

April 4, 2002

ORGANIZATION: NUCLEAR ENERGY INSTITUTE

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) ON THE PROPOSED REVISION OF CHAPTERS II AND III OF GENERIC AGING LESSONS LEARNED (GALL) REPORT ON AGING MANAGEMENT OF CONCRETE ELEMENTS

On February 14, 2002, the Nuclear Regulatory Commission (NRC) staff met with NEI and other industry representatives to discuss the staff's proposed revision of Chapters II (Containment) and III (Structures) of the GALL report, which was issued for comment on November 23, 2001. The revision was to clarify applicable aging management programs (AMPs) for concrete elements identified during the lessons learned meeting on the license renewal demonstration project held on October 11, 2001. Attached are the agenda (Attachment 1), two NEI handouts provided during the meeting (Attachments 2 and 3), and the list of meeting attendees (Attachment 4).

The meeting began with an NEI representative making opening remarks that any resolution of technical issues (e.g., station blackout, and fire protection) or any changes to the license renewal process should be addressed through a series of meetings between the NRC staff and NEI. Following the opening remarks, an industry representative provided an overview (Attachment 2) of how to identify systems, structure, and components that should be in the scope of the license renewal, structures and components that are subjected to aging management review, and the industry's view on the use of the GALL report for license renewal. Next, an industry representative made a presentation on aging of concrete (Attachment 3) and relevant industry-wide operating experience over the years.

Immediately following these presentations, a general discussion ensued during which industry representatives presented the following views:

- Concrete fabricated according to its original design and not subjected to extreme environments will not age significantly or result in the loss of intended function of the concrete components.
- Aging management reviews of concrete structures and components have determined that not all of these structures and components require aging management for license renewal.

- The current version of the GALL report does not require an AMP for all accessible concrete components.
- The NRC staff's position that all accessible concrete components require aging management for license renewal, regardless of the applicants's aging management review of these components, is not justifiable.

In contrast to the above views presented by industry, the NRC staff made the following points:

- The GALL report describes an AMP for all accessible concrete components. The last column in the GALL report table concludes further evaluation beyond an AMP for concrete components that do not meet the environmental conditions presented in the AMP column of the GALL report table.
- The GALL report adopted the Structures Monitoring Program as an existing program developed under the Maintenance Rule to address (1) recommendations from NUREG-1557, "Summary of Technical Information and Agreements from Nuclear Management and Resources Council Industry Reports Addressing License Renewal", (2) actual industry experience from Generic Letters, or Information Notices and (3) comments from NEI, industry, and public through a series of public meetings during development of the GALL report.
- The staff's position requiring an AMP for all accessible concrete components for license renewal is consistent with and has not changed since the publication of the GALL report. Current proposed revisions to the GALL report are only intended to clarify and not change the staff's position.
- Aging management reviews of concrete components, performed by license renewal applicants, can be used to show that inspection frequencies may be varied based on the results of the applicant's aging management review.
- In order for the NRC staff to make a reasonable assurance finding that all concrete structures and components will maintain their structural integrity and intended function(s), the staff requires inspections of concrete components during the period of extended operation.
- The staff disagrees with industry's interpretation of the term "Non-significant" in NUREG-1557 to imply that no aging management is required for concrete structures at nuclear power plants.

As a result of the discussion, both the NRC staff and NEI achieved a better understanding of their respective positions regarding the aging management of concrete elements for license renewal. NEI will provide any written comments pertinent to the staff's proposed revision of GALL Chapters II and III at a later date. After the industry comments are received, the NRC staff will schedule another public meeting to discuss the resolution of this issue.

/RA/

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Project No. 690

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Aging Management of Concrete Elements
February 14, 2002

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