

June 28, 2001

Licensee: Virginia Electric Power Company

Facility: North Anna, Units 1 and 2, and Surry, Units 1 and 2

SUBJECT: TELECOMMUNICATION TO CLARIFY THE AGING MANAGEMENT REVIEW OF CABLES AND THE TIME-LIMITED AGING ANALYSIS OF ENVIRONMENTALLY QUALIFIED ELECTRICAL COMPONENTS

On June 19, 2001, after completing its initial review of the license renewal application (LRA), Section 3.6, "Aging Management of Electrical and Instrument and Controls," and Section 4.4, "Environmental Qualification (EQ) of Electrical Components," the staff raised the following two concerns:

1. The applicant determined that non-EQ cables at North Anna, Units 1 and 2 (NAS 1 and 2), and Surry, Units 1 and 2 (SPS 1 and 2), do not require aging management. This was based on an evaluation using the "spaces-approach" to determine high temperature and high radiation areas throughout both plants. The staff does not agree with this assessment, and clarified its position that non-EQ cables within the scope of license renewal in the containment, auxiliary building, and turbine building require aging management. All applicants to date have had to provide aging management for non-EQ cables. Oconee, Hatch, and Turkey Point initially determined that non-EQ cables at their facility did not require aging management for similar reasons as provided by the applicant and, in the end, all previous applicants had to have an aging management for non-EQ cables. Aging management of non-EQ cables is in GALL and has been accepted by the "industry," as well.

The applicant stated that they are confident that their plant-specific review was done correctly and accurately reflects its plant performance and potential aging of electrical cables. However, they agreed to reconsider its position to develop an aging management program for cables and will advise the staff of its decisions after evaluating related industry experience.

2. 10 CFR 54.21c.1.ii allows for re-analyses of TLAAs to project qualification to the end of the period of extended operation. Although re-analysis is not required at time of application (preferred but not required), a detailed description of the re-analysis methodology that will be used is required for the staff to do its safety evaluation. The applicant was also requested to provide a description of the EQ re-analyses attributes such as the analytical methods, data collection and reduction methods, underlying assumptions, acceptance criteria, and corrective actions. The staff recommended that the applicant review recent staff license renewal safety evaluation reports regarding the level of detail needed for the staff to perform its safety evaluation.

The applicant stated that they will provide the information needed for the staff to perform its evaluation.

The staff also questioned the applicant's grouping of EQ components in § 54.21c.1.ii and § 54.21c.1.iii. The staff stated that if the applicant chooses to delay re-analysis it should be categorized under § 54.21c.1.iii, which appears to be the applicant's intent. However, in several places in the application, the applicant refers to re-analyses already completed.

The applicant explained that they have completed the calculations to extend the qualified life for many of the environmentally qualified components with the exception of the quality assurance review required by the applicant's 10 CFR Part 50, Appendix B program and, therefore, can not yet take credit for these calculations. The staff understood the applicant's position and will discuss the situation in its safety evaluation report.

A draft of this meeting summary was provided to the applicant to allow them the opportunity to comment prior to the summary being issued.

/RA/

Robert J. Prato, Project Manager
License Renewal Project Directorate
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos. 50-338, 50-339, 50-280, and 50-281

Attachment: List of Participants

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