennis M. Crutchfield of NRC to Charles H. Cruse of Baltimore Gas and Electric, dated April 4, 1996.</p> <p>This documented NRC position taken regarding instrumentation would be helpful for future NRC reviewers and should be retained in the SRP-LR.</p>	
S-2-11	Table 2.1-1	Delete "Probabilistic Risk Assessment summary report."	<p>The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." The PRA is not part of the CLB. Staff review of this document may not provide the information it is seeking. The PRA report reflects the estimated core damage frequency for the plant configuration at the time the evaluation is performed. This report also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation</p>	See NRC disposition of NEI comment S-2-3 in this Appendix B, Table B.2.11.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-11 (cont.)			systems. The PRA report does not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as appropriate. The staff is already reviewing these latter documents, which provide more current information than that which may be contained in the PRA report.	
S-2-12	Table 2.1-1	Delete "Emergency operating procedures."	EOPs are not sources of information regarding evaluations or analyses for design basis events or regulated events.	EOPs were developed to cope with analyzed plant-specific <u>transients and accidents</u> in accordance with NUREG-0737, Item I.C.1 requirements. While EOPs deal with some transients and/or accidents not bound by plant-specific CLBs, EOPs nonetheless constitute <u>a valuable source of information</u> regarding both the facility's CLB and its design basis events. The SRP-LR was not revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-13	Table 2.1-2	Revise the third sentence under Commodity Groups to read: “The basis for grouping structures and components can be determined by such characteristics as similar function, similar design, similar materials of construction, similar aging management practices, or similar environments.”	Sentence 3 does not consider a grouping based on similar function. Function is a valid basis for grouping as this is the basis for all electrical commodity groups in SRP-LR Table 2.1-5.	Grouping components by function is similar to that of grouping them based on design or environment with function being more bearing on their intended safety function or that of their associated component. The SRP-LR, Table 2.1-2 was revised to address this comment to revising the line item for Commodity Groups to include grouping of components based on function.
S-2-14	Table 2.1-2	Remove the reference to NUREG 1723 in the Complex assemblies row. The staff could add an example of complex assemblies from NUREG 1705, Section 2.2.3.22.2.2.		Although NUREG-1705 discusses complex assemblies, the Example 5 in Appendix C of NEI 95-10, Revision 0, better illustrates the evaluation guidance contained in SRP-LR Table 2.1-2 and NEI 95-10, Section 4.1.1. The SRP-LR, Table 2.1-2 was revised to address this comment.
S-2-15	Table 2.1-4	Reword the fifth function as “Provide electrical connections to specified sections of an electrical circuit to deliver voltage, current or signals.”	This provides a more accurate description of the function of cable.	Clarification on the function of an electrical cable. The SRP-LR, Table 2.1-4, fifth function under ‘Components’ was revised to address this comment as noted.
S-2-16	Table 2.1-5	Delete motor items 65 and 66.	These motors are examples of the motor commodity group and are already included in the Motors, Generators commodity group.	Inconsistency corrected in NEI 95-10, Rev. 3. The SRP-LR Table 2.1-5 was revised to address this comment by adopting NEI 95-10, Rev. 3.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-17	Table 2.1-5	<p>Remove entry 107 for terminal blocks.</p> <p>Entry 77 should say "Annunciators" and Entry 98 should say "Regulators"</p> <p>The notes regarding references for entries 83, 86, 92, 105 should refer to NRC letters, which provided the passive/active determination for these components. For entry 83 it should be letters from C.I. Grimes to D.J. Walters dated September 19, 1997 and November 19, 1999. For entry 86 it should be the letter from C.I. Grimes to D.J. Walters dated April 27, 1999. For entry 92 it should be the letter from C.I. Grimes to D.J. Walters dated September 19, 1997. For entry 105 it should be the letter from C.I. Grimes to D.J. Walters dated September 19, 1997.</p>	Terminal blocks are included in entry 79. The second comment corrects the table. The third clarifies references.	See NRC disposition of NEI comment S-2-16 in this Appendix B, Table B.2.11.
S-2-18	Table 2.1-5	<p>Revise this Item 89 to read:</p> <p>"Surge Arresters (e.g., switchyard surge arresters, lightning arresters, surge suppressers, surge capacitors, protective capacitors, reactors)"</p>	Surge arresters that are separate components have applications other than just high-voltage. Suggest dropping "High-voltage" from the name of the commodity group. In continuing license renewal electrical work reactors, another type of surge arrester, was identified that would be helpful to have in the list of examples.	See NRC disposition of NEI comment S-2-16 in this Appendix B, Table B.2.11.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-19	Table 2.1-5	<p>Change Item 96 to read: "Radiation Monitors (e.g., area radiation monitors, process radiation monitors)" and change the passive determination to "No".</p> <p>Change Item 85 to read: "Elements, RTDs, Sensors, Thermocouples, Transducers (e.g., conductivity elements, flow elements, temperature sensors, radiation sensors, watt transducers, thermocouples, RTDs, vibration probes, amp transducers, frequency transducers, power factor transducers, speed transducers, var. transducers, vibration transducers, voltage transducers)"</p> <p>Change Item 106 to read: "Transmitters (e.g., differential pressure transmitters, pressure transmitters, flow transmitters, level transmitters, radiation transmitters, static pressure transmitters)"</p>	<p>The original SRP-LR table had the three items; Radiation Sensors, Radiation Monitors and Radiation Transmitters listed as separate items. Radiation Sensors was the only item associated with a pressure boundary in the table. Combining these three separate items is not consistent with the rest of the table under Electrical and I&C in combining into commodity groups.</p>	<p>See NRC disposition of NEI comment S-2-16 in this Appendix B, Table B.2.11.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-20	2.2.3	Revise second sentence of Section 2.2.3, Paragraph 1 to read: "Should the reviewer request additional information from the applicant regarding why a certain system or structure was not identified by the applicant as within the scope of license renewal for the applicant's plant, the reviewer should provide a plant specific CLB reference and the specific scoping criterion under which the reviewer believes the system or structure scopes in."	<p>The second sentence of Section 2.2.3, Paragraph 1 states: <i>"Should the reviewer request additional information from the applicant regarding why a certain system or structure was not identified by the applicant as within the scope of license renewal for the applicant's plant, the reviewer should provide a brief description of why the reviewer believes that this particular system or structure could be potentially within the scope of license renewal."</i></p> <p>The above guidance of providing a brief statement is vague and may not prevent an applicant from having to "prove the negative". The "brief statement" guidance should be expanded to instruct the reviewer to provide a plant specific CLB reference for the system and the specific scoping criterion under which the reviewer believes the system scopes in. It is the responsibility of the reviewer to explain why they believe a specific system or structure that the applicant scoped out is in the scope of license renewal.</p>	<p>If the reviewer questions why a certain system or structure was not within scope in an application and requests additional information from the applicant then he or she should provide the applicant with a brief description of why the SSC may be viewed as within the scope of the license renewal.</p> <p>The SRP-LR, Section 2.2.3, 1st paragraph was revised to address this comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-21	2.2.3.1	The last three full paragraphs: these were added since last draft and refer to components, rather than systems and structures. They seem out of place. They should go in the screening section. If the intention was to add these paragraphs here, they should refer to systems and structures.	Consistency with the purpose of the section.	<p>This section of SRP-LR is concerned with systems and structures not components so the word “components” was changed to “systems and structures.”</p> <p>The SRP-LR, subsection 2.2.3.1, was revised to address this comment by changing the last and third from the last paragraphs as noted and deleting the second from the last paragraph.</p>
S-2-22	2.3.3.1	Remove this section. This change makes this section consistent with 2.4.	The Rule does not require an applicant to identify structures and components in the scope of license renewal in an application. An application must contain an identification of structures and components that require aging management review. Please see pages 60 and 61 of NEI 95-10, revision 2, for industry guidance regarding contents of the Scoping and Screening sections of a License Renewal Application. The SRP-LR should focus on the actual expected contents of an application.	<p>Clarification on the intent of rule in regard to the basis for requiring structures and systems to be identified in an application.</p> <p>The SRP-LR was revised to address this comment by revising Section 2.4 to be consistent with Section 2.3 and revising subsection 2.3.3.1 in Section 2.3 to meet the intend of the comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-23	2.3.3.2	In the first paragraph remove the second sentence.	A license renewal application will not contain a list of components in the scope of license renewal. Please see pages 60 and 61 of NEI 95-10, revision 2, for industry guidance regarding contents of the Scoping and Screening sections of a License Renewal Application. The SRP-LR should focus on the actual expected contents of an application.	Clarification on the intent of rule in regard to the basis for requiring structures and systems to be identified in an application. The SRP-LR, Section 2.3.3.2 was revised to address this comment by eliminating the words "if they" in the third sentence and by revising Section 2.4 to be consistent with Section 2.3.
S-2-24	2.3.3.2	Paragraph 2 states "Although Table 2.1-5 is extensive, it is not all inclusive. Thus, the reviewer should use other available information sources, such as prior application reviews, to determine whether a component is subject to an aging management review." Sections 2.4 and 2.5 do not contain these words. This statement should be removed from Section 2.3. A combination of Table 2.1-5 and other NRC guidance should be sufficient.	Inclusion of a component by a license renewal applicant is not indicative of the need for a following applicant to include a similar component as the current licensing bases and scoping and screening methodologies of the two applicants may be different.	Scoping is plant specific depending on a plant's CLB. Each application is for a different plant and as such can be different in regard to the components identified and scoped in it under the rule. The SRP-LR, Section 2.3.3.2 was revised to address this comment by revising the 2 nd paragraph by replacing the verb "is" by "may be" and by adding the same sentence to Sections 2.4 and 2.5.
S-2-25	2.5.1	Remove the third paragraph as system level scoping is addressed in section 2.2.	The third paragraph reiterates information already provided in section 2.2. This section is addressing components requiring aging management review; therefore, this paragraph is not needed for the reviewer.	Section 2.5 is a stand alone section and has a different intent than Section 2.2, thus the information in it is not a mere repeat of the wording in Section 2.2. The SRP-LR was not revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-26	2.5.1	In the fourth paragraph indicate that the "plant spaces" approach may be used. It is not required.	The License Renewal Rule does not require use of SAND96-0344. An applicant may use another method that complies with rule requirements.	An applicant may use any method to meet the requirement of the rule including the 'plant spaces' approach. The SRP-LR, Section 2.5.1, 4 th paragraph was revised to address this comment by changing the words "an applicant would" to "an applicant may".
S-2-27	2.5.1	Revise the last sentence of the fifth paragraph to read: "For the above example, if the applicant identified elevated temperatures in a particular area within the turbine building, the applicant may elect to further refine the scope in this particular area by identifying electrical equipment that is not subject to an aging management review and excluding this equipment from the aging management review. In this case, the excluded electrical equipment would be reported in the application as not subject to an aging management review." (Colaianni, Duke)	The last sentence in Section 2.5.1, paragraph 5, does not follow the way scoping in a specific area would be reported in the application when using the plant spaces approach. The space approach starts with the assumption that all passive long-lived electrical and I&C components subject to an aging management review. During the aging management review when a plant area that could be adverse to equipment is identified, the specific equipment in the area is identified in order to eliminate all equipment that does not meet the scoping criteria. In most cases this eliminates all electrical equipment in the area from the scope of review. Since a scoping evaluation was performed to exclude equipment from the aging management review, the excluded equipment would be reported in the application in a manner such as, "All non-EQ cables and connections are subject to an aging management	The example cited in the comment did not properly illustrate the 'plant spaces' approach. The SRP-LR, Section 2.5.1, 5 th paragraph was revised to address this comment by revising the last sentence.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-27 (cont.)			review excluding cables and connections used for the nonsafety-related thermocouples in the in-core instrumentation system.”	
S-2-29	2.5.1.1 and 2.5.1.2	Delete Sections 2.5.1.1 and 2.5.1.2. Also delete the sentence before 2.5.1.1.	Sections 2.5.1.1 and 2.5.1.2 are not duplicated in the Mechanical Systems and Structures sections (2.3 and 2.4 respectively) and it seems to be a duplication of the material covered in Section 2.5.3, Review Procedures.	Clarification of intent of Section 2.5 to be consistent with Sections 2.3 and 2.4.. The SRP-LR, Sections 2.5.1.1 and 2.5.1.2 were revised to address this comment by deleting those sections and the sentence just prior to Section 2.5.1.1.
S-2-30	2.5.3	Revise the third paragraph to read: “Equipment in the EQ (10 CFR 50.49) program has a qualified life and is replaced at the end of its qualified life. With a qualified life, EQ equipment does not meet the ‘long-lived’ screening criteria and is not subject to an aging management review. However, the qualified life analyses that provide the basis for a 40-year or greater qualified life are TLAA’s for license renewal. The staff reviews the applicant’s EQ TLAA evaluation separately following the guidance in Section 4.4 of this standard review plan.”	<p><i>“The scope of 10 CFR 50.49 electric equipment to be included within 10 CFR 54.4(a)(3) is that ‘long-lived’ (qualified life of 40-years or greater) equipment already identified by licensees under 10 CFR 50.49(b), which specifies certain electric equipment important to safety.”</i></p> <p>The scope of §50.49 (EQ) equipment to be included within §54.4(a)(3) is all EQ equipment, not just EQ equipment with a 40-year or greater qualified life.</p> <p>The sentence implies that the ‘long-lived’ screening criteria applies only to SSCs that are subject to replacement based on a qualified life or specified time period equal to or greater than 40 years. There is no basis for this limitation of the §54.21(a)(1)(ii) criteria in either 10</p>	<p>The SRP-LR, Section 2.5.3, 3rd paragraph is consistent with the intent of 10 CFR 54.4(a)(3).</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-30 (cont.)			<p>CFR 54 or in the accompanying Statement of Considerations.</p> <p><i>“An applicant may identify EQ equipment separately for TLAA evaluation and not include such equipment as subject to an aging management review under 10 CFR 54.21(a)(1).”</i></p> <p>Equipment in the EQ program has a qualified life and is replaced at the end of its qualified life. With a qualified life EQ equipment does not meet the long-lived screening criteria and is not subject to an AMR. The sentence is misleading in that no EQ equipment is required to be included in the list of components subject to an AMR.</p> <p>Much of the information in this paragraph is TLAA evaluation specific and may confuse future reviewers as to the difference between ‘long-lived’ screening and TLAA evolution regarding EQ equipment.</p>	

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-31	2.5.3.1	Revise this section. This change makes this section consistent with 2.4 and 2.3 as revised.	The Rule does not require an applicant to identify structures and components in the scope of license renewal in an application. An application must contain an identification of structures and components that require aging management review.	See NRC disposition of NEI comment S-2-22 in this appendix, Section B.2.11. The SRP-LR was revised to address this comment by making Section 2.5.3.1 consistent with Sections 2.3 and 2.4.
S-2-32	2.5.3.2	Delete the last sentence of paragraph 2, Section 2.5.3.2.	The last sentence of paragraph 3 states, <i>"An applicant should justify omitting a component that is within scope of license renewal at their facility and is listed as 'passive' in Table 2.1-5."</i> This information is not required by 10 CFR 54 to be provided in the application, but would be available for on-site inspection at the applicant's facility. An applicant is required to list in the application components subject to an aging management review and describe and justify the methodology, but not to justify why any specific component is not subject to an aging management review.	The information referred to is not required by 10 CFR 54, but available on-site. The SRP-LR, Section 2.5.3.2, 2nd paragraph was revised to address this comment by deleting the last sentence.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-33	2.1.2	Second bullet: should say “systems, structures, and components”	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-34	2.1.3.2.2	The quote from the SOC should in the middle read “... with a specified time period is deemed ...”	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-35	2.1.6	Reference 11 is a duplicate of reference 8.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-36	Table 2.1-3	Change column heading “Subject” to “Issue.”	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-37	2.2.3.1	The fourth full paragraph says “internal functions”, should instead say “intended functions.”	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-38	2.2.3.1	In the sixth paragraph beginning “An applicant may...” Insert “that” between “indicating” and “the”	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-39	2.3.1	In the fifth paragraph beginning “Mechanical components...” delete “(or must).”	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-40	2.3.3.2	In the first paragraph the third line from end should read, "...AMR, components that perform..."	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-41	2.4.1	The items in the third bullet are components rather than structures and should be included in the sentence following the bullets.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-42	2.4.3.1	The fourth paragraph from end and last paragraph say essentially the same thing.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-43	2.5.1	In the second paragraph insert "to" after "staff" in the fifth line from end.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.