

APPENDIX B, TABLE B.2.10

**DISPOSITION OF NEI COMMENTS
ON CHAPTER 1 OF SRP-LR**

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Table B.2.10: Disposition of NEI Comments on Chapter 1 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-1-1	B.3.7 General	NEI 95-10 should be added as a reference in each section.	This provides the reviewer with insight to the industry recommended process.	The SRP-LR already references NEI 95-10, as appropriate. SRP-LR was revised to address this comment by updating its references to NEI 95-10 to the latest revision.
S-1-2	B.3.7 1.1.3.2	This section should include the 20-year criteria of 1.1.2.2.	Consistency.	10 CFR 54.17(c) does not permit an application for a renewed license to be submitted prior to 20 years before expiration of the current operating license that affects the acceptance of the application for docketing. The timely renewal provision of 10 CFR 2.109(b) does not affect the acceptance of a sufficient application for docketing. An application can be accepted for docketing with less than 5 years of operation remaining under the current license but the provision within 10 CFR 2.109(b) that allows operation beyond the current license period if the staff's review is not complete would not apply. The SRP-LR was revised to address this comment by reformatting and clarifying the SRP-LR, Section 1.1 and Table 1.1-1.
S-1-3	B.3.7 Table 1.1-1	In Item I.4 the 20-year criteria should be moved to Item II Timeliness Provision.	Consistency.	See NRC disposition of NEI comment S-1-2 in this Appendix B, Table B.2.10.

Table B.2.10: Disposition of NEI Comments on Chapter 1 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-1-4	B.3.7 Table 1.1-1	Delete III.1.A.a and b.	III.1.A is adequate and consistent with rule requirements. The sufficiency review should verify compliance with the regulation only.	<p>Items III.1.A.a and b have been retained in Table 1.1-1. Although the descriptions of the scoping boundaries for systems and structures discussed in Table 1.1-1, Item III.1.A.a, are not explicitly required by 10 CFR Part 54, both NRC staff and applicant experience with the first renewal applications have established that the boundary information is needed for the staff to verify the completeness and acceptability of the applicant's list of structures and components subject to an AMR (Table III.1.A.b) and the method used to identify them (Table III.1.B).</p> <p>The SRP-LR was revised to address this comment by reformatting and clarifying the SRP-LR, Section 1.1 and Table 1.1-1.</p>
S-1-5	B.3.7 Table 1.1-1	<p>Revise Table 1.1-1, Section III.1.C.b. to read:</p> <p>"Identification of aging effects requiring management based on materials, environment, operating experience, etc."</p>	<p>Section III.1.C.b. states "Identification of applicable aging effects based on materials, environment, operating experience, etc."</p> <p>An "applicable aging effect" is not defined. Suggest substituting the term "aging effects requiring management" as used in NEI 95-10.</p>	See NRC disposition of NEI comment SA.1-2 in this Appendix B, Table B.2.14.

APPENDIX B, TABLE B.2.11

**DISPOSITION OF NEI COMMENTS
ON CHAPTER 2 OF SRP-LR**

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Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-1	General	NEI 95-10 should be added as a reference in each section.	This provides the reviewer with insight to the industry recommended process.	NEI 95-10 <u>is included</u> as a reference in the SRP-LR, Section 2.1, "Scoping and Screening Methodology." The SRP-LR was not revised to address this comment.
S-2-2	2.1.3 Item 3	In the second sentence replace "accident" with "events." Remove the sentence beginning with "however, events such as fire," and the next sentence and replace with "Design basis events are defined as conditions of normal operations, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure the functions in 54.4(a)(1). See the Branch Technical position beginning on page A.1-1 of the SRP-LR, specifically the design basis event discussion on page A.1-2 in the second paragraph of item 6."	Events not specifically identified in 50.49(b)(1)(ii) are listed – fire, floods, storms, earthquakes, tornadoes and hurricanes. The paragraph should correlate exactly with the definition in 50.49(b)(1)(ii). Additionally SSCs required for compliance with the commission's regulations for fire protection are in scope under 54.4(a)(3).	The word "accident" was replaced by the word "event"; since for a population of events accidents would be a subset of it per 10 CFR 50.49(b)(1)(ii). Fire, floods, storms, earthquakes, tornadoes, and hurricanes are further <u>examples</u> of design basis events and /or anticipated operational occurrences currently used in NUREG-0800 but not addressed in Chapter 15 (Accident Analysis). This is consistent with the definition in §50.49(b)(1)(ii). The SRP-LR, Section 2.1.3, third bulleted-paragraph was revised to address this comment as stated in above paragraph.
S-2-3	2.1.3	Delete item 4.	The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping."	While the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-3 (cont.)			<p>Further, the guidance in item 4 focuses on drawing "attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." These evaluations are not parts of the CLB. Staff review of these documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation systems. The IPE and IPEEE reports do not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as appropriate. The staff is already reviewing these latter documents, which provide more current information than that which may be contained in the IPE and IPEEE reports.</p>	<p>vulnerabilities (e.g. results of an IPE or IPEEE)." The comment addresses the content of the 4th paragraph in section 2.1.3 of the SRP-LR which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-4	2.1.3	Delete item 5.	<p>The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." Staff review of the probabilistic documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation systems. The IPE and IPEEE reports do not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as</p>	See NRC disposition of NEI comment S-2-3 in this Appendix B, Table B.2.11.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-4 (cont.)			appropriate. The staff is already reviewing these latter documents which provide more current information than that which may be contained in the IPE and IPEEE reports.	
S-2-5	2.1.3.1	Add the following as the last sentence in the first paragraph of 2.1.3.1: "Usually plants will already have a list of those systems, structures, and components identified for compliance with other regulations in the plants CLB that contain identical scoping criteria, such as NRC Regulatory Guide 1.29 or 10CFR100, Appendix A."	This change gives credit to work already completed by the applicant and reviewed and approved by the NRC under 10 CFR Part 50. Such credit would make the staff review more efficient. The NRC staff indicated agreement with a change containing this concept at a public meeting about the SRP-LR on July 18, 2000.	LR applicants can rely on pre-existing lists of SSCs identified for compliance with other regulations to demonstrate §54.4(a) requirements have been satisfied. The SRP-LR, Section 2.1.3.1 was revised to address this comment by adding a sentence to the 1 st paragraph.
S-2-6	2.1.3.1.2	Revise the last paragraph of Section 2.1.3.1.2 to read: "It is important to note that the scoping criterion under 10 CFR 54.4(a)(2) specifically applies to those functions 'identified in paragraph (a)(1)(i), (ii), and (iii)' of 10 CFR 54.4 and does not apply to those functions identified in 10 CFR 54.4(a)(3)."	The last paragraph states, " <i>On the basis of the staff's experience to date, it is important to clarify that the scoping criterion under 10 CFR 54.4(a)(2) specifically applies to those functions 'identified in paragraph (a)(1)(i), (ii), and (iii)' of 10 CFR 54.4. An applicant need not extend this requirement to the scoping criteria under 10 CFR 54.4(a)(3), as is discussed below.</i> " The way this is written (<i>On the basis of the staff's experience...</i>) it implies that staff judgement was necessary to determine that §54.4(a)(2) does not apply to §54.4(a)(3) and that based on staff judgement this could	The rule as written is clear in that the scoping requirements of 10 CFR 54.4(a)(2) do not need to be extended into the scoping criteria of 10 CFR 54.4(a)(3). The SRP-LR, Section 2.1.3.1.2, was revised to address this comment by revising the last paragraph.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-6 (cont.)			change (...to date...) in the future. As the regulation is clear, there is no judgement necessary.	
S-2-7	2.1.3.1.3	In the third paragraph remove "and operate within." Also in the fifth paragraph remove "or operation within."	The regulation does not state "demonstrate compliance with and operation within the Commission's regulations."	10 CFR 50.54(a)(3) includes within the scope of the rule all "SSCs relied on in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations" for the five specific cases listed. The SRP-LR, Section 2.1.3.1.3, 3 RD and 5 th paragraphs were revised to address this comment to align their wording with that of the regulation.
S-2-8	2.1.3.1.3	In the third full paragraph excluding the quote, remove "based on the applicant's design specifications for the diesel,"	The example in this paragraph regarding the diesel goes beyond the rule and conflicts with other sections of the SRP-LR when it refers to the design specifications for the diesel. The 3rd paragraph further down has more appropriate wording, "that is, whose functions were credited in the analysis or evaluation."	See NRC disposition of NEI comment S-2-7 in this Appendix B, Section B.2.11. The SRP-LR, Section 2.1.3.1.3, 3 RD full paragraph was revised to address this comment to align its wording with that of the regulation.
S-2-9	2.1.3.1.3	Restate the third sentence of fifth paragraph to read: "For example, if a nonsafety-related diesel generator is only relied upon to remain functional to demonstrate compliance with the Commission SBO regulations, an applicant need not consider the following SSCs:"	This comment clarifies provides a firmer statement.	See NRC disposition of NEI comment S-2-7 in this Appendix B, Table B.2.11. The SRP-LR, Section 2.1.3.1.3, 5 th paragraph was revised to address this comment to align its wording with that of the regulation.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-10	2.1.3.2.1	Revise the last paragraph of Section 2.1.3.2.1 to read: "10 CFR 54.21(a)(1)(i) explicitly excludes instrumentation, such as pressure transmitters, pressure indicators, and water level indicators, from an aging management review. The applicant does not have to identify pressure retaining boundaries of this instrumentation because 10 CFR §54.21(a)(1)(i) excludes this instrumentation without exception, unlike pumps and valves. Further, instrumentation is sensitive equipment and degradation of the pressure retaining boundary of the instrumentation would be readily determinable by the extensive surveillance and testing. If an applicant determines that certain structures and components listed in Table 2.1-5 as meeting 10 CFR 54.21(a)(1)(i) does not meet that requirement for its plant, the reviewer reviews the applicant's basis for that determination.	<p>The last paragraph of Section 2.1.3.2.1 states: <i>"10 CFR 54.21(a)(1)(i) explicitly excludes instrumentation, such as pressure transmitters, pressure indicators, and water level indicators, from an aging management review. If an applicant determines that certain structures and components listed in Table 2.1-5 as meeting 10 CFR 54.21(a)(1)(i) do not meet that requirement for its plant, the reviewer reviews the applicant's basis for that determination."</i></p> <p>The same paragraph in the SRP-LR Working Draft, September 1997, stated: "10 CFR 54.21(a)(1)(i) explicitly excludes instrumentation, such as pressure transmitters, pressure indicators, and water level indicators, from an aging management review. The applicant does not have to identify pressure retaining boundaries of this instrumentation because 10 CFR §54.21(a)(1)(i) excludes this instrumentation without exception, unlike pumps and valves. Further, instrumentation is sensitive equipment and degradation of the pressure retaining boundary of the instrumentation would be readily determinable by the extensive surveillance and testing."</p>	<p>Instrumentation like pressure transmitters, pressure indicators, and water level indicators is excluded from being subject to aging management review by 10 CFR 54.21(a)(1)(i). In addition, their pressure retaining boundaries do not have to be identified per the staff's position since degradation can be determined by an applicant's surveillance and testing records.</p> <p>The SRP-LR, Section 2.1.3.2.1, last paragraph was revised to address this comment to align its wording with that of the staff's position.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-10 (cont.)			<p>REFERENCE: Letter from Dennis M. Crutchfield of NRC to Charles H. Cruse of Baltimore Gas and Electric, dated April 4, 1996.</p> <p>This documented NRC position taken regarding instrumentation would be helpful for future NRC reviewers and should be retained in the SRP-LR.</p>	
S-2-11	Table 2.1-1	Delete "Probabilistic Risk Assessment summary report."	<p>The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." The PRA is not part of the CLB. Staff review of this document may not provide the information it is seeking. The PRA report reflects the estimated core damage frequency for the plant configuration at the time the evaluation is performed. This report also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation</p>	See NRC disposition of NEI comment S-2-3 in this Appendix B, Table B.2.11.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-11 (cont.)			systems. The PRA report does not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as appropriate. The staff is already reviewing these latter documents, which provide more current information than that which may be contained in the PRA report.	
S-2-12	Table 2.1-1	Delete "Emergency operating procedures."	EOPs are not sources of information regarding evaluations or analyses for design basis events or regulated events.	EOPs were developed to cope with analyzed plant-specific <u>transients and accidents</u> in accordance with NUREG-0737, Item I.C.1 requirements. While EOPs deal with some transients and/or accidents not bound by plant-specific CLBs, EOPs nonetheless constitute <u>a valuable source of information</u> regarding both the facility's CLB and its design basis events. The SRP-LR was not revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-13	Table 2.1-2	Revise the third sentence under Commodity Groups to read: "The basis for grouping structures and components can be determined by such characteristics as similar function, similar design, similar materials of construction, similar aging management practices, or similar environments."	Sentence 3 does not consider a grouping based on similar function. Function is a valid basis for grouping as this is the basis for all electrical commodity groups in SRP-LR Table 2.1-5.	Grouping components by function is similar to that of grouping them based on design or environment with function being more bearing on their intended safety function or that of their associated component. The SRP-LR, Table 2.1-2 was revised to address this comment to revising the line item for Commodity Groups to include grouping of components based on function.
S-2-14	Table 2.1-2	Remove the reference to NUREG 1723 in the Complex assemblies row. The staff could add an example of complex assemblies from NUREG 1705, Section 2.2.3.22.2.2.		Although NUREG-1705 discusses complex assemblies, the Example 5 in Appendix C of NEI 95-10, Revision 0, better illustrates the evaluation guidance contained in SRP-LR Table 2.1-2 and NEI 95-10, Section 4.1.1. The SRP-LR, Table 2.1-2 was revised to address this comment.
S-2-15	Table 2.1-4	Reword the fifth function as "Provide electrical connections to specified sections of an electrical circuit to deliver voltage, current or signals."	This provides a more accurate description of the function of cable.	Clarification on the function of an electrical cable. The SRP-LR, Table 2.1-4, fifth function under 'Components' was revised to address this comment as noted.
S-2-16	Table 2.1-5	Delete motor items 65 and 66.	These motors are examples of the motor commodity group and are already included in the Motors, Generators commodity group.	Inconsistency corrected in NEI 95-10, Rev. 3. The SRP-LR Table 2.1-5 was revised to address this comment by adopting NEI 95-10, Rev. 3.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-17	Table 2.1-5	<p>Remove entry 107 for terminal blocks.</p> <p>Entry 77 should say "Annunciators" and Entry 98 should say "Regulators"</p> <p>The notes regarding references for entries 83, 86, 92, 105 should refer to NRC letters, which provided the passive/active determination for these components. For entry 83 it should be letters from C.I. Grimes to D.J. Walters dated September 19, 1997 and November 19, 1999. For entry 86 it should be the letter from C.I. Grimes to D.J. Walters dated April 27, 1999. For entry 92 it should be the letter from C.I. Grimes to D.J. Walters dated September 19, 1997. For entry 105 it should be the letter from C.I. Grimes to D.J. Walters dated September 19, 1997.</p>	Terminal blocks are included in entry 79. The second comment corrects the table. The third clarifies references.	See NRC disposition of NEI comment S-2-16 in this Appendix B, Table B.2.11.
S-2-18	Table 2.1-5	<p>Revise this Item 89 to read:</p> <p>"Surge Arresters (e.g., switchyard surge arresters, lightning arresters, surge suppressers, surge capacitors, protective capacitors, reactors)"</p>	Surge arresters that are separate components have applications other than just high-voltage. Suggest dropping "High-voltage" from the name of the commodity group. In continuing license renewal electrical work reactors, another type of surge arrester, was identified that would be helpful to have in the list of examples.	See NRC disposition of NEI comment S-2-16 in this Appendix B, Table B.2.11.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-19	Table 2.1-5	<p>Change Item 96 to read: "Radiation Monitors (e.g., area radiation monitors, process radiation monitors)" and change the passive determination to "No".</p> <p>Change Item 85 to read: "Elements, RTDs, Sensors, Thermocouples, Transducers (e.g., conductivity elements, flow elements, temperature sensors, radiation sensors, watt transducers, thermocouples, RTDs, vibration probes, amp transducers, frequency transducers, power factor transducers, speed transducers, var. transducers, vibration transducers, voltage transducers)"</p> <p>Change Item 106 to read: "Transmitters (e.g., differential pressure transmitters, pressure transmitters, flow transmitters, level transmitters, radiation transmitters, static pressure transmitters)"</p>	<p>The original SRP-LR table had the three items; Radiation Sensors, Radiation Monitors and Radiation Transmitters listed as separate items. Radiation Sensors was the only item associated with a pressure boundary in the table. Combining these three separate items is not consistent with the rest of the table under Electrical and I&C in combining into commodity groups.</p>	<p>See NRC disposition of NEI comment S-2-16 in this Appendix B, Table B.2.11.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-20	2.2.3	Revise second sentence of Section 2.2.3, Paragraph 1 to read: "Should the reviewer request additional information from the applicant regarding why a certain system or structure was not identified by the applicant as within the scope of license renewal for the applicant's plant, the reviewer should provide a plant specific CLB reference and the specific scoping criterion under which the reviewer believes the system or structure scopes in."	<p>The second sentence of Section 2.2.3, Paragraph 1 states: <i>"Should the reviewer request additional information from the applicant regarding why a certain system or structure was not identified by the applicant as within the scope of license renewal for the applicant's plant, the reviewer should provide a brief description of why the reviewer believes that this particular system or structure could be potentially within the scope of license renewal."</i></p> <p>The above guidance of providing a brief statement is vague and may not prevent an applicant from having to "prove the negative". The "brief statement" guidance should be expanded to instruct the reviewer to provide a plant specific CLB reference for the system and the specific scoping criterion under which the reviewer believes the system scopes in. It is the responsibility of the reviewer to explain why they believe a specific system or structure that the applicant scoped out is in the scope of license renewal.</p>	<p>If the reviewer questions why a certain system or structure was not within scope in an application and requests additional information from the applicant then he or she should provide the applicant with a brief description of why the SSC may be viewed as within the scope of the license renewal.</p> <p>The SRP-LR, Section 2.2.3, 1st paragraph was revised to address this comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-21	2.2.3.1	The last three full paragraphs: these were added since last draft and refer to components, rather than systems and structures. They seem out of place. They should go in the screening section. If the intention was to add these paragraphs here, they should refer to systems and structures.	Consistency with the purpose of the section.	<p>This section of SRP-LR is concerned with systems and structures not components so the word "components" was changed to "systems and structures."</p> <p>The SRP-LR, subsection 2.2.3.1, was revised to address this comment by changing the last and third from the last paragraphs as noted and deleting the second from the last paragraph.</p>
S-2-22	2.3.3.1	Remove this section. This change makes this section consistent with 2.4.	The Rule does not require an applicant to identify structures and components in the scope of license renewal in an application. An application must contain an identification of structures and components that require aging management review. Please see pages 60 and 61 of NEI 95-10, revision 2, for industry guidance regarding contents of the Scoping and Screening sections of a License Renewal Application. The SRP-LR should focus on the actual expected contents of an application.	<p>Clarification on the intent of rule in regard to the basis for requiring structures and systems to be identified in an application.</p> <p>The SRP-LR was revised to address this comment by revising Section 2.4 to be consistent with Section 2.3 and revising subsection 2.3.3.1 in Section 2.3 to meet the intend of the comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-23	2.3.3.2	In the first paragraph remove the second sentence.	A license renewal application will not contain a list of components in the scope of license renewal. Please see pages 60 and 61 of NEI 95-10, revision 2, for industry guidance regarding contents of the Scoping and Screening sections of a License Renewal Application. The SRP-LR should focus on the actual expected contents of an application.	<p>Clarification on the intent of rule in regard to the basis for requiring structures and systems to be identified in an application.</p> <p>The SRP-LR, Section 2.3.3.2 was revised to address this comment by eliminating the words "if they" in the third sentence and by revising Section 2.4 to be consistent with Section 2.3.</p>
S-2-24	2.3.3.2	Paragraph 2 states "Although Table 2.1-5 is extensive, it is not all inclusive. Thus, the reviewer should use other available information sources, such as prior application reviews, to determine whether a component is subject to an aging management review." Sections 2.4 and 2.5 do not contain these words. This statement should be removed from Section 2.3. A combination of Table 2.1-5 and other NRC guidance should be sufficient.	Inclusion of a component by a license renewal applicant is not indicative of the need for a following applicant to include a similar component as the current licensing bases and scoping and screening methodologies of the two applicants may be different.	<p>Scoping is plant specific depending on a plant's CLB. Each application is for a different plant and as such can be different in regard to the components identified and scoped in it under the rule.</p> <p>The SRP-LR, Section 2.3.3.2 was revised to address this comment by revising the 2nd paragraph by replacing the verb "is" by "may be" and by adding the same sentence to Sections 2.4 and 2.5.</p>
S-2-25	2.5.1	Remove the third paragraph as system level scoping is addressed in section 2.2.	The third paragraph reiterates information already provided in section 2.2. This section is addressing components requiring aging management review; therefore, this paragraph is not needed for the reviewer.	<p>Section 2.5 is a stand alone section and has a different intent than Section 2.2, thus the information in it is not a mere repeat of the wording in Section 2.2.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-26	2.5.1	In the fourth paragraph indicate that the "plant spaces" approach may be used. It is not required.	The License Renewal Rule does not require use of SAND96-0344. An applicant may use another method that complies with rule requirements.	An applicant may use any method to meet the requirement of the rule including the 'plant spaces' approach. The SRP-LR, Section 2.5.1, 4 th paragraph was revised to address this comment by changing the words "an applicant would" to "an applicant may".
S-2-27	2.5.1	Revise the last sentence of the fifth paragraph to read: "For the above example, if the applicant identified elevated temperatures in a particular area within the turbine building, the applicant may elect to further refine the scope in this particular area by identifying electrical equipment that is not subject to an aging management review and excluding this equipment from the aging management review. In this case, the excluded electrical equipment would be reported in the application as not subject to an aging management review." (Colaianni, Duke)	The last sentence in Section 2.5.1, paragraph 5, does not follow the way scoping in a specific area would be reported in the application when using the plant spaces approach. The space approach starts with the assumption that all passive long-lived electrical and I&C components subject to an aging management review. During the aging management review when a plant area that could be adverse to equipment is identified, the specific equipment in the area is identified in order to eliminate all equipment that does not meet the scoping criteria. In most cases this eliminates all electrical equipment in the area from the scope of review. Since a scoping evaluation was performed to exclude equipment from the aging management review, the excluded equipment would be reported in the application in a manner such as, "All non-EQ cables and connections are subject to an aging management	The example cited in the comment did not properly illustrate the 'plant spaces' approach. The SRP-LR, Section 2.5.1, 5 th paragraph was revised to address this comment by revising the last sentence.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-27 (cont.)			review excluding cables and connections used for the nonsafety-related thermocouples in the in-core instrumentation system."	
S-2-29	2.5.1.1 and 2.5.1.2	Delete Sections 2.5.1.1 and 2.5.1.2. Also delete the sentence before 2.5.1.1.	Sections 2.5.1.1 and 2.5.1.2 are not duplicated in the Mechanical Systems and Structures sections (2.3 and 2.4 respectively) and it seems to be a duplication of the material covered in Section 2.5.3, Review Procedures.	Clarification of intent of Section 2.5 to be consistent with Sections 2.3 and 2.4. The SRP-LR, Sections 2.5.1.1 and 2.5.1.2 were revised to address this comment by deleting those sections and the sentence just prior to Section 2.5.1.1.
S-2-30	2.5.3	Revise the third paragraph to read: "Equipment in the EQ (10 CFR 50.49) program has a qualified life and is replaced at the end of its qualified life. With a qualified life, EQ equipment does not meet the 'long-lived' screening criteria and is not subject to an aging management review. However, the qualified life analyses that provide the basis for a 40-year or greater qualified life are TLAAs for license renewal. The staff reviews the applicant's EQ TLAA evaluation separately following the guidance in Section 4.4 of this standard review plan."	<i>"The scope of 10 CFR 50.49 electric equipment to be included within 10 CFR 54.4(a)(3) is that 'long-lived' (qualified life of 40-years or greater) equipment already identified by licensees under 10 CFR 50.49(b), which specifies certain electric equipment important to safety."</i> The scope of §50.49 (EQ) equipment to be included within §54.4(a)(3) is all EQ equipment, not just EQ equipment with a 40-year or greater qualified life. The sentence implies that the 'long-lived' screening criteria applies only to SSCs that are subject to replacement based on a qualified life or specified time period equal to or greater than 40 years. There is no basis for this limitation of the §54.21(a)(1)(ii) criteria in either 10	The SRP-LR, Section 2.5.3, 3 rd paragraph is consistent with the intent of 10 CFR 54.4(a)(3). The SRP-LR was not revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-30 (cont.)			<p>CFR 54 or in the accompanying Statement of Considerations.</p> <p><i>"An applicant may identify EQ equipment separately for TLAA evaluation and not include such equipment as subject to an aging management review under 10 CFR 54.21(a)(1)."</i></p> <p>Equipment in the EQ program has a qualified life and is replaced at the end of its qualified life. With a qualified life EQ equipment does not meet the long-lived screening criteria and is not subject to an AMR. The sentence is misleading in that no EQ equipment is required to be included in the list of components subject to an AMR.</p> <p>Much of the information in this paragraph is TLAA evaluation specific and may confuse future reviewers as to the difference between 'long-lived' screening and TLAA evolution regarding EQ equipment.</p>	

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-31	2.5.3.1	Revise this section. This change makes this section consistent with 2.4 and 2.3 as revised.	The Rule does not require an applicant to identify structures and components in the scope of license renewal in an application. An application must contain an identification of structures and components that require aging management review.	See NRC disposition of NEI comment S-2-22 in this appendix, Section B.2.11. The SRP-LR was revised to address this comment by making Section 2.5.3.1 consistent with Sections 2.3 and 2.4.
S-2-32	2.5.3.2	Delete the last sentence of paragraph 2, Section 2.5.3.2.	The last sentence of paragraph 3 states, " <i>An applicant should justify omitting a component that is within scope of license renewal at their facility and is listed as 'passive' in Table 2.1-5.</i> " This information is not required by 10 CFR 54 to be provided in the application, but would be available for on-site inspection at the applicant's facility. An applicant is required to list in the application components subject to an aging management review and describe and justify the methodology, but not to justify why any specific component is not subject to an aging management review.	The information referred to is not required by 10 CFR 54, but available on-site. The SRP-LR, Section 2.5.3.2, 2nd paragraph was revised to address this comment by deleting the last sentence.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-33	2.1.2	Second bullet: should say "systems, structures, and components"	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-34	2.1.3.2.2	The quote from the SOC should in the middle read "... with a specified time period is deemed ..."	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-35	2.1.6	Reference 11 is a duplicate of reference 8.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-36	Table 2.1-3	Change column heading "Subject" to "Issue."	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-37	2.2.3.1	The fourth full paragraph says "internal functions", should instead say "intended functions."	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-38	2.2.3.1	In the sixth paragraph beginning "An applicant may..." Insert "that" between "indicating" and "the"	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-39	2.3.1	In the fifth paragraph beginning "Mechanical components..." delete "(or must)."	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.

Table B.2.11: Disposition of NEI Comments on Chapter 2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S-2-40	2.3.3.2	In the first paragraph the third line from end should read, "...AMR, components that perform..."	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-41	2.4.1	The items in the third bullet are components rather than structures and should be included in the sentence following the bullets.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-42	2.4.3.1	The fourth paragraph from end and last paragraph say essentially the same thing.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.
S-2-43	2.5.1	In the second paragraph insert "to" after "staff" in the fifth line from end.	Editorial Comment	Clarification to ensure consistency. The SRP-LR was revised to address this comment.

APPENDIX B, TABLE B.2.12

**DISPOSITION OF NEI COMMENTS
ON CHAPTER 3 OF SRP-LR**

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Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-1	SRP-LR 3.1	SRP-LR Section 3.1.1 Areas of Review, describes "connected systems." Statements describing the "connected systems" should be deleted.	SRP-LR 3.1 covers the aging management review of the reactor coolant systems. Connected systems are not part of the review of the reactor coolant system.	<p>The section SRP-LR 3.1 covers the reactor vessel, vessel internals, and the reactor coolant system (including connected systems). Connected systems up to the second containment isolation valve were included in this chapter to keep Class 1 components with similar programs together in the GALL report. The title of SRP-LR 3.1 was changed to be consistent with the GALL report. The title of SRP-LR 3.5 was also changed to be consistent with GALL Chapters II and III.</p> <p>The SRP-LR was revised to address a portion of this comment as stated in above paragraph.</p>
S3.1-2	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Inservice Inspection	GALL Section I applies. The presentation of the Inservice Inspection program in the GALL is different than any other program evaluated in the GALL that is relied upon for license renewal. What specifically is an applicant supposed to do that allows this program to be credited without further review?	<p>Chapter 1 of the GALL report, Vol. 2, "Application of the ASME Code," does not give specifics of a 10-element inservice inspection program. XI.M1, "ASME, Section XI, Inservice Inspection, Subsections IWB, IWC, and IWD" in NUREG-1801, Vol. 2 does. In places where ISI is acceptable, no further evaluation is annotated in the further evaluation column.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-3	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Water Chemistry	GALL Section XI.M.11 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XIM11-1 through G-XI.M11-2 in this Appendix B, Table B.2.9-2. The SRP-LR was revised to address this comment to make it consistent with the GALL report.
S3.1-4	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Minimization and Control of SCC Delete this program from all locations in all documents.	For PWRs, this topic is discussed in GALL IV.A2.1.3. Regulatory Guide 1.65 is referenced within this GALL entry. Regulatory Guide 1.65 entitled, "Materials and Inspections for Reactor Vessel Closure Studs," which was published in 1973 was reviewed by the B&W Owners Group during the licensing of BAW-2251, "Demonstration of the Management of Aging Effects for the Reactor Vessel." In a letter to the NRC staff dated April 1, 1997 (Project No.683), the B&WOG addressed Regulatory Guide 1.65 in response to RAI # 14. In brief, the B&WOG concluded that all recommendations (i.e., examination methods and acceptance standards) of the RV studs in Regulatory Guide 1.65 have been superceded by the current examination requirements specified in the 1989 Edition of ASME Section XI. The examination requirements specified in ASME Section XI, Examination Category B-	See NRC disposition of NEI comments G-IVA2-3 in this Appendix B, Table B.2.3. References to the design requirements of Regulatory Guide 1.65 were removed from the GALL report as recommended in NEI comment G-IV A2-3 in Appendix B and in this comment. However, the preventive features of Regulatory Guide 1.65 remain in GALL Chapter XI.M3. Also, programs were not deleted from the SRP-LR for minimization and control of SCC as a result of this comment. The SRP-LR was not revised to address this comment.

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-4 (cont.)			G-1 are sufficient to manage that potential for IGSCC of the RV studs during the period of extended operation.	
S3.1-5	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Fatigue Monitoring Program	GALL Section X.M1 applies. Refer to comments on Aging Management programs.	The SRP-LR was revised to address this comment by deleting fatigue monitoring program from section 3.1 because it is addressed in Table 4.3-2.
S3.1-6	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Bolting Integrity	GALL Section XI.M.12 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XIM12-1 through G-XIM12-4 in this Appendix B, Table B.2.9-2. The SRP-LR was not revised to address this comment.
S3.1-7	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Reactor Vessel Surveillance	GALL Section XI.M.13 applies. Refer to comments on Aging Management programs.	There were no NEI comments on Chapter XI, program M13. The SRP-LR was not revised to address this comment.
S3.1-8	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Boric Acid Corrosion	GALL Section XI.M.5 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XIM5-1 through G-XIM5-2 in this Appendix B, Table B.2.9-2. The SRP-LR was revised to address this comment to make it consistent with the GALL report.
S3.1-9	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Thermal Aging and neutron irradiation embrittlement (CASS)	GALL Section XI.M.2 applies. Refer to comments on Aging Management programs.	There were no NEI comments on Chapter XI, program M2. The SRP-LR was not revised to address this comment.

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-10	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Flow Accelerated Corrosion	GALL Section XI.M.6 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-XIM6-1 in this Appendix B, Table B.2.9-2. The SRP-LR was revised to address this comment to make it consistent with the GALL report.
S3.1-11	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Quality Assurance	GALL Appendix A and SRP-LR Appendix A.2 apply. Refer to comments on Aging Management programs.	Quality Assurance for Aging Management of Nonsafety-Related Components is described in Branch Technical Position IQMB-1 (Appendix A.2 of the standard review plan.) The SRP-LR was not revised to address this comment.
S3.1-12	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Vessel Closure Head Penetrations Delete the requirement for further review of this program in SRP-LR 3.1.2.2.7.	GALL Section IV A2.2.1 applies. The applicable GALL section states “No Further Evaluation Recommended” as does Table 3.1-1 of the SRP-LR. Actions will be taken by the applicant to address this topic within the bounds of the program.	There is no further evaluation necessary for item A2.2.1, “CRD pressure housing,” in chapter IV of the GALL report. SRP-LR statement 3.1.2.2.7 does not apply to this item. The SRP-LR was not revised to address this comment since there is no further evaluation required.

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-13	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Steam Generator Tube Integrity	GALL Sections IV D1.2.1, D1.2.3, D2.2.1, and D2.2.2 apply. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-IVD1-3 through G-IVD1-8 in this Appendix B, Table B.2.3. There were no NEI comments on item numbers D1.2.3, D2.2.1, and D2.2.2 The SRP-LR was revised to address this comment by making conforming changes consistent with changes to the Steam Generator Tube Integrity Program.
S3.1-14	SRP-LR 3.1	AMPs Evaluated in the GALL report that are Relied on for License Renewal – Loose Part monitoring Delete this program from all locations in all documents.	ASME Section XI, Examination Category B-N-3 has been found to be acceptable to manage loss of prestress by the staff in previous reviews. (i.e., BAW-2248, NUREG-1723). Operating experience provided in GALL IV B2.1.7 does not support the assertion that loose parts monitoring is an effective program to detect loss of preload from stress relaxation.	See NRC disposition of NEI comment G-IV-6 in Appendix B, Table B.2.3. ISI alone was considered inadequate in the Oconee SER. The SRP-LR was not revised to address this comment.

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-15	SRP-LR 3.1	<p>AMPs Evaluated in the GALL report that are Relied on for License Renewal – Neutron Noise monitoring</p> <p>Delete this program from all locations in all documents.</p>	<p>ASME Section XI, Examination Category B-N-3 has been found to be acceptable to manage loss of prestress by the staff in previous reviews. (i.e., BAW-2248, NUREG-1723).</p> <p>Operating experience provided in GALL IV B2.1.7 does not support the assertion that neutron noise monitoring is an effective program to detect loss of preload from stress relaxation.</p>	<p>See NRC disposition of NEI comment G-IV-6 in this Appendix B, Table B.2.3. ISI alone was considered inadequate in the Oconee SER.</p> <p>The SRP-LR was not revised to address this comment.</p>
S3.1-16	SRP-LR 3.1	<p>SRP-LR 3.1.2.2.2 addresses loss of material due to pitting and crevice corrosion in the steam generator shell assembly and refers to IN 90-04. GALL Sections (IV D1.1.3, 1.1.4, 2.1.4) apply.</p> <p>This requirement should be deleted.</p>	<p>IN 90-04, Cracking of the Upper Shell-to-Transition Cone Girth Welds in Steam Generators was issued to alert licensees to problems related to cracking of the upper shell-to-transition cone girth welds in certain steam generators. The aging mechanism is related to the weld itself. The cracking was found during a scheduled ISI. While a common factor was general corrosion pitting on the inside surface of the SGs, the cracks were initiated at the welds not in the base metal.</p> <p>IN 90-04 does not appear to support the GALL/SRP-LR conclusion that further evaluation is necessary. General corrosion pitting of base metal remote from the weld is not likely to result in a loss of component intended function.</p>	<p>See NRC disposition of NEI comment GIV D1-1 in this Appendix B, Table B.2.3.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-17	SRP-LR 3.1	SRP-LR 3.1.2.2.3, 2 nd paragraph should be revised to read as follows: "Appendix H of 10 CFR 50, Section III.B.3 requires staff review of the plant surveillance program for the period of licensed operation."	While it is true that the GALL recommends staff approval, the more correct reason is that such review and approval is required by the regulations.	Staff review is required of surveillance programs for period of licensed operation. The SRP-LR was revised to address this comment by modifying Section 3.1.2.2.3, second paragraph per the comment.
S3.1-18	SRP-LR 3.1	SRP-LR 3.1.2.2.3, 3 rd paragraph states that the GALL report recommends an enhanced inservice inspection to detect tight cracks and supplemental examinations for crevice regions of reactor pressure vessel beltline shell and nozzles. Contrary to what the SRP-LR states, there are no such recommendations in the GALL report. This statement should be deleted.	The pertinent GALL report locations for the reactor vessel beltline shell and nozzles are IV.A2.5 and IV A2.3. Both sections address loss of fracture toughness. Neither section identified the recommendation for further evaluation nor the basis for such an issue.	The third paragraph of SRP-LR 3.1.2.2.3 recommending an enhanced ISI and supplemental examinations was not consistent with GALL and was an error. Therefore, the recommendation was removed from the SRP-LR to be consistent with the GALL report. The SRP-LR was revised to address this comment.
S3.1-19	SRP-LR 3.1	SRP-LR 3.1.2.2.4 states that unanticipated thermal and mechanical loading can cause crack initiation and growth. This requirement should be deleted.	SRP-LR A.1.2.1 discusses the process to determine applicable aging effects. Item number 6 specifically states that "abnormal events need not be postulated specifically for license renewal." Unanticipated thermal and mechanical loading is an abnormal event that is outside the design of the plant.	See NRC disposition of NEI comments G-IVC2-3 through G-IVC2-5 in Appendix B, Table B.2.3. GALL was revised to remove the wording "unanticipated" from thermal and mechanical loading. The SRP-LR, Section 3.1.2.2.4, was revised to address this comment consistent with the changes in the GALL report.

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-20	SRP-LR 3.1	<p>SRP-LR Sections 3.1.2.2.4 and 3.1.2.2.7 SRP-LR States that GALL recommends enhanced inspection and one-time inspections for small bore piping.</p> <p>The statement needs to be revised to state: GALL recommends one-time inspections for small bore piping.</p>	<p>GALL Chapter IV item C2.1.5 applies to this comment.</p> <p>This GALL section does not recommend enhanced inspections. It only recommends the one-time inspection.</p>	<p>The words "enhanced inspection" were removed from the GALL report on Page C2-9, the last sentence under "Aging Management Programs." A plant-specific destructive examination or a nondestructive examination (NDE) that permits inspection of the inside surfaces of the piping needs to be conducted to ensure that cracking has not occurred and the component intended function will be maintained during the extended period is the recommendation of GALL for small bore piping.</p> <p>The SRP-LR, Sections 3.1.2.2.4 and 3.1.2.2.7, were revised to address this comment.</p>
S3.1-21	SRP-LR 3.1	<p>Section 3.1.2.2.7 indicates that further evaluation is recommended of CRD nozzles (page 3.1-5). This statement should be deleted.</p>	<p>GALL IV A2.2.1 also indicates that there are actions for the applicant to take but that no further evaluation is recommended by the staff. Also Table 3.1-1, PWR, CRD nozzle item (page 3.1-20) indicates that no further evaluation is recommended.</p>	<p>Program M11, "Nickel-Alloy Nozzles/ and Penetrations," was placed in Chapter XI of GALL. An applicant that meets this program is not required to provide further evaluation. Table 3.1-2 was also modified to reflect that this is an existing program.</p> <p>The SRP-LR was revised to address this comment.</p>

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-22	SRP-LR 3.1	<p>Section 3.1.2.2.7 indicates that further evaluation is required to address the potential for cracking of cladding remote from the welds (GALL D1.1.9).</p> <p>This statement needs to be deleted.</p>	<p>The GALL basis for this requirement relies inappropriately on inadvertent introduction of contaminants into the RCS. This activity is an abnormal event and need not be specifically postulated for license renewal unless the event has occurred at the plant. (SRP-LR A.1.2.1)</p> <p>Welds and the heat-affects zones adjacent to them are inspected because they are known to be the leading indicator of potential cracks.</p> <p>The consideration of potential cracks beyond the welds and HAZ is not required in order to provide reasonable assurance that the intended functions will be maintained during the period of extended operation.</p>	<p>It is true that SRP-LR A.1.2.1, item 6, indicates that aging effects from abnormal events need not be postulated specifically for license renewal. However, if an abnormal event has occurred at a particular plant, its contribution to the aging effects on structures and components for license renewal should be considered for that plant. For example, if a resin intrusion has occurred in the reactor coolant system at a particular plant, the contribution of this resin intrusion event to aging should be considered for that plant.</p> <p>The SRP-LR was revised to address this comment.</p>
S3.1-23	SRP-LR 3.1	<p>Sections 3.1.3.2.2, 3.1.3.2.3, 3.1.3.2.4 and 3.1.3.2.7 need to be revised to be consistent with the equivalent revisions to the 3.1.2 sections listed above.</p>	<p>Conforming changes, technical justification provided above.</p>	<p>This is a conforming change.</p> <p>SRP-LR, section 3.1.3, was revised to address this comment by making it consistent with changes made in SRP-LR section 3.1.2.</p>

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-24	SRP-LR 3.1	Table 3.1-1 should be revised to include the specific GALL sections that apply to the specific component group. Merge Table 1 of GALL Volume 1 with Table 3.3-1.	See Generic comments covering all aging management program summary tables.	<p>Table 1 of GALL Volume 1 was designed as a TOC or pointer to assist the applicant in finding the components in GALL.</p> <p>Table 3.1-1 was designed for easy reference to the NRC reviewer and it was determined that duplication was not desired.</p> <p>The SRP-LR was not revised to address this comment.</p>
S3.1-25	SRP-LR 3.1	Table 3.1-1, BWR/PWR, Reactor vessel beltline shell and welds item (page 3.1-16): Revise "Aging Management Program" entry to be "Plant Specific." Revise "Further Evaluation Recommended" entry to be "Yes, staff review of plant reactor vessel surveillance program required (see subsection 3.1.2.2.3)."	Proposed change makes entry consistent with proposed change to subsection 3.1.2.2.3.	<p>Table 3.1-1 was made consistent with subsection 3.1.2.2.3.</p> <p>The SRP-LR was revised to address this comment by making it internally consistent in Section 3.1.</p>
S3.1-26	SRP-LR 3.1	Table 3.1-1, PWR, Primary Nozzles and Safe Ends (page 3.1-18), delete further revaluation item consistent with comments provided above.	Technical justification provided above.	<p>Program M11, "Nickel-Alloy Nozzles and Penetrations," was placed in Chapter XI of GALL. An applicant that meets this program is not required to provide further evaluation. Tables 3.1-1 and 3.1-2 were also modified to reflect that this is an existing program.</p> <p>The SRP-LR was revised to address this comment.</p>

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-27	SRP-LR 3.1	Table 3.1-1, BWR/PWR, Reactor Vessel closure studs and stud assembly item (page 3.1-18): Under the "Aging Management Programs" delete "Minimization and control of SCC" consistent with comments provided above.	Technical justification provided above.	Tables 3.1-1 and 3.1-2 were made consistent with section 3.1 verbiage and/or the GALL report. The GALL report and the SRP-LR were revised to address this comment.
S3.1-28	SRP-LR 3.1	Table 3.1-1, PWR, Upper and lower internals assembly (Westinghouse) item (page 3.1-21). Credit for neutron noise monitoring program should be deleted.	Technical justification provided above.	Tables 3.1-1 and 3.1-2 are consistent with section 3.1 verbiage and/or the GALL report. The GALL report and the SRP-LR were not revised to address this comment.
S3.1-29	SRP-LR 3.1	Table 3.1-1, PWR, Upper and lower internals assembly (Westinghouse) item (page 3.1-21). Credit for loose part monitoring program should be deleted.	Technical justification provided above.	Table 3.1-1 and 3.1-2 are consistent with section 3.1 verbiage and/or the GALL report. The GALL report and the SRP-LR were not revised to address this comment.
S3.1-30	SRP-LR 3.1	Table 3.1-2, delete the "Minimization and control of SCC" program summary (page 3.1-22).	Conforming change to proposed change noted above.	Tables 3.1-1 and 3.1-2 are consistent with section 3.1 verbiage and/or GALL. The GALL report and the SRP-LR were not revised to address this comment.
S3.1-31	SRP-LR 3.1	Table 3.1-2, delete the "Loose part monitoring" program summary (page 3.1-26).	Conforming change to proposed change noted above.	Tables 3.1-1 and 3.1-2 are consistent with section 3.1 verbiage and/or the GALL report. The GALL report and the SRP-LR were not revised to address this comment.

Table B.2.12-1: Disposition of NEI Comments on Chapter 3, Section 3.1, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.1-32	SRP-LR 3.1	Table 3.1-2, delete the "Neutron noise monitoring" program summary (page 3.1-26).	Conforming change to proposed change noted above.	<p>Tables 3.1-1 and 3.1-2 are consistent with section 3.1 verbiage and/or the GALL report.</p> <p>The GALL report and the SRP-LR were not revised to address this comment.</p>
S3.1-33	SRP-LR 3.1	Table 3.1-2, delete summary of Steam Generator Tube Integrity program as this program is already required by technical specifications.	<p>Technical specifications are part of the facility operating license and are approved and issued by the NRC staff. A description of the Steam Generator Tube Integrity program is contained in Chapter 5 of the facility technical specifications.</p> <p>Due to the hierarchy of regulatory documents, requirements contained in the technical specifications supercede any statements contained in the FSAR.</p>	<p>A tube integrity program has been added to Chapter XI of the GALL report, that includes the requirements in the Technical Specification. Tables 3.1-1 and 3.1-2 were made consistent with the wording in SRP-LR section 3.1 and/or the GALL report.</p> <p>The GALL report and the SRP-LR were revised to address this comment.</p>

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-1	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Bolting Integrity	GALL Section XI.M.12 applies. Refer to comments on Aging Management programs.	See NRC dispositions for NEI comments G-XIM12-1 through G-XIM12-4 in this Appendix B, Table B.2.9-2.
S3.2-2	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Boric Acid Corrosion	GALL Section XI.M.5 applies. Refer to comments on Aging Management programs.	See NRC dispositions for NEI comments G-XI-M5-1 through G-XI-M5-2 in this Appendix B, Table B.2.9-2.
S3.2-3	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Closed Cycle cooling water system	GALL Section XI.M.4 applies. Refer to comments on Aging Management programs.	See NRC dispositions for NEI comments G-XI.M4-1 through G-XI.M4-2 in this Appendix B, Table B.2.9-2.
S3.2-4	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Flow accelerated corrosion (FAC) program	GALL Section XI.M.6 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XI-M6-1 in this Appendix B, Table B.2.9-2.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-5	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Inservice Inspection	GALL Section I applies. The presentation of the Inservice Inspection program in the GALL is different than any other program evaluated in the GALL that is relied upon for license renewal. What specifically is an applicant supposed to do that allows this program to be credited without further review?	<p>Applicant should refer to GALL report, Chapter XI, program M1, "ASME, Section XI, Inservice Inspection, Subsections IWB, IWC, and IWD" in NUREG-1801, Vol. 2, for the evaluation of the inservice inspection program. The SRP-LR (NUREG-1800), Sections 3.2.1.1 through 3.2.1.3 tells the basis for crediting an applicant's program by just referring to GALL report and the justifications required when the GALL report is not bounding. Chapter I of GALL, Vol. 2, "Application of the ASME Code," does not give specifics of a 10-element inservice inspection program but that is contained in the SRP-LR, Section A.1.2.3.</p> <p>The SRP-LR was not revised to address this comment, but the GALL report, Chapter XI, was modified by updating program M1.</p>

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-7	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Open-cycle cooling water system	GALL Section XI.M.3 applies. Refer to comments on Aging Management programs.	The comment on aging management program M3 was not received by the NRC along with other NEI comments on Chapter XI aging management programs. NEI in a subsequent e-mail on February 02, 2001, considered the matter closed indicating there were no comments on aging management program M3. SRP-LR was not revised to address this comment.
S3.2-8	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Protective Coating monitoring and maintenance program	GALL Section XI.S.8 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XI.S8-1 in this Appendix B, Table B.2.9-3.
S3.2-9	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Thermal aging embrittlement of CASS AMP.	GALL Section XI.M.1 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XIM1 in this Appendix B, Table B.2.9-2.
S3.2-10	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Water Chemistry	GALL Section XI.M.11 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XIM11-1 and G-XI.M11-2 in this Appendix B, Table B.2.9-2.
S3.2-11	SRP-LR 3.2	Section 3.2.2.2.2 Crack Initiation and Growth Due to SCC Delete this Inservice Inspection.	Inservice inspections do not include tanks within the scope of inspection so it is inappropriate to credit in this instance. See additional comments concerning the water chemistry program.	See NRC disposition of NEI comment G-VD1-3 in this Appendix B, Table B.2.4. SRP-LR was revised to address this comment by deleting Subsection 3.2.2.2.2 as in August 2000 version and modifying Tables 3.2.1 and 3.2.2 accordingly.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-12	SRP-LR 3.2	<p>Section 3.2.2.2.4 Local Loss of Material Due to Pitting and Crevice Corrosion</p> <p>Delete this item.</p>	<p>No objective evidence has been provided in the GALL report Sections VA 2.1, 5.1, VC 2.1, 2.2 to support the requirement to perform additional inspections.</p> <p>See additional comments concerning the water chemistry program.</p>	<p>The one-time inspection is proposed to verify that the water chemistry program is adequately managing the aging effect - loss of material for aging mechanisms - pitting and crevice corrosion per SRP-LR 3.2.2.2.4. However, sections of the GALL report referenced do not require one-time inspection but a plant specific program. It is a reasonable check to verify that chemistry program is suitable before entering extended period of operation. This argument is supported by objective evidence in which pitting has been found on inside surface of low-alloy steel and carbon steel components exposed to secondary water (steam generator girth weld region and feedwater nozzle region).</p> <p>SRP-LR was not revised to address this comment.</p>

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-13	SRP-LR 3.2	<p>Section 3.2.2.2.5 Local Loss of Material Due to MIC</p> <p>Delete this item.</p>	<p>No objective evidence has been provided in the GALL report Section VC.2.1 to support the requirement to perform additional inspections.</p>	<p>See NRC disposition to NEI comment S3.2-12 in this Appendix B, Table B.2.12-2.</p> <p>This proposal to do a one-time inspection to verify if evidence of microbiologically influenced corrosion is present, as in SRP-LR 3.2.2.2.5, is supported by objective evidence like IN 85-30 "MIC of Containment Service Water System" and Chapter 3 of EPRI Sourcebook for MIC in Nuclear Power Plants (Case Histories).</p> <p>SRP-LR was not revised to address this comment.</p>
S3.2-14	SRP-LR 3.2	<p>Section 3.2.2.2.6 Changes in Properties Due Elastomer Degradation</p>	<p>BWR item</p>	<p>This elastomer is considered a structural sealant and as such should be addressed by a structural aging management program on a plant -specific basis. NRC agrees that this elastomer is in the standby gas treatment system and thus a BWR component.</p> <p>SRP-LR was not revised to address this comment.</p>
S3.2-15	SRP-LR 3.2	<p>Section 3.2.2.2.7 Loss of Iodine Retention Capacity Due to Moisture Absorption</p> <p>Delete this item.</p>	<p>Charcoal absorber filter media should be considered to be a consumable. See SRP-LR Table 2.1-3.</p>	<p>See NRC disposition of NEI comment G-VB-2 in this Appendix B, Table B.2.4.</p> <p>SRP-LR was revised to address this comment by deleting section 3.2.2.2.7.</p>

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-16	SRP-LR 3.2	Section 3.2.2.2.8 Buildup of Deposit from Biofouling Delete this item.	No objective evidence has been provided in the GALL report Sections VC.2.1, VC.2.2 to support the requirement to perform additional inspections.	See NRC disposition of NEI comment G-VC-2 in this Appendix B, Table B.2.4. SRP-LR was revised to address this comment by deleting section 3.2.2.2.8.
S3.2-17	SRP-LR 3.2	Section 3.2.2.2.9 Local Loss of Material Due to Erosion Delete this item.	No objective evidence has been provided in the GALL report Section VD.1.2.3 to support the requirement to perform additional inspections.	Local loss of material due to erosion has been verified to occur as evidenced by LER 50-275/94-023. Because this component requires a plant specific program, the GALL report was modified under aging management program for this component's line item to show this reference. SRP-LR was not revised to address this comment but the GALL report was as stated above.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-18	SRP-LR 3.2	<p>Table 3.2-1, page 3.2-13, BWR/PWR, Closure bolting in high-pressure or high-temperature systems</p> <p>This component description is not consistent with the scope of the actual program. It should be "Class 2 bolting greater than 2 inches in diameter".</p>	See generic comments concerning the Bolting Integrity Program.	<p>See NRC disposition for NEI comments G-XIM12-1 through G-XIM12-4 in this Appendix B, Table B.2.9-2.</p> <p>The scope of the actual program includes volumetric inspection of bolting greater than 2-in. in diameter as mentioned by the comment. The scope also includes visual inspection of all pressure, retaining components during leakage tests. This will include visual inspection of bolting smaller than 2-in. in diameter.</p> <p>SRP-LR was not revised to address this comment.</p>
S3.2-19	SRP-LR 3.2	Section 3.2-3, Tables 3.2-1 and 3.2-2, and the applicable GALL sections need to be revised as necessary to reflect changes made above.	Conforming changes	The SRP-LR was revised to address this comment by making conforming changes to Section 3.2-3, as well as Tables 3.2-1 and 3.2-2, including the applicable GALL sections, to reflect changes made in responses to the NEI comments in this Appendix B, Table B.2.12-2.

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Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-2	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Bolting Integrity	GALL Section XI.M.12 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M12-1 through G-XI.M12-4 in this Appendix B, Table B.2.9-2.
S3.3-3	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Boraflex Monitoring	GALL Section VII A2.1.1 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-VII A2.1.1 in this Appendix B, Table B.2.6.
S3.3-4	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Boric Acid Corrosion	GALL Section XI.M.5 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M5-1 through G-XI.M5-2 in this Appendix B, Table B.2.9-2.
S3.3-5	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Closed Cycle cooling water system	GALL Section XI.M.4 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M4-1 through G-XI.M4-2 in this Appendix B, Table B.2.9-2.
S3.3-6	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Compressed air inspection and maintenance	GALL Section VII D.1.1 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-VIID-2 in this Appendix B, Table B.2.6.
S3.3-7	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Fire Protection	GALL Section VII.G applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-VIIG-1 through G-VIIG-12 in this Appendix B, Table B.2.6.
S3.3-8	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Fire Water System	GALL Section XI.M.10 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M10-1 through G-XI.M10-2 in this Appendix B, Table B.2.9-2.
S3.3-9	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Fuel oil Chemistry	GALL Section XI.M.9 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M9-1 through G-XI.M9-4 in this Appendix B, Table B.2.9-2.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-10	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Inservice Inspection	GALL Section I applies. The presentation of the Inservice Inspection program in the GALL is different than any other program evaluated in the GALL that is relied upon for license renewal. What specifically is an applicant supposed to do that allows this program to be credited without further review?	Chapter 1 of GALL, Vol. 2, "Application of the ASME Code," does not give specifics of a 10-element inservice inspection program. XI.M1, "ASME, Section XI, Inservice Inspection, Subsections IWB, IWC, and IWD" in NUREG-1801, Vol. 2, does. In places where ISI is acceptable, no further evaluation is noted in the further evaluation column. The SRP-LR was not revised to address this comment.
S3.3-11	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Open-cycle cooling water system	GALL Section XI.M.3 applies. Refer to comments on Aging Management programs.	There were no NEI comments on the GALL report, chapter G-XI.M3. The SRP-LR was not revised to address this comment.
S3.3-12	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Outer surface of aboveground carbon steel tanks	GALL Section XI.M.7 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-XI.M7-1 in this Appendix B, Table B.2.9-2.
S3.3-13	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Outer surface of buried piping and components	GALL Section XI.M.8 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-XI.M8-1 in this Appendix B, Table B.2.9-2.
S3.3-14	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Overhead and gantry cranes inspection and maintenance	GALL Section VII B.1.1 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-VII B.1.1 in this Appendix B, Table B.2.6.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-15	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Protective coating monitoring and maintenance	GALL Section XI.S.8 applies. Refer to comments on Aging Management programs.	Because the condition of the coating does not directly affect the intended function, coating degradation and the Protective Coating Monitoring and Maintenance program were deleted as an aging mechanism of concern and AMP for auxiliary systems. Coatings are covered under the maintenance rule. The SRP-LR was revised to address this comment.
S3.3-16	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Structural Monitoring	GALL Section XI.S.6 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.S6-1 through G-XI.S6-6 in this Appendix B, Table B.2.9-3.
S3.3-17	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Water Chemistry	GALL Section XI.M.11 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M11-1 through G-XI.M11-2 in this Appendix B, Table B.2.9-2.
S3.3-18	SRP-LR 3.3	Section 3.3.2.2.1 Loss of Material from General, MIC, Galvanic, Pitting, and Crevice Corrosion	See generic comments concerning water chemistry program. No objective evidence has been provided in GALL VII A3.2.1 that supports this additional inspection.	See NRC disposition of NEI comments G-XI.M11-1 through G-XI.M11-2 in this Appendix B, Table B.2.9-2.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-19	SRP-LR 3.3	Section 3.3.2.2.2 Hardening, and Cracking from Material Degradation	No objective evidence has been provided in GALL VII A3.3.3, F1.1.3, and F2.1.3 that supports this additional inspection.	Page 5.18-16 (Spent Fuel Cooling System) of BG&E LR states "Long term exposure of rubber to water will result in water absorbing and swelling, blistering, hardening, and eventually cracking. Exposure to radiation can result in degradation of material properties such as tensile strength, hardness etc." These are credible aging effects/mechanisms on elastomer lining as mentioned in the BG&E LR. The SRP-LR was not revised to address this comment.
S3.3-20	SRP-LR 3.3	Section 3.3.2.2.4 Crack Initiation and Growth from SCC 2 nd paragraph is inconsistent with Table 3.3-1 and GALL report which also refer to "unanticipated cyclic loading" for this item. Inconsistency needs to be corrected. 3 rd paragraph concerns SCC that could occur in external surfaces adhered with electrical tape. This item should be deleted.	Unanticipated cyclic loading should not be considered an aging effect that needs to be managed for the period of extended operation. This is an abnormal event per SRP-LR A.1. No objective evidence in GALL VII E1.4.1 provided to support that this is an aging effect. Also, per SRP-LR A1, abuse due to human activity is an abnormal event and aging effects from such abuse need not be postulated for license renewal.	See NRC disposition of NEI comments G-VIIE1-5, G-VIIE1-6, and G-VIIE1-11 in this Appendix B, Table B.2.6. See NRC disposition of NEI comments G-VIIE1-8 and G-VIIE1-9 in this Appendix B, Table B.2.6.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-21	SRP-LR 3.3	Section 3.3.2.2.5 Loss of Material from MIC, Galvanic, Pitting, and Crevice Corrosion, Wear and Erosion/Corrosion	Moist air required. Movement required in order to have mechanical wear.	See NRC disposition of NEI comment G-VIID-2 in this Appendix B, Table B.2.6.
S3.3-22	SRP-LR 3.3	Section 3.3.2.2.6 Loss of Iodine Retention Capacity from Moisture Absorption Delete this item.	Charcoal absorber filter media should be considered to be a consumable. See SRP-LR Table 2.1-3.	See NRC disposition of NEI comment G-VIIF1-3 in this Appendix B, Table B.2.6.
S3.3-23	SRP-LR 3.3	Section 3.3.2.2.7 Loss of Material from General, Galvanic, Pitting, and Crevice Corrosion	RCP Oil Collection Tank inspection at ONS.	See NRC disposition of NEI comments G-VIIG-12 and G-VIIH2-15 in this Appendix B, Table B.2.6.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-24	SRP-LR 3.3	<p>Section 3.3.2.2.8 Induced cracking from vibration and wall thinning from Erosion/Corrosion</p> <p>Vibration induced cracking should be deleted.</p> <p>Erosion /corrosion should be deleted.</p>	<p>Unanticipated cyclic loading should not be considered an aging effect that needs to be managed for the period of extended operation. This is an abnormal event per SRP-LR A.1. Vibration induced cracking is a design problem not an aging management issue.</p> <p>GALL Section VII H2.1.1 and H2.1.2 apply.</p> <p>No objective evidence is provided that supports the determination that either of these aging effects is of concern for the period of extended operation.</p> <p>Erosion / corrosion is plant specific and can be managed by the Flow Accelerated Corrosion program. However, the operating experience described in GALL XI.M6 does include any incidents with Diesel engine cooling water systems.</p>	<p>See NRC disposition of NEI comment G-VIIH2-6 in this Appendix B, Table B.2.6.</p> <p>See NRC disposition of NEI comment G-VIIH2-12 in this appendix, Table B.2.6.</p>
S3.3-25	SRP-LR 3.3	<p>Section 3.3.2.2.9 Loss of Material from corrosion or Buildup of Deposits from Biofouling</p> <p>Delete this item.</p>	<p>No objective evidence in GALL H1.4.1 provided to support that this is an aging effect.</p>	<p>See NRC disposition of NEI comment G-VIIH1-6 in this Appendix B, Table B.2.6.</p>

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-26	SRP-LR 3.3	Table 3.3-1, page 3.3-13, Diesel engine cooling water system item Delete entire line item.	Unanticipated cyclic loading should not be considered an aging effect that needs to be managed for the period of extended operation. This is an abnormal event per SRP-LR A.1. Vibration induced cracking is a design problem not an aging management issue. Consistent with comments made on SRP-LR 3.3.2.2.8.	See NRC disposition of NEI comment G-VIIH2-6 in this Appendix B, Table B.2.6.
S3.3-27	SRP-LR 3.3	Table 3.3-1, page 3.3-14, BWR, Closure Bolting item. The Bolting integrity program as written cannot manage the effects of aging identified in this item. Another program or activity must be provided.	The bolting integrity program only includes ASME Class 1 bolting and ASME Class 2 bolting greater than 2 inches in diameter.	See NRC disposition of NEI comment S3.2-18 in this Appendix B, Table B.2.12-2.
S3.3-28	SRP-LR 3.3	Table 3.3-2, page 3.3-18, Fuel Oil Chemistry Delete the statement concerning ASTM Standards.	Required ASTM Standards are also in ITS Section 5.5, Programs.	See NRC disposition of NEI comments G-XI.M9-1 through G-XI.M9-4 in this Appendix B, Table B.2.9-2.

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Table B.2.12-4: Disposition of NEI Comments on Chapter 3, Section 3.4, of SRP-LR

Comment Number	Item Number	Proposed Change	Justification For Proposed Change	NRC Disposition
S3.4-1	SRP-LR 3.4	Section 3.4.1 Areas of Review For PWRs, the boundary between the secondary side systems and the steam generator needs to be clearly defined.		SRP-LR, Section 3.4.1 was revised to state "The aging management for the steam generator is reviewed following the guidance in Section 3.1 of this Standard Review Plan." Section 3.4 of the SRP-LR reviews the secondary piping from the steam generator. SRP-LR, Section 3.4.1 was revised to address this comment.
S3.4-2	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Bolting Integrity	GALL Section XI.M.12 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments for G-XIM12-1 through G-XIM12-4 in this Appendix B, Section B.2.9-2.
S3.4-3	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Boric Acid Corrosion	GALL Section XI.M.5 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments for G-XI-M5-1 through G-XI-M5-2 in this Appendix B, Section B.2.9-2.
S3.4-4	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Closed Cycle cooling water system	GALL Section XI.M.4 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments for G-XI.M4-1 through G-XI.M4-2 in this Appendix B, Section B.2.9-2.
S3.4-5	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Flow accelerated corrosion (FAC) program	GALL Section XI.M.6 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment for G-XI-M6-1 in this Appendix B, Section B.2.9-2.
S3.4-6	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Open-cycle cooling water system	GALL Section XI.M.3 applies. Refer to comments on Aging Management programs.	No comments were received for GALL Section G-XI.M.3, Open-cycle cooling water system. No NRC disposition for this item.
S3.4-7	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Outer surface of above ground carbon steel tanks	GALL Section XI.M.7 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment for G-XI.M7-1 in this Appendix B, Section B.2.9-2.

Table B.2.12-4: Disposition of NEI Comments on Chapter 3, Section 3.4, of SRP-LR (continued)

Comment Number	Item Number	Proposed Change	Justification For Proposed Change	NRC Disposition
S3.4-8	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Outer surface of buried piping and components	GALL Section XI.M.8 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment for G-XI.M8-1 in this Appendix B, Section B.2.9-2.
S3.4-9	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Protective coating monitoring and maintenance	GALL Section XI.S.8 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment for G-VIII.H-4 in this Appendix B, Section B.2.7.
S3.4-10	SRP-LR 3.4	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Water Chemistry	GALL Section XI.M.11 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments for G-XIM11-1 through G-XI.M11-2 in this Appendix B, Section B.2.9-2.
S3.4-11	SRP-LR 3.4	Table 3.4-1, page 3.4-9, BWR/PWR, Closure bolting in high-pressure or high-temperature systems This component description is not consistent with the scope of the actual program. It should be "Class 2 bolting greater than 2 inches in diameter."	GALL Section XI.M.12 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment for S3.2-18 in this Appendix B, Section B.2.12-2.
S3.4-12	SRP-LR 3.4	Table 3.4-2, page 3.4-12, the summary for Inservice Inspection should be deleted.	Inservice Inspection is not relied upon to manage the effects of aging summarized in table 3.4-1.	The Inservice Inspection program is not relied on to manage aging effects in SRP-LR section 3.4. The SRP-LR was revised to address this comment by deleting Inservice Inspection from Table 3.4-2.

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.	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. The license renewal guidance documents were not revised to address this comment.
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.	The information in the GALL and this section need to be consistent. Editorial.	This is an editorial comment on consistency of license renewal documents. The license renewal guidance documents were revised to address this comment as appropriate to ensure consistency among them.

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.	<p>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..."</p> <p>There is not enough guidance provided in this document for either an applicant or review to know what is required.</p>	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-IIIA3-5 and G-IIIB1-6 in Appendix B, Table B.2.2.
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.

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-3.5-22	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.

APPENDIX B, TABLE B.2.13

**DISPOSITION OF NEI COMMENTS
ON CHAPTER 4 OF SRP-LR**

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Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.1-1	SRP-LR 4.1-4.7	Delete qualifying term "plant-specific". This comment should be noted throughout Chapter 4 of the SRP-LR.	In the first paragraph of section 4.1, the second sentence, and the second paragraph, first sentence, use of the term "plant-specific" incorrectly limits the scope of TLAA's, and adds nothing to the discussion. For example, a CE-generic surge line fatigue calc. (most certainly not plant-specific) was determined to be a TLAA for CCNPP. It may be correct to say, "the list of TLAA's is plant specific".	<p>NEI comment is to revise the term "plant-specific" to read, "the list of TLAA's is plant specific."</p> <p>A TLAA may not be plant-specific. It is more proper to say that, "the list of TLAA's is plant-specific." This proposed change makes this issue clearer.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.1-2	SRP-LR 4.1.1	Delete the last sentence in the first paragraph.	<p>The last sentence in paragraph 1 states, "<i>The listing of TLAA's should provide sufficient detail to identify the type of calculations and a summary result of calculations.</i>"</p> <p>Providing a summary result of a calculation that is a TLAA goes beyond the listing requirements of 10 CFR 54.21(c)(1). Details of an analysis would only be necessary for the demonstration portion if demonstration methods (i) or (ii) were chosen for a TLAA. No such details as the type of calculation or a summary of results are required if demonstration method (iii) is chosen.</p> <p>The information reviewed in SRP-LR 4.1.1 should at most be no more than a table of contents of the</p>	<p>NEI comment is to delete the sentence, "The listing of TLAA's should provide sufficient detail to identify the type of calculations and a summary result of calculations."</p> <p>The results of analysis and calculation is necessary when demonstration methods (i) or (ii) is chosen and that, the details of the results of analysis and calculations are not required if demonstration method (iii) is chosen.</p> <p>The SRP-LR was revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.1-2 (cont.)			TLAA Chapter. Each TLAA will be addressed in its own Chapter 4 section. The last sentence of paragraph 1 is just not needed.	
S 4.1-3	SRP-LR 4.1.1	In the first paragraph of the section add a sentence to the end as follows, "A listing of specific calculation numbers is not required."	A specific listing of the individual calculations will not be provided. Rather, a listing of the categories of calculations identifying a topical area will be identified. Sufficient information as requested for each category of calculations will be provided. For example, containment liner fatigue is a 'category' of calculations. Several calc numbers may have been used for this category.	See NRC disposition of NEI comment S 4.1-2 in this Appendix B, Table B.2.13.
S 4.1-4	SRP-LR 4.1.1	SRP-LR Section 4.1.1, 3 rd paragraph should be revised to read: "an applicant must provide a list of plant-specific exemptions granted under 10 CFR 50.12 that are based on TLAA."	Part 54 limits exemptions to only those granted under 50.12.	NEI commented that SRP-LR Section 4.1.1, third paragraph should be revised to read, "an applicant must provide a list of plant-specific exemptions granted under 10 CFR 50.12 that are based on TLAA." According to 10 CFR 54.21(c)(2), a list of plant-specific exemptions that is granted pursuant to 10 CFR 50.12 must be provided. This proposed change makes this issue clearer. The SRP-LR was revised to address this comment.

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.1-5	SRP-LR 4.1.3	<p>In the paragraph that starts "The reviewer should use the plant Updated Final Safety Analysis Report ---" add two sentences as follows, "Sections 4.2 through 4.6 identify typical types of TLAAAs for most plants. Information on the licensee's methodology for identifying TLAAAs may also be useful in identifying calculations that did not meet the six criteria below."</p>	<p>The reviewer should start with the plant CLB as stated. The use of Tables 4.1-2 and 4.1-3 may start the reviewer on the wrong track as stated in the next comment. Inserting this wording allows the reviewer to quickly retrace the efforts of the licensee in identifying TLAAAs so the reviewer may discover potential omissions.</p>	<p>NEI comment is to add two sentences in the paragraph that starts "The reviewer should use the plant Updated Final Safety Analysis Report ---" to read, "Sections 4.2 through 4.6 identify typical types of TLAAAs for most plants. Information on the licensee's methodology for identifying TLAAAs may also be useful in identifying calculations that did not meet the six criteria below."</p> <p>This comment is helpful in the sense that the staff review should start with the plant current licensing bases (CLB.)</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.1-6	SRP-LR 4.1.3	<p>In the paragraph that starts "The number and type of TLAAAs vary ---," delete the remainder of the paragraph that starts with the sentence, "Table 4.1-2 provides a list ---."</p> <p>Also, delete Tables 4.1-2 and 4.1-3.</p>	<p>The use of Tables 4.1-2 and 4.1-3 start the reviewer from the wrong place. The search for possible TLAAAs should start from the licensee's CLB and the reviewer's knowledge of the six criteria. Of particular concern in retaining these SRP-LR tables, would be the need for each licensee to address each of the items in the tables to preclude questions on the topics listed. The licensee's efforts start from the CLB, not from the tables. The reviewer should have a reasonable basis for believing that a TLAA exists. This will come from a review of the CLB, not from a review of these tables.</p>	<p>NEI recommends deleting Tables 4.1-2 and 4.1-3 because these tables may mislead the staff reviewer.</p> <p>Examples listed in the Tables 4.1-2 and 4.1-3 are just examples and are not a list of required TLAAAs. These tables may help reviewers to get on the right track, instead of misleading.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.1-7	SRP-LR 4.1.3	<p>SRP-LR Section 4.1.3, page 4.1-3, statements in the first two examples on the page should be revised to read as follows: "A review of the code and standard reveals that an analysis or calculation is required. Some of these calculations or analyses will be TLAAs."</p> <p>Similarly, revise the statement in the 2nd example to read: "In response to a generic letter, licensee submitted a letter to the NRC committing to perform an analysis or calculation..."</p>	<p>TLAA is a term that is unique to Part 54. Codes and standards do not in and of themselves require a TLAA. Codes and standards often require an analysis or calculation which if the criteria of §54.3 are met then a TLAA exists.</p> <p>Commitments in response to generic letters would not necessarily be a TLAA unless all criteria contained in §54.3 were met.</p>	<p>The proposed change in the first paragraph is helpful in order to clarify the intent of the sentence.</p> <p>The SRP-LR was revised to address this comment.</p> <p>However, in the second paragraph, the sentence is clear that the calculation or analysis should be related to time-limited aging analyses.</p> <p>The SRP-LR was not revised to address this comment.</p>
S 4.2-1	SRP-LR 4.2, 4.3, 4.4, 4.5, 4.6, 4.7	<p>In each of these SRP-LR Sections, there is a statement in the Review Procedures section, FSAR Supplement discussion that begins with: "The staff expects to impose a license condition in the renewed license, if granted, ..."</p>	<p>It is not clear why this statement is included in the review procedure section. It is true information but does not seem to have anything to do with the FSAR summary review. Perhaps it should be relocated or deleted.</p> <p>This statement begins a new thought and if it needs to stay in this section of the SRP-LR, then it should be a new paragraph. Please note that this comment also applies to Chapter 3 of the SRP-LR.</p>	<p>NEI suggests starting the statement as a new paragraph. This proposed change makes the issue clearer. Chapter 3 and 4 of the SRP-LR regarding the FSAR were revised to introduce a new paragraph as suggested.</p> <p>The SRP-LR was revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.2-2	SRP-LR 4.2.2.1.5 and 4.2.3.1.5	Delete these sections from the SRP-LR.	The BWRVIP analysis referred to was to demonstrate the difference between the axial and circumferential welds in a BWR vessel for the purpose of eliminating circumferential weld examinations. The fluence experienced by BWRs is significantly less than PWRs and does not pose a threat to the integrity of the reactor vessel. The axial welds are examined periodically in accordance with ASME Section XI. Finally, the reactor material surveillance program and the assessment of the data monitor the level of embrittlement by evaluating the impact on upper shelf energy. See IV.A1.2.4 of GALL.	<p>NEI recommends deleting Sections 4.2.2.1.5 and 4.2.3.1.5 from the SRP-LR.</p> <p>According to 10 CFR Part 54, the analyses must be performed for a 60-year period and not for 40-year period. SRP-LR sections 4.2.2.1.5 and 4.2.3.1.5 were revised to identify that embrittlement of axial beltline welds need to be monitored and that plant-specific information or a program for monitoring embrittlement is necessary.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.3-1	SRP-LR 4.3.1.2	<p>Insert the language previously provided with regard to the environmental effects of fatigue. Also include conforming changes throughout section 4.3 including deleting sections 4.3.2.2, 4.3.3.2 and the second paragraph of Table 4.3-2. Note that the previous comments suggested that this issue be addressed in Section 3 under the RCS.</p> <p>NOTE: Conforming changes will need to be made to the GALL report sections that reference this section and GALL Chapter X. For example, refer to GALL IV C2.1.1, C2.1.2</p>	None of the industry comments pertaining to GSI-190 were included in the August 2000 version of the SRP-LR. The alternative method to address EAF was not included. Chapter X of the GALL now contains a Fatigue Management Program description (comments are provided below in comments labeled G X.M1-1). Environmental effects are not a TLAA and should not be addressed in the TLAA section. The industry has not closed on a long-term strategy for dealing with environmental effects so the language proposed in the original comments provides the flexibility for	<p>NEI states that environmental effects are not a TLAA and should not be addressed in the TLAA.</p> <p>Environmental concerns relate to conservatism of the fatigue calculation, which is a TLAA. These issues are related and should not be separated.</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.3-1 (cont.)		Fatigue. The language related to environmental effects should be deleted. A new line item related to environmental effects should be added and a site-specific program should be identified with further evaluation set to yes.	applicants to propose methods for addressing the issue.	
S 4.3-2	SRP-LR 4.3.1.2	SRP-LR Section 4.3.1.2 Generic Safety Issue, in the opening paragraph describes the concern that the effects of reactor coolant environment on the fatigue life of components were not adequately addressed by the code of record. This statement is in contrast to the 12/26/99 Thadani letter (Reference 11, SRP-LR Section 4.3) that allows the use of the same code of record for advanced reactor designs, but questions its validity for currently licensed plants. Because Reference 11 provides a confident foundation for the fatigue design basis of the next generation of nuclear plants, it is unclear how this same basis is a cause for concern for the existing plants. Resolution of this disagreement needs to be clearly articulated.	The concern over the fatigue design of the existing plants casts a shadow on the viability of the fatigue design in the next generation of plants. Metal fatigue is a physical issue for both existing and future designs. The apparent conflict in NRC positions should be resolved to assure continuity in plant design.	This comment does not provide any specific recommendation for a change to the SRP-LR. The staff will address ALWRs when it receives an application for an initial operating license. The SRP-LR was not revised to address this comment.

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.3-3	SRP-LR 4.3.1.2	SRP-LR Section 4.3.1.2 Generic Safety Issue, in the last full paragraph, uses the phrase "the nature of age-related degradation" to indicate the potential for an increase in the frequency of pipe leaks. Please define "nature of age-related degradation."	The phrase "nature of age-related degradation" has no meaning in the context written. Since it is being used as a justification for further action, the phrase needs to be more fully defined to assist the reviewer.	<p>NEI recommends deleting the phrase; "nature of age-related degradation" from Section 4.3.1.2.</p> <p>The phrase is contained in the GSI-190 closeout letter. There is no objection to eliminating the phrase from the SRP-LR.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.3-4	SRP-LR 4.3.1	SRP-LR Section 4.3.1, "Areas of Review" does not seem to include fatigue analyses associated with the RCP Flywheel.	Confirm that the RCP flywheel fatigue analyses should not be included under Section 4.3 and that it will be considered plant specific and included under Section 4.7.	<p>NEI indicated that the SRP-LR does not discuss the fatigue analysis of the RCP flywheel.</p> <p>According to NEI letter dated June 15, 2000, the following paragraph was added to Section 4.3.1, "The metal fatigue analysis review includes, as appropriate, a review of in service flaw growth analyses, reactor vessel underclad cracking analysis, reactor vessel internals fatigue analysis, postulated high energy line break, leak-before-break, RCP fly wheel, and metal bellows." This information should be helpful to the reviewer.</p> <p>The SRP-LR was revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.3-5	SRP-LR 4.3.1.1.3	SRP-LR Section 4.3.1.1.3 lists metal bellows designed to ASME NC-3649.4 (e)(3). SRP-LR Section 4.6.1 also lists penetration bellows as within the "Area of Review" for Section 4.6. Bellows should be addressed in only one section.	Clarify which section of the SRP-LR addresses metal bellows.	SRP-LR addresses metal bellows in two separate sections. NEI stated that metal bellows should only be addressed in one section. See NRC disposition of NEI comment S 4.3-4 in this Appendix B, Table B.2.13. The SRP-LR was revised to address this comment.
S 4.3-6	SRP-LR 4.3.2.1.1.2 (Typical for other sections)	The last sentence should be revised to read "The resulting CUF remains less than unity for the period of extended operation."	There is a Code requirement to design for a CUF below one, but a CUF below one during operation is not a Code requirement. This comments applies throughout Section 4.2 where the Code is tied with the period of extended operation.	NEI recommends rewording statement regarding CUF to "The resulting CUF remains less than unity for the period of extended operation" in several sections of the SRP-LR. The proposed change is clear and helpful. The SRP-LR was revised to address this comment.
S 4.3-7	SRP-LR 4.3.2.1.2.1 4.3.2.1.2.2	These two paragraphs should be revised to read as follows: 4.3.2.1.2.1 The existing fatigue strength reduction factors remain valid because the number of cycles would not be exceeded during the period of extended operation. 4.3.2.1.2.2 The fatigue strength reduction factors have been re-evaluated based on an increased number of assumed thermal cycles and	The allowable full cycle thermal stresses calculated during design are adjusted based on fatigue strength reduction factors. If the actual number of full range thermal cycles (e.g. 7000 cycles) remains valid for the 60-year term, then (i) is satisfied. If the fatigue strength reduction factor is increased but the design basis allowable is still met, then (ii) is satisfied.	NEI recommends modification of Sections 4.3.2.1.1.2 and 4.3.2.1.2.2 to address fatigue strength reduction factors instead of allowable stresses. The proposed change makes the issue clearer and it is helpful. The SRP-LR was revised to address this comment.

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.3-7 (cont.)		Table 4.3-1 to bound the period of extended operation. The adjusted fatigue strength reduction factors are such that the component design basis remains valid during the period of extended operation.		
S 4.3-8	SRP-LR 4.3.2.1.2.3 Also, conforming changes with 4.3.3.1.2.3	Replace the existing text with the text presented in Section 4.3.2.1.1.3.	Piping that was designed to B31.1 can be managed by cycle counting the same as piping designed to ASME Section III. If this change is not accepted as proposed, then delete the second sentence of the first paragraph because there is no requirement to replace piping when the design cycles are reached. ASME XI can be applied the same as if CUF exceeds one. Also, there should be no requirement that if the pipe is replaced it be designed to last until the end of the extended period of operation. It may be economically better to replace the pipe several times during plant lifetime rather than design such that the pipe will last for the entire plant lifetime.	NEI suggests replacing the existing text in 4.3.2.1.2.3 with the text presented in Section 4.3.2.1.1.3. NEI states that, "the piping that was designed to B31.1 can be managed by cycle counting the same as piping designed to ASME Section III." Staff believes the existing wording does not preclude B31.1 plants from cycle counting. However, the staff is not aware of any instances where applicants plan to monitor cycles for the B31.1 cycle limits. Therefore, the staff has not developed an AMP similar to the AMP used for plants with fatigue analyses (ASME Section III, Class I designs). The SRP-LR was not revised to address this comment.

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.3-9	SRP-LR 4.3.3.1.1.3 (typical for other sections)	Insert a second sentence as follows, "Cycle counting can be used by the applicant in one of two ways. First, it may be implemented as a confirmation of design assumptions in support of options (i and ii). Secondly, it may be used as an aging management program in support of an option (iii) solution."	This may not be a disposition of fatigue TLAA's (option iii). The only time one would apply (iii) is if a CUF of 1.0 had been exceeded during the period of extended operation, or in the case of monitoring existing flaws. In that case the program could be one, which manages cracking or might involve cycle counting. Cycle counting can also be used to confirm that you are remaining within your design cycle assumptions and supports the (i) and (ii) alternatives.	NEI recommends that cycle counting can be used to satisfy options (i) or (ii) for the fatigue TLAA. However, the staff considers options (i) and (ii) calculations that should be performed prior to the period of extended operation to verify the fatigue analysis remain valid. The intent of cycle counting in option (iii) is to monitor the usage during the extended period of operation to assure that the CUF does not exceed its allow limit. The SRP-LR was not revised to address this comment.
S 4.3-10	SRP-LR Table 4.3-2	The first sentence should begin with "The aging management program..." The phrase "In order to not exceed the design limit on fatigue usage and the number of design cycles" should be deleted.	The fatigue-monitoring program does not have to prevent exceeding the number of design cycles. The purpose of the AMP is to monitor thermal fatigue to identify before the plant exceeds the limit on cycles of CUF, so that appropriate action can be taken. This can include revising the CUF calculations, inspection of the piping per ASME Section XI, or replacement of the pipe.	NEI recommends changing the first sentence in Table 4.3-2 to indicate that the fatigue-monitoring program does not have to prevent exceeding the number of design cycles. This proposed change makes it clearer that the program should prevent exceeding the fatigue design limit. The SRP-LR was revised to address this comment.

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.4-1	SRP-LR 4.4	EQ Component Reanalysis Attributes section of GALL X.E.1 is identical to the information provided in SRP-LR Section 4.4.3.1.2 and Table 4.4-1. Suggest deleting the information from SRP-LR 4.4.3.1.2 and simply referencing the GALL report	From an administrative perspective, it makes sense to only have this information in one location. Future changes would then need to be made to only one location. It also fits the objective of the overall GALL report. The story in the GALL report makes sense as told and it should remain as is and revise the SRP-LR.	NEI recommends deleting the information from SRP-LR 4.4.3.1.2. However, the staff considers the information from SRP-LR 4.4.3.1.2 regarding reanalysis is too important relative to 10 CFR 54.21(c)(1)(ii) to be deleted. The SRP-LR is considered to be a stand-alone document. The SRP-LR was not revised to address this comment.
S 4.4-2	SRP-LR 4.4.1	At the end of the paragraph on "Areas of Review" add a new sentence as follows, "For the purposes of license renewal only those components with a service life of 40 years or greater would be TLAA's."	Please provide a statement that clarifies that only equipment qualified for 40 years or greater meets the 6 TLAA criteria. This statement was included in Chapter X of the GALL	NEI states that for license renewal, only those components with a "qualified" life of 40 years or greater require evaluation as a TLAA. The proposed change is helpful as long as it addresses the "qualified" life of 40 years or greater vs. "service" life of 40 years or greater. The SRP-LR was revised to address this comment.
S 4.4-3	SRP-LR 4.4.1.2	Delete the first sentence of Section 4.4.1.2	The first sentence is a true statement, but there are a variety of other reasons that GSI-168 was generated. Highlighting this one reason and not the others implies that it is of most importance. In actuality the difference in EQ requirements between newer and older plants was eliminated as an issue in a letter from the NRC dated 2-5-98.	NEI comments that the first sentence in SRP-LR 4.4.1.2 regarding "older" vs. "newer" requirements was resolved in the staff EQ Task Action Plan and need not be highlighted in the SRP-LR. This proposed change is helpful and clear. The SRP-LR was revised to address this comment.

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.5-1	SRP-LR Chapter 4.5	<p>Replace Chapter 4.5 with the previously submitted NEI version of Chapter 4.5.</p> <p>NOTE: Conforming changes will also need to be made to the GALL report. For example, in GALL section II A1.3 Loss of Prestress, the evaluation and technical basis description should be revised as follows: Delete the second sentence of the first paragraph. Revise the sentence in the second paragraph to read "...see Chapter XI.S2 and XI.Sx." where "x" refers to the new number for the tendon surveillance program</p>	<p>The latest version of this SRP-LR chapter remains based on a fundamental misconception of what constitutes a TLAA. Based strictly on the definition of a TLAA presented in the Rule, the TLAA for Containment Tendon Prestress consists ONLY of the PLL curves that currently are calculated out to 40 years. The trend lines of the actual measurements, and any comparison of these trend lines to the PLL curves, DO NOT constitute a TLAA, because they are in no way based on the forty-year operating life of the plant. The trend line is based on data taken at individual points in time that have no relation to a forty year life, and the trend line is compared to whatever point on the PLL curve it intersects, not to the point on the PLL curve representing 40 years.</p> <p>In actuality, since the TLAA for Containment Tendon Prestress consists only of the PLL curves, the only options for positioning this TLAA should be (i), the PLL curves are already calculated to 60 years, or (ii), we will project the PLL curves to 60 years.</p> <p>The activities described in the SRP-LR under option (iii), with the</p>	<p>NEI recommends replacing Chapter 4.5 of the SRP-LR with the NEI version of the Chapter 4.5. NEI states that based on its interpretation of a TLAA presented in the Rule, the TLAA for Containment Tendon Prestress consists only of the PLL curves that currently are calculated out to 40 years. The trend lines of the actual measurements, and any comparison of these trend lines to the PLL curves, do not constitute a TLAA, because they are in no way based on the forty-year operating life of the plant. The trend line is based on data taken at individual points in time that have no relation to a forty year life, and the trend line is compared to whatever point on the PLL curve it intersects, not to the point on the PLL curve representing 40 years.</p> <p>The estimation of PLLs and MRVs are parts of the basic design calculations, that are required whether the license renewal application is made or not. The purpose of this TLAA is to demonstrate that the time-dependent characteristics of the actually measured prestressing forces remain above the corresponding PLLs and MRVs. As</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.5-1 (cont.)			<p>exception of projecting the PLL curves, have nothing to do with any TLAA. Rather, they constitute the Aging Management Program that the applicant will have to credit after performing the AMR of the Containment Tendons. The industry does not dispute that these activities will be required, only that they have nothing to do with dispositioning the TLAA for Containment Tendon Prestress. The Aging Management Program aspects of Containment Tendon Prestress, including comparison of the slope of the trend line to the PLL curves, will be considered in the aging management review for the Containment structure, not in this TLAA.</p> <p>With the current version of this SRP-LR chapter, the NRC has presented two options for disposition, (i) and (ii) that will almost certainly be rejected by applicants. This is because they require making conjectures about future equipment performance. Also, option (iii) consists of first, extending the PLL curves to 60 years (which as described above should be listed as option (ii) in its entirety and must be done anyway) and then proceeding with the Tendon Prestress activities that every</p>	<p>a result of an earlier NEI comment on GALL IIA1.3, the staff had agreed to make the trend line comparison with the corresponding MRVs rather than PLLs, as that is required by 10 CFR 50.55a(b)(2)(ix)(B) [August 1996].</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.5-1 (cont.)			<p>licensee is required to perform already.</p> <p>For option (ii), the staff is requiring an extrapolation of data for a time-period that is in excess of the current regulatory requirement in 50.55a.</p> <p>in 50.55a(b)(viii)(B), the trend of data needs to be made out only through the next inspection interval (5 years). With data scatter, there is a large degree of uncertainty in extrapolating out upwards of 40 years. Developing a retensioning plan based on a lengthy extrapolation of data adds no value towards assuring the intended function of the tendons is maintained above and beyond existing regulatory requirements. In the absence of any additional TLAA considerations, licensees would continue to treat the prestress trend results in accordance with the existing regulatory requirements.</p> <p>The industry and NRC are not in disagreement as to the complete set of activities that must be performed for aging management and for TLAA disposition for Containment Tendons. The previous industry rewrite of this SRP-LR chapter intended to allocate those activities that, by the Rule, actually pertain to</p>	

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.5-1 (cont.)			the TLAA aspects of this issue, and relegate the remainder to the appropriate aging management review process.	

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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	<p>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:</p> <p>"More than one type of aging management program may be implemented to ensure that aging effects are managed."</p>	<p>This is not true and has not been the case with the first two approved licenses.</p>	<p>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.</p> <p>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."</p>
SA.1 --2	SRP-LR App A.1	<p>Currently, A.1.2.1, Applicable Aging Effects, paragraph 1 states:</p> <p>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.</p>	<p>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.</p> <p>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.</p>	<p>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</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.1-2 (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.)				<p>aging effect is detected, the results are evaluated to determine the appropriate corrective actions.</p> <p>The SRP-LR was not revised to address this comment.</p>
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:</p> <p>"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>		<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."</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.)		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	<p>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.</p>	<p>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>	<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:</p> <p>"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, litem 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>	<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</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.3-4 (cont.)		demonstrate that the effects of aging are or will be adequately managed or that TLAA's 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>

APPENDIX B, TABLE B.2.15

**DISPOSITION OF WRITTEN
GENERIC NEI COMMENTS**

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Table B.2.15: Disposition of Written Generic NEI Comments

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-1	B.3.2	Based on the lessons learned from the review of the first few renewal applications, the GALL provides sufficient credit for existing programs. As renewal applications continue to be submitted and reviewed, the NRC should consider future revisions to GALL to capture any additional lessons learned.	The GALL report is somewhat limited in that the existing programs must be generic. Obviously, renewal applicants will credit existing programs that are plant specific but at this time it seems that the focusing GALL on the generic programs is appropriate.	See NRC disposition of comment ACRS-2 in Table C of this NUREG.
NEI-2	B.3.2	The GALL report does not provide too much credit for existing programs. The programs credited in GALL are a reflection of the programs credited in the first few renewal applications. The technical detail is sufficient. The GALL evaluates the existing programs against ten attributes that are typically found in adequate aging management programs.		<p>The comment is NEI's opinion on the GALL report's credit of existing programs.</p> <p>The GALL report was not revised to address this comment.</p>

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-3	B.3.2	While we do not agree that all ten elements need to exist for a program to be found adequate, the fact that GALL uses all them is a testament to the robustness of the technical evaluation.		<p>The GALL report is not a regulatory requirement, but a guidance document; therefore, each AMP proposed will be evaluated to determine whether it meets the requirements specified in the license renewal rule. The 10-element evaluation approach has worked well in the GALL report and the staff review of the initial license renewal applications.</p> <p>See NRC disposition of comment NMC-3 in Table C of this NUREG for a discussion on how NRC staff will use the SRP-LR (NUREG 1800) to evaluate proposed AMPs.</p> <p>The GALL report was not revised to address this comment.</p>
NEI-4	B.3.2	If a specific revision of a code - say those published by the American Concrete Institute (ACI), is referenced and evaluated in GALL a renewal applicant can indicate that they use the same program at their facility and rely on the GALL evaluation. If the ACI standard used by an applicant is different from that in the GALL then the applicant must demonstrate that its program is adequate in the areas which differ between the standard revision contained in GALL and the revision of the standard which the applicant uses.		See NRC disposition of comment ACRS-2 in Table C of this NUREG.

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Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-5	B.3.2	<p>This question addresses the staffs desire for an applicant to discuss, in its application, any aging effects identified in the draft GALL report for a particular structure or component that the applicant has determined to be not applicable to its plant. It appears that the GALL identified aging effects are to be used by the staff as a checklist of those that require management. This implies that it would be acceptable for an applicant to use the GALL to determine which aging effects require management. Is this the staffs intent? Is it acceptable for an applicant to refer to the GALL for a particular system or structure with the same materials and environments as those identified in the GALL, and use it as a basis for conclusions regarding the aging effects requiring management? If the GALL is intended to provide guidance regarding the need to manage certain aging effects as well as guidance on the adequacy of existing plant programs, then this appears to be an acceptable approach.</p>		See NRC disposition of comment NMC-8 in Table C of this NUREG.

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-6	B.3.3	It is not clear what type of certification is acceptable nor is it clear what the NRC staff will look for if they examine the on-site verification documents.	Some insight into the certification question is found in the Standard Review Plan. We believe the language in Subsection 3.1.3.1 is the appropriate language if an applicant is relying in a program evaluated in the GALL report. We recommend the other sections and subsections in the SRP-LR be revised to be consistent with subsection 3.1.3.1.	See NRC disposition of comment NMC-2 in Table C of this NUREG.
NEI-7	B.3.3	When a program evaluation in GALL concludes that no further evaluation is necessary, there should be a statement that the program is adequate and demonstrably effective in managing aging in the period of extended operation.		See NRC disposition of comment NMC-2 in Table C of this NUREG.
NEI-8	B.3.3	We would appreciate the opportunity to discuss with NRC staff the possibility of a program evaluation for IWB-2500 with the NRC staff. We are willing to provide draft evaluations for the NRC staff review but believe it's important to reach agreement with the NRC staff on how that evaluation will be partitioned.		The GALL report, Chapter XI evaluates aging management program XI.M1 "ASME Section XI Inservice Inspection, Subsections IWB-2500, IWC-2500, and IWD-2500." The GALL report was revised to address this comment by providing an evaluation of IWB-2500 in AMP XI.M1.
NEI-9	B.3.4 Reg. Guide	Does the Reg. Guide need to address the issue of electronic submittal.	None Provided	See NRC disposition of comment DG-1104-2 in Table C of this NUREG.

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
NEI-10	B.3.5 NEI 95-10	Make changes to NEI 95-10	None Provided	Appropriate changes were incorporated into NEI 95-10. The GALL report was not revised to address this comment.
NEI-11	B.3.5 NEI 95-10	Incorporating guidance on the use of GALL	None Provided	See NRC disposition of comment NMC-2 in Table C of this NUREG.
NEI-12	B.3.5 NEI 95-10	Updating Appendix B consistent with the comments provided on GALL	None Provided	Appropriate changes were incorporated into NEI 95-10. The GALL report was not revised to address this comment.
NEI-13	B.3.5 NEI 95-10	Refinements to the standard applicant format guidance in chapter 6	None Provided	Appropriate changes were incorporated into NEI 95-10. The GALL report was not revised to address this comment.
1	B.3.9 NEI 95-10 Sect. 1.5	NEI 95-10, Section 1.5 discusses resolution of current safety issues. SRP-LR Appendix A.2 provides a similar discussion. The current descriptions are not consistent and the threshold for addressing new issues may be too low.	An approach needs to be developed to address any new issues that reveal themselves over the course of the review of license renewal applications.	See NRC disposition of SA3.1 in this Appendix B, Table B.2.14. The SRP-LR was revised to address this comment by providing clear and specific guidance for reviewing and resolving current generic safety issues.
2	B.3.9 NEI 95-10 Sect. 5.1.3	NEI 95-10, Section 5.1.3 should be revised to delete the following statement: " For example, poisons in the high density spent fuel racks have coupons that are periodically removed and tested to verify that the rack continues to be capable of performing its intended function."	Aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA. Note that Section X of the SRP-LR contains several TLAA program descriptions	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.

Table B.2.15: Disposition of Written Generic NEI Comments (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
3	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-1 should be revised to delete Section 3.1 of the Application Table of Contents and renumber the remaining Chapter 3 sections to align with equivalent sections of the SRP-LR.	Alignment of the documents. NRC SRP-LR no longer has a section 3.1 describing common aging management programs	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
4	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-1 should be revised to delete Section 4.7 of the Application Table of Contents and renumber the remaining Chapter 4 section to align with equivalent sections of the SRP-LR.	Alignment of the documents – As noted above, aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA.	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
5	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-2 should be revised to delete Section 4.7 of the Application Table of Contents and renumber the remaining Chapter 4 section to align with equivalent sections of the SRP-LR.	Alignment of the documents – As noted above, aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA.	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
6	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-2 should be revised to delete Section 3.7 of the Application Table of Contents and renumber the remaining Chapter 3 section to align with equivalent sections of the SRP-LR.	Alignment of the documents. NRC SRP-LR no longer has a section 3.1 describing common aging management programs	NEI 95-10, Rev. 3 incorporates changes as appropriate to be consistent with license renewal guidance documents.
7	B.3.9 NEI 95-10 Sect. 6.2	NEI 95-10, Section 6.2, Table 6.2-2 should be revised to offer guidance to applicants for using the GALL report as part of the aging management review.	TBD	See NRC disposition of NEI comment 1 in this Appendix B, Table B.2.15.

APPENDIX B, TABLE B.2.16

**DISPOSITION OF NEI COMMENTS
SUBMITTED AT MEETING BETWEEN NEI
AND NRC ON NOVEMBER 8, 2000**

Table B.2.16: Disposition of NEI Comments Submitted at Meeting between NEI and NRC on November 8, 2000

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
NEI-14	B.3.10 Chapters V and VII	The Refueling Water System is in Auxiliary Systems in NUREG-0800 and in Engineered Safety Features in GALL/SRP-LR.	GALL/SRP-LR states that it is consistent with NUREG-0800 in the placement of items in systems.	<p>The refueling water storage tank is located in ESF in GALL/SRP-LR because its main function is to supply water to the ECCS in PWRs. The RWST is a component connected to both CVCS 9.3.4 (NUREG-0800 Auxiliary Systems) and ESF 6.3 (NUREG-0800 Engineered Safety Features).</p> <p>The SRP-LR, Sections 3.2 and 3.3, was revised to address this comment by stating that each of these SRP-LR sections and NUREG-0800 are generally consistent except for the stated systems.</p>
NEI-15	B.3.10 Chapters V and VII	The Control Area Ventilation and Chilled Water are in Engineered Safety Features in NUREG-0800 and in Auxiliary Systems in GALL/SRP-LR.	GALL/SRP-LR states that it is consistent with NUREG-0800 in the placement of items in systems.	<p>The control room habitability system is located in ESF 6.4 in NUREG-0800. However, all other ventilation systems are located in NUREG-0800 Auxiliary Systems in Chapter 9. Sections 9.4.1 through 9.4.5 cover ventilation systems, and 9.4.1 is for the control room area ventilation system. All ventilation systems were kept together in Chapter VII (AUX) of GALL.</p> <p>The SRP-LR, Sections 3.2 and 3.3, was revised to address this comment by stating that each of these SRP-LR sections and NUREG-0800 are generally consistent except for the stated systems.</p>

Table B.2.16: Disposition of NEI Comments Submitted at Meeting between NEI and NRC on November 8, 2000 (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
NEI-16	B.3.10 Chapters V and VII	Residual Heat Removal is in Engineered Safety Features in NUREG-0800 and in Auxiliary Systems and Engineered Safety Features in GALL/SRP-LR.	GALL/SRP-LR states that it is consistent with NUREG-0800 in the placement of items in systems.	<p>The residual heat removal (rhr) system is in ESF in GALL and in NUREG-0800 ESF. The shutdown cooling system for older BWRs has no ESF function and is a reactor auxiliary water cooling water system per NUREG-0800 9.2.2.</p> <p>The SRP-LR, Sections 3.2 and 3.3, was revised to address this comment by stating that each of these SRP-LR sections and NUREG-0800 are generally consistent except for the stated systems.</p>
NEI-17	B.3.10 Chapters VII and VIII	Condenser Circulating Water is in Steam and Power Conversion System in NUREG-0800 and in Auxiliary Systems in GALL/SRP-LR.	GALL/SRP-LR states that it is consistent with NUREG-0800 in the placement of items in systems.	<p>The circulating water system is located in 10.4.5 (NUREG-0800 steam and power conversion systems). The other raw water systems are located in Chapter 9 (NUREG-0800 Auxiliary Systems). The raw water systems were kept together in Chapter VII (AUX) of GALL.</p> <p>The SRP-LR, Sections 3.3 and 3.4, was revised to address this comment by stating that each of these SRP-LR sections and NUREG-0800 are generally consistent except for the stated systems.</p>

Table B.2.16: Disposition of NEI Comments Submitted at Meeting between NEI and NRC on November 8, 2000 (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
NEI-18	B.3.10 Chapters VII and VIII	Condensate Storage System is in the Auxiliary System in NUREG-0800 and in Steam and Power Conversion System in GALL/SRP-LR.	GALL/SRP-LR states that it is consistent with NUREG-0800 in the placement of items in systems.	<p>The condensate storage facilities are located in 9.2.6 (NUREG-0800 Auxiliary Systems), the auxiliary feedwater system is located in 10.4.9 (NUREG-0800 Steam and Power Conversion Systems). The AFWS takes suction from the condensate storage tank, which is located in AUX in GALL. The condensate system in SPCS in GALL is located in Section 10.4.7 Condensate and Feedwater System of NUREG-0800.</p> <p>The SRP-LR, Sections 3.3 and 3.4, was revised to address this comment by stating that each of these SRP-LR sections and NUREG-0800 are generally consistent except for the stated systems.</p>
NEI-19	B.3.10 Chapter VII	The Spent Fuel Racks, the Spent Fuel Pool and the Fire Barriers are located in Auxiliary Systems in NUREG-0800 and in GALL/SRP-LR. However, these systems are structural and have been put in the structures and component supports in the license renewal application.	These systems require structure and component support review.	<p>The fire barriers were kept with the other fire protection systems in Auxiliary Systems in GALL. The spent fuel racks and the spent fuel pool were kept with the spent fuel pool cooling and cleanup (PWR and BWR) in Auxiliary Systems in GALL as in NUREG-0800.</p> <p>The SRP-LR was not revised to address this comment.</p>

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