

APPENDIX A

**DISPOSITION OF PARTICIPANT COMMENTS
FROM THE LICENSE RENEWAL PUBLIC WORKSHOP,
SEPTEMBER 25, 2000**

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A.1. INTRODUCTION

NRC's September 25, 2000, license renewal public workshop (LR-PW) was the second outreach workshop (the first was December 6, 1999) to obtain feedback from stakeholders on the NRC development of the "Generic Aging Lessons Learned" (GALL) report and the revised guidance for the conduct of review of license renewal applications.

The draft GALL report dated August 2000, along with the draft SRP-LR dated August 2000, DG-1104, and NEI 95-10 Revision 2, were available for public comment on the Regulatory Guidance website page (<http://www.nrc.gov/NRC/REACTOR/LR/guidance.html>). The August 2000 Draft GALL report superceded the earlier version of the report, dated December 6, 1999, and the original NUREG/CR-6490, "Nuclear Power Plant Generic Aging Lessons Learned (GALL)," Volumes 1 and 2, issued in December 1996.

The NRC staff made 16 presentations during the workshop that were designed to elicit stakeholder input. The workshop discussion was based on first reviewing the agenda for any add-on topics and then addressing the relevant documents with ten discussion topics addressed by different speakers. The Federal Register Notice Questions (65 FR 53047) were addressed at the end. Thirty-two individuals spoke and/or made comments, with 17 being from the NRC and 15 from other organizations. About 86 different comments were made by these 15 non-NRC stakeholders. Sixty-seven were made by individuals representing industry groups and 19 from individuals representing public interest groups or themselves. The focus of the majority of the discussion seemed to be the technical details or fine points. The nature of the comments was substantially different from that of the December 6, 1999, workshop, during which more general recurring themes, such as credit for existing programs for license renewal, regulatory and/or attribute creep, and adequacy of mechanisms for public review.

All comments made by stakeholders are sorted in alphabetical order by the commenter's last name and listed in Table A of Appendix A, along with the NRC analysis of the stakeholder comments. Stakeholder comments have been incorporated or addressed in the license renewal guidance documents.

A.2. PARTICIPANT AFFILIATION

Of the 115 documented attendees attending NRC's September 25, 1999, License Renewal Public Workshop (LR-PW, <http://www.nrc.gov/NRC/REACTOR/LR/IRG/workshop0925.html>), 56 were from the NRC. At least 26 participants represented power companies, 10 were from National Laboratories, 1 participant was from the Union of Concerned Scientists, 5 participants represented the Nuclear Energy Institute, and 18 represented other organizations.

The participant list is shown, sorted alphabetically first by organizational affiliation and then by name of attendee. Individuals who participated and whose comments are noted in the official hard copy of the transcript for the NRR-License Renewal Public Workshop (LR-PW) are noted by an asterisk (*) next to their name.

Affiliation	Attendee
AEP-Cook	*Kunsemiller, David
AmerenUE	Bell, Patrick
Analytical Consulting Services	Ely, Richard
ANL	Chopra, Omesh
ANL	Fabian, Ralph (Bud)
ANL	Hull, Amy B.
ANL	*Liu, Yung Y.
ANL	Ma, David C.
ANL	Shah, Vik
ANL	Shelton, Brent
ANL	Tam, Shiu-Wing
Bechtel	Keys, Julie
Bechtel Power Corp.	Smith, Wayne
BNL	Lofaro, Robert
BNL	Morante, Rich
CES	*Chang, Ken
Constellation Nuclear Services (CNS)	*Bowman, Marvin
CNS	*Rycyna, John
CNS	Sturdevant, Lee
CNS	*Taormina, Ernie
CP&L	Fletcher, Michael H.
Dominion	Corbin, Bill
Duke Energy	Robison, Greg
Enercom Services	Masiero, David
Entergy	Young, Garry G.
First Energy	Kurtz, Gene
Entergy Operations	Mosher, Natalie
First Energy Corp.	Borysiak, Michael
Florida Power and Light	*Menocal, Antonio G.
FPC	Becker, Gary
GE	Negres, Paige
Hopkins & Sutter	*Danstanger, Chris (noted in transcript but not on attendance roster)
Hopkins & Sutter	Stenger, Dan
Hopkins & Sutter	Trubatch, Sheldon
NEI	*Beedle, Ralph
NEI	Evans, Robert

Affiliation	Attendee
NEI	Marion, A.
NEI	Pietrangelo, Tony
NEI	*Walters, Doug
Northeast Utilities	Guonest, Jay
NRC/NRR/DRIP	Ader, Charles
NRC/NRR/DRIP/RLSB	Anand, Raj
NRC/DE/EMCB	Andruszkiewicz, Edward V.
NRR/DRIP/RGEB	Auluck, Raj
NRC/NRR/DE	Bagchi, Goutam
NRC	Banic, Lee
NRC	Bartlett, Jeff
NRC/NRR/DE	Bateman, William
NRC/NRR	Berlinger, Carl H.
NRC/NMSS/HLW	*Bloomer, Tamara
NRC/RES/DET	Boardman, John
NRC/NRR/DRIP	Burton, William
NRC	Chen, Pel-Ying
NRC/NRR/DE	*Cheng, Thomas
NRC/NRR/DE	*Davis, Jim
NRC/NRR/RLSB	*Dozier, Jerry
NRC/ACRS	Dudley, Noel
NRC/NRR/DE/EMCB	Elliot, Barry
NRC/NRR	*Elliott, Rob
NRC	*Fair, John
NRC/RII	*Franovich, Rani
NRC/NRR/DE	Gaspar, Joseph
NRC/DSSA	Gratton, Chris
NRC	Graves, Herman
NRC/DRIP/RLSB	*Grimes, Chris
NRC/NRR/EMEB	Grubelich, Francis
NRC/NRR/DE	Hermann, Robert
NRC/NRR	*Hiser, Allen
NRC/NRR	Hoffman, Steve
NRC/NRR	Hou, Shou-Nien
NRC	*Hsu, Chuck
NRC	Huang, Yu Sang
NRC/NRR/DE	*Jeng, Dave
NRC/NRR/DRIP/RLSB	Kang, Peter J.
NRC/NRR	Kein, Andrew
NRC/NRR	Koenick, Stephen
NRC/NRR/DRIP/RLSB	*Kuo, P. T.
NRC/NRR/DE	Lauron, Carolyn L.
NRC/NRR/DRIP/RLSB	*Lee, Sam
NRC/NRR/SPLB	Li, Chang-Yang
NRC/NRR/DE/EMEB	Li, Y. C. (Renee)
NRC/NRR/DRIP/RLSB	Liu, Wah C.(Winston)
NRC	Mcneil, Michael
NRC/NRR/DRIP/RLSB	Mitra, Sikhindra
NRC/NRR/DE	Munson, Cliff
NRC/NRR	*Peralta, Juan
NRC	Prato, Robert J.
NRC/NRR/DE	Rothman, Robert

Affiliation	Attendee
NRC/NRR/DE/EEIB	*Shemanski, Paul
NRC/NRR/DRIP/RLSB	Strnisha, Jim
NRC/NRR/SPLB	Thomas, Brian
NRC/RES/DET	*Vora, Jit
NRC/NRR/DRIP/RLSB	Wang, Hai-Boh
NRC/NRR/DE	Wichman, Keith
NRC/NRR/DE/EMEB	Wu, Cheng-Ih
NRC	*Zimmerman, Roy
NUS Info Services	Willbank, Charles
NNECO	Watson, Bill
PA DEP BRP	Dyckman, Dennis
PECO Energy	*Patel, Erach
PECO Energy	Phillabaum, Jerry
PECO Energy	*Polaski, Frederic W.
PENOL	Ackerman, Mark
PPL Susquehanna	Machalich, Gerard
Proto-Power	Philpot, Lloyd E.
RG&E (Rochester Gas & Electric)	Wrobel, George
Rockbestos-Surprenant Inc.	Sandberg, Steve
Self	Connor, Lynn
SNC	Evans, William P.
SNC	Ghosal, Partha
SNC	*Mulvehill, Jeff
UCS	*Lochbaum, Dave
WEPCO	*Newton, Roger
Winston & Strawn	Sutton, Kathryn

A.3. EVALUATION AND DISPOSITION OF COMMENTS

Table A, at the end of Appendix A, contains comments provided by the participants at the workshops. The column heading "Commenter and Affiliation" is primarily intended to provide the source of the comment, meaning the individual and his/her affiliated organization that submitted the comment. For example, Beedle-1, NEI, indicates that the comment was made by Mr. Beedle of NEI and the "1" segregates this comment from all other comments made by that individual. The abbreviations used in this appendix are listed in the front matter of this NUREG. This table is sorted alphanumerically based on the name of the individual and the consecutive number assigned to his/her comment.

A.4. REFERENCES

American National Standards Institute (ANSI) Standard, B31.1 Power Piping Code.

ASME Boiler and Pressure Vessel Code, Section XI, Rules for In-Service Inspection of Nuclear Power Plant Components, American Society of Mechanical Engineers.

Code of Federal Regulations 10 CFR, Part 2 – Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders, Subpart B – Procedure for Imposing Requirements by Order, or for Modification, Suspension, or Revocation of a License, or for Imposing Civil Penalties §2.206 *Requests for action under this subpart.*

Code of Federal Regulations 10 CFR, Part 50, – Domestic Licensing of Production and Utilization Facilities, Appendix A *General Design Criteria for Nuclear Power Plants.*

Code of Federal Regulations 10 CFR, Part 50, – Domestic Licensing of Production and Utilization Facilities – §50.21, *Class 104 licenses; for medical therapy and research and development facilities.*

Code of Federal Regulations 10 CFR, Part 50, “Domestic Licensing of Production and Utilization Facilities” – §50.49, *Environmental qualification of electrical equipment important to safety for nuclear power plants.*

Code of Federal Regulations 10 CFR, Part 50, “Domestic Licensing of Production and Utilization Facilities” – §50.54, *Conditions of licenses.*

Code of Federal Regulations 10 CFR, Part 50, “Domestic Licensing of Production and Utilization Facilities” – §50.55a, *Codes and Standards.*

Code of Federal Regulations 10 CFR, Part 50, “Domestic Licensing of Production and Utilization Facilities” – §50.59, *Changes, tests and experiments.*

Code of Federal Regulations 10 CFR, Part 50, “Domestic Licensing of Production and Utilization Facilities” – §50.61, *Fracture toughness requirements for protection against pressurized thermal shock events.*

Code of Federal Regulations 10 CFR, Part 54 - Requirements for Renewal of Operating Licenses for Nuclear Power Plants, §54.21, *Contents of application – technical information.*

Code of Federal Regulations 10 CFR, Part 54 - Requirements for Renewal of Operating Licenses for Nuclear Power Plants, §54.31, *Issuance of a renewed license.*

NEI 95-10, Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule, *Revision 2, August 2000* (http://ruleforum.llnl.gov/cgi-bin/downloader/rg_lib/123-0118.pdf).

NRC Draft Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants (SRP-LR), August 2000 (<http://www.nrc.gov/NRC/REACTOR/LR/IRG/SRP/srp.html>).

NRC Generic Aging Lessons Learned (GALL), Dec. 6, 1999 Draft Report, NRC/NRR (<http://www.nrc.gov/NRC/REACTOR/LR/index.html>).

NRC Generic Letter 88-20, *Individual Plant Examination for Severe Accident Vulnerabilities*, November 23, 1988.

NRC Generic Letter 89-13, *Service Water System Problems Affecting Safety-Related Equipment*, July 18, 1989.

NRC Generic Safety Issue 190, *Fatigue Evaluation of Metal Components for 60-Year Plant Life*, September 1995.

NRC Official Transcript of Proceedings, Public Meeting License Renewal Workshop. (<http://www.nrc.gov/NRC/REACTOR/LR/IRG/workshop0925.html>).

NRC Organizational Abbreviations (<http://www.nrc.gov/NRC/PHONE/org.html>).

NRC Regulatory Guide (draft) DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," August 2000.

NRC Regulatory Guide 1.54, Rev. 1, *Service Levels I, II, and III Protective Coatings Applied to Nuclear Power Plants*, U.S. Nuclear Regulatory Commission, Rockville, MD, July 2000.

NRC Regulatory Guide 1.84, Design and Fabrication Code Case Acceptability – ASME Section III, Division 1, May 1999.

NRC Website License Renewal Section (<http://www.nrc.gov/NRC/REACTOR/LR/index.html>).

NRC/NRR Office Letter No. 805 "License Renewal Application Review Process."

NUREG/CR-6490, Vols. 1 and 2, *Nuclear Power Plant Generic Aging Lessons Learned (GALL)*, December 1996.

NUREG-0544, NRC Collection of Abbreviations, Rev. 4 (<http://www.nrc.gov/NRC/NUREGS/SR0544/R4/index.htm>).

NUREG-1275, "Operating Experience Feedback Report," U.S. Nuclear Regulatory Commission, *Air System Problems* (Vol. 2) December 1987.

NUREG-1275, "Operating Experience Feedback Report," U.S. Nuclear Regulatory Commission, *SWS Failure and Degradation in LWRs* (Vol. 3) December 1987.

NUREG-1611, *Aging Management of Nuclear Power Plant Containments for License Renewal*, September 1997.

NUREG-1705, Safety Evaluation Report (SER) Related to the License Renewal Application of Calvert Cliffs Nuclear Power Plant Units 1 and 2, Prepared by David L. Solorio, March 1999 (<http://www.nrc.gov/NRC/REACTOR/LR/CALVERT/SER/>).

NUREG-1723, *Safety Evaluation Report related to the License Renewal of Oconee Nuclear Station, Units 1, 2 and 3*, March 2000 (<http://www.nrc.gov/NRC/NUREGS/SR1723/index.html>).

NUREG-1801, *Generic Aging Lessons Learned (GALL)*, U.S. Nuclear Regulatory Commission, April 2001.

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Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Audience participant-1, Anonymous	40	[Inaudible] I wondered what kind of results you mean. Sometimes the results, types of programs, listed in the GALL report have to be plant-specific.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report contains one acceptable way to manage aging effects for license renewal. An applicant may reference GALL in an application with no further review by NRC staff or may propose plant-specific alternatives for staff review in its license renewal application. If there is no existing program that manages the specific aging effect then the GALL report will identify the required program as "plant specific" with an evaluation by the staff.</p> <p>The GALL report was not revised to address this comment.</p>
Audience participant-2, Anonymous	56	(Inaudible) Could NRC inspection reports be used as a reference in a license renewal application?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Referencing inspection reports as evidence of NRC approval of a program may be difficult because inspection reports generally verify compliance with the licensing basis. However, if there is a relevant NRC exposition on the intended purpose and operating experience of that program, then the report may be adequate as a reference.</p> <p>The GALL report was not revised as a result of this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Beedle-1, NEI	12	It is not clear to NEI how the attributes (10 elements of a program) will be derived, what process controls will be utilized to prevent attribute creep or attribute shrink, and how stakeholder disagreements over the scope of these attributes will be resolved.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report generically evaluates the attributes of existing aging management programs (AMPs) and recommends when those programs should be augmented. NRC management oversight will be the major process control to prevent additional attribute creep or shrink by requiring justification from the NRC staff for any such internal change in the GALL report. Similarly, an applicant must provide justifications for either changes from programs in GALL or new programs proposed in its license renewal application.</p> <p>If disagreements over the attributes of a program cannot be resolved, the disagreement can be appealed in accordance with the process discussed between the NRC's License Renewal Steering Committee and NEI's License Renewal Working Group in meetings on 9/29/00 and 12/9/99. The appeal process is being incorporated into the next revision of NRR Office Letter No. 805, "License Renewal Application Review Process."</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Beedle-2, NEI	13	GALL evaluates the adequacy of existing programs and identifies where enhancements are needed. Since 85-90% of the programs credited in the Calvert Cliffs and Oconee applications were existing programs that did not require enhancement, NEI would expect this result to be reflected in the GALL. Thus the focus should be on program enhancements and new programs for the remaining 10-15%. This will ensure that the license renewal complements the extensive review conducted to assure compliance with the current licensing basis (CLB).	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report is a generic compilation of structures, systems, and components and an evaluation of existing aging management programs. By merely referencing the GALL report, when it is bounding, the NRC review is focused on proposed programs of an applicant that are augmentations of programs in the GALL report or new programs. The GALL report and SRP already took into account individual insights gained during staff reviews of Calvert Cliffs and Oconee.</p> <p>The GALL report and SRP were not revised to address this comment.</p>
Bowman-1, CNS	54	Why did NRC not adopt what is already an existing aging management program for coatings inside containment as opposed to a brand new one?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>NRC adopted the current revision of Reg. Guide 1.54 because the references for the original version were outdated. NRC has no objection to the programs supported in the original version of that regulatory guide. An applicant can use the original version if copies of the supporting standards are available.</p> <p>The GALL report was revised to address this comment by allowing both the original and current revision of the regulatory guide to be utilized.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Bowman-2, CNS	61	Many programs in Section 11 can be considered common or generic programs. One of the difficulties is the lack of a unique identifier for each row. When I am writing up a program evaluation, and I am trying to say it applies to B1.1 and I have about 10 or 12 rows that have that, I then have to not only add that it is B1.1, I have to in some cases add that it is for carbon steel with steam and for a particular aging effect.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>A unique identifier was used in conjunction with each line item number in the GALL report in order to afford better traceability when referencing to a particular line item of the GALL report.</p> <p>The GALL report was globally revised to address this comment. The SRP also was further subdivided in any respective subsection of a chapter by assigning unique, numerical identifiers to paragraphs with different subsection matters.</p>
Bowman-3, CNS	153	The GALL report takes two approaches in regard to non-service-level one coatings. Cranes fall as one approach for coatings, whereas for service-level one, two, three, for other coatings, it takes a different approach. The approach for cranes appears more straightforward and more realistic in terms of the desired objective; i.e., protecting the substrate. Perhaps it would be better to give more credit for the existing Reg. Guide 1.54 1973 programs, and if there are deficiencies that need to be addressed to take credit for that, that would be an improvement to allow either way, either version of Reg. Guide 1.54 to be credited.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Bowman-1 in this Table A.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Bowman-4, CNS	155	When you get into a sub-tier of ANSI standards, ASTM standards and so forth, there are substantial differences between the two versions of the Reg. Guide, This puts the applicant in the mode of trying to reconcile and separate the aspects that are really important to service-level-one coatings and not important to other non-containment coatings. It becomes a major bookkeeping exercise with the result of ending up at the same end point – that is, that either program is probably acceptable.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Bowman-1 in this Table A.
Bowman-5, CNS	163	Sometimes credit may be mis-assigned (such as crediting the chemistry program for doing things that the chemistry program really doesn't do). In GALL, the chemistry program includes a one-time inspection element. The plant chemistry people own the chemistry program, but they don't own the inspection program; at plants, it's hard to get people to think across their borders. In the SRP-Appendix A, four different types of aging management activities are presented (prevention, mitigation, condition monitoring, and performance monitoring). There are cases where, when you look through GALL, you find yourself trying to shoehorn all 10 elements around a particular activity, where some of those elements really don't apply. So, for example, for a chemistry program,	The basis for this comment is contained in and around the denoted transcript page (T-pg).	Appendix A of the SRP considers each acceptable AMP to consist of ten elements. An applicant can take exception to one or more of the ten elements of a program in the GALL report and provide justifications in an application. In some cases in the GALL report, more than one program is required to manage a particular aging mechanism in a specific environment. In those cases, each program crosscuts the other, and the combination is treated as a singular program under Appendix A of the SRP. The NRC does not believe that there is any added value gained by classifying each program into the four categories identified in Appendix A of the SRP since the ten elements in a program typically describe the respective characteristics of each of those four categories.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Bowman-5, CNS (cont.)		I think if you characterize the program as the type of program that it is, that would be helpful, identify the chemistry program, this is a mitigation program, and these other – and also think about what of those 10 attributes really are essential for certain of these types of programs and aren't essential for certain of these types of programs. For example, the trending – for a preventive program, trending really isn't very meaningful, whereas for a condition-monitoring program, it is very meaningful.		<p>The GALL report used and evaluated existing AMPs and augmented them as necessary. Consistent with that concept, it was determined that chemistry control and one-time inspections are actually separate aging management programs.</p> <p>The GALL report Chapter XI was revised to address this issue, but not specifically for this comment.</p>
Chang-1, CES	43	In this process of preparing the GALL report and soliciting comments, were any efforts made by the NRC to have foreign utilities review and comment on it [inaudible]?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC did not solicit comments on GALL and SRP from foreign utilities because typically they have different licensing periods than the United States. Some countries re-license their plants every ten years, thus aging effects may not have materialized by now. There has been considerable foreign interest in the development of this guidance. NRC has shared it with many international colleagues but did not seek formal international public comment on these documents.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Chang-2, CES	94	<p>For those plants that apply for license renewal, most of them have already been operated 20, 25 years, so that's one of the main reasons they apply for it. In those 20, 25 years, they have monitoring programs, they have cycle counting, so they know exactly what happens in the past 25 years (and probably different from the design trending conditions). For license renewal, is the applicant supposed to evaluate the fatigue impact on their plants, based on a combined operating for the past, design for the future, or should the applicant evaluate operating in the past and extrapolate for the future?</p> <p>What exactly are the monitoring requirements for a plant to comply with the GALL report?</p>	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Fatigue is to be analyzed and evaluated as a time-limited aging analysis (TLAA) in accordance with 10 CFR 54.21(c)(1). For license renewal, there are three ways of maintaining the current licensing basis, for the fatigue usage factor per 10 CFR 54.21(c)(1) :</p> <ol style="list-style-type: none"> 1. The current TLAA is valid for period of extended operation based on original conservative estimate for number of cycles. Compare estimate with the number of cycles monitored in a component's operating history. 2. Project the usage using a new TLAA based on operating history. Knowledge of the operating history is essential. 3. Monitor the usage (i.e., number of actual and design basis cycles) during extended period and use that as the basis to determine that aging effects will be adequately managed. This is discussed in Chapter X of the GALL report. <p>The GALL report was not revised to address this comment.</p>
Chang-3, CES	95	<p>Can the three ways listed in 10 CFR 54.21(c)(1) be used to handle the fatigue part of the license renewal? Do you need to revise the design transient documents or type in specifications on them, or do you just say this demonstrates operability for 60 years?</p>	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Chang-2 in this Table A.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Chang-4, CES	96	At many plants, there is no fatigue design basis in the licensing basis because they are 31.1 plants. Do you have extra requirements for those plants that are 31.1 plants? For critical locations, what are the requirements in regard to fatigue?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	Plants licensed prior to ASME Section III are not required to do a fatigue analysis but must still meet the ANSI B31.1 design criteria for bending stresses in regard to the 7000 thermal cycles during plant life. An applicant should address Generic Safety Issue (GSI) 190, regarding environmental effects on fatigue, at fatigue critical locations for 60 years. The GALL report was not revised to address this comment.
Chang-5, CES	97	Regarding the 7,000 cycles you mentioned, those are based on the test results and so on and so forth. Now, if I have a transient that only has 200 cycles, can I increase the number of allowable cycles, or can I increase the allowable stress, since there are fewer cycles?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	The allowable stress limit for bending stress in ANSI B31.1 is for less than 7,000 thermal cycles. Only a couple hundred actual thermal cycles occur during the current license term. A simple extrapolation would show that the 7000 cycles would not be exceeded for 60 years. The GALL report was not revised to address this comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Chang-6, CES	180	<p>The code editions and addenda are beyond the GALL report. The code edition addendum is a generic issue, and should be considered by ASME to any application or by ACI by any application. GALL should describe a general methodology defining conditions or situations where codes of different edition and addenda can be used to replace the GALL-based code base or the plant design basis code base. If you meet those criteria, then we do not object to a different code edition or addenda. For instance, in the ASME code itself, early codes don't have that high-cycle fatigue. So, for all those infinite cycles, for those flow-induced vibrations, you cannot evaluate. Old plants are designed to one code. You have to use ASME code for doing any fatigue evaluation or assessment. The NRC Reg. Guide 1.84, issued periodically – always tells you what code edition and addenda and code case are approved by the NRC. Those are the basis of using different code base edition, addenda for any evaluation, and the GALL report, GALL evaluation should not be different from that.</p>	<p>The basis for this comment is contained in and around the denoted transcript page (T-pg).</p>	<p>The intent in the GALL report is to refer to a particular code, including chapter and section, and provide sufficient criteria to allow an excerpt or summary of a code requirement to stand independent of the revision of the code or standard it was taken from. An applicant can compare the latest revision of a code or standard with the excerpt or summary. This comparison provides the technical basis to determine if the position in the GALL report is still bounding in order to adopt the latest code revision.</p> <p>The Commission has a process to endorse the ASME Code. To ensure that the GALL report will remain valid when future editions of the ASME code are approved by the NRC, the staff will perform an evaluation of future code revisions as part of the 10 CFR 50.55a rulemaking. This evaluation will determine the adequacy of code revision with respect to the ten-element program evaluation described in the GALL report.</p> <p>The GALL report was not revised to address this comment.</p>
Danstanger-1, Hopkins & Sutter	127	<p>How will the new risk-informed Part 50 be incorporated into license renewal?</p>	<p>The basis for this comment is contained in and around the denoted transcript page (T-pg).</p>	<p>See NRC disposition of comment UCS-3 in Table C of this NUREG.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Kunsemiller-1, AEP	47	How does the GALL report differentiate in its applicability and treatment of plants constructed before and after the General Design Criteria of 10 CFR 50, Appendix A was invoked?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	GALL was drafted to evaluate aging management of SSCs in particular environments irrespective of the vintage of a plant. For instance, the applications of older plants may discuss why particular SSCs need no AMPs. This could be done, for example, by noting that, per CLB, particular SSCs have no intended functions that would be impaired if aging effects were not prevented or controlled. The GALL report was not revised to address this comment.
Lochbaum-1, UCS	15	Does the draft GALL report provide sufficient credit for existing aging management programs? Is the adequacy of existing programs being ensured?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	The GALL report is a generic evaluation of existing AMPs and it sometimes recommends augmentation of those programs to adequately manage specific aging effects. An applicant can take credit in his application by referencing the existing programs in the GALL report with only limited review by staff. The applicant must demonstrate "reasonable assurance" that new, existing, or augmented programs other than those evaluated in the GALL report will be effective in managing effects of aging on structures and components in the period of extended operation. The GALL report was not revised to address this comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-2, UCS	16	There are clearly times when one-time inspections are warranted. However, the adequacy of these one-time inspections will be in question for some time into the future until some of them are actually implemented.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	Both Calvert Cliffs and Oconee proposed one-time inspections. Although these plants had rigorous chemistry control programs, the one-time inspections were designed to examine areas most susceptible to crevice or pitting corrosion and to confirm the adequacy of the chemistry control program to manage aging. A one-time inspection, performed to verify if an aging effect is being adequately managed, is a reasonable action to take where there is some uncertainty about the occurrence and progression of the aging effect. The GALL report was not revised to address this comment.
Lochbaum-3, UCS	17	There seem to be mechanisms for shrinking the level of effort in the GALL report, but not mechanisms for increasing its scope.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Lochbaum-1 in this Table A for demonstrated adequacy of the staff review of applicant's program. See NRC disposition of comment Beedle-1 in this Table A on process controls to ensure integrity of the GALL report. The GALL report was not revised to address this comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-4, UCS	17	<p>Are the efforts of the group formerly known as AEOD (NRC Office for Analysis and Evaluation of Operational Data) factored back into the GALL report?</p> <p>Is there another group that continues the efforts of AEOD or some other means to factor in lessons learned from plant operation into the license renewal effort?</p>	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Significant safety and important generic issues of the AEOD reports on aging of long-lived passive components and structures have been included in the GALL report.</p> <p>1. The majority of AEOD reports address safety and generic problems or issues of system operations and active components. Few AEOD reports deal with the aging aspects of long-lived passive components and structures.</p> <p>2. The significant safety and important generic issues identified in AEOD reports have been addressed in NRC generic communications, such as GL, BL, and IN. The generic communications have been reviewed by ANL, INEEL, and BNL in the GALL report.</p> <p>3. Many former AEOD staff participated in the RES review of the GALL report. They are either authors of AEOD reports or are aware of AEOD reports that are relevant to their specific review areas. They have factored the applicable AEOD reports into their reviews. As an example, the AEOD Report, NUREG-1275, Vol. 3, SWS Failure and Degradation in LWRs, was addressed in GL 89-13. Bill Jones, one of the authors of the AEOD report, S-96-02, <i>Assessment of Spent Fuel Pool</i>, was assigned to review the GALL-2 Chapter VII spent fuel sections. Harold Ornstein, the author of NUREG-1275, Vol. 2, <i>Air System Problems</i>, reviewed the GALL report compressed air system section.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-4, UCS (cont.)				The Office of NRC Research continues to monitor operating experience at plants and will continue to provide information to license renewal activities. The GALL report was not revised to address this comment.
Lochbaum-5, UCS	17	The actual feedback on implementation of aging programs will not occur until plants begin operation in the extended period. Will preliminary feedback be factored in from renewal applications approved to date, Calvert Cliffs and Oconee, which are not real road tests of success of the license renewal process, to decrease the scope of the GALL report or to make it less conservative?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>See NRC disposition of comment Lochbaum-1 in this Table A on intended purpose of the GALL report.</p> <p>The staff positions in SERs for plants reviewed have been or will be integrated into the GALL report, but the intent is not to make the GALL report less conservative. After the issuance of a license for extended operation, the plant will be subject to the same regulatory oversight as under CLB.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-6, UCS	18	The license renewal applications submitted to date do not seem to provide adequate information for the ten elements in every case as required by the SRP, Appendix A for the aging management programs.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Current experience indicates that the 10 elements are found in most programs, but sometimes they crosscut. When an element does not apply to a specific program, Chapter XI of the GALL report identifies it. The ten elements should be present in an effective AMP. Some individual programs standing alone may not have all ten elements, but there is a synergy between different programs. The applicant should identify what combination of aging programs is most effective so as to provide reasonable assurance that aging effects are being adequately managed.</p> <p>In addition, the SRP is not a requirement but a guidance document which provides information to facilitate staff reviews.</p> <p>The GALL report was revised to address this issue, but not specifically for this comment, by modifying the program evaluations in Chapter XI of the GALL report as appropriate to ensure there is adequate information in each one.</p>
Lochbaum-7, UCS	19	The NRC staff stated previously in written correspondence that IPE submittals for GL 88-20 are obsolete or out of date. However, page 2.1-3 of the SRP still requires their review as part of NRC staff review of scoping and screening methodology of an application.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>IPE submittals for GL 88-20 are considered only one source of many that are reviewed to help the reviewer understand the functions of plant systems, structures, and components for scoping purposes.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-8, UCS	43	Will the guidance documents - the GALL report, SRP, and draft Reg. Guide - be the vehicles for communication to the public or will something else be provided that is more easily understood by the general public?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC envisions these guidance documents as being the primary means of communicating to the public the license renewal process. In their present form, these documents are designed more for practitioners. The NRC is considering whether to develop a summary form of this information for the general public as part of public outreach activities.</p> <p>The license renewal guidance documents were not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-9, UCS	71	The guidance documents submitted for formal review and made available to all stakeholders were modified during the review period without communicating to all stakeholders ("bait and switch") either in the Federal Register or other means the reasons for and types of changes being made.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC has reformatted the GALL report to make it easier to understand and use. The substance of the information provided to the public was not expected to change as a result of this reformatting. If the public provided comments on information that was changed, the NRC evaluated if the comments would negate or affect the changes. The tables in the GALL report were reformatted by combining information in columns "Structure and Component" and "Region of Interest" into a column titled "Structure and/or Component" and also in columns "Aging Effect" and "Aging Mechanism" into column "Aging Effect/Mechanism." In addition, the staff relocated the information in columns "References" and "Evaluation and Technical Basis" into Chapter XI under the various aging management programs with applicable references in table to the respective programs.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-10, UCS	73	<i>Only one hour of the September 25, 2000, agenda is focused on the Federal Register notice that the public has to comment on. The bulk of the meeting concerns topics that aren't officially out for public comment.</i>	The basis for this comment is contained in and around the denoted transcript page (T-pg).	Guidance documents for license renewal were officially made available to the public with no constraints on the nature of comments that could be made. The NRC specifically asked in the Federal Register Notice for input on four areas very important to the credibility and public confidence in these guidance documents. This NRC workshop and others like it were open to the public and the NRC has tried to be very open in all communications to the general public. The GALL report was not revised to address this comment.
Lochbaum-11, UCS	125	There is a move afoot to move towards a risk-informed regulation, and 50.49 is one of the target regulations. Assuming that move continues on and makes some progress and things actually happen, is the implication to have two GALL reports? A GALL report for the risk-uninformed plants, and something like a "GALL-lite" for the risk-informed plants? How do you foresee handling that situation?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment UCS-3 in Table C of this NUREG.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-12, UCS	140	NRC did not refer to or address in this workshop the petition for rulemaking submitted by UCS. What is the current status of that petition for rulemaking?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The request for action by UCS filed under 10 CFR 2.206 was in regard to operation of the Edwin Hatch nuclear plant outside its design and licensing basis for liquid or gaseous radioactive waste systems. A copy of the Final Director's Decision (DD-00-05, ADAMS ascension no. ML003758416) in regard to this matter was filed with the Commission on October 18, 2000 and was officially final 25 days from that date or about November 22, 2000.</p> <p>The GALL report was not revised to address this comment.</p>
Lochbaum-13, UCS	155	If an applicant submits an application, relies on GALL and meets all 10 attributes without exception or variation, the NRC approves the license and the SER cites reliance on meeting GALL. Does NRC view that, then, as a licensing commitment that requires prior approval, review and approval, if any changes are made by the licensee to how they do aging management in that area?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC views it as a commitment and as part of the licensing basis, since the rule requires a summary of these programs in the FSAR supplement. Any change in this licensing basis is by the 10 CFR 50.59 process.</p> <p>If a license condition is imposed, any changes to it require prior approval by the NRC.</p> <p>The GALL report was not revised to address this comment.</p>
Lochbaum-14, UCS	156	If the applicant later changes the procedure for addressing aging management, is it necessary to return to NRC for further evaluation?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Lochbaum-13 in this Table A.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Lochbaum-15, UCS	185	Since in the single-page format adopted, the reference column was deleted altogether, would not any discussion about references become a moot point?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>See NRC disposition of comment Lochbaum-9 in this Table A.</p> <p>The reference column in the August 2000 version contains redundant information that is already contained in the other columns in the GALL report. The information was not lost, just relocated to a more central location in the GALL report. Therefore, the reference column was deleted in the reformatting of the GALL report.</p> <p>A citation to a code or standard ,as applicable is in the text of the Aging Management Programs contained in Chapter XI of the GALL report. The actual references to a code and standard for a specific AMP are included at the end of each AMP.</p> <p>The GALL report was not revised to address this comment.</p>
Menocal-1, Florida Power and Light	63	The latest version of the draft GALL included a new section for carbon steel external surfaces for steam and power conversion, aux systems normal engineered safety feature (NESF), yet it looked like in some cases external surfaces were also addressed within the body of the sections. Was the intent to have that new section address all the external surfaces for each section of the GALL?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The intent of the last Section in each of Chapters IV, V, VII, and VIII discussing carbon steel external surfaces was to cover all carbon steel surfaces in each of those respective chapters of GALL. It was done to comprehensively cover all carbon steel external surfaces without listing each component or requiring any further evaluation.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Menocal-2, Florida Power and Light	118	Is crevice corrosion one of the mechanisms that are of concern with respect to adequacy of existing chemistry programs and can it be detected and verified by one-time inspection in accordance with GALL? Is a corrective action program with root cause identification a suitable substitute for a one-time inspection?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Crevice corrosion is an aging mechanism of concern in certain areas of particular systems, and combinations of environments. One aging management program to control crevice corrosion aging effects as presented in GALL is a chemistry program in conjunction with a one-time inspection. The one-time inspection, conducted prior to expiration of the current license, is a validation of either the presence or absence of corrosion and is implemented by nondestructive evaluation techniques. Any corrosion detected is evaluated and corrective actions are implemented if necessary. Any program that similarly verifies that corrosion is either present or not can be credited as an acceptable alternative.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Menocal-3, Florida Power and Light	119	Will the absence of symptoms of aging mechanisms such as crevice corrosion, based on a one-time inspection, appropriately permit the conclusion that a problem does not exist? Certain other aging effects may be found other than the specific effects for which the inspections were initiated.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The one-time inspection is used to confirm either the lack of corrosion or the slow progression of corrosion, which has an innocuous effect, and to evaluate any corrosion detected, per established acceptance criteria. It is not a stand-alone aging management program. The primary aging management program, which the one-time inspection is used to validate as performing as intended, will still be in effect even if no corrosion is detected to ensure the continued management of that aging mechanism. An applicant would be well advised to look for as many aging effects/mechanisms as would be applicable in a specific one-time inspection.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Mulvehill-1, Southern Nuclear	126	Can an applicant just select the more economical option three, 10 CFR 54.21(c)(1)(iii), or will he have to update the EQ calculation?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>An applicant is allowed to select the option listed in 10 CFR 54.21 (c)(1)(iii), which means the applicant must show the ability to manage the aging effects of the electrical components during the renewal period under its current EQ program. This allows the applicant to delay the decision as to whether to update the EQ calculation or replace those components until just prior to the renewal period in order to extend their qualification under 10 CFR 50.49 into the renewal period.</p> <p>The GALL report was not revised to address this comment.</p>
Newton-1, WEPCO	100	For the reactor vessel, could a program like the Master Curve Approach be included in the GALL report, and how can programs like that be recognized in the GALL report as acceptable?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Any program like the Master Curve Approach can be incorporated into the GALL report if deemed of a generic nature and if approved by NRC staff. Specifically, for the Master Curve Approach, a rule change would probably be needed. To use the Master Curve Approach instead of the screening criteria in the pressurized thermal shock (PTS) rule in 10 CFR 50.61, an exemption could be granted in the interim, but over the long term, there would have to be a change in the 10 CFR 50.54 rule.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Newton-2, WEPCO	102	What if a utility came in, and in their application, referenced specifically planned future use of the Master Curve. How would that be reviewed and assessed as an acceptable aging management program?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	The Master Curve Approach in regard to licensing renewal would be a TLAA and would have to meet the requirements of 10 CFR 50.21(c)(1). An applicant would have to show that under the present technology, the screening criteria or the basis for the PTS rule in 10 CFR 50.61 is met. The staff would have to know how the Master Curve Approach would be used and how it would be implemented in order to review it as a means to manage aging. The GALL report was not revised to address this comment.
Newton-3, WEPCO	103	If existing rules were used and a reactor vessel only meets the screening criteria for some arbitrary number (say 55 years) and the applicant intends to apply the Master Curve Approach, before that time period expires; -- how would that program be reviewed and accepted?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	The NRC would need to condition the license to require a demonstration of adequate reactor vessel toughness past 55 years. The GALL report was not revised to address this comment.
Newton-4, WEPCO	104	The NRC has accepted TLAA's where the analysis was not valid for the entire 60 years for license renewal applications already granted. So why would the NRC not accept a TLAA for the reactor vessel if the analysis similarly was either not valid for or had not been projected to the end of the period of extended operation?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	If an analysis is not updated to be valid for the entire 60 years, then the NRC will require reasonable assurance that aging effects are being adequately managed for the entire extended period or until the analysis is updated. The applicant has the burden under 10 CFR 54.21(c)(1)(iii) to demonstrate this is actually the case. The GALL report was not revised to address this comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Newton-5, WEPCO	109	One vision of the future with respect to reactor vessel internals is that applicants can learn from each other's inspections, and show their applicability to similar plants. Is that vision shared by the NRC?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC looks for opportunities to focus the staff's review on unique aspects and relies on generic efforts to increase the efficiency of that review. The NRC is open to increasing the generic aspects of GALL based on the staff's review of the inspection and research activities performed by applicants. Licensees of plants with renewed licenses are participating in industry programs and workshops to share their license renewal experiences. The NRC expects that, as a result of these industry forums, future applicants and holders of renewed licenses will propose changes to their programs and possibly to programs in the GALL report. With many aging mechanisms and aging effects, it is unclear when they become critical in regard to impeding an intended function. NRC's experience with its research programs, inspections, and industry insights will provide some guidance.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Newton-6, WEPCO	142	Is it correct that the SRP causes an examination of what is not in the scope? Is it clear that the applicant knows what NRC staff is looking for during site visits when NRC staff want to confirm what's in and what's out of scope in the SRP?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The rule requires an applicant to develop a screening and scoping methodology that will ultimately classify those SSCs that are and are not in scope. The staff visits the site to understand the applicant's scoping and screening process and making sure that it is consistent with the requirements of the rule. The NRC first tries to understand the applicant's methodology and then reviews the SSCs the applicant classified as being in scope based on that methodology. The SRP provides guidance for the staff in reviewing the applicant's methodology and scoping results.</p> <p>The SRP was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Newton-7, WEPCO	182	Codes and standards very seldom make up the entire 10 set of attributes that we use in a program; they could be used for an inspection technique, scope definition, etc. So, when the NRC looks at what we've referenced from a code or standards standpoint, they really look at what attribute it's trying to satisfy in a program. Once you've accepted that code and standard in that program, we can then use that as a guide to say we are equivalent or better to that. I anticipate that you're going to look at the standard and say, for this attribute, it's all right in that one, then we can use that in the future, and once you've blessed it for that, we can use that as the process by which it gets approved.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	Usually, the NRC relies on codes and standards for certain important attributes – scope, method, frequency – the key features of an aging management program. The objective is to find a way to maximize the efficiency of GALL by defining an attribute in such a way so as to give maximum credit. However, the SRP in Appendix A discusses ten elements (attributes) for aging management programs. Although typically only the most important attributes require a benchmark to be established from a reference or code, it is up to the staff to determine the weight assigned to each attribute of a program in regard to managing specific aging effects and mechanisms. The GALL report was not revised to address this comment.
Newton-8, WEPCO	187	If the applicant does not justify, in its application, the omission of any aging effects identified in the GALL report, that the applicant has determined not to be applicable will the applicant get an RAI (Request for Additional Information) asking it anyway?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	If an applicant does not justify in applications instances where GALL is not bounding, the staff should focus its review on those aging programs. The objective is to allow maximum credit for programs that adequately manage aging effects. If that standard is not met, RAIs should be issued to help reviewers to fully understand the augmented or new programs proposed in the application. The GALL report was not revised to address this comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Patel-1, PECO Energy	32	How will the GALL report be used in the future? Is NRC planning to revise the GALL as more plants apply for license renewal?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report looks back and reflects on experience; future GALL updates would address the most recent experience. The NRC looks for opportunities to focus the staff's review on unique aspects and relies on generic efforts to increase the efficiency of review. The staff plans to update these license renewal guidance documents to capture additional lessons learned from future reviews and industry activities. However, the schedule of this update is not determined.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Patel-2, PECO Energy	46	There seems to be some inconsistency in guidelines in different sections of the SRP corresponding to the GALL report – is the intent to include the 10 attribute table or is it just a three line or a four line statement?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report is a topical report that an applicant can merely reference in an application to focus staff efforts on the evaluation of plant-specific AMPs or exceptions to the GALL report. By merely referencing the GALL report when it is bounding, the applicant decreases the volume of the application and the review time of the staff. These references and any exceptions to the GALL report may be in tables, footnotes to tables, or in a separate section in the front or the back of the application. The applicant typically would include only those components or AMPs that are either exceptions or plant-specific as the case may be in the application with the remainder of supporting information for material in application, bounded by GALL, in auditable form at plant site. The Final Safety Analysis Report (FSAR) supplement that is included in the application may take the form of tables, for both components and aging management programs, as outlined in Chapter 3 of the SRP. This would be for those components and AMPs identical to those in the GALL report. If additional components are added, then the applicant must, as previously stated, denote somewhere in the application the inclusion of those components.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Patel-3, PECO Energy	50	When the word "program" is used, many plants don't necessarily have what could be considered a full-fledged program in all cases. For example, the mechanism a plant uses to meet the intent of GL 89-13 (Service Water System Problems Affecting Safety-Related Equipment) may be a series of activities. One of the NEI's previous comments was to call these "aging management activities" rather than "aging management programs." Clarify what is considered an aging management program.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>There is no distinction between the terms "program" and "activity" in the GALL report. A program should consist of ten elements as stated in SRP, Appendix A, Section A.1.2.2. and in Chapter XI of the GALL report, and if it does not, then it must be justified by the applicant and evaluated by the staff. Many of the "existing programs" at plants serve multiple purposes whereas the definition of program used here is exclusively for managing aging effects.</p> <p>The GALL report was not revised to address this comment.</p>
Patel-4, PECO Energy	63	The 2-pg format in the August 2000 draft of GALL had the effect of sometimes carrying over an extensive write-up of the 10 elements for the AMPs. This would be displaced to a location in the table that would be two pages away (leaving the left side of the page blank when there was no change in line item). This made the tables sometimes difficult to read.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The tables in various chapters of GALL now refer to the aging management programs in Chapter XI of the GALL report. Thus, this problem of AMP descriptions extending to several pages was eliminated.</p> <p>The GALL report was revised to address this comment by placing all AMPs in Chapter XI of the GALL report and have the various line items in the GALL report (Chapters 2 through 8) under the "Aging Management Programs" column refer to those AMPs.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Patel-5, PECO Energy	75	When NRC said 'scoping questions' does this focus only on systems and components or does this also include aging effects? If I don't have an aging effect, then I don't need to manage it. Do I need to explain it in my application?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report is completely independent of the scoping issue. The GALL report is a generic evaluation of aging management programs for components in specific environments. The inclusion or exclusion of an SSC into GALL does not dictate that an SSC will be included or excluded in the application. Thus, its associated aging effect or mechanism would be treated similarly.</p> <p>The GALL report was not revised to address this comment.</p>
Patel-6, PECO Energy	76	If the GALL report calls out an aging effect or an aging mechanism for a certain material and component, and an applicant determines that this is not relevant to the plant, is it necessary to explain why it is not applicable?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report is a generic evaluation of aging management programs and is not a scoping document. An applicant is required to identify and list structures and components that are within the scope of the 10 CFR 50.54 rule in the application. For the GALL report, any exceptions to programs for particular SSCs must be identified and justified in an application.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Patel-7, PECO Energy	108	If the applicant has the BWR VIP program with an SER for license renewal, will this be recognized in GALL Chapter XI "Aging Management Programs?" If a relevant AMP is included in GALL Chapter XI, then aging effects considered by the BWRVIP, will be covered. At present, this information is absent.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>All aging management programs were placed in GALL Chapter XI in order to present this guidance only once. This provides a user-friendlier document and an easier format to understand. Chapter XI, Sections M1 (ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD), XI.M4 (BWR Vessel ID Attachment Welds), XI.M7 (BWR Stress Corrosion Cracking), XI.M8 (BWR Bottom Head Penetration), and especially XI.M9 (BWR Vessel Internals) rely heavily on BWRVIP guidance.</p> <p>A new AMP, XI.M9 (BWR Vessel Internals), was drafted and inserted in GALL, Chapter XI, concerning Aging Management Programs. This particularly references the Boiling Water Reactor Vessel Internals Programs (BWRVIP).</p> <p>The GALL report was revised to address this comment and other similar comments by placing all aging management programs in Chapter XI and basing several aging management programs in part on BWRVIPs.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Patel-8, PECO Energy	185	The GALL report provides too much detail on ASME Section XI in the evaluation basis, right down to the category level; with the new codes coming out, with the new editions coming out, those categories would change. The Gall report still lists references down to the category level for the '89 version of that code. Some plants have already switched to the '95 version and some categories have changed. So, even though we meet the intent of the GALL and meet all the attributes, we still cannot say we meet all of the requirements of the GALL, because the categories have changed.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Chang-6 in this Table A in regard to updating the GALL report for new ASME code revisions.
Polaski-1, PECO Energy	51	From a license renewal perspective, many plants that have plant-unique configurations may be placed at a disadvantage. It would be better if the GALL report does not become so overly-prescriptive that it does not allow for existing plant-specific exceptions for those programs that have been in place at plants for years.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>If a program was developed in conformance to a Regulatory Guide, staff position, standard, or code (with some exceptions noted) and was documented in that plant's CLB or previously evaluated by the NRC, then the applicant should make a statement to that effect in the application. If GALL were binding, other than the exception noted for license renewal, the staff would evaluate the impact of the exception on the program. The NRC staff may still need to review exceptions to programs or the CLB to determine the applicability to license renewal.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Polaski-2, PECO Energy	87	Containment and inspections – Is there any reason that an applicant couldn't just cite his inspections that he does in accordance with IWE, IWL, which are mandated by regulations and acceptable programs? But when the NRC promulgated that rule, they found that it was an acceptable aging management program for current-term and the renewal term. So the question is, why do we need to do more than what's currently mandated by regulation for renewal term?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Walters-8 in this Table A.
Polaski-3, PECO Energy	88	The NRC, for licensing renewal, requires inspections in inaccessible areas with no presence of corrosion in accessible areas. This seems counter to some current regulations.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC, in conjunction with industry, has proposed acceptance criteria for addressing inaccessible areas. Exceeding the criteria will probably denote the presence of corrosion in inaccessible areas. If the threshold of the acceptance criteria is exceeded, then inspection of those inaccessible areas will be performed.</p> <p>The GALL report was revised to address this comment by incorporating into AMPs XI.S1 (ASME Section XI, Subsection IWE) and XI.S2 (ASME Section XI, Subsection IWL) in Chapter XI of GALL acceptance criteria.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Polaski-4, PECO Energy	148	What is the significance about the maintenance rule for scoping mentioned earlier in the public workshop? It ought to be fairly easy and straightforward to take the maintenance rule answers which were developed under regulation and just apply them to license renewal.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The intents of the license renewal rule and the maintenance rule are similar in that they both verify that the effects of aging on functionality of SSCs will be adequately managed. The Commission has determined that the license renewal rule should credit the existing maintenance rule including the area of scoping for most SSCs when applicable. This is in accordance with the first principle of license renewal, i.e., the reliance on the current regulatory process to protect the public health and safety except for age-related degradation issues. Therefore, an applicant should exercise credit for both the scoping of SSCs and programs developed for the maintenance rule in addressing compliance with the license renewal rule to the extent possible within the guidelines of license renewal.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Polaski-5, PECO Energy	157	<p>A general concern is that the plants that are going through license renewal right now are some of the original plants that were licensed, and a lot of the programs that are credited in GALL are written from the viewpoint of latest, best industry standards that would be suitable to a fairly recent plant, like a Watts Bar or a plant like that, but have no applicability at all to the earlier plants; and so, some of the earlier plants are going to expend a great effort to try to use GALL to the extent that was hoped it would be. Part of the challenge will be to adapt GALL so that it reflects, justifiably, earlier applications for older plants which were accepted despite some disagreements with the presentation and aging management programs in the GALL report. The reason being is not to have subsequent plants of a similar vintage to submit applications and to have to revisit issues and concerns that were previously accepted by the NRC in some respect anyway.</p>	<p>The basis for this comment is contained in and around the denoted transcript page (T-pg).</p>	<p>See NRC disposition of comment Patel-1 in this Table A.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Polaski-6, PECO Energy	159	It is not clear that we will have the immediate increase in efficiency that some people hoped we would have, where it would have been. If I'm putting in an application two years from now for a plant that was built and the license will expire in 2012, I ought to be able to go right down the list and match up. I think you're going to find there's going to be some disparity. Maybe 10 years from now, when you're talking about a Watts Bar and some of the latest plants, it should be very clear-cut that that process will go real easy.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>If industry representatives or future applicants think the GALL report is too limited in scope in the number of SSCs presented, or in the number or content of the evaluations of AMPs (thus applying only to newer plants), the NRC should be informed of such. The NRC is sensitive to this issue, but the GALL report cannot envelope all plant-specific details because it would not be a generic evaluation of aging management programs that applicants could use to present and justify their own programs.</p> <p>The GALL report was not revised to address this comment.</p>
Robinson-1, Duke Energy	111	During the Oconee work, one-time inspections played a very important role for us, in that there were certain areas where we could not characterize the aging that was going on. We proposed one-time inspections as an opportunity to go in, look at the hardware, characterize what may be going on, and then determine if follow-up and more perpetual aging management programs were required. Could you address the characterization of aging, versus proving that an aging management program is effective?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>NRC presented the position in the GALL report that a one-time inspection was a verification of an existing AMP that probably was adequately managing the aging effect, and that new proposed programs or modifications of the existing program, based on input from the one-time inspections, were not out of the question, but were not likely.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Robinson-2, Duke Energy	112	The one-time inspections at Oconee were aimed at areas where no program existed or the aging mechanisms occurring could not be characterized. Using the water chemistry program as an example, after over 20-25 years of operating nuclear power plants with chemistry programs, if corrosion was going to occur in the systems in which chemistry is controlled then evidence of that would have been apparent by now. One-time inspections can be very valuable in helping you characterize things where knowledge of what prevailing synergistic effects are going to do to hardware is not available. But be careful when you're including well established, and well run programs, like a chemistry program, for which additional sampling is not required, based on operating experience, into the bin of programs to be verified by one-time inspections.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>One-time inspections are appropriate to "verify" that an aging effect is being adequately managed by existing programs, if it is postulated that a very slow-acting aging mechanism is in progress or no aging effect is to be observed. However, there are concerns about possibly long incubation periods or lack of evidence about an aging effect. Corrective action process based on either operating experience or inspections could be used to initiate a plant-specific program. The GALL report identifies the need for a one-time inspection on a case-by-case basis.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Robinson-3, Duke Energy	146	The whole scoping methodology exercise seems to be evolving to the point of looking at what's not in scope. There seems to still be a disconnect between the scoping phase and the aging management review phase of renewal. My first comment is that it seems there could be a more efficient way to get through that. The second comment is that we focus a lot of scoping on structures and systems. There's the other aspect of commodity reviews that we do, sort of super-set reviews that we do at the aging management review level.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The reviews of an applicants' scoping and screening methodologies will become more efficient as more applications are processed and the staff knows what questions to ask to not only expedite the review but also to obtain reasonable assurance that all aging effects are being adequately managed.</p> <p>The GALL report was not revised to address this comment.</p>
Robinson-4, Duke Energy	161	The write-up in the SRP and GALL on the words to be used in an applicant's FSAR supplement may cause future applicants some concern. For Oconee we have included our FSAR supplement in our FSAR, and are trying to make sure we have procedures in place to maintain those words into the future. Reasonably specific information in a FSAR will be required in order to give guidance to future generations. Some of the words in the GALL and SRP are not specific and strong enough about their intent or meaning to prevent an applicant from changing the words in his FSAR at a later date to something that is less specific than originally intended.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The write-up in the SRP on the content of the FSAR supplement represents minimum information. An applicant may propose to include more details if that helps in maintaining the licensing commitment for its plant. NRC would welcome any suggested improvements during or subsequent to the public comment period of the license renewal guidance documents so as to assist applicants in the future maintenance of their FSAR's content. The nature of such suggestions would have to be specific in order for the staff to assess their merit and make the necessary changes to the GALL report and the SRP on the content of the FSAR supplement.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Robinson-5, Duke Energy	173	If we meet some information in GALL, then we should take credit for it. A code or standard does not manage aging, but it's the actions under the program that manages aging. A code or guidance document gives us some help in setting up that program, but we still have to do the program in-house. If our code or standard is a later version than the one referenced in GALL then we have to make sure that we're doing the appropriate aging management task in-house. Referencing a code like 50.55(a) means nothing, it's the program actions themselves that we have to justify so that you can make a judgment on them not the codes and standards.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Chang-6 in this Table A.
Robinson-6, Duke Energy	175	There are really two issues. One is how you measure up to GALL and what happens if you want to use a code that's outside of the particular rev that's been described in GALL. That's sort of an administrative process you have to go through. The other question is, once you've signed up for a program that has certain elements to it that will help you manage aging, how do you, in a systematic way, begin to progress and mature beyond that?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Chang-6 in this Table A for what to do when references in the GALL report and in an applicant's application are different prior to granting a renewed license. The process to change a code or standard after granting an applicant a renewed license is the 10 CFR 50.59 process. The GALL report was not revised to address this comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Robinson-7, Duke Energy	176	Being clear with what's written in GALL, whether I agree with it or I want to take a deviation from it, you've got to be specific. You can't just say an in-service inspection, but if you call out a particular type of volumetric inspection or a particular technique that you believe works or that you've seen in industry practice that works and you want to report that in GALL and I want to deviate from it, you have to be specific enough so I can know how to deviate.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report is a generic evaluation of aging management programs for specific materials in certain environments. The GALL report describes one acceptable way to manage aging effects. An applicant can deviate from any program but must then provide reasonable assurance on the adequacy of his program to manage aging. This also applies to the codes and standards on which an aging management program is based. The NRC received several comments during the formal public comment period on how to modify the GALL report to make it more specific and evaluated them individually. Any additional comments on this same matter should identify where the GALL report lacks specificity.</p> <p>The GALL report was revised to address this comment and other similar public comments by modifying the AMPs in the GALL report.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Robinson-8, Duke Energy	191	When aging effects are identified in GALL, they should not be just someone's perspective or experiences that can not be substantiated by operating experience or a legitimate reference document. An assertion based on some laboratory experience in graduate school but with no operating experience should not be allowed since there is really nothing for an objective reviewer to follow up on. A word search should be done to avoid using phrasing such as "based on staff experience, these effects occur."	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>One of the elements requested of all programs is operating experience per SRP, Appendix A. All programs in the GALL report, chapter XI, have supporting evidence why they are legitimate programs. The NRC has made all operating experience provided in the GALL report objective rather than the subjective viewpoint of the staff that developed a particular program. A word search produced no instances where aging programs were not adequately supported. In addition, the NRC reverified any operating experience that had been questioned based on formal comments submitted.</p> <p>The GALL report was not revised to address this comment.</p>
Rycyna-1, CNS	160	What are the expectations of those plants that have programs similar to those in the GALL report but for which it's more effort to justify similarity with the GALL than to do the 10-point review and just ignore the GALL?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>If the GALL report is bounding then an applicant can merely reference the GALL report. If not, an applicant should provide reasonable assurance on the suitability of a new or augmented program for a particular application.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Taormina-1, CNS	188	<p>Can an applicant identify in GALL the appropriately corresponding system, components, with the same materials and environments and make the conclusion that it has the same aging effects and put that in his application? Is it acceptable to use the GALL as a basis for the aging effects requiring management for a particular system?</p> <p>I don't feel I should have to address an aging effect that's in the GALL if my own analysis shows I don't require to manage that, unless you can let me use the GALL to draw those conclusions, in which case, if I need to dispute the finding in the GALL, I'd like to see those technical bases for those conclusions that are in the GALL.</p>	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report is not a scoping document, and an applicant can only reference it when the GALL report is bounding. The applicant bears the entire responsibility for determining and defending what applicable aging effects and mechanisms are relevant for his plant. The inclusion or exclusion of an SSC in the GALL report does not dictate that an SSC will be included or excluded in the application. Thus, its associated aging effect or mechanism would be treated similarly. For example, there may be aging effects observed through plant-specific operating experience that may not be included in the GALL report.</p> <p>The GALL report was not revised to address this comment.</p>
Taormina-2, CNS	190	It was our understanding that the GALL was really intended to describe how programs are adequate to manage aging effects for those particular systems and structures, not necessarily to describe which aging effects require management. We were just curious where the basis for those aging effects requiring management came from.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>GALL is a generic evaluation of aging management programs for specific materials in certain environments. The basis for the description of aging effects requiring management stems from the original GALL report (NUREG/CR-6490). This was a comprehensive catalog of aging effects based on an extensive review of operating experience and aging studies.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Committer and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-1, NEI	31	Implicit in many of the topics addressed today is how the Regional inspection process or program will be applied. If not already targeted as being addressed today, can you place it on the agenda for today?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC anticipates that the inspection guidance documents contained in plant inspection procedures will evolve and be refined slightly as more applications are processed. Presently, inspection plans are developed from them for separate reviews of scoping and screening methodology and aging management programs, including TLAAs, during the license renewal process. Before the start of the extended period of operation, another inspection will be performed to verify the status of outstanding commitments or licensing actions identified by applicants during the license renewal process. The inspection plans could evolve to a much greater extent than the procedures since they focus on problem areas defined by prior experience or staff guidance. The inspections will focus on the supporting evidence for scoping methodology and aging management programs kept in an auditable form at the site. This will be pursued, along with other key areas under the guidance of NRC staff in headquarters. The NRC will entertain comments of a more specific nature on the inspection procedures for license renewal contained in both manual chapters 2515 and 2516.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-2, NEI	66	How is the distinction between structures/components (one column in the August 2000 draft version of GALL) and regions of interest (adjacent column in the August 2000 draft version of GALL) handled in the revised 1-page format where the region of interest column is eliminated?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The GALL report has been reformatted into a single-page format that retains the distinction between "structure & component" and "regions of interest" by having a single column where the heading is "structure and/or component." The immediate entry under that column for each line item is the structure and component of concern with subcategories on that same line item being the previous regions of interest.</p> <p>The GALL report was revised to address this comment as stated above.</p>
Walters-3, NEI	67	<i>Has the NRC ever considered adding a column for function? (If the purpose of the rule is to manage aging to ensure functionality, it is not clear how programs can be evaluated without considering function.)</i>	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The NRC has not included a column for "intended function" in the GALL report for several reasons. First, an SSC can have several intended functions with the aging effect and mechanism being the same for each. Listing all those intended functions would unnecessarily increase the volume of the GALL report. Second, intended functions are plant specific, which, if included, would further detract from the generic nature of the GALL report.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-4, NEI	68	Has the NRC considered an approach that would start with the program first, specifically those where no further evaluation was required? The components would be defined for each program and then the GALL-type of format would be utilized for those programs that require further evaluation. This approach might be a more expedient way for the applicant to go through the process.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	Generally, an applicant first must determine what SSCs are included within the licensing renewal rule. Once he determines that, then the GALL report presents an understandable format for determining the evaluations performed for a SSC and the results. Again, the applicant can follow the GALL format or present his own. In addition, the SRP summary tables for a grouping of plant systems provide, in a condensed format, the association between SSCs, aging effect/mechanism, programs, and plant type. Chapter XI of the GALL report also provides a compilation of aging management programs. The GALL report was not revised to address this comment.
Walters-5, NEI	70	At this date, has it been determined that the final version of GALL will be reformatted or are you considering this and looking for input?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Lockbaum-9 in this Table A. The GALL report was previously revised to address this issue but not specifically for this comment.
Walters-6, NEI	77	The SRP seems to describe a methodology of how to evaluate scoping and it really focuses on proving the negative. The licensee has to defend why something wasn't in the scope. Although separate from GALL, it seems to be a logical extension that the staff reviewer may ask why wasn't something in scope that was included in the GALL report?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Patel-5 in this Table A.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-7, NEI	81	By structural monitoring program, is it implied that an applicant can take credit for a similar program implemented under the maintenance rule?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>An applicant can take credit for a program meant for compliance with the maintenance rule if the applicant provides reasonable assurance in the LRA why it is also applicable to adequately manage aging effects for those SSCs without all ten elements present as required by SRP, Appendix A, for all programs. The staff would review this program to see if it meets the criteria for an aging management program.</p> <p>The GALL report was not revised to address this comment.</p>
Walters-8, NEI	90	The issue seems to be that the Agency looked at the 50.55(a) rulemaking to endorse IWE and IWL for containment inservice inspections, specifically with an eye to license renewal. I believe the statements of consideration indicate that they did that, and that they found it acceptable for the period of extended operation. On this issue, we've just been in quandary why, if that's what the intent of the rulemaking was, is there now an exception to that to do something different?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The Statements of Consideration (SOC) (60 FR 22461; May 8, 1995) in support of 50.55a rulemaking endorse IWE and IWL for containment inservice inspections. The Commission amended Part 54, but did not limit aging management activities for containment for license renewal to just IWE and IWL. Aging management activities including IWE and IWL should adequately manage aging effects. If not, they should be augmented to accomplish that goal. The GALL report is consistent with the 50.55a rule and recommends aging management programs for areas that are not covered by 10 CFR 50.55a.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-9, NEI	116	If a one-time inspection is performed for an area, as agreed in GALL, is it possible that this inspection could be done at a more opportune time (such as during an outage) either before or during the preparation of an application? Would this still qualify as satisfying that particular need?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>A one-time inspection is a verification of the absence or presence of specific types of corrosion. It may be performed at anytime in accordance with the GALL report, Chapter XI, AMPM32, as long as it is before the expiration of the original operating period. Preferably, the inspection should be as near the end of the original licensing period as possible.</p> <p>The GALL report was not revised to address this comment.</p>
Walters-10, NEI	132	Do we have, collectively, any operating experience that shows that inaccessible cables are being degraded? Do we have any experience that suggests that those cables, the buried cables, in particular, are degrading? I guess the question is how aggressive do we have to be in going to look for this aging? An issue with the original rule was we shouldn't have to speculate on what might occur. We ought to deal with what we know.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The concern is with non-EQ cables within the license renewal rule exposed to environmental effects (like temperature and water), that could compromise their safe operation after 40 years. Accessible cables can be monitored for hot spots, and there is recent operating experience with degradation with inaccessible cables.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-11, NEI	136	For EQ equipment, is there anything that precludes the staff from accepting an original analysis that shows that the equipment is good for 80 years or 100 years so that additional evaluation is not required every 20-year licensing renewal interval?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>Environmental qualification per the license renewal rule is satisfied by a time-limited aging analysis (TLAA). There are three methods to verify that TLAA's are adequate under the license renewal rule in 10 CFR 54.21(c)(1). First, an applicant may show the original TLAA is valid for a time span exceeding the original 40 years and one or more renewal periods. Second, the original TLAA is modified to include at least one extended period of operation. Third, the applicant can show that the aging effects are adequately controlled during the extended period of operation. Proceeding from the first method to the last requires increasing levels of evaluation and assessment on the part of the staff and also the applicant. Equipment cannot be credited for more than one renewal period at a time, but an applicant can decrease his and the staff's review efforts by including as many renewal periods as feasible in the TLAA evaluation.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-12, NEI	143	As a follow-up to the question about looking at what is not in scope, does the NRC actually approve the methodology? Unless you're doing that review to somehow verify that I implemented an approved methodology satisfactorily, in which case I wonder why do you need to do that?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>The rule requires the applicant to submit a scoping and screening methodology for NRC approval. The staff will review the methodology and its results to determine if all within scope SSCs have been included. On-site inspection will be used to verify, on a sampling basis, the implementation of the applicant's scoping methodology by primarily reviewing supporting documentation, which forms the basis for his compliance with the rule in regard to scoping.</p> <p>The GALL report was not revised to address this comment.</p>
Walters-13, NEI	167	The staff's evaluation of an applicant's program based on the required ten elements appears rather robust. The content of the programs in the GALL report does not seem to agree with that of the actual programs in the field. How do we come to closure on this issue about increasing the agreement between these two program descriptions?	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>See the NRC disposition of comment Bowman-5 in Table A.</p> <p>In addition, the NRC considered public comments on the composition of the aging management programs and revised the GALL report as appropriate. However, each aging management program in the GALL report was evaluated using the ten elements in the SRP, Appendix A.</p> <p>The GALL report was not revised to address this comment.</p>
Walters-14, NEI	168	If the old program is okay and there is a new program that's okay, shouldn't we capture both in GALL, because there is a probability that a certain percentage of licensees will use the old program? Have you thought about that, to the extent that it provides	The basis for this comment is contained in and around the denoted transcript page (T-pg).	The staff focuses its review on the unique aspects in an application rather than generic efforts bounded by the GALL report. The NRC is open to increasing the generic aspects of the GALL report based on the staff's approval of an applicant's inspection and research

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-14, NEI (cont.)		sufficient credit? There's probably other situations like that, where there's a percentage of licensees who use a certain version or revision of a particular Reg. Guide or code. Older programs may be in place and may be just as acceptable as a newer program, and should we capture those in GALL?		<p>activities and where the revision of a code or standard has an innocuous effect on an existing program. For the latter case, the GALL report could be expanded to include both the new and old programs supported by different code or standard revisions, as long as each adequately manages the postulated aging effects. Conformance, as well as exceptions to a Regulatory Guide, staff position, standard, or code in accordance with a plant's CLB or evaluated in an NRC document, should be noted in an application, but only the exceptions should be reviewed by the staff. The GALL report looks back and reflects on experience; future GALL updates (when issued) would address the most recent experience. The NRC's experience with its research programs, inspections, and industry insights will provide some guidance as to when and to what extent the GALL report needs to be expanded.</p> <p>The GALL report was previously revised to address this comment based on staff reviews of other similar comment but not directly as a result of this comment. Dispositions of other comments on programs are provided elsewhere.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-15, NEI	173	I think for the codes and standards that are not endorsed by 50.55(a), certainly you could evaluate those in GALL, and I believe that the applicant, certainly if they implement the version that was evaluated in GALL, has a straightforward job. If they've got a different revision that they're using, then perhaps what they need to do is evaluate the differences and provide that in the application.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	<p>See NRC disposition of comment Chang-6 in this Table A in regard to the incorporation of codes and standards in the GALL report or applications.</p> <p>The NRC has reviewed the 1995 ASME Code Edition through 1996 Addendum against the ten element evaluations for AMPS where the Code is utilized in Chapter XI of GALL. Where appropriate, the NRC has identified and included those items that are different in the 1995 Code Edition through the 1996 Addendum from the 1989 ASME Code Edition in Chapter XI.M1.</p> <p>Any future revisions of the ASME code will be evaluated in a similar manner as described above. If an applicant has a different version of a code and standard than the one referenced in the GALL report, the applicant should evaluate the differences and provide that information in the application.</p> <p>The GALL report was not revised to address this comment.</p>

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-16, NEI	178	There are two issues of concern. (1) If there are two acceptable existing programs, you ought to consider putting both of those in the 8/00 version of GALL. I'll tell you where I differ, and you're going to pass judgement on that and you're going to give me a renewed license. (2) What happens if the ACI standard is upgraded or there's a new ACI standard. I've got to go back and say have I changed anything between what the NRC approved for renewal and what this does, and I would probably argue that even on 50.55(a), the fact that you endorse it by regulation, I'm not sure I just go off and say I'm going to implement that version. Certainly if I took credit for it as an AMP, regardless of code edition, I don't believe I'm going to be able to use that unless I go through the process of evaluating that new edition against what you approved in my LR application. If we're aware of another program that's older, that's acceptable, we shouldn't impose or make GALL appear to impose something newer merely because that's what's in place at the time.	The basis for this comment is contained in and around the denoted transcript page (T-pg).	See NRC disposition of comment Bowman-1 in this Table A to address the first issue in the comment. See NRC disposition of comment Lochbaum-13 in this Table A to address the second issue in the comment.

Table A: Disposition of Participant Comments from the License Renewal Public Workshop, September 25, 2000 (continued)

Commenter and Affiliation	T-pg	Comment	Basis for Comment	NRC Disposition
Walters-17, NEI	192	<p>It's not clear why the process can't work by reviewing what the applicant describes as their methodology for scoping and then also for determining which aging effects require management. If the agency looks at that methodology and applies it however they think they would apply it and they think that a structure or component was omitted or an aging effect was omitted, then ask that question.</p> <p>For the applicant to be requested to provide information about everything that is not included, is very hard. The burden is on the applicant, but I always thought that the burden was to provide your process for how you come up with what's in the basket. If the agency thinks there is a problem with that, then the question ought to go back to the applicant with a basis for why the staff believes, based on their review of the methodology, a certain aging effect or a certain structure or component should have been included, I'm not sure that's the way that we're headed.</p>	<p>The basis for this comment is contained in and around the denoted transcript page (T-pg).</p>	<p>Industry is looking for ways to minimize the amount of information that they are required to put in the application. At the same time, the staff is looking for an optimum level of information that will make reliance on references and the evaluation basis clear. As a general rule, the NRC does not expect to challenge everything, but expects to limit challenges to specific areas based on knowledge, experience, and a rationale.</p> <p>At the same time, an applicant could reference GALL, and where there are differences, should provide basis regarding how the reference was incorporated. The NRC will continue to improve the efforts to explain the reasons behind questions in a clear manner. NRC guidance provides a guide on level of detail in applications in order for the NRC to review the applicable aging effects and assess the effectiveness of aging management programs.</p> <p>The GALL report was not revised to address this comment.</p>

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