

August 8, 2002

ORGANIZATION: NUCLEAR ENERGY INSTITUTE

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) RE: (1) PROPOSED STAFF GUIDANCE ON AGING MANAGEMENT OF FIRE PROTECTION SYSTEMS FOR LICENSE RENEWAL, AND (2) FATIGUE ENVIRONMENTAL EFFECTS IN A LICENSE RENEWAL APPLICATION

On July 25, 2002, the U. S. Nuclear Regulatory Commission staff met with the NEI and other industry representatives to discuss: (1) the staff's comment on the industry response of the aging management for fire protection systems, which was received on June 17, 2002, and (2) the review status of the EPRI technical report, "Guidelines for Addressing Fatigue Environmental Effects in a License Renewal Application (MRP-47)." The participants also discussed the status of other license renewal activities. Enclosed are the agenda (Enclosure 1) and the list of meeting attendees (Enclosure 2).

#### Fire Protection

The following summarizes specific comments discussed:

- The term "work control process" should be replaced with "plant maintenance visual inspections" throughout aging management programs (AMPs) for the fire protection system. "Plant maintenance visual inspections" is a more generic term than "work control process." Both terms require the applicant to look internally into the pipe, evaluate and track piping thickness and condition, and correct problems.
- NEI's proposed pipe wall thickness evaluation/inspection "at 10-year intervals" should be replaced with "at plant-specific intervals," since more frequent inspections would be performed if any problems were found.
- The interval for the hollow metal fire doors inspection should be performed at the plant-specific interval.
- If defective penetration seals were found, the scope of the inspection would be expanded either to replace those defective seals or to perform more inspections. Thus, it should not be necessary to specify any specific visual inspection frequency prior to finding any defective seals.
- Corrective Actions (Item No. 7) in the AMP (XI.M26) for the fire protection program (as it clarifies 10 CFR Part 50, Appendix B) should be used for corrective actions, confirmation process, and administrative controls for aging management during the period of extended operation.

- Regarding the fire water piping system, a periodic full flow testing will be performed (per NFPA recommendation) or evaluated for wall thickness using non-intrusive, volumetric testing or plant maintenance inspections at a plant-specific interval in the AMP (XI.M27) for the fire water system.
- Since the term “flow blockage” is not an aging effect, it should be deleted from the AMP (XI.M27) for the fire water system.
- Chemical analysis should be deleted from the AMP (XI.M27) for the fire water system, as the chemical analysis, alone, could not ensure that no significant corrosion, MIC, or biofouling has occurred.
- Since all fire protection piping implies all piping, regardless of its size, it may not be necessary to specifically call out small diameter piping for fire protection in “Detection of Aging Effects” of the AMP (XI.M27) for the fire water system.

The staff plans on finalizing the staff guidance after addressing these comments.

#### Updates on Fatigue Issue

NEI submitted the EPRI technical report (MRP-47) that addresses the fatigue issues for staff review, and the staff recently issued a request for additional information (RAI). NEI informed the staff that the EPRI has developed additional information. The additional information will be submitted for staff review in two parts: (1) carbon steel and low alloys, and (2) stainless steel. NEI expects to submit the first part of the information in September, along with their response to the staff's RAI on MRP-47.

#### License Renewal Application Format

An NEI representative stated that the industry would prefer that the format issue not be raised to the level of an interim staff guidance (ISG). However, NEI proposed a meeting with the staff in September to discuss the license renewal application (LRA) format for the benefit of applicants who will be submitting their applications in 2003. The need for the meeting will be decided after NEI reviews the staff's lessons learned from the NEI demonstration project, which was transmitted to NEI by a letter dated July 24, 2002 (see Adams Accession No. ML022060290).

#### ISG process

The staff indicated that the staff guidance, for updating the improved license renewal guidance (i.e., ISG process) documents, is being revised to include Committee to Review Generic Requirements (CRGR) review and to address any backfit issues. Subsequent to the meeting, the staff transmitted a letter that solicited comments for the above ISG process to stakeholders on July 30, 2002 (see Adams Accession No. ML022120383).

Workshop

A license renewal workshop is currently scheduled for October 22 and 23, 2002. The first (full) day is reserved for the safety LRA review while the second (half) day is for the environmental review. The staff will coordinate with NEI to develop the workshop agenda.

**Original Signed By: PJKang**

Peter J. Kang, Reactor Systems Engineer  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Project No. 690

Enclosures: As stated

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\*See previous concurrence

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Project No. 690

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**License Renewal Meeting  
on  
Staff Comments on Industry Response  
to Aging Management of Fire Protection Systems and  
Status of Environmentally Assisted Fatigue**

**Room O-7B4  
July 25, 2002  
(8:30-11:30 AM)**

**Meeting Agenda**

|   |                   |
|---|-------------------|
| <b>Opening remarks</b>  | <b>5 minutes</b>  |
| <b>1) Staff Comments on Industry Response to Aging Management of Fire Protection Systems:</b>   | <b>90 minutes</b> |
| <ul style="list-style-type: none"><li>• NRC Staff Position on Aging Management of Fire Protection Systems</li><li>• GALL Aging Management Program (XI.M26) Fire Protection</li><li>• GALL Aging Management Program (XI.M27) Fire Water System</li></ul> |                   |
| <b>2) Status of Environmentally Assisted Fatigue</b>  | <b>50 minutes</b> |
| <b>Discussion of Status of Interim Staff Guidance (ISG) Issues</b>  | <b>20 minutes</b> |
| <b>Public comment</b>   | <b>10 minutes</b> |
| <b>Concluding remarks</b>   | <b>5 minutes</b>  |

**NRC Meeting Attendance List**

Aging Management of Fire Protection Systems and Environmentally  
Assisted Fatigue for License Renewal  
July 25, 2002

| <b><u>Name</u></b>     | <b><u>Organization</u></b>  |
|------------------------|-----------------------------|
| John Fair              | NRC/NRR/DE                  |
| Eric Weiss             | NRC/NRR/SPLB                |
| Noel Dudley            | NRC/NRR/RELP                |
| Jane Grant             | PPL Susquehanna             |
| Nancy Chapman          | SERCH/Bechtel               |
| Jan E. Fridrichson     | Southern Nuclear            |
| Jim Strnisha           | NRC/NRR/DE                  |
| Tanya Eaton            | NRC/NRR/DSSA/SPLB           |
| Gary M. Adkins         | TVA                         |
| Stuart Thiakma         | Dominion Millstone          |
| William R. Watson, Jr. | Dominion Millsone           |
| John Rycyna            | Constellation               |
| Sam Lee                | NRC/NRR/DRIP/RLEP           |
| P.T. Kuo               | NRC/NRR/DRIP/RLEP           |
| J. Rajan               | NRC/NRR/DE                  |
| Jack Cushing           | NRC/NRR/RLEP                |
| Peter J. Kang          | NRC/NRR/RLEP                |
| Thomas C. Matthews     | Omaha Public Power District |
| James E. Knorr         | Nuclear Management Co., LLC |
| Bernie Van Sant        | Omaha Public Power District |
| J. E. Wroniewicz       | Dominion                    |
| Alan Nelson            | NEI                         |
| Michael W. Henig       | Dominion                    |
| Steve Hale             | FPL                         |
| Fred Polaski           | Exelon                      |
| S.K. Mitra             | NRR/DRIP/RLEP               |
| Deann Raleigh          | LIS, Scientech              |
| Talmage Clements       | CP&L                        |
| Y.C. (Renee) Li        | NRR/DE/EMEB                 |
| Gregory Twachtman      | McGraw Hill                 |
| Michael Heath          | CP&L                        |
| Mark Ackerman          | FENOC                       |
| Brian A. McIntyre      | AEP                         |