

August 12, 2003

Mr. Alex Marion
Nuclear Energy Institute
1776 I Street, NW., Suite 400
Washington, DC 20006-3708

Mr. David Lochbaum
Union of Concerned Scientists
1707 H Street, NW., Suite 600
Washington, DC 20006-3919

SUBJECT: PROPOSED INTERIM STAFF GUIDANCE (ISG)-15: REVISION OF GENERIC AGING LESSONS LEARNED (GALL) AGING MANAGEMENT PROGRAM (AMP) XI.E2, "ELECTRICAL CABLES NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL QUALIFICATION REQUIREMENTS USED IN INSTRUMENTATION CIRCUITS"

Dear Messrs. Marion and Lochbaum:

The purpose of this letter is to provide you with the opportunity to comment on the proposed Interim Staff Guidance (ISG)-15 on revision of Generic Aging Lessons Learned (GALL) aging management program (AMP) XI.E2, "Electrical cable not subject to 10 CFR 50.49 Environmental Qualification Requirements used in instrumentation circuits." The U. S. Nuclear Regulatory Commission (NRC) staff has developed the subject ISG to clarify a routine calibration testing provision in GALL AMP XI.E2. The calibration test is used to identify the existence of aging degradation for the electrical cables used in radiation monitoring and nuclear instrumentation circuits.

By letter dated February 20, 2003, the Nuclear Energy Institute (NEI) submitted a proposed revision to GALL AMP XI.E2 (see ADAMS Accession No. ML030650773). On March 13, 2003, the staff met with NEI and other industry representatives to discuss NEI's proposal (see ADAMS Accession No. ML030970594). The staff has considered NEI's comments and revised GALL AMP XI.E2 as appropriate. Enclosure 1 is the staff's reason for the GALL AMP XI.E2 revision. Enclosure 2 is the proposed revision of GALL AMP XI.E2 for your review and comment. The staff requests that you submit any comments you might have to the staff within 30 days following the date of this letter to ensure a timely resolution of this issue.

August 12, 2003

A. Marion and D. Lochbaum

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For the resolved ISGs, it is also possible that comparable changes might be needed to NEI 95-10, Revision 3, "Industry Guidance for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule." If you have any questions regarding this matter, please contact Peter Kang at 301-415-2779.

Sincerely,

/RA/

Pao-Tsin Kuo, Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project 690

Enclosures: As stated

cc w/encls: See next page

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Accession No: ML032250579

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PROPOSED INTERIM STAFF GUIDANCE (ISG)-15:
REVISION OF GENERIC AGING LESSONS LEARNED (GALL)
AGING MANAGEMENT PROGRAM (AMP) XI.E2,
"ELECTRICAL CABLES NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL
QUALIFICATION REQUIREMENTS USED IN INSTRUMENTATION CIRCUITS"

Reason for Revision

The reason for revision of GALL AMP XI.E2, "Electrical cable not subject to 10 CFR 50.49 Environmental Qualification Requirements used in instrumentation circuits," is to incorporate lessons learned since the GALL was first issued. The current AMP XI.E2 relies on a routine calibration test performed as a part of plant technical specification requirements to identify the existence of aging degradation for the electrical cables used in radiation monitoring and nuclear instrumentation circuits. For those plants for which technical specifications do not require calibration testing of the instrumentation loops, this revision provides that an applicant may use either a surveillance test or calibration test to detect electrical cable aging degradation. For cases in which cables are not included in a calibration test, this revision provides that an applicant may use a proven cable test for detecting deterioration of the insulation system (such as insulation resistance tests, time-domain reflectometry tests, or other testing judged to be effective in determining cable insulation condition). Finally, additional revisions were made after considering comments submitted by NEI in a February 20, 2003, letter.

Enclosure 1

NUCLEAR ENERGY INSTITUTE

Project No. 690

cc:

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