

## **3.4 AGING MANAGEMENT OF STEAM AND POWER CONVERSION SYSTEM**

### **Review Responsibilities**

**Primary** - Branch responsible for materials and chemical engineering

**Secondary** - Branch responsible for mechanical engineering

#### **3.4.1 Areas of Review**

This review plan section addresses the Aging Management Review (AMR) of the steam and power conversion system for license renewal. For a recent vintage plant, the information related to the steam and power conversion system is contained in Chapter 10, "Steam and Power Conversion System," of the plant's FSAR, consistent with the "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (NUREG-0800) (Ref. 1). The steam and power conversion systems contained in this review plan section are generally consistent with those contained in NUREG-0800 except for the condenser circulating water and the condensate storage systems. For older plants, the location of applicable information is plant-specific because their FSAR may have predated NUREG-0800. Typical steam and power conversion systems that are subject to an AMR for license renewal are steam turbine, main steam, extraction steam, feedwater, condensate, steam generator blowdown (PWR), and auxiliary feedwater (PWR). The aging management for the steam generator is reviewed following the guidance in section 3.1 of this standard review plan. The aging management for portions of the BWR main steam and main feedwater systems, extending from the reactor vessel to the outermost containment isolation valve, is reviewed separately following the guidance in Section 3.1 of this standard review plan.

The staff has issued a GALL report (Ref. 2) addressing aging management for license renewal. The GALL report documents the staff's basis for determining whether generic existing programs are adequate to manage aging without change, or generic existing programs should be augmented for license renewal. The GALL report may be referenced in a license renewal application, and should be treated in the same manner as an approved topical report.

Because a license renewal applicant may or may not be able to reference the GALL report as explained below, the following areas are reviewed:

##### **3.4.1.1 Aging Management Programs Evaluated in the GALL Report that Are Relied on for License Renewal**

An applicant may reference the GALL report in a license renewal application to demonstrate that the applicant's programs at its facility correspond to those reviewed and approved in the report, and that no further staff review is required. If the material presented in the GALL report is applicable to the applicant's facility, the staff should find the applicant's reference to the report acceptable. In making this determination, the staff should consider whether the applicant has identified specific programs described and evaluated in the GALL report. The staff, however, should not repeat its review of the substance of the matters described in the report. Rather, the staff should ensure that the applicant verifies that the approvals set forth in the GALL report for generic programs apply to the applicant's programs.

### **3.4.1.2 Further Evaluation of Aging Management as Recommended by the GALL Report**

The GALL report provides the basis for identifying those programs that warrant further evaluation during the staff review of a license renewal application. The staff review should focus on augmented programs for license renewal.

### **3.4.1.3 Aging Management Evaluations that Are Different from or Not Addressed in the GALL Report**

The GALL report provides a generic staff evaluation of certain aging management programs. If an applicant does not rely on a particular program for license renewal, or if the applicant indicates that the generic staff evaluation of the elements of a particular program does not apply to its plant, the staff should review each such aging management program to which the GALL report does not apply.

The GALL report provides a generic staff evaluation of certain components and aging effects. If an applicant has identified particular components subject to an AMR for its plant that are not addressed in the GALL report, or particular aging effects for a component that are not addressed in the GALL report, the staff should review the applicant's aging management programs applicable to these particular components and aging effects.

### **3.4.1.4 FSAR Supplement**

The FSAR supplement summarizing the programs and activities for managing the effects of aging for the period of extended operation is reviewed.

## **3.4.2 Acceptance Criteria**

The acceptance criteria for the areas of review describe methods for determining whether the applicant has met the requirements of the NRC's regulations in 10 CFR 54.21.

### **3.4.2.1 Aging Management Programs Evaluated in the GALL Report that Are Relied on for License Renewal**

Acceptable methods for managing aging of the steam and power conversion system are described and evaluated in Chapter VIII of the GALL report (Ref. 2). In referencing this report, the applicant should indicate that the material presented in the GALL report is applicable to the specific plant involved, and provide the information necessary to adopt the finding of program acceptability as described and evaluated in the report. The applicant should also verify that the approvals set forth in the GALL report for generic programs apply to the applicant's programs. The applicant may reference appropriate programs as described and evaluated in the GALL report.

### **3.4.2.2 Further Evaluation of Aging Management as Recommended by the GALL Report**

The GALL report indicates that further evaluation should be performed for:

#### **3.4.2.2.1 Cumulative Fatigue Damage**

Fatigue is a TLAA as defined in 10 CFR 54.3. TLAA's are required to be evaluated in accordance with 10 CFR 54.21(c). The evaluation of this TLAA is addressed separately in Section 4.3 of this standard review plan.

#### **3.4.2.2.2 Loss of Material due to General, Pitting, and Crevice Corrosion**

The management of loss of material due to general, pitting, and crevice corrosion should be evaluated further for carbon steel piping and fittings, valve bodies and bonnets, pump casings, pump suction and discharge lines, tanks, tubesheets, channel heads, and shells except for main steam system components and for loss of material due to pitting and crevice corrosion for stainless steel tanks and heat exchanger/cooler tubes. The water chemistry program relies on monitoring and control of water chemistry based on the guidelines in BWRVIP-29 (EPRI TR-103515) (Ref. 3) for water chemistry in BWRs and EPRI guidelines of TR-102134 (Ref. 4) for secondary water chemistry in PWRs to manage the effects of loss of material due to general, pitting, or crevice corrosion. However, corrosion may occur at locations of stagnant flow conditions. Therefore, the effectiveness of the chemistry control program should be verified to ensure that corrosion is not occurring. The GALL report recommends further evaluation of programs to manage loss of material due to general, pitting, and crevice corrosion to verify the effectiveness of the water chemistry program. A one-time inspection of select components and susceptible locations is an acceptable method to ensure that corrosion is not occurring and that the component's intended function will be maintained during the period of extended operation.

#### **3.4.2.2.3 Loss of Material due to General, Pitting, and Crevice Corrosion, Microbiologically Influenced Corrosion, and Biofouling**

Loss of material due to general corrosion, pitting and crevice corrosion, microbiologically influenced corrosion (MIC), and biofouling could occur in carbon steel piping and fittings for untreated water from the backup water supply in the PWR auxiliary feedwater system. The GALL report recommends further evaluation to ensure that these aging effects are adequately managed. Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1, of this standard review plan.)

#### **3.4.2.2.4 General Corrosion**

Loss of material due to general corrosion could occur on the external surfaces of all carbon steel structures and components, including closure boltings, exposed to operating temperature less than 212°F. The GALL report recommends further evaluation to ensure that this aging effect is adequately managed. Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1, of this standard review plan.)

#### **3.4.2.2.5 Loss of Material due to General, Pitting, Crevice, and Microbiologically Influenced Corrosion**

1. Loss of material due to general corrosion (carbon steel only), pitting and crevice corrosion, and MIC could occur in stainless steel and carbon steel shells, tubes, and tubesheets within the bearing oil coolers (for steam turbine pumps) in the PWR auxiliary feedwater system. The GALL report recommends further evaluation to ensure that these aging effects are adequately managed. Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1, of this standard review plan.)

2. Loss of material due to general corrosion, pitting and crevice corrosion, and MIC could occur in underground piping and fittings and emergency condensate storage tank in the auxiliary feedwater system and the underground condensate storage tank in the condensate system. The buried piping and tanks inspection program relies on industry practice, frequency of pipe excavation, and operating experience to manage the effects of loss of material from general corrosion, pitting and crevice corrosion, and MIC. The effectiveness of the buried piping and tanks inspection program should be verified to evaluate an applicant's inspection frequency and operating experience with buried components, ensuring that loss of material is not occurring.

#### **3.4.2.2.6 Quality Assurance for Aging Management of Nonsafety-Related Components**

Acceptance criteria are described in Branch Technical Position IQMB-1 (Appendix A.2 of this standard review plan.)

#### **3.4.2.3 Aging Management Evaluations that Are Different from or Not Addressed in the GALL Report**

Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1, of this standard review plan.)

#### **3.4.2.4 FSAR Supplement**

The summary description of the programs and activities for managing the effects of aging for the period of extended operation in the FSAR supplement should be appropriate such that later changes can be controlled by 10 CFR 50.59. The description should contain information associated with the bases for determining that aging effects will be managed during the period of extended operation.

### **3.4.3 Review Procedures**

For each area of review, the following review procedures are to be followed:

#### **3.4.3.1 Aging Management Programs Evaluated in the GALL Report that Are Relied on for License Renewal**

The applicant may reference the GALL report in its license renewal application, as appropriate. The staff should not repeat its review of the substance of the matters described in this report. If the applicant has provided the information necessary to adopt the finding of program acceptability as described and evaluated in the GALL report, the staff should find the applicant's reference to the report in a license renewal application acceptable. In making this determination, the reviewer verifies that the applicant has provided a brief description of the system, components, materials, and environment. The reviewer also verifies that the applicant has stated that the applicable aging effects and industry and plant-specific operating experience have been reviewed by the applicant and are evaluated in the GALL report. The reviewer verifies that the applicant has identified those aging effects for the steam and power conversion system components that are contained in the GALL report as applicable to its plant. In addition, the reviewer verifies that the applicant has stated that the plant programs covered by the applicant's reference contain the same program elements that the staff evaluated and relied upon in approving the corresponding generic program in the GALL report.

The reviewer should verify that the applicant has stated that certain of its aging management programs contain the same program elements as the corresponding generic program described in the GALL report, and upon which the staff relied in its evaluation. The reviewer should also verify that the applicant has stated that the GALL report is applicable to its plant with respect to these programs. The reviewer verifies that the applicant has identified the appropriate programs as described and evaluated in the GALL report. Programs evaluated in the report regarding the steam and power conversion system components are summarized in Table 3.4-1 of this review plan section. No further staff evaluation is necessary if so recommended in the GALL report.

### **3.4.3.2 Further Evaluation of Aging Management as Recommended by the GALL Report**

#### **3.4.3.2.1 Cumulative Fatigue Damage**

Fatigue is a TLAA as defined in 10 CFR 54.3. TLAA's are required to be evaluated in accordance with 10 CFR 54.21(c). The staff reviews the evaluation of this TLAA separately following the guidance in Section 4.3 of this standard review plan.

#### **3.4.3.2.2 Loss of Material due to General, Pitting, and Crevice Corrosion**

The GALL report recommends further evaluation of programs to manage loss of material due to general, pitting, and crevice corrosion of carbon steel piping and fittings, valve bodies and bonnets, pump casings, pump suction and discharge lines, tanks, tubesheets, channel heads, and shells, except for main steam system components, and for loss of material due to pitting and crevice corrosion for stainless steel tanks and heat exchanger/cooler tubes to verify the effectiveness of the water chemistry program. An acceptable verification program consists of a one-time inspection of select components and susceptible locations in the system. The water chemistry program relies on monitoring and control of water chemistry based on BWRVIP-29 (EPRI TR-103515) (Ref. 3) for water chemistry in BWRs and EPRI guidelines of TR-102134 (Ref. 4) for secondary water chemistry in PWRs to manage the effects of loss of material due to general, pitting, or crevice corrosion. However, corrosion may occur at locations of stagnant flow conditions. Therefore, the effectiveness of the chemistry control program should be verified to ensure that significant degradation is not occurring and that the component's intended function will be maintained during the extended period of operation.

The staff reviews the applicant's proposed program to ensure that corrosion is not occurring and that the component's intended function will be maintained during the period of extended operation. If an applicant proposes a one-time inspection of select components and susceptible locations to ensure that corrosion is not occurring, the reviewer verifies that the applicant's selection of susceptible locations is based on severity of conditions, time of service, and lowest design margin. The reviewer also verifies that the proposed inspection would be performed using techniques similar to ASME Code and ASTM standards.

#### **3.4.3.2.3 Loss of Material due to General, Pitting, and Crevice Corrosion, Microbiologically Influenced Corrosion, and Biofouling**

The GALL report recommends further evaluation of programs to manage the loss of material due to general corrosion, pitting and crevice corrosion, MIC, and biofouling for carbon steel piping and fittings for untreated water from the backup water supply in the PWR auxiliary feedwater system. Such corrosion may be due to untreated water from the backup water supply. The staff reviews the applicant's proposed program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.

#### **3.4.3.2.4 General Corrosion**

The GALL report recommends further evaluation of programs to manage the loss of material due to general corrosion for external surfaces of all carbon steel structures and components, including closure boltings, exposed to operating temperature less than 212°F. Such corrosion may be due to air, moisture, or humidity. The staff reviews the applicant's proposed program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.

#### **3.4.3.2.5 Loss of Material due to General, Pitting, Crevice, and Microbiologically Influenced Corrosion**

1. The GALL report recommends further evaluation of programs to manage the loss of material due to general corrosion (carbon steel only), pitting and crevice corrosion, and MIC for stainless steel and carbon steel shells, tubes, and tubesheets within the bearing oil coolers (for steam-turbine pumps) in the PWR auxiliary feedwater system. Such corrosion may be due to water contamination that affects the quality of the lubricating oil in the bearing oil coolers. The staff reviews the applicant's proposed program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.
2. The GALL report recommends further evaluation of programs to manage loss of material due to general corrosion, pitting and crevice corrosion, and MIC of underground piping and fittings and emergency condensate storage tank in the auxiliary feedwater system and underground condensate storage tank in the condensate system to verify the effectiveness of the water chemistry program. The buried piping and tanks inspection program relies on industry practice, frequency of pipe excavation, and operating experience to manage the effects of loss of material from general corrosion, pitting and crevice corrosion, and MIC. The effectiveness of the buried piping and tanks inspection program should be verified to evaluate an applicant's inspection frequency and operating experience with buried components, ensuring that corrosion is not occurring and that the component's intended function will be maintained during the period of extended operation.

#### **3.4.3.2.6 Quality Assurance for Aging Management of Nonsafety-Related Components**

An applicant's aging management programs for license renewal should contain the elements of corrective actions, the confirmation process, and administrative controls. Safety-related components are covered by 10 CFR Part 50 Appendix B, which is adequate to address these program elements. However, Appendix B does not apply to nonsafety-related components that are subject to an AMR for license renewal. Nevertheless, an applicant has the option to expand the scope of its 10 CFR Part 50 Appendix B program to include these components and address these program elements. If an applicant chooses this option, the reviewer verifies that the applicant has documented such a commitment in the FSAR supplement. If an applicant chooses alternative means, the branch responsible for quality assurance should be requested to review the applicant's proposal on a case-by-case basis.

#### **3.4.3.3 Aging Management Evaluations that Are Different from or Not Addressed in the GALL Report**

Review procedures are described in Branch Technical Position RLSB-1 (Appendix A.1, of this standard review plan.)

#### **3.4.3.4 FSAR Supplement**

The reviewer verifies that the applicant has provided a FSAR supplement for aging management of the steam and power conversion system for license renewal with information equivalent to that in Table 3.4-2 of this review plan section. The reviewer also verifies that the applicant has provided information, equivalent to that in Table 3.4-2, in the FSAR supplement for Subsection 3.4.3.3, "Aging Management Evaluations that Are Different from or Not Addressed in the GALL Report."

The staff expects to impose a license condition on any renewed license to require the applicant to update its FSAR to include this FSAR supplement at the next update required pursuant to 10 CFR 50.71(e)(4). As part of the license condition, until the FSAR update is complete, the applicant may make changes to the programs described in its FSAR supplement without prior NRC approval, provided that the applicant evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59.

As noted in Table 3.4-2, the applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should verify that the applicant has identified and committed in the license renewal application to any future aging management activities to be completed before the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.

#### **3.4.4 Evaluation Findings**

The reviewer verifies that the applicant has provided information sufficient to satisfy the provisions of this review plan section and that the staff's evaluation supports conclusions of the following type, to be included in the staff's safety evaluation report:

The staff concludes that the applicant has demonstrated that the aging effects associated with the steam and power conversion system will be adequately managed so that there is reasonable assurance that these systems will perform their intended functions in accordance with the current licensing basis during the period of extended operation. The staff also concludes that the FSAR supplement contains an appropriate summary description of the programs and activities for managing the effects of aging for the steam and power conversion system as reflected in the license condition.

#### **3.4.5 Implementation**

Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the NRC's regulations, the method described herein will be used by the staff in its evaluation of conformance with NRC regulations.

#### **3.4.6 References**

1. NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," U.S. Nuclear Regulatory Commission, July 1981.
2. NUREG-1801, "Generic Aging Lessons Learned (GALL)," U.S. Nuclear Regulatory Commission, April 2001.

3. BWRVIP-29, BWR Water Chemistry Guidelines-Revision 3 [EPRI TR-103515], Normal and Hydrogen Water Chemistry, Electric Power Research Institute, Palo Alto, CA, February 1994.
4. EPRI TR-102134, PWR Secondary Water Chemistry Guideline-Revision 3, Electric Power Research Institute, Palo Alto, CA, May 1993.

**Table 3.4-1. Summary of Aging Management Programs for Steam and Power Conversion System Evaluated in Chapter VIII of the GALL Report**

<b>Type</b>	<b>Component</b>	<b>Aging Effect/ Mechanism</b>	<b>Aging Management Programs</b>	<b>Further Evaluation Recommended</b>
PWR/BWR	Piping and fittings in main feedwater line, steam line and AFW piping (PWR only)	Cumulative fatigue damage	TLAA, evaluated in accordance with 10 CFR 54.21(c)	Yes, TLAA (see Subsection 3.4.2.2.1)
PWR/BWR	Piping and fittings, valve bodies and bonnets, pump casings, tanks, tubes, tubesheets, channel head and shell (except main steam system)	Loss of material due to general (carbon steel only), pitting, and crevice corrosion	Water chemistry and one-time inspection	Yes, detection of aging effects is to be further evaluated (see subsection 3.4.2.2.2)
PWR	Auxiliary feedwater (AFW) piping	Loss of material due to general, pitting, and crevice corrosion, MIC, and biofouling	Plant specific	Yes, plant specific (see subsection 3.4.2.2.3)
PWR	Oil coolers in AFW system (lubricating oil side possibly contaminated with water)	Loss of material due to general (carbon steel only), pitting, and crevice corrosion and MIC	Plant specific	Yes, plant specific (see subsection 3.4.2.2.5.1)
BWR/PWR	External surface of carbon steel components	Loss of material due to general corrosion	Plant specific	Yes, plant specific (see subsection 3.4.2.2.4)
BWR/PWR	Carbon steel piping and valve bodies	Wall thinning due to flow-accelerated corrosion	Flow-accelerated corrosion	No
BWR/PWR	Carbon steel piping and valve bodies in main steam system	Loss of material due to pitting and crevice corrosion	Water chemistry	No
BWR/PWR	Closure bolting in high-pressure or high-temperature systems	Loss of material due to general corrosion; crack initiation and growth due to cyclic loading and/or SCC.	Bolting integrity	No
BWR/ PWR	Heat exchangers and coolers/condensers serviced by open-cycle cooling water	Loss of material due to general (carbon steel only), pitting, and crevice corrosion, MIC, and biofouling; buildup of deposit due to biofouling	Open-cycle cooling water system	No

**Table 3.4-1. Summary of Aging Management Programs for Steam and Power Conversion System Evaluated in Chapter VIII of the GALL Report (continued)**

<b>Type</b>	<b>Component</b>	<b>Aging Effect/ Mechanism</b>	<b>Aging Management Programs</b>	<b>Further Evaluation Recommended</b>
BWR/PWR	Heat exchangers and coolers/ condensers serviced by closed-cycle cooling water	Loss of material due to general (carbon steel only), pitting, and crevice corrosion	Closed-cycle cooling water system	No
BWR/PWR	External surface of aboveground condensate storage tank	Loss of material due to general (carbon steel only), pitting, and crevice corrosion	Aboveground carbon steel tanks	No
BWR/PWR	External surface of buried condensate storage tank and AFW piping	Loss of material due to general, pitting, and crevice corrosion and MIC	Buried piping and tanks surveillance or Buried piping and tanks inspection	No  Yes, detection of aging effects and operating experience are to be further evaluated (see subsection 3.4.2.2.5.2)
PWR	External surface of carbon steel components	Loss of material due to boric acid corrosion	Boric acid corrosion	No

**Table 3.4-2. FSAR Supplement for Aging Management of Steam and Power Conversion System**

Program	Description of Program	Implementation Schedule*
Bolting integrity (BWR/PWR)	This program consists of guidelines on materials selection, strength and hardness properties, installation procedures, lubricants and sealants, corrosion considerations in the selection and installation of pressure-retaining bolting for nuclear applications, and enhanced inspection techniques. This program relies on the bolting integrity program delineated in NUREG-1339 and industry's recommendations delineated in EPRI NP-5769, with the exceptions noted in NUREG-1339 for safety-related bolting and in EPRI TR-104213 for pressure retaining bolting and structural bolting.	Existing program
Boric acid corrosion (PWR)	The program consists of (1) visual inspection external surfaces that are potentially exposed to boric acid leakage, (2) timely discovery of leak path and removal of the boric acid residues, (3) assessment of the damage, and (4) follow-up inspection for adequacy. This program is implemented in response to GL 88-05.	Existing program
Closed-cycle cooling water system (BWR/PWR)	The program relies on preventive measures to minimize corrosion by maintaining inhibitors and by performing non-chemistry monitoring consisting of inspection and nondestructive evaluations based on the guidelines of EPRI-TR-107396 for closed-cycle cooling water systems.	Existing program
Flow-accelerated corrosion (BWR/PWR)	The program consists of (1) conduct appropriate analysis and baseline inspection, (2) determine extent of thinning, and replace/repair components, and (3) perform follow-up inspections to confirm or quantify and take longer-term corrective actions. The program relies on implementation of EPRI guidelines of NSAC-202L-R2.	Existing program
One-time inspection (BWR/PWR)	To verify the effectiveness of the water chemistry control program by determining if the aging effect is not occurring or the aging effect is progressing slowly so that the intended function will be maintained during the period of extended operation, a one-time inspection of internal surfaces of piping, valves, pump casings, heat exchangers and tanks is performed using suitable techniques at the most susceptible locations to ensure that the aging effect is not occurring.	The inspection should be completed before the period of extended operation.

**Table 3.4-2. FSAR Supplement for Aging Management of  
Steam and Power Conversion System (continued)**

Program	Description of Program	Implementation Schedule*
Open-cycle cooling water system (BWR/PWR)	The program includes (a) surveillance and control of biofouling, (b) tests to verify heat transfer, (c) routine inspection and maintenance program, (d) system walk down inspection, and (e) review of maintenance, operating, and training practices and procedures. The program provides assurance that the open-cycle cooling water system is in compliance with General Design Criteria and Quality Assurance to ensure that the open-cycle cooling water (or service water) system can be managed for an extended period of operation. This program is in response to NRC GL 89-13.	Existing program
Above-ground carbon steel tanks (BWR/PWR)	The program includes preventive measures to mitigate corrosion by protecting the external surface of carbon steel components, per standard industry practice, with sealant or caulking at the interface of concrete and component. Visual inspection during periodic system walk downs should be sufficient to monitor degradation of the protective paint, coating, caulking, or sealant. Verification of the effectiveness of the program by measuring the thickness of the tank bottoms ensures that significant degradation is not occurring and that the component intended function will be maintained during the extended period of operation.	Existing program
Buried piping and tanks surveillance (BWR/PWR)	The program includes preventive measures to mitigate corrosion by protecting the external surface of buried piping and components, e.g., coating, wrapping, and a cathodic protection system. The program also includes surveillance and monitoring of the coating conductance versus time or current. This program is based on standard industry practices as described in NACE-RP-01-69.	Existing program
Buried piping and tanks inspection	The program includes (a) preventive measures to mitigate corrosion, and (b) periodic inspection to manage the effects of corrosion on the pressure-retaining capacity of buried carbon steel piping and tanks. Preventive measures are in accordance with standard industry practice for maintaining external coatings and wrappings and cathodic protection. As an alternative, buried piping and tanks are inspected when they are excavated during maintenance and when a pipe is dug up and inspected for any reason with a frequency that is based on operating experience.	Program should be implemented before the period of extended operation.
Plant-specific AMP (PWR)	The description should contain information associated with the bases for determining that aging effects will be managed during the period of extended operation.	Program should be implemented before the period of extended operation.

**Table 3.4-2. FSAR Supplement for Aging Management of Steam and Power Conversion System (continued)**

<b>Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
Quality assurance (BWR/PWR)	The 10 CFR Part 50 Appendix B program provides for corrective actions, the confirmation process, and administrative controls for aging management programs for license renewal. The scope of this existing program will be expanded to include nonsafety-related structures and components that are subject to an AMR for license renewal.	Program should be implemented before the period of extended operation.
Water chemistry (BWR/PWR)	To mitigate aging effects on component surfaces that are exposed to water as process fluid, chemistry programs are used to control water impurities (e.g., chloride, fluoride, sulfate) that accelerate corrosion. The water chemistry program relies on monitoring and control of water chemistry based on BWRVIP-29 (EPRI TR-103515) for water chemistry in BWRs and EPRI guidelines of TR-102134 for secondary water chemistry in PWRs.	Existing program
<p>* An applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should verify that the applicant has identified and committed in the license renewal application to any future aging management activities to be completed before the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.</p>		

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