October 9, 2003

LICENSEE: South Carolina Electric and Gas Company (SCE&G)

FACILITY: V.C. Summer Nuclear Station (VCSNS)

SUBJECT: AUDIT REPORT RELATED TO THE LICENSE RENEWAL APPLICATION FOR V.C. SUMMER NUCLEAR STATION (VCSNS), DURING JULY 15-17, 2003 (TAC NO. MB5224)

The License Renewal and Environmental Impacts (RLEP) Program conducted an audit at VCSNS during July 15-17, 2003. The purpose of the audit was to verify the consistency of the applicant's aging management programs (AMPs) described in the license renewal application (LRA) with the AMPs in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." The NRC audit team examined all of the 32 AMPs that the applicant stated were consistent with GALL. Of these, 24 were found consistent (see attached table) and eight consistent with enhancements/exceptions with the GALL report. The Audit Report is included in Attachment 1.

/RA/

Rajender Auluck, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No. 50-395

Attachment: As stated

cc w/attachment: See next page

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cc w/attachment: See next page Accession no.: **ML032820212**
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OFFICE	RLEP:DRIP:PM	RLEP:DRIP:PM	RLEP:DRIP:LA	SC:RLEP:DRIP	PD:RLEP:DRIP
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Date	10/1/03	10/8/03	10/8/03	10/8/03	10/9/03

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NRR/DRIP/RLEP

Docket No:	50-395
License No:	NPF-12
Licensee:	South Carolina Electric and Gas Company (SCE&G)
Facility:	V.C. Summer Nuclear Station (VCSNS)
Location:	V.C. Summer Nuclear Station (VCSNS)
Dates:	July 15-17, 2003
Auditors:	Kenneth Chang, Project Manager Ram Subbaratnam, Project Manager Raj Anand, Project Manager Rajender Auluck, Senior Project Manager Ben Gitnick, Contractor Spyros Traiforos, Contractor

AUDIT REPORT REGARDING CONSISTENCY WITH GALL
FOR THE V.C. SUMMER NUCLEAR STATION,
JULY 15-17, 2003

The Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (NUREG-1800) provides staff guidance for reviewing a license renewal application (LRA). The Standard Review Plan allows an applicant to reference in its LRA the aging management programs (AMPs) described in NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." By referencing the GALL AMPs, if the applicant concludes that its AMPs are consistent with those AMPs, which are reviewed and evaluated in the GALL Report, no further staff review is required. If an applicant credits an AMP as being consistent with a GALL program, it is incumbent on the applicant to ensure that the plant program contains all of the elements of the referenced GALL program. The applicant's determination should be documented in an auditable form and maintained on site.

The purpose of the U.S. Nuclear Regulatory Commission (NRC) audit was to confirm that the applicant's determination of consistency between the applicant's AMPs and the AMPs described in the GALL Report. The audit team evaluated each of the 10 attributes of an applicant's AMP claimed to be consistent with the related attribute of the associated AMP described in the GALL Report. The audit team reviewed the applicant's license renewal aging management program basis documents, the AMPs described in the GALL Report, applicants' responses to the requests for additional information (RAI), and selected implementing procedures. The audit team identified differences between the applicant's AMPs and the associated GAL L AMPs and evaluated whether they constituted a deviation from the GALL Report.

The NRC audit team examined all of the 32 AMPs that the applicant stated were consistent with GALL. Of these, 24 were found consistent (see attached table) and eight consistent with enhancements/exceptions with the GALL.

B.1.10 STEAM GENERATOR MANAGEMENT PROGRAM

In Section B.1.10 of the LRA, the applicant states that the VCSNS Steam Generator Management Program is consistent with XI.M19 Steam Generator Tube Integrity, as identified in NUREG-1801.

The audit team reviewed the Steam Generator Management Program TR00160-020, Revision 0, Attachment XXIII.

The GALL AMP cites documents WCAP-12244 and WCAP-12245 as the technical basis for Acceptance Criteria for SG tube plugs. These documents specifically address Alloy 600 plug material. These Westinghouse Commercial Atomic Power (WCAP) reports are not applicable to VCSNS with Delta 75 SGs having alloy 690 tubes and plugs. In response to RAI B.1.10-1, the applicant identified WCAP-13480, Revision 1, as the correct reference for the alloy 690 components used in the Delta 75 SGs.

On the basis of its review of the VCSNS AMP, GALL AMP XI.M19, the associated program basis document, responses to relevant RAIs, the relevant station administrative procedure, and

a sample of implementing procedures, the audit team determined that the VCSNS AMP is consistent with the GALL report, with an enhancement to cover Alloy 690, as noted above. Specifically, in its response to RAI B.1.10-3, the applicant explained that the scope of GALL AMP XI.M19 is specific to SG tubes, whereas the scope of the applicant's AMP includes SG shell and internals, such as antivibration bars and the feedwater distributor, in addition to tubes and plugs. The staff evaluation found the applicant's response to RAI B.1.10-3, acceptable because the applicant's Steam Generator Management Program is more comprehensive than GALL XI.M19 in the management of steam generator components. The applicant agreed to add a clarification to support documentation to identify that the WCAPs12244 and 12245 are not applicable, and WCAP-13480, Rev. 1 is the correct reference.

B.1.11 10 CFR 50 APPENDIX J GENERAL VISUAL INSPECTION

In Appendix B, Section B.1.11 of the LRA, the applicant states that its 10 CFR 50 Appendix J General Visual Inspection Program is consistent with GALL XI.S4, "10 CFR 50 Appendix J." The audit team reviewed Section 7.1 of Technical Report TR00170-003, "Structures Aging Management Review for License Renewal," Revision 0, 7/3/02. Section 7.1 describes the applicant's aging management program contained in Appendix B.1.11 of the LRA.

The audit team found that this program performs the pre-leak rate testing activities addressed by Appendix J. The GALL XI.S4 program only addresses leakage rate testing and does not address visual inspection at all. This issue was discussed as a part of response to staff's RAI 3.5-20. The applicant stated that this program is supplementary to the containment ISI - IWE/IWL (B1.16) and 10 CFR 50 Appendix J Leak Rate Testing Program (B1.12), and is not credited as a substitute for any of the requirements of these two programs. The applicant will clarify this activity in the program basis document and this will be tracked through the corrective action program (see CER No. 03-2963, Dt: 9-23-03). The staff will verify the completion of this action item in a follow-up inspection, tentatively scheduled for November 2003.

B.1.12 10 CFR 50 APPENDIX J LEAK RATE TESTING

In Appendix B, Section B.1.12 of the LRA, the applicant states that its 10 CFR 50 Appendix J Leak Rate Testing Program is consistent with GALL XI.S4, "10 CFR 50 Appendix J." The audit team reviewed Section 7.2 of Technical Report TR00170-003, "Structures Aging Management Review for License Renewal," Revision 0, 7/3/02. Section 7.2 describes the applicant's aging management program contained in Appendix B.1.12 of the LRA.

The audit team identified a difference in the detection of aging effects attribute. The applicant's AMP claims that it will detect aging effects prior to loss of component intended function through Type A integrated leakage rate test (ILRT) and Type B ILRT, while the GALL AMP states that only the leak-tightness and structural integrity of the containment are demonstrated through ILRT, it does not by itself provide information that would indicate that aging degradation has initiated or that the capacity of the containment may have been reduced for other types of loads. This would be achieved with the additional implementation of an acceptable containment inservice inspection program such as XI.S1 (IWE) and XI.S2 (IWL). The applicant agreed with the audit team and committed to revise that attribute of the AMP to make it consistent with the GALL AMP. The applicant committed to clarify this information in the program basis document, as documented through the corrective action program (see CER No. 03-2963 Dt: 9-23-03). The staff will verify the completion of this action item in a follow-up inspection, tentatively scheduled

for November 2003.

On the basis of its review of this AMP, GALL AMP XI.S4, and the associated technical report, the audit team determines that this AMP is consistent with the GALL report.

B.1.18 MAINTENANCE RULE STRUCTURES PROGRAM

In Appendix B, Section B.1.18 of the LRA, the applicant states that its Maintenance Rule Structures Program is consistent with GALL XI.S6, "Structures Monitoring Program" and XI.S5, "Masonry Wall Program." The audit team reviewed Section 7.12 of Technical Report TR00170-003, "Structures Aging Management Review for License Renewal," Revision 0, 7/3/02. Section 7.12 describes the applicant's aging management program contained in Appendix B.1.18 of the LRA.

The audit team found inconsistencies between the applicant's AMP and the LRA. In the scope of the program attribute, the applicant's AMP states that the Switchyard Relay House is within the scope of the Maintenance Rule Structures Program but not in the scope of license renewal. Table 2.2-2 of the LRA lists only portions of the Electrical Substation which are in the scope of license renewal, however, the Switchyard Relay House was not listed. The applicant explained to the audit team that the Switchyard Relay House is located within the electrical substation, but not within the scope of license renewal. Additionally, the foundation of the switchyard circuit breaker (which is part of the emergency transformer circuit breaker system) is in the scope of license renewal and is redundantly listed in both the scope of the AMP and Table 2.2-2 of the LRA. Therefore, the redundant listings should be deleted. The applicant agreed with the audit team's finding and has committed to revise the AMP to delete the redundancy. The applicant committed to clarify this information in the program basis document, as documented through the corrective action program (see CER No. 03-2963 Dt: 9-23-03). The staff will verify the completion of this action item in a follow-up inspection, tentatively scheduled for November 2003.

On the basis of its review of this AMP, GALL AMPs XI.S5 and XI.S6, and the associated technical report, the audit team determines that this AMP is consistent with the GALL report.

B.3.2 THERMAL FATIGUE MANAGEMENT PROGRAM

In Appendix B, Section B.3.2 of the LRA, the applicant states that, with two enhancements in scope and acceptance criteria, its Thermal Fatigue Management Program is consistent with GALL program X.M1, "Metal Fatigue of Reactor Coolant Pressure Boundary." Fatigue monitoring is a time limited aging analysis (TLAA). The audit team reviewed: (1) license renewal Technical Report TR-00140-001, "TLAA and Exemptions for LR," Rev. 0 and (2) TR-00140-002, "TLAA, Thermal Fatigue for LR," Rev. 0, and reference documents which contain the detailed description of fatigue monitoring at V.C. Summer. The audit team interviewed applicants' responsible technical staff. The applicant identified in B.3.2 an enhancement to incorporate the new guidance in EPRI Report MRP-47 for the environmental effects of the reactor coolant environment on fatigue into the VCSNS program. The acceptance criteria will also be revised to account for the environmental effects on fatigue. These enhancements are acceptable to the audit team if their scope was limited to the portion of the EPRI guidelines reviewed and approved by the NRC technical staff.
The audit team reviewed the 10 attributes evaluated in Section 6.3, thermal fatigue management program proposed by the applicant (TR-00140-002). It is an existing plant

program using computer program WESTEMS to implement the method for evaluating and documenting an annual review of plant operational transients/cycles following station Procedure ES-401. The acceptance criterion is to maintain the accumulated thermal cycle count within the allowable limits for the defined transients and/or the cumulative usage factor (CUF) less than 1.0. This is consistent with the requirement of the GALL report. To assure compliance to GALL for all 10 attributes, several actions are needed to enhance Thermal Fatigue Management Program. The audit team recommended the enhancements as identified in Section 8.0 of the applicant's Technical Report TR-00140-002. These actions included revising program procedures and guidelines to base analysis for a 60-year license instead of 40-year license, leak-before-break (LBB) analysis for 60-years and a SS cycle limit to 7,000. The applicant agreed to implement these prior to the extended period of operation. The applicant agreed to document these enhancements in its corrective action program and clarified the information in the program basis document (see CER No. 03-2963 Dt: 9-23-03). In a letter dated September 24, 2003, the applicant has made specific commitments for these issues. These will be documented in staff's safety evaluation report on VCSNS's LRA.

On the basis of its review of AMPB.3.2, GALL AMP X.M1, TR-00140-001 Rev.0, TR-00140-002 Rev.0 and the implementation of clarifications and enhancements identified above, the audit team determined that AMP B.3.2 is consistent with the GALL report.

B.1.1 ALLOY 600 AGING MANAGEMENT PROGRAM

In Appendix B, Section B.1.1 of the LRA, the applicant stated that, with enhancement, its Alloy 600 Aging Management Program is consistent with GALL program XI.M11, "Nickel-Alloy Nozzles and Penetration." The audit team reviewed the license renewal Technical Reports TR-00160-020 Rev. 0, Alloy 600 Aging Management Program Rev. 0, TR-00160-011, and applicable reference documents, and interviewed applicants' responsible technical staff.

In TR-00160-020 Attachment II, the applicant recommended four (4) enhancements/revisions including the revision of the In-service Examination Program, ISE-3. These include enhancement of the scope beyond the requirements of the current regulatory frame work, perform a susceptibility study including ranking of variables that influence PWSCC such as ID stress, operating temperature and also establish specific replacement guidelines for VCSNS. The audit team recommended adding information notice (IN) 90-10 and IN 96-11 to the operating experience attribute as well as adding TR-00160-011 to the Program/Activity reference list. The applicant agreed to document these enhancements in its corrective action program and clarified the information in the program basis document (see CER No. 03-2963 Dt: 9-23-03). The staff will verify the completion of this action item in a follow-up inspection, tentatively scheduled for November 2003. In Appendix B of the LRA, the applicant has made a specific commitment to follow emerging regulatory requirements and developments by the industry groups. This will be documented in staff's safety evaluation report.

On the basis of its review of this AMP, GALL AMP XI.M11, the associated program basis document, and the enhancements and identified clarifications, the audit team determined that this AMP is consistent with the GALL report.

B.2.4 REACTOR VESSEL INTERNALS INSPECTION PROGRAM

In Appendix B, Section B.2.4 of the LRA, the applicant described, its Reactor Vessel Internals Inspection Program is consistent with GALL Program XI.M16, "PWR Vessel Internals." The audit team reviewed the license renewal Technical Report TR-00160-020 Rev. 0, Attachment XVIII "Reactor Vessel Internals Inspection Program," and applicable referenced documents, and interviewed applicants' responsible technical staff.

The Reactor Vessel Internals Inspection is a new program that supplements the existing In-Service Inspection (ISI) plan. Although AMP B.2.4 identified the susceptible/limiting items, it should be enhanced via improved inspection technique such as enhanced visual VT-1 or other volumetric techniques (see GALL report XI-M-56). This also ought to include bolted and non-bolted components as described in the report. The audit team identified that there was no operating experience of the program at VCSNS since it is a new activity. However, industry experience could be discussed under "Operating Experience."

TR-00160-020 Rev.0, Attachment XVIII identified that a clarification is needed on the detection of aging effects. The VCSNS AMP program could not clearly quantify the resolution criteria for detection, i.e., less than or equal to 0.0005 inches for the enhanced VT-1 examination as specified in the GALL program. The applicant's technical staff clarified that while it is their intent to achieve this resolution for the enhanced visual VT-1 examination, it will depend upon the inspecting conditions such as viewing conditions and accessibility issues. The applicant agreed to document these enhancements in its corrective action program and clarified the information in the program basis document (see CER No. 03-2963 Dt: 9-23-03). The staff will verify the completion of this action item in a follow-up inspection, tentatively scheduled for November 2003. In response to RAI B.2.4-1, the applicant provided additional information on this issue which was acceptable to the staff.

On the basis of its review of this AMP, GALL AMP XI.M16, the associated technical report, and the above clarifications/enhancements, the audit team determined that this AMP is consistent with the GALL report.

B.1.24 REACTOR VESSEL SURVEILLANCE PROGRAM

In Appendix B Section B.1.24 of the LRA, the applicant states its Reactor Vessel Surveillance Program is consistent with GALL program XI.M31, "Reactor Vessel Surveillance" with two (2) enhancements. The audit team reviewed the license renewal Technical Report TR-00160-020 Rev. 0, Attachment XIX, "Reactor Vessel Internals Inspection Program," and Surveillance Test Procedure STP-211.001 dated 10/10/97. The audit team also interviewed applicants' responsible technical staff.

The audit team reviewed the scope of the program and compared it with the GALL report. While the scope of AMP B.1.24 covers the applicable components, the GALL report also addresses application aspects of the program using NRC RG 1.99 Rev.2. The GALL AMP emphasizes RG 1.99 Rev.2 throughout the program description while the applicant's AMP B.124 only cites RG 1.99 Rev.2 in administrative controls and required enhancement. Although the applicant's program reported VCSNS operating experience on reactor vessel surveillance, industry experience which could be discussed under this category was absent. The applicant agreed to document these enhancements in its corrective action program and clarified the information in the program basis document. By letter dated September 24, 2003, the applicant has made specific commitments related to the upper shelf energy and the P-T limits. VCSNS will recalculate the P-T limit curves following removal of the one of the two remaining capsule from the vessel. The implementation of this item will be tracked through CER No. 03-2963 Dt: 9-23-03. The staff will verify the completion of this action item in a follow-up inspection, tentatively scheduled for November 2003.

On the basis of its review of this AMP in B.1.24 of LRA, the GALL AMP XI.M31, the license renewal technical report, and the required enhancement in TR-00160-020 Rev 0 Attachment XIX, the audit team determined that this AMP is consistent with GALL.

Other Aging Management Programs

The audit team reviewed the following applicant's AMPs, associated GALL AMPs, associated license renewal (LR) aging management program basis documents, applicants' responses to the requests for additional information, and selected implementing procedures. The audit team determined that these programs were consistent with GALL.

Applicant's Aging Management Program	GALL Program	LR-AMP Programs Reviewed	Remarks
B.1.2 Boric Acid Corrosion Surveillances	XI.M10, "Boric Acid Corrosion"	TR00160-020, Revision 0, "License Renewal Evaluation of the Boric Acid Corrosion Surveillances" TR00170-003, Revision 0, page 136 of 224, "7.6 Boric Acid Corrosion Surveillances"	
B.1.4 - Chemistry Program	XI.M2, "Water Chemistry " XI.M30, "Fuel Oil Chemistry"	TR00160-020, Attachment VII, Revision 0 "Chemistry Program"	By letter dated, Sept. 2, 2003, FSAR summary description has been revised to include specific EPRI documents
B.1.5 - Fire Protection Program-Mechanical	XI.M.27, "Fire Water System," and XI.M.33, "Selective Leaching of Materials"	TR00160-020, Revision 0, "Fire Protection Program-Mechanical"	

Applicant's Aging Management Program	GALL Program	LR-AMP Programs Reviewed	Remarks
B.1.6 Flow-accelerated Corrosion Monitoring Program	XI.M17, "Flow-Accelerated Corrosion Monitoring Program"	TR00160-020, Revision 0, dated July 2, 2002, "Flow-accelerated Corrosion Monitoring Program"	The applicant is in compliance with EPRI guidelines provided in Nuclear Safety Analysis Center (NSAC) - 202L, Revision 2
B.1.7 - In-Service Inspection (ISI) Plan	XI.M.1, "ASME Section XI Inservice Inspection, Subsection IWB, IWC, IWD"	TR-00160-020, Attachment XII, "Mechanical Aging Review," Revision 0 QSP-505, "Visual Examination," Revision 9 ISE-3, "In-service Inspection Manual for the 2nd Inspection Interval," Revision 2	
B.1.8 Reactor Head Closure Studs	XI.M3, "Reactor Head Closure Studs"	1.TR-00160-020 Att. XVII 2.TR-00160-011 Att.III3.TR-00160-002 Att.XII-3	
B.1.9 - Service Water System Reliability and In Service Testing Program	XI.M.20, "Open-Cycle Cooling Water System"	TR00160-020, Rev.0, "Service Water System Reliability and In Service Testing Program"	
B.1.13 ASME Section XI ISI Program - IWF	XI.S.3, "ASME Section XI Inservice Inspection, Subsection IWF"	TR-00170-003, Section 7.3, Revision 0 QSP-211, "ISI for Component Supports," Revision 4 ISE-3, "In-service Inspection Manual for the 2nd Inspection Interval," Revision 2	
B.1.15 Containment Coating Monitoring and Maintenance Program	XI.S.8, "Protective Coating Monitoring Program"	TR-00170-003, "Structures Aging Management Review for License Renewal"	
B.1.16 Containment ISI Program - IWE/IWL	XI.S.1, "ASME Section XI Inservice Inspection, Subsection IWE" and XI.S.2, "ASME Section XI Inservice Inspection, Subsection IWL"	TR-00170-003, Section 7.9, "Structures Aging Management Review for License Renewal," Revision 0 QSP-506, "Steel Containment Liner," Revision 1	

Applicant's Aging Management Program	GALL Program	LR-AMP Programs Reviewed	Remarks
B.1.19 - Material Handling System Inspection Program	XI.M.23, "Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems	TR00170-003, Revision 0, "Material Handling System Inspection Program"	
B.1.21, "Service Water Pond Dam Inspection Program"	XI.S7, "RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants"	TR00170-003, "Structures Aging Management Review for License Renewal," Revision 0 ES-400, "Service Water Pond Structures and Dam Inspections," Revision 3	
B.2.1 Service Water Pond Dam Inspection Program	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Above Ground Tank Inspection"	
B.2.2 Diesel Generator Systems Inspection	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Diesel Generator Systems Inspection"	
B.2.3 Liquid Waste Systems Inspection	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Liquid Waste System Inspection"	
B.2.5 Reactor Building Cooling Unit Inspection	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Reactor Building Cooling Unit Inspection"	
B.2.6 Service Air Systems Inspection	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Service Air System Inspection"	
B.2.7 Small Bore Class a Piping Inspection	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Small Bore Piping Inspection"	
B.2.8 Waste Gas Systems Inspection	XI.M.32, "One Time Inspection"	TR00160-020, Revision 0, "Waste Gas System Inspection"	

Applicant's Aging Management Program	GALL Program	LR-AMP Programs Reviewed	Remarks
B.2.9 – Non-EQ Insulated Cables and Connections Inspection Program	XI.E1, "Electrical cables and Connections not subject to 10 CFR 50.49 Environmental Qualification Requirements"	TR-00150-003, "Electrical Component Aging Management Review for License Renewal" RAI 3.6-1Response dated 6/12/03, RC-03-0112 Attach VII Interim Staff Guidance (ISG) 5	Revised Program in response to the LRA RAI 3.6-1 Revision of this Program added fuse clips as potential in-scope connections
B.2.10 - Buried Piping & Tank Inspection	XI.M.34, "Buried Piping &Tank Inspection"	TR00160-020, Attachment V, Revision 0 "Buried Piping & Tank Inspection"	This is a new aging management the program date of implementation is not specified
B.2.12 Heat Exchanger Inspections	XI.M.32, "One Time Inspection"	TR00160-020, Revision.0, "Heat Exchanger Inspection"	
B.3.1 – "Environmental Qualification Program"	X.E1, "Equipment Subject to 10 CFR 50.49 Environmental Qualification Requirements"	TR00140-001, "Time-Limited Aging Analyses and Exemptions for License Renewal" ES-305 EQ-02 ES-112, "Control and Maintenance of EQ database and Instrument Loop Insulation Resistance Calculation"	
B.3.3 Tendon Surveillance Program	X.S1, "Concrete Containment Tendon Prestress"	TR00170-003 - "Structures Aging Management Review for License Renewal"	Editorial corrections to the last paragraph of Section 7.17 of TR00170-003

Applicant's Aging Management Program	GALL Program	LR-AMP Programs Reviewed	Remarks
New Program - "Aging Management Program for Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements"	XI.E3, "Inaccessible Medium Voltage cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements"	RAI 3.6-3 Response dated 6/12/03, RC-03-0112 Attach IX	New Program developed in response to RAI 3.6-3
New Program - "Electrical Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirement Used in Instrumentation Circuits"	XI.E2, "Electrical Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits"	RAI 3.6-2 Response dated 6/12/03, RC-03-0112 Attach VIII	New Program in response to the LRA RAI 3.6-2
New Program – " License Renewal Aging Management Program for Non-EQ Electrical Cables Used in Instrumentation Circuits"	Alternate to XI.E2	RAI 3.6-2 Response dated 6/12/03, RC-03-0112 Attach VIII	New Program in response to NRC staff RAI 3.6-2 Alternate XI.E2 Program is for those applicable cables not included in instrument loop calibrations.