NUCLEAR ENERGY INSTITUTE

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Mr. Christopher I. Grimes
Chief, License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**SUBJECT:** Proposed Staff Guidance on the Position of the GALL Report Presenting One Acceptable Way to Manage Aging Effects for License Renewal

**PROJECT NUMBER: 690**

Dear Mr. Grimes:

In response to your November 23, 2001 correspondence providing an opportunity to comment on NUREG – 1801, "Generic Aging Lessons Learned (GALL) Report," we offer the following recommendations.

A clear process should be developed to update license renewal guidance based on staff and industry lessons learned as stated in the October 3, 2001 letter from NRC industry meeting summary. This summary notes:

> *The GALL report presents one acceptable way to manage aging. During the preparation of the request for additional information, the GALL report was sometimes treated as the only acceptable way. This is not consistent with the purpose of the GALL report.*
>
> *The GALL report indicates that it contains one acceptable way and not the only way to manage aging. However, this observation indicates that the GALL report or the other license renewal guidance documents should be revisited to see if further enhancement is necessary.*

The industry agrees that the GALL report contains one acceptable way and not the only way to manage aging for license renewal. If the applicant does not reference the GALL report in its renewal application, additional staff evaluation is necessary to determine

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whether the applicant's program is acceptable for this area of review. Once reviewed and accepted as an alternative approach the generic portions should be applicable to all license renewal applicants.

A meeting should be scheduled in the near future to discuss lessons learned, guidance updates and industry communications. I look forward to discussing these issues with you and your staff in the near future.

Sincerely,

Alan Nelson