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April 29, 2002

Dr. P.T. Kuo
Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Industry Response to Proposed Revision of Chapters II and III of Generic Aging Lessons Learned (GALL) Report on Aging Management of Concrete Elements

PROJECT NUMBER: 690

Dear Dr. Kuo:

On November 23, 2001, NEI received the "Proposed Revision of Chapters II and III of Generic Aging Lessons Learned (GALL) Report on Aging Management of Concrete Elements." A meeting was held on February 14, 2002, with the NRC license renewal staff and industry representatives to discuss the staff's concerns regarding the treatment of concrete aging management in the context of license renewal activities. On March 14, 2002 NEI submitted a response to the staff's position including a white paper and technical justification for the industry position. On April 5, 2002, NEI received NRC's response that "the staff cannot accept the changes proposed by industry to Chapter II and III of the GALL report."

The NRC position maintains that regardless of significance, all credible aging effects should be managed under the current licensing basis programs for the extended period of operation (including Parts 50 and 54), even though a loss of intended function is not expected.

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The industry does not agree with this assessment, however, the industry understands that it is the NRC's position regarding aging management of concrete for License Renewal.

In the March 14 submittal the industry provided a white paper describing "Aging Management of Concrete," which demonstrates that licensees have determined that their structural components are designed and constructed to accepted industry standards thus providing a good quality, dense, low permeability concrete. For such concrete exposed to non-aggressive environments, the aging effects that occur will not be significant enough to cause a loss of intended function and therefore these aging effects do not require management. For concrete not exposed to an environment that may cause structural degradation, operating experience provides additional justification that aging effects that result in loss of the intended function have not occurred. The industry provided technical justification that the aging management review process for License Renewal is sufficient to identify those concrete structures and structural members that require aging management to ensure that loss of intended function will not occur. The industry is of the opinion that, "The guidance provided in the NUREGs, referenced ACI standards, and industry data, combined with a review of applicant plant operating experience, provides an adequate basis for an applicant to determine which, if any, concrete structures are exposed to environments or conditions such that aging management is required."

Based on the technical discussion above the industry does not agree with the staff position and do not intend to pursue the matter further at this time. If you have any questions, please call me (202) 739-8110 or by e-mail (apn@nei.org).

Sincerely,

Alan Nelson