

APPENDIX B, TABLE B.2.14

**DISPOSITION OF NEI COMMENTS
ON APPENDIX A OF SRP-LR**

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Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-A.1-1	A.1.1	Under background, the statement is made that "In many instances, more than one type of aging management programs are implemented to ensure that aging effects are managed." The sentence should be changed to: "More than one type of aging management program may be implemented to ensure that aging effects are managed."	This is not true and has not been the case with the first two approved licenses.	The intent of this sentence was to inform the reviewer that more than one aging management program may be used to manage an aging effect. The proposed sentence more clearly states this fact. The SRP-LR, Section A.1.1, third paragraph was revised to address this comment by revising the sentence referred to in the comment from "In many instances, more than one type of aging management programs are implemented to ensure that aging effects are managed" to "More than one type of aging management program may be implemented to ensure that aging effects are managed."
SA.1 –2	SRP-LR App A.1	Currently, A.1.2.1, Applicable Aging Effects, paragraph 1 states: The determination of applicable aging effects is based on the degradations that have actually occurred and those that potentially could cause structure and component degradation. The materials, environment, stresses, service conditions, operating experience, and other relevant information should be considered in identifying applicable aging effects. The effects of aging on the structure and component intended function(s) should also be considered.	The threshold for when an aging effect needs to be managed for the period of extended operation needs to be clearly defined and have a technical basis that supports the conclusion. The statement that an aging effect that needs to be managed is one that "potential could" is too vague and ambiguous and subject to too much judgement.	The threshold for when an aging effect needs to be managed for the period of extended operation cannot always be clearly defined. An example of this is void swelling in reactor vessel components. Void swelling has not occurred and there is no definite evidence that it would result in loss of component function during the period of extended operation but there is a potential for it to cause structure or component degradation. Based on aging effects such as this, the NRC position is that aging management programs are to be implemented for degradations that have occurred

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.1-2 (cont.)		<p>This paragraph should be revised to read as follows:</p> <p>The determination of aging effects that require management during the period of extended operation is based degradations that have actually occurred and those that would result in loss of component function during the period of extended operation if left unmanaged. The materials, environment, stresses, service conditions, operating experience, and other relevant information should be considered in identifying applicable aging effects. The effects of aging on the structure and component intended function(s) should also be considered.</p>		<p>and for those that potentially could cause structure and component degradation. Potentially applicable aging effects would include aging effects such as void swelling which requires aging management.</p> <p>The SRP-LR was not revised to address this comment.</p>
SA.1-3	SRP-LR App A.1	<p>Section A1.2.3.2 Preventive Actions, paragraph 2 currently states:</p> <p>“However, in many instances, more than one type of aging management programs should be implemented to ensure that effects are managed.”</p>	<p>In many instances, reasonable assurance has been provided by programs that prevent or mitigate the effects of aging during the current term of the operating license.</p> <p>Only if there is a recognized deficiency in the existing program should there be a need to augment the program with an inspection program.</p>	<p>See disposition of NRC comment SA.1-1 in this Appendix B, Table B.2.14.</p> <p>The GALL report evaluates recognized deficiencies in existing programs and augments program with an inspection. An example of this is the water chemistry program where the program may not be effective in low flow or stagnant flow areas, the program needs to be augmented with an inspection to verify the effectiveness of water chemistry control and confirm the absence of an aging effect. If an</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.1-3 (cont.)				aging effect is detected, the results are evaluated to determine the appropriate corrective actions. The SRP-LR was not revised to address this comment.
SA.1-4	SRP-LR App A.1	<p>Section A.1.2.3.4 Detection of Aging Effects</p> <p>This section should focus on what is needed to do the aging management program or activity.</p> <p>This section should be revised to discuss the method by which the aging effect will be detected; how often the activity will be performed, and how large the sample size should be. In addition, for new activities, the timing of when the new activity will be implemented.</p> <p>Appropriate industry codes and standards may be included to support the program.</p> <p>The “Detection of Aging Effects” attribute should be revised to read as follows:</p> <p>This program element describes “when”, “where” and “how” program data is collected; i.e., all aspects of activities to collect data as part of the program. This includes aspects such as method or technique (e.g.,</p>	<p>This section does not currently provide enough guidance to the applicant or the reviewer relative to the information that should be discussed within this attribute.</p> <p>The guidance needs to address the expectations for the ‘Detection of Aging Effects’ attribute for all four types of aging management programs and activities: prevention, mitigation, condition monitoring, and performance monitoring.</p>	<p>The proposed program attributes provide detailed guidance to the reviewer and the applicant describing how the aging effect will be detected. The attributes also provide expectations that are relevant to the four types of aging management programs.</p> <p>The SRP-LR was revised to address this comment by revising item 1 and adding three new items (3, 4, and 5) in Section A.1.2.3.4 Detection of Aging Effect: “1. Detection of aging effects should occur before there is a loss of the structure and component intended function(s). The parameters to be monitored or inspected should be appropriate to ensure that the structure and component intended function(s) will be adequately maintained for license renewal under all CLB design conditions. This includes aspects such as method or technique (e.g., visual, volumetric, surface inspection), frequency, sample size, data collection and timing of new/one-time inspections to ensure timely</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA. 1-4 (cont.)		<p>visual, volumetric, surface inspection), frequency, sample size, and timing of new/one-time inspections. Provide information that links the parameters to be monitored or inspected to the aging effects being managed.</p> <p>The method or technique and frequency may be linked to plant specific or industry wide operating experience. Provide justification, including codes and standards referenced, that the technique and frequency are adequate to detect the aging effects prior to a loss of SC intended function. The NRC staff position is that a program based solely on detecting SC failures is not considered an effective aging management program.</p> <p>When sampling is used to inspect a group of SCs, provide the basis for the inspection population and sample size. The inspection population should be based on aspects of the SCs such as a similarity of materials of construction, fabrication, procurement, design, installation, operating environments or aging effects. The sample size should be based on aspects of the SCs such as the specific aging effect, location, existing technical information,</p>		<p>detection of aging effects. Provide information that links the parameters to be monitored or inspected to the aging effects being managed.</p> <p>3. This program element describes “when,” “where,” and “how” program data is collected (i.e., all aspects of activities to collect data as part of the program).</p> <p>4. The method or technique and frequency may be linked to plant specific or industry wide operating experience. Provide justification, including codes and standards referenced, that the technique and frequency are adequate to detect the aging effects prior to a loss of SC intended function. A program based solely on detecting SC failures is not considered an effective aging management program.</p> <p>5. When sampling is used to inspect a group of SCs, provide the basis for the inspection population and sample size. The inspection population should be based on aspects of the SCs such as a similarity of materials of construction, fabrication, procurement, design, installation, operating environments or aging effects. The sample size should be based on aspects of the SCs such as the specific aging effect, location, existing technical information,</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA. 1-4 (cont.)		system and structure design, materials of construction, service environment or previous failure history. The samples should be biased towards locations most susceptible to the specific aging effect of concern in the period of extended operation. Provisions should also be included on expanding the sample size when degradation is detected in the initial sample.		<p>system and structure design, materials of construction, service environment or previous failure history. The samples should be biased towards locations most susceptible to the specific aging effect of concern in the period of extended operation. Provisions should also be included on expanding the sample size when degradation is detected in the initial sample.”</p> <p>To be consistent with above program description, additional changes were made to SRP-LR and GALL.</p> <p>A sentence was added after the first sentence in the description for element “Detection of Aging Effects” in both SRP-LR, Table A.1-1, and GALL Volume 1, page 2: “This includes aspects such as method or technique (i.e., visual, volumetric, surface inspection), frequency, sample size, data collection, and timing of new/one-time inspections to ensure timely detection of aging effects.”</p> <p>To be consistent with the above changes, the second sentence in SRP-LR section A.1.2.3.5 for Monitoring and Trending, Item 1 was deleted. Also, the second</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.1-4 (cont.)				sentence in the description for element "Monitoring and Trending" in the SRP-LR, Table A.1-1 and GALL Volume 1, page 2 was deleted. The deleted statement read, "The monitoring, inspection, testing frequency, and sample size should be appropriate for timely detection of aging effects."
SA.1-5	SRP App A.1	<p>Section A.1.2.3.5 Monitoring and Trending</p> <p>This section should focus on what evaluations are performed after the results from performing the aging management program or activity are obtained.</p> <p>This section could be re-titled to be 'Evaluation and Trending.' The use of the term 'monitoring' is ambiguous and confusing, because it relates to actually doing the aging management activity.</p> <p>This section should focus on the review or evaluation of the data obtained from the aging management program or activity described in the previous section. Quantitative results can be trended if appropriate. Past inspection results can be reviewed in preparation for a forthcoming inspection.</p>	<p>This section does not currently provide enough guidance to the applicant or the reviewer relative to the information that should be discussed within this attribute.</p> <p>The guidance needs to address the expectations for the 'Monitoring and Trending' attribute for all four types of aging management programs and activities: prevention, mitigation, condition monitoring, and performance monitoring.</p>	<p>Changing the title of "Monitoring and Trending" was not appropriate.</p> <p>The proposed change to information contained under "Monitoring and Trending" provides useful guidance to both the applicant and the reviewer describing what is done with data collected in the Detection of Aging element. The attributes also provide expectations that are relevant to the four types of aging management programs.</p> <p>The SRP-LR was revised to address this comment by revising element #2 in section A.1.2.3.5 on page A-1.4 as follows: "2. This program element describes "how" the data collected is evaluated and may also include trending for a forward look. This includes an evaluation of the results against the acceptance criteria and a prediction regarding the rate of degradation in order to confirm that timing of the next scheduled</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.1-5 (cont.)		<p>The evaluation confirms that the structure or component will continue to meet its acceptance criteria through the next planned inspection.</p> <p>The "Evaluation and Trending" attribute should be revised to read as follows:</p> <p>This program element describes "how" the data collected is evaluated and may also include trending if a forward look is required. This includes an evaluation of the results against the acceptance criteria and a prediction regarding the rate of degradation in order to confirm that timing of the next scheduled inspection will occur prior to a loss of SC intended function. Although aging indicators may be quantitative or qualitative, aging indicators should be quantified, to the extent possible, to allow trending. Explain how the parameter or indicator will be trended. If not straightforward, describe the methodology for analyzing the inspection or test results against the acceptance criteria.</p> <p>This attribute is used for condition or performance monitoring programs that trend the results of the monitoring activities. Trending is a comparison of the current</p>		inspection will occur prior to a loss of SC intended function. Although aging indicators may be quantitative or qualitative, aging indicators should be quantified, to the extent possible, to allow trending. The parameter or indicator trended should be described. The methodology for analyzing the inspection or test results against the acceptance criteria should be described. Trending is a comparison of the current monitoring results with previous monitoring results in order to make predictions for the future."

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.1-5 (cont.)		monitoring results with previous monitoring results in order to make predictions for the future.		
SA.1-6	SRP-LR A.1	<p>Section A.1.2.3.6</p> <p>The statement in the first paragraph that reads: "The program should include a methodology for analyzing the results against applicable acceptance criteria." May be deleted if the changes noted in the previous section are made.</p> <p>Acceptance criteria can also be qualitative such as that used during a visual inspection.</p>	<p>The specific feature of analyzing results is more appropriately included within the "Evaluation and Trending" attribute.</p> <p>Acceptance criteria can be both quantitative and qualitative and expectations for both need to be addressed.</p>	<p>Analyzing results of data against acceptance criteria can occur in both the "Monitoring and Trending" and the "Acceptance Criteria" elements.</p> <p>Acceptance criteria can be qualitative such as that used during a visual inspection.</p> <p>The SRP-LR was revised to address this comment by adding a fourth item to Section A.1.2.3.6 as follows: "4. Qualitative inspections should be performed to same predetermined criteria as quantitative inspections by personnel in accordance with ASME Code and through approved site specific programs."</p>
SA.1-7	SRP-LR A.1	Revise A.1.2.3.10, paragraph 1 to add the following statement: By providing the objective evidence, the demonstration required by §54.21(a)(3) is satisfied.	In the checklist provided in SRP-LR Chapter 1, the staff is required to determine if the demonstration requirements of §54.21(a)(3) have been met. This additional statement is recommended in order to clearly establish what is meant by demonstration.	<p>The proposed change implies that operating experience by itself would be sufficient to demonstrate that the effects of aging will be adequately managed and based on this, the applicant need not address elements 1-9 of the 10 element aging management program.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-A.1-8	A.1.2.1	Applicable and potential aging effects needs to be defined if it is determined that these are the correct terms to use. NEI 95-10 uses the term "aging effects requiring management." Suggest using this term to be consistent with industry guidance.		<p>During the NRC/NEI meeting dated 31 January 2001, NEI's concern was that the term potential aging effect does not provide a definite threshold for when an aging effect requires management. Staff and NEI agreed that since there is no certainty when an unseen aging effect becomes likely to warrant aging management, this determination will have to involve engineering judgment.</p> <p>The SRP-LR was not revised to address this comment.</p>
S-A.1-9	A.1.2.1	Item No. 3 should be deleted.	The rule only requires an applicant to demonstrate that the aging effects are managed. The applicant does not have to identify aging effects that it does not have to manage or justify why it does not have to manage those effects.	<p>NRC agrees that the applicant does not have to identify aging effects that it does not have to manage or justify why it does not have to manage those effects.</p> <p>The SRP-LR, Section A.1.2.1, was revised to address this comment by rewriting the third item as follows to provide the reviewer with guidance in questioning the applicant concerning aging effects not listed in the application: "If operating experience or other information indicates that a certain aging effect may be applicable and an applicant determines that it is not applicable to its plant, the reviewer may question the absence of this aging effect unless the applicant has provided the basis for this</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-A.1-9 (cont.)				determination in its license renewal application. However, in questioning the absence of the aging effect, a reference and/or basis which provides relevance to aid the applicant in addressing the question should be provided. For example, the question could cite a previous application review, NRC generic communications, engineering judgment, relevant research information, or other industry experience as the basis for the question. Simply citing that the aging effect is listed in the GALL report is not a sufficient basis. For example, the aging effect is applicable to a PWR component, but the applicant's plant is a BWR and does not have such a component. In this example, using the GALL report merely as a checklist is not relevant."
S-A.1-10	A.1.2.3.2	The second sentence under Item 2 states that "However, in many instances, more than one type of aging management programs are implemented to ensure that aging effects are managed." This should be changed to: However, more than one type of aging management program may be implemented to ensure that aging effects are managed.	This is not true and has not been the case with the first two approved licenses.	See NRC disposition of NEI comment for SA.1-1 in this Appendix B, Table B.2.14.

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-A.1-11	A.1.2.3.6	Delete the second sentence under Item 3 that discusses CLB design loads.	Acceptance criteria, which do permit degradation, are based on maintaining the intended function under all CLB design loads. Therefore, this comment is irrelevant.	<p>Section A.1.2.3.6 Acceptance Criteria, item 3 provides the reviewer guidance on acceptance criteria for CLB design loads. Acceptance criteria, which do permit degradation, are based on maintaining the intended function under all CLB design loads.</p> <p>The SRP-LR, Section A.1.2.3.6, Item 3, was revised to address this comment as follows: "3. It is not necessary to justify any acceptance criteria taken directly from the design basis information that is included in the FSAR because that is a part of the CLB. Also, it is not necessary to discuss CLB design loads if the acceptance criteria do not permit degradation because a structure and component without degradation should continue to function as originally designed. Acceptance criteria, which do permit degradation, are based on maintaining the intended function under all CLB design loads."</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.2-1	SRP-LR App A.2	SRP-LR Appendix A.2, Section A.2.2, Item 2 contains the following statement that should be deleted: "The applicant should document such a commitment in the final safety analysis report (FSAR) supplement in accordance with 10 CFR 54.21(d)."	<p>In general, the SRP-LR contains guidance for the staff reviewers. Including a specific applicant requirement such as this should not be in the SRP-LR.</p> <p>The specific content of the FSAR supplement is already provided by examples contained in all appropriate sections of the SRP-LR.</p> <p>This issue of documenting this commitment should be contained in each example FSAR summary description. If necessary, it can be placed in brackets to indicate that whether or not to include the statement is a plant specific decision.</p>	<p>The intent of SRP-LR Appendix A.2, Section A.2.2, Item 2 was to provide guidance to NRC staff reviewers in performing safety reviews of applications and not to impose applicant requirements.</p> <p>The SRP-LR contains example FSAR summary descriptions and the decision to include these statements is a plant specific decision. Revising the SRP-LR tables to include brackets indicating that this is a plant specific decision would complicate the tables.</p> <p>The SRP-LR FSAR summary tables were not updated.</p> <p>The SRP-LR, Section A.2.2, Item No.2, was revised to address this comment by clarifying the second sentence from "The applicant should document such a commitment in the final safety analysis report (FSAR) supplement in accordance with 10 CFR 54.21(d)" to "The reviewer should verify that the applicant has documented such a commitment in the FSAR supplement in accordance with 10 CFR 54.21(d)."</p>
SA.3-1	SRP-LR App A.3	SRP-LR Appendix A.3, Section A.3.2.1, Item 2, states that "the version of NUREG-0933 that is current on the date 6 months before the date of the license renewal	There is routinely several weeks delay from the time the revision is finished until the time it is published and available to the public.	Updates of NUREG-0933 are planned approximately every 6 months and, as such, NUREG-0933 is a more current source of information than the annual report to

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.3-1 (cont.)		<p>application...”</p> <p>Revise this review process to include as a viable alternative an applicant’s review of the annual staff report to the Commission of the activities related to Generic Safety Issues.</p>	<p>An approach needs to be developed to address any new issues that reveal themselves over the course of the review of license renewal applications.</p> <p>In SECY-98-030, the Commission directed the staff to provide an annual summary of activities related to open reactor and non-reactor GSIs. These annual summaries of activities have been recently provided in SECY-98-166, July 6, 1998; SECY-99-185, dated July 16, 1999; and most recently in SECY-00-0149, dated June 30, 2000. It appears that these annual reports from the staff and to the Commission may be a reliable alternative to the actual release of supplements to NUREG-0933 and more useful to applicants in determining the current status of open GSIs.</p>	<p>the Commission. Additionally, NUREG-0933 contains the detailed discussion of the generic issue and would still need to be referenced if the annual report was used. If an applicant is preparing a license renewal application during a NUREG-0933 supplement issue period, the NRC should be contacted for the supplement issue status.</p> <p>The approach used by the NRC to determine the need for a renewal applicant to address an emerging generic issue was discussed between the NRC’s License Renewal Steering Committee and the NEI License Renewal Working Group on December 9, 1999. If an issue is identified, its significance is evaluated by both staff and management with respect to the ability of the NRC to make its reasonable assurance finding that actions have been or will be taken to manage the effects of aging during the period of extended operation on the functionality of structures and components that are subject to review. If that finding cannot be made, the applicant must address the issue before a renewed license can be issued.</p> <p>The SRP-LR, Section A.3.2.1,</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.3-1 (cont.)				Item 2, was revised to address this comment regarding use of NUREG-0933 by adding the following sentence: "Prior to SER completion, any new issues contained in later versions of NUREG-0933 should be reviewed and resolved if determined to be applicable to the applicant's plant."
SA.3-2	SRP-LR App A.3	SRP-LR Appendix A.3, Section A.3.2.1, Item 3, states that "the amendment to the license renewal application identifying current licensing basis (CLB) changes, as required by 10 CFR 54.21(b), should address any additional USI, HIGH-, or MEDIUM- priority issues designated after the application has been submitted..."	<p>§54.21(b) requires an applicant to submit an amendment to the application that addresses and changes to the CLB that materially affect the contents of the application.</p> <p>Changes to NUREG-0933 are not considered to be changes to the plant CLB. Therefore, it is inappropriate to include them within the §54.21(b) amendment to the application.</p> <p>An approach needs to be developed to address any new issues that reveal themselves over the course of the review of license renewal applications.</p>	<p>New GSIs identified during the review of a license renewal application are not CLB changes. This is consistent with the Commission's intent in the Statements of Consideration for 10 CFR Part 54 when amended in 1995 (60 FR 22484) a generic issue identified involving an aging concern or a time-limited aging analysis needs to be evaluated and should be submitted as an update to the application.</p> <p>The approach used by the NRC to determine the need for a renewal applicant to address an emerging generic issue was discussed between the NRC's License Renewal Steering Committee and the NEI License Renewal Working Group on December 9, 1999. If an issue is identified, its significance is evaluated by both staff and management with respect to the ability of the NRC to make its reasonable assurance finding that</p>

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.3-2 (cont.)				<p>actions have been or will be taken to manage the effects of aging during the period of extended operation on the functionality of structures and components that are subject to review. If that finding cannot be made, the applicant must address the issue before a renewed license can be issued.</p> <p>The SRP-LR Section A.3.2.1, Item 3, was revised to address this comment by changing paragraph to read "New generic safety issues, designated as USI, HIGH-, or MEDIUM- priority after the application has been submitted, that involve aging effects for structures and components subject to an aging management review or TLAA should be submitted in the annual update of the application."</p>
SA.3-4	SRP-LR App A.3	SRP-LR Appendix A.3, Section A.3.2.1, Item 4, states that "During the preparation and review of a license renewal application, an applicant or the NRC may become aware of an aging management or TLAA issue that may be generically applicable to other nuclear units. If issues may have generic applicability (but are not yet part of the formal generic safety issues resolution process as identified in NUREG-0933), an applicant should still address the issue to	<p>In general, the SRP-LR contains guidance for the staff reviewers. Including a specific applicant requirement such as this should not be in the SRP-LR.</p> <p>An approach needs to be developed to address any new issues that reveal themselves over the course of the review of license renewal applications.</p> <p>The threshold of when an issue becomes of concern during the license renewal application review needs to be clearly defined.</p>	See NRC disposition of NEI comment SA.3.2 in this Appendix B, Table B.2.14, regarding the approach used by the NRC for identifying new issues. Because of the variety of potential issues that may arise, both technical and process, it is not possible to establish specific thresholds for all possible issues that may become of concern for license renewal. Each issue will be evaluated by NRC staff and management using the process discussed in the NRC disposition

Table B.2.14: Disposition of NEI Comments on Appendix A of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
SA.3-4 (cont.)		demonstrate that the effects of aging are or will be adequately managed or that TLAAAs have been evaluated for the period of extended operation."		referred to in this paragraph. The SRP-LR was not revised to address this comment.
SA.3-5	SRP-LR App A.3	<p>SRP-LR Appendix A.3.3 References indicates that the current version of NUREG-0933 is Supplement 23, April 1999.</p> <p>The SRP-LR should be revised to reflect the actual current version - Supplement 24, June 2000.</p> <p>Table A.3-1 should be updated to include issues are not in NUREG-0933 but have been identified to be addressed during the initial applicant reviews.</p>	<p>As of September 19, 2000, the NRC web site also lists Supplement 23 as the current version of NUREG-0933.</p> <p>The SRP-LR may not be updated as often as NUREG-0933 is revised. Specification of a specific supplement of NUREG-0933 in the SRP-LR may be counterproductive.</p> <p>In addition, the NRC web site needs to also be kept current with respect to NURG-0933, and its most recent supplement issued.</p> <p>As an aid to both applicants and staff reviewers, Table A.3-1 should be updated annually to reflect the emerging issues that need to be reviewed during license renewal.</p>	<p>See NRC disposition of NEI comment SA.3.1 in this Appendix B, Table B.2.14.</p> <p>The Office of Nuclear Reactor Regulation will coordinate with the Office of Regulatory Research regarding updating the version of NUREG-0933 maintained on the NRC's Web site.</p> <p>Table A.3-1 is provided as an illustration of the evaluation process used to determine whether a GSI needs to be addressed in a license renewal application and was not intended to be a complete list of applicable issues for a renewal applicant. The current list of generic issues that an applicant needs to address can be found by review of NUREG-0933, review of recent renewal applications, and discussions with the NRC staff.</p> <p>The SRP-LR, Appendix A.3.3, Reference 1 was revised to address this comment by deleting the supplement (current version) from NUREG-0933.</p>