

July 13, 2001

Organization: Nuclear Energy Institute (NEI)

SUBJECT: TELECOMMUNICATION WITH NEI TO CLARIFY RAIs REGARDING THE  
NEI LICENSE RENEWAL DEMONSTRATION PROJECT

On May 3 and June 20, 2001, the staff had conference calls with representatives of NEI to obtain clarifying information for the demo project and the draft request for additional information. Attached is a summary for each of the telecommunications. Each summary provides the names of the attendees and a summary description of the main discussion points. The draft RAIs sent to NEI by e-mail are also provided as attachments.

*/RA/*

Jerry Dozier, General Engineer  
License Renewal and Standardization Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Attachments: As stated

Project No.: 690

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NUCLEAR ENERGY INSTITUTE

Project No. 690

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### May 3, 2001 Conference Call with NEI

A conference call was held with Doug Walters of NEI on May 3, 2001. Attendees included P.T. Kuo, Jerry Dozier, and Peter Kang of RLSB. The purpose of the call was to request additional samples for the License Renewal Demo Project, discuss NRC observations with the submitted sample and articulate NEI's expectations from the Demo Project.

The staff requested three additional samples: containment, intake structure and electrical. NEI agreed to submit a structural sample (at least one) and an electrical sample with both the standard review plan (SRP) format and six column table format.

The staff observed that a meaningful safety evaluation report (SER) could not be performed on the sample that was provided at the May 1 meeting because the programs provided did not align with those discussed in the sample sections. NEI agreed to resubmit the steam and power conversion system to the staff with sufficient detail and alignment to write the SER because NEI also wanted to exercise the SER process.

One of NEI's expectations from the demonstration project was to see if the staff would allow judgement in using GALL for components that are not in GALL but have an identical material and environment. NEI also wanted to see if the "rolled up" methodology consistent with the SRP approach would be acceptable. This is primarily why two options were provided.

NEI plans to submit the information requested above in a formal letter by May 11, 2001 or notify us promptly of any expected delays.

June 20, 2001 Conference Call with NEI  
Attendees List

<u>Name</u>	<u>Organization</u>
Alan Nelson	NEI
Doug Walters	NEI
Steve Hale	FPL
Joe Casper	ODPD
John Rycena	Constellation
Mark Bowman	Constellation
Ken Henry	OPPD
PY Chen	NRC
Jerry Dozier	NRC
Barry Elliot	NRC
Dan Jeng	NRC
Peter Kang	NRC
P.T. Kuo	NRC
Sam Lee	NRC
Paul Shemanski	NRC
Yung Liu	ANL
Vic Shah	ANL
Shiu Wen Tam	ANL
Kent Faris	PNNL
Jim Nickolaus	PNNL
Dan Nans	ORNL
Rich Morante	BNL
Joe Braverman	BNL
Bob Lofaro	BNL

## June 20, 2001 Conference Call with NEI

NEI was sent the draft RAIs for the Plant X steam and power conversion system, structures, and electrical systems before the conference call (see attached). The purpose of this conference call was to discuss and clarify the draft RAIs. Another purpose was to determine if some of the draft RAIs were within the scope of the Demo Project. Staff indicated that if the RAIs were not understood by NEI then they would be clarified. The final RAIs would be sent to NEI in a formal letter by June 27, 2001.

In the opening remarks Alan Nelson indicated that NEI would like to know NRC's impression of the best format to present the information. This was the reason that two example formats (Plant X and Plant Y) were provided.

The following refers to the attached RAIs for each of the sections in the Demo Project.

**Electrical Plant Y** (See the attached Draft Request for Additional Information Plant Y License Renewal Application Section 3.6: Aging Management of Electrical and Instrumentation and Controls)

During the conference call, NEI requested to withdraw the Plant Y electrical submittal because of limited industry resources to address the RAIs. NEI indicated that they believed that withdrawal of the Plant Y electrical system would not reduce the benefit of the project. Therefore, the electrical RAIs for Plant Y were not discussed any further.

**Electrical Plant X** (See the attached Draft Request for Additional Information Plant X License Renewal Application Section 3.6: Aging Management of Electrical and Instrumentation and Controls)

NEI indicated that they understood RAI 3.6-1. They would respond to RAI 3.6-1 with a plant specific program instead of a one-time inspection. This plant specific program would include the 10 element evaluation consistent with the SRP-LR acceptance criteria and references to the procedures used for implementation. In addition, NEI indicated that they understood the editorial comments.

**Plant X Steam and Power Conversion System** (See attached Draft Request For Additional Information Demonstration Project for License Renewal Steam and Power Conversion System)

NEI indicated that they understood RAI 3.4-1. They have identified no cracking in the operating experience.

NEI indicated that they understood RAI 3.4-2. They said that they would most likely provide a bolting program consistent with the current version of GALL.

NEI indicated that they understood RAI 3.4-3. NEI indicated the program General Corrosion of the External Surfaces Program is equivalent to the Boric Acid Program. They will clarify in the response.

NEI indicated that they understood RAI 3.4-4. NEI indicated that they would need to have a plant specific evaluation and they have not decided how to manage galvanic corrosion at

Plant X. The participants agreed that a plant-specific resolution of how Plant X will manage galvanic corrosion is not necessary for the purpose of the Demo Project. The staff indicated that this could be identified as an open item in the demo project SER.

NEI indicated that they understood RAI 3.4-5. NEI indicated that they could make the appropriate change.

NEI indicated that they understood RAI 3.4-6. NEI indicated that this was a very important process question and should be discussed at the public meeting. They could make a bounding statement for the mechanical section but was not sure if they could make the bounding statement for the structures section. The staff indicated that the statement quoted from the sample section was confusing. NEI indicated that they would clarify it. The staff also indicated different words were used in the demo to reference the GALL report such as "bounding", "consistent", etc. The participants agreed that this should be discussed in a future public meeting.

NEI indicated that they understood RAI 3.4-7. NEI responded that extraction steam and condensate is not in the scope of the demo. NEI agreed to make the pages consistent. Since it appeared unnecessary for the flow accelerated corrosion (FAC) program description in appendix B of the samples to include which systems that the program applied to, the staff indicated that NEI could consider removing the list of systems provided in the program description.

NEI indicated that they understood RAI 3.4-8. However, NEI indicated that the staff should not make an assumption in the RAI. The RAI would have been more appropriately, "Are the components exposed to raw water...? If so, ..." Staff indicated that this RAI would be reworded to not make assumptions in accordance with the RAI style guide.

NEI indicated that they understood RAI 3.4-9. This question is similar to RAI 3.4-7. NEI indicated that if they rewrote the Appendix B program descriptions without the list of systems, this issue would probably be resolved.

NEI indicated that they understood RAI 3.4-10. The primary question was how the applicant should address emerging operating experience after GALL has been published. This issue will be discussed further in a public meeting.

NEI indicated that they understood RAI 3.4-11. Staff indicated that this RAI would be reworded to not make an assumption as discussed in RAI 3.4-8.

NEI indicated that they understood RAI 3.4-12. This question is similar 3.4-2 and will be addressed by the bolting program.

NEI indicated that they understood RAI 3.4-13. NEI indicated that if the applicant determines that an aging effect that is identified in GALL is not applicable to their system or component, the application will indicate in Table 3.4.1 that the aging effect identified in GALL is not applicable.

**Containment, Structures, and Component Supports** (See attached List of Draft RAIs for 3.5 Aging Management of Containment, Structures and component supports on Plant X)

NEI indicated that they understood RAI 3.5-1. NEI indicated that the leak rate test would be credited for cracking and that they will provide details in the RAI response.

NEI indicated that they understood RAI 3.5-2. The staff clarified that they needed the documentation to determine that the river water or groundwater was not an aggressive environment. NEI indicated that on a plant specific basis they would provide test documentation and would be consistent with the new version of GALL. The GALL report provides conditions when water is not aggressive. The participants agreed that the treatment of such GALL conditional statement in an application should be discussed at a public meeting.

NEI indicated that they understood RAI 3.5-3. NEI indicated that this should be a question rather than a statement of fact. See RAI 3.4-8.

NEI indicated that they understood RAI 3.5-4. How to treat GALL programs that are not relied on by an applicant in its application is a process question and should be discussed at a public meeting. NEI indicated that they did not credit the protective coatings program.

NEI indicated that they understood RAI 3.5-5. NEI questioned why this RAI is necessary because the plant is located on bedrock. This is another example of an "if" statement and should be discussed at the public meeting. See RAI 3.5-2.

NEI indicated that they understood RAI 3.5-6. NEI indicated that TLAA's were not part of the demo project. Staff indicated that they would not issue this RAI.

NEI indicated that they understood RAI 3.5-7. NEI indicated that this was an omission that was not addressed in the Demo application.

NEI indicated that they understood RAI 3.5-8. Staff clarified that the aging is different for steel and concrete and should be addressed. NEI indicated that they would clarify the plant-specific program enhancements that would be made to be consistent with GALL.

NEI indicated that they understood RAI 3.5-9 with no further discussion.

NEI indicated that they understood RAI 3.5-10. NEI indicated that they will make consistent with the latest version of GALL.

NEI indicated that they understood RAI 3.5-11. NEI indicated that they would propose new words to resolve this issue.

NEI indicated that they understood RAI 3.5-12. NEI emphasized that the information submitted in the Demo LRA was work in progress and the resolution of this RAI would have to be plant specific.

NEI indicated that they understood RAI 3.5-13. The larger issue was how to address components that are not found in GALL (such as the fuel transfer tube). This will be discussed in a public meeting.

NEI indicated that they understood RAI 3.5-14. NEI emphasized that the information submitted in the Demo LRA was work in progress and the resolution of this RAI would have to be plant specific.

NEI indicated that they understood RAI 3.5-15. NEI indicated that they will make component descriptions consistent with the latest version of GALL.

NEI indicated that they understood RAI 3.5-16. NEI indicated that the aggregates had been tested.

NEI indicated that they understood RAI 3.5-17 with no further discussion.

NEI indicated that they understood RAI 3.5-18. NEI believed that they are consistent with the GALL report. Thus, NEI commented that the treatment of concrete cracking in chapters II and III of the GALL report should be clarified. The treatment of clarification issues in the GALL report should be discussed in a public meeting. The staff would reconsider the need of this RAI.

After the conference call, the staff shared its draft notes with NEI. However, NEI did not provide any comments.