

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-1	B.3.8 S3.5 Generic Comment	Since this section deals with AMR, a discussion needs to be included on determining aging effects. If a discussion is not provided, include a pointer to A1.2.1.	Editorial clarification.	<p>Aging effects are discussed under aging management review in Appendix A, Section A1.2.1. The addition of pointers can be extended to other topics, which would increase the details required and may lend itself to heightened confusion.</p> <p>The license renewal guidance documents were not revised to address this comment.</p>
S-3.5-2	B.3.8 S3.5 Generic Comment	This section contains a lot of information from the GALL. Many changes have been recommended to the information in the GALL. The GALL should be corrected first, and then the changes to this section should be made accordingly. For example, 3.5.2.2.1.2, discusses porous concrete sub foundations. The industry has recommended that this information be deleted from GALL since it is not generic to all sites and was not applicable to the two sites, which have received, extended licenses. Therefore, the GALL should change and this section should change.	<p>The information in the GALL and this section need to be consistent.</p> <p>Editorial.</p>	<p>This is an editorial comment on consistency of license renewal documents.</p> <p>The license renewal guidance documents were revised to address this comment as appropriate to ensure consistency among them.</p>

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-3	B.3.8 3.5.1	Suggest adding the following sentence next to last paragraph: "Where GALL report has referenced a code (e.g. ACI 201.2R-77) as a technical basis for concluding that aging management is not required if it was constructed in accordance with that particular code, the staff will accept the deviation as long as the intent of that code has been satisfied and that referenced code is not the code of record for that particular plant".	Older plants, which were not constructed per referenced code, should be able to reference a code if the intent of the code has been satisfied.	See NRC disposition of comments NMC-1 and ACRS-2 in Table C of this NUREG.
S-3.5-4	B.3.8 3.5.1 Page 3.5-1	Add a sentence to the paragraph to address older vintage plants. Proposed wording: For older vintage plant, the information related to the structures and component supports is plant specific, and is contained in various Sections and Appendices of the UFSAR.	Second sentence of the first paragraph states: "for a recent vintage plant, the information related to the structures and component supports is contained in Chapter 3". The rest of the paragraph does not address older vintage plants.	See NRC disposition of comment ACRS-Chen-1 in Table E of this NUREG.
S-3.5-5	B.3.8 S3.5.1.3 Generic Comment	The second sentence states that "If an applicant does not rely on a particular program for license renewal, or if the staff should review each such aging management program to which the GALL report does not apply". The statement should begin with: If an applicant does not rely on a program in GALL.	Provide clarification to address program not in GALL.	See NRC disposition of comments NMC-2 and NMC-3 in Table C of this NUREG.

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-6	B.3.8 S3.5.1.4 Generic Comment	The second sentence states that: "If an applicant has identified particular components subject to aging management review for its plant, ..." The statement should begin with: If an applicant has identified particular components subject to aging management review for its plant which are not addressed in GALL.	Provide clarification for components not addressed in GALL.	The SRP-LR was revised to address this comment. Similar changes were also made to the other sections of chapter 3 of SRP-LR to ensure consistency.
S-3.5-7	B.3.8 S3.5.1.4 Generic Comment	Add statement: Not all aging effects in GALL require aging management at all plants.	Provide clarification. What happens if an applicant does not identify an aging effect that is in GALL?	See NRC disposition of this comment NMC-8 in Table C of this NUREG.
S-3.5-8	B.3.8 S3.5.2.1 Generic Comment	Provide more guidance so that an applicant or reviewer will know what is required.	The second sentence in this section states that the applicant should "... provide the information necessary to adopt the finding..." There is not enough guidance provided in this section for an applicant or a reviewer to know what is required.	See NRC dispositions of comments NMC-2 in Table C of this NUREG and also NEI-5 of this Appendix B, Table B.2.15.
S-3.5-9	B.3.8 S3.5.2.1 Generic Comment	Provide more guidance so that an applicant or reviewer will know what is required.	The third sentence in this section states that the applicant should "...also verify that the approvals set forth in the GALL report for generic programs apply to the applicant's programs". There is not enough guidance provided in this section for either an applicant or reviewer to know what is required.	See NRC disposition of comment NMC-2 in Table C of this NUREG.
S-3.5-10	B.3.8 S3.5.2.2 Generic Comment	Information included in this section should be compared to the final GALL report to ensure that any changes are incorporated.	The industry has recommended several changes to the GALL. These changes should be incorporated in both the GALL and SRP-LR.	See NRC disposition of NEI comment S.3.5-2 of this Appendix B, Table B.2.12-5.

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-11	B.3.8 3.5.2.1 Pg. 3.5-3 Generic Comment	This paragraph requires the applicant to provide information such that the Staff can establish acceptability of the program as described and evaluated in GALL. According to GALL Volume 1 and paragraph 3.5.1.1, if the applicant's program corresponds to GALL evaluated GALL Generic Program no further staff review is required. Clarify the requirement of paragraph 3.5.2.1.	If the applicant's program corresponds to the GALL evaluated Program, then any information required in the LRA is a duplication. It should suffice to reference GALL as stated in Volume 1. The Staff can audit the credited program to confirm it corresponds to GALL.	See NRC disposition of comment NMC-2 in Table C in this NUREG.
S-3.5-12	B.3.8 3.5.2.2.1 Pg. 3.5-4	The title "Aging of Supports not covered". should be "Aging of Structures not covered".	Paragraph content discuss structures. Supports are discussed in 3.5.2.2.3.	Section 3.5.2.2.2.1 of SRP-LR concerns structures not supports so the title should be revised. The SRP-LR, Section 3.5.2.2.2.1, was revised to address this comment by revising its title appropriately. Other license renewal guidance documents were revised to ensure consistency.
S-3.5-13	B.3.8 3.5.2.2.2.2 Pg. 3.5-5	Aging management of Inaccessible Areas. This paragraph requires further evaluation of Class 1 structures, concrete and structural steel, in inaccessible areas. GALL only requires further evaluation of structural steel and not concrete. Revise the paragraph to be consistent with GALL.	Aging management of concrete structures is not required if the evaluation and technical basis described in GALL are met.	See NRC disposition of NEI comments G-III A1-1 and G-III A1-6 in this Appendix B, Table B.2.2.

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-14	B.3.8 3.5.2.2.3.2 Pg. 3.5-5	The paragraph states fatigue is a TLAA for Groups B1.1, B1.2, & B1.3 components supports. Delete B1.2 & B1.3.	ANSI B31.1-B31.7 requires no fatigue analyses for supports. ASME III fatigue requirements apply to supports ASME class 1 piping.	<p>If the code of record requires a fatigue analysis, then this fatigue analysis is a TLAA, which may apply to B1.1, B1.2, and B1.3.</p> <p>The SRP-LR, Section 3.5.2.2.3.2, was revised to address this comment by inserting a sentence “ only if a CLB fatigue analysis exists”.</p>
S-3.5-15	B.3.8 S3.5.3.1 Generic Comment	Provide more guidance.	The third sentence of the first paragraph of this section states: “If the applicant has provided the information necessary to adopt the finding of program acceptability...” There is not enough guidance provided in this document for either an applicant or review to know what is required.	See NRC disposition of comment NMC-2 in Table C of this NUREG.

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-16	B.3.8 S3.5.3.1 Generic Comment	<p>The fifth sentence states that the “The reviewer also verifies that the applicant has stated that the applicable aging effects and industry and plant-specific operating experience had been reviewed by the applicant and are evaluated in the GALL report”.</p> <p>Since the GALL did not necessarily evaluate plant-specific operating experience, the sentence should be changed to the following: The reviewer also verifies that the applicant has stated that the applicant had reviewed the applicable aging effects and are evaluated in the GALL report. The reviewer verifies that the applicant stated that industry and plant-specific operating experience had been reviewed and no additional aging effects were identified beyond those evaluated in the GALL report.</p>	Provides clarification on how to handle plant-specific operating experience and industry experience.	See NRC disposition of comment NMC-8 in Table C of this NUREG. Also see additional guidance for evaluating elements of an aging management program in SRP-LR, Appendix A.1, “Aging Management Review.”
S-3.5-17	B.3.8 3.5.3.1 Pg. 3.5-6 Generic Comment	This paragraph requires the applicant to provide information such that the Staff can establish acceptability of the program as described and evaluated in GALL. According to GALL Volume 1 and paragraph 3.5.1.1, if the applicant’s program corresponds to GALL evaluated GALL Generic Program no further staff review is required. Clarify the requirement of paragraph 3.5.3.1.	If the applicant’s program corresponds to the GALL evaluated program, then any information required in the LRA is a duplication. It should suffice to reference GALL as stated in Volume 1. The Staff can audit the credited program to confirm it corresponds to GALL.	See NRC disposition of comment NMC-2 in Table C in this NUREG.

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-18	B.3.8 S3.5.3.1 Generic Comment	Add statement: Not all aging effects in GALL require aging management at all plants.	The next to last sentence in the first paragraph states that "the reviewer verifies that the applicant has identified those aging effects for the structures and component supports that are contained in the GALL report as applicable to its plant". Not all aging effects are applicable to all plants. For example, settlement is not applicable for sites located on bedrock.	See NRC disposition of comment NMC-8 in Table C in this NUREG.
S-3.5-19	B.3.8 S3.5.3.2.1.1	Delete the information on inaccessible areas.	The requirement for inaccessible areas goes beyond what is required by ASME and 50.55a.	See NRC disposition of NEI comment G-IIA1-1 in this Appendix B, Table B.2.1.

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-20	B.3.8 S3.5.3.2.1.7	<p>Information in this section disagrees with information in the GALL. The SRP-LR states that, "However, the report notes that VT-3 inspection may not be sufficient to detect cracks". The GALL states, "For cracking due to cyclic loading of penetration sleeves and penetration bellows, VT-3 visual inspection may not detect fine cracks (one option may be to perform VT-1 visual inspections)".</p> <p>In both documents, the conclusions should be changed to determine that VT-3 is adequate. In this section and throughout both documents, the adequacy of visual VT-3 examination is called into question for the detection of cracking. In particular, GALL Section III.B1.1.1 determines that VT-3 is inadequate for detection of cracking in Class 1 piping and component supports and GALL Section III.B1.2.1 finds this to be true for Class 2 and 3 piping and component supports, as well.</p>	<p>The conclusions reached in this section go beyond what is current in the code. Licensee should not have to go beyond Code requirements without justification.</p> <p>VT-3 should be found to be adequate for detection of "crack-life indications" in at least three circumstances:</p> <p>When the structure or component can tolerate "mature cracks". This should be the case for Class 1, 2, and 3 component supports, where mature cracks are needed to jeopardize the load-carrying function of the component or support.</p> <p>When pressure-containing component is subject to both visual examination and pressure testing capable of detecting localized, small-capacity leakage. This should be the case for bellows, sleeves, and penetrations subjected to Appendix J Type B and C tests.</p> <p>Situations where proximity to the component or structure surface is not an issues, so that visual acuity, lighting, and character recognition is essentially identical for VT-1 and VT-3.</p>	See NRC disposition of NEI comments G-III A3-5 and G-III B1-6 in this Appendix B, Table B.2.1.
S-3.5-21	B.3.8 3.5.3.2.2.1 Pg. 3.5-9	The title "Aging of Supports not covered". should be "Aging of Structures not covered".	Paragraph content discuss structures. Supports are discussed in 3.5.3.2.3.	See NRC disposition of NEI comment S-3.5-12 in Appendix B, Table B.2.12-5.

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Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-22	B.3.8 3.5.3.2.2.2 Pg. 3.5-10	Aging management of Inaccessible Areas. This paragraph requires further evaluation of Class 1 structures, concrete and structural steel, in inaccessible areas. GALL only requires further evaluation of structural steel and not concrete. Revise the paragraph to be consistent with GALL.	Aging management of concrete structures is not required if the evaluation and technical basis described in GALL are met.	See NRC disposition of NEI comment S-3.5-13 in this Appendix B, Table B.2.12-5.
S-3.5-23	B.3.8 3.5.3.2.3.2 Pg. 3.5-11	The paragraph states fatigue is a TLAA for Groups B1.1, B1.2, & B1.3 components supports. Delete B1.2 & B1.3.	ANSI B31.1-B31.7 requires no fatigue analysis for supports. ASME III fatigue requirements apply to supports ASME Class 1 piping.	See NRC disposition of NEI comment S-3.5-14 in this Appendix B, Table B.2.12-5.
S-3.5-24	B.3.8 3.5.3.2.3.1	The industry disagrees with the conclusions reached in GALL on reduction in concrete capacity due to vibration loads. This information should be deleted.	Vibration induced cracking is not a license renewal aging effect and should be deleted. Vibration induced cracking is expected to occur during the current term and be corrected. This type of aging is random and is corrected as discovered with inspections of similar locations and configurations to ensure the event is location specific or a one-time event.	See NRC disposition of NEI comment G-IIIB1-2 in this Appendix B, Table B.2..

Table B.2.12-5: Disposition of NEI Comments on Chapter 3, Section 3.5, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-3.5-25	B.3.8 Table 3.5-1 Generic Process Issue	Delete Table 3.5-1.	This table adds no value. In addition, there are now 4 places where information would have to be changed if it was determined that the conclusions in GALL were not correct. For example, the industry disagrees with the conclusion for aggressive chemical attack on PWR containments. This information is incorrect in (1) the GALL, (2) SRP-LR Section 3.5.2.2.1.1, (3) SRP-LR Section 3.5.3.2.1.1, and (4) Table 3.5-1.	The purpose of Table 3.5-1 is to provide a summary of the conclusions from the detailed GALL report to help the staff focus its review. Without this table, the reviewer would use the GALL report and may develop a similar summary for each review. It is more efficient and consistent to provide one summary as guidance in the SRP-LR. There are six such Tables (3.1-1, 3.2-1, 3.3-1, 3.4-1, 3.5-1, and 3.6-1) in SRP-LR Chapter 3. Thus, the requested removal of Table 3.5-1 is not consistent with the intent of these existing tables in SRP Chapter 3. The SRP-LR was not revised to address this comment.
S-3.5-26	B.3.8 Table 3.5-	Dissimilar metal welds should be deleted from the component column.	Dissimilar metal welds are optional per 50.55a.	See NRC disposition of NEI comment G-IIA3-1 in this Appendix B, Table B.2.1.
S-3.5-27	B.3.8 Table 3.5-2 Page 3.5-20	In Table 3.5-2 (referenced in Section 3.5.3.5), on page 3.5-20, replace the "Monitoring of Leak in Fuel Storage Facility" with "Liner Integrity" and revise the Program Description to describe the Water Chemistry Program.	Make SRP-LR consistent with proposed GALL revision of comment in GALL section IIIA, page IIIA5-9.	See NRC disposition of NEI comment G-IIIA5-1 in this Appendix B, Table B.2.2.