

3.6 AGING MANAGEMENT OF ELECTRICAL AND INSTRUMENTATION AND CONTROLS

Item	Locator	Comment	Justification
1	<u>Sections 3.6.2.2.2, 3.6.2.2.3, and 3.6.2.2.4, and Sections 3.6.3.2.2, 3.6.3.2.3, and 3.6.3.2.4 on</u>	<u>These sections are noted as "Deleted." Rather than include these sections as they are presently annotated, delete them entirely.</u>	<u>Some applicants prefer to align the LRA section numbers of Further Evaluation Recommended items so that they correspond to the paragraphs in NUREG-1800. Including these deleted sections would make it more difficult and awkward to achieve one-to-one correspondence.</u>

3.6 AGING MANAGEMENT OF ELECTRICAL AND INSTRUMENTATION AND CONTROLS

Review Responsibilities

Primary - Branches assigned responsibility [by PM as described in](#), SRP-LR section 3.0

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3.6.1 Areas of Review

This review plan section addresses the aging management review (AMR) of the electrical and instrumentation and controls (I&C). For a recent vintage plant, the information related to the Electrical and I&C is contained in Chapter 7, "Instrumentation and Controls," and Chapter 8, "Electric Power," of the plant's FSAR, consistent with the "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" (NUREG-0800) (Ref. 1). For older plants, the location of applicable information is plant-specific because [an older plant's](#) FSAR may have predated NUREG-0800. Typical electrical and I&C components that are subject to an AMR for license renewal are electrical cables and connections.

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The responsible review organization is to review the following LRA AMR and AMP items, assigned to it, per SRP-LR section 3.0, for review:

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AMRs

- AMRs consistent with the GALL report, for which further evaluation is not recommended
- AMRs consistent with the GALL report, for which further evaluation is recommended
- AMRs not consistent with the GALL report

AMPs

- AMPs consistent with GALL AMPs (with or without exceptions)
- Plant-specific AMPs

FSAR Supplement

- In addition, the responsible review organization is to review the FSAR supplement associated with each assigned AMP.

3.6.2 Acceptance Criteria

The acceptance criteria for the areas of review describe methods for determining whether the applicant has met the requirements of the NRC's regulations in 10 CFR 54.21.

3.6.2.1 AMR Results Consistent with the GALL Report for Which No Further Evaluation is Recommended

The aging management review and acceptable aging management programs applicable to the electrical and I&C components are described and evaluated in Chapter VI of the GALL report (Ref. 2).

The applicant's LRA should provide sufficient information so that the NRC reviewer is able to confirm that the specific AMR line-item and the associated AMP are consistent with the cited GALL AMR line-item. The staff reviewer should then confirm that the LRA AMR line-item is consistent with the GALL line-item to which it is compared.

If the applicant identifies an exception to the cited GALL AMP, the LRA should include a basis demonstrating how the criteria of 10 CFR 54.21(a)(3) would still be met. The NRC reviewer should then confirm that the AMP with all exceptions would satisfy the criteria of 10 CFR 54.21(a)(3). If, while reviewing the AMP, the reviewer identifies a difference from the GALL AMP, this difference should be reviewed and dispositioned as if it were an exception identified by the applicant in its LRA. The disposition of all LRA-defined exceptions and staff-identified differences should be documented.

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The LRA should identify any enhancements that are needed to permit an existing aging management program to be declared consistent with the GALL AMP to which the LRA AMP is compared. The reviewer is to confirm both that the enhancement, if implemented, would allow the existing plant aging management program to be consistent with the GALL AMP and also that the applicant has a commitment in the FSAR supplement to implement the enhancement prior to the period of extended operation. The reviewer should document the disposition of all enhancements.

3.6.2.2 AMR Results Consistent with the GALL Report for Which Further Evaluation is Recommended

The basic acceptance criteria defined in 3.6.2.1 apply to all of the AMRs and AMPs reviewed as part of this section. In addition, if the GALL AMR line-item to which the LRA AMR line-item is compared identifies that "further evaluation is recommended," then additional criteria apply as identified by the GALL report for each of the following aging effect/aging mechanism combinations.

3.6.2.2.1 Electrical Equipment Subject to Environmental Qualification

Environmental qualification is a TLAA as defined in 10 CFR 54.3. TLAAAs are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The evaluation of this TLAA is addressed separately in Section 4.4 of this standard review plan.

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3.6.2.2.2 Degradation of Insulator Quality due to Presence of Any Salt Deposits and Surface Contamination; and Loss of Material due to Mechanical Wear

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Degradation of insulator quality due to presence of any salt deposits and surface contamination; and loss of material due to mechanical wear caused by wind blowing on transmission conductors could occur in high voltage insulators. The GALL report recommends further evaluation of a plant-specific aging management program to ensure that this aging effect is adequately managed. Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1 of this standard review plan).

3.6.2.2.3 Loss of Material due to Wind Induced Abrasion and Fatigue; Loss of Conductor Strength due to Corrosion; and Increased Resistance of Connection due to Oxidation or Loss of Pre-load

Loss of material due to wind induced abrasion and fatigue; loss of conductor strength due to corrosion; and increased resistance of connection due to oxidation or loss of pre-load could occur in transmission conductors and connections; and in switchyard bus and connections. The GALL report recommends further evaluation of a plant-specific aging management program to ensure that this aging effect is adequately managed. Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1 of this standard review plan).

3.6.2.2.4 Quality Assurance for Aging Management of Nonsafety-Related Components

Acceptance criteria are described in Branch Technical Position IQMB-1 (Appendix A.2 of this standard review plan).

3.6.2.3 AMR Results Not Consistent with or Not Addressed in GALL Report

Acceptance criteria are described in Branch Technical Position RLSB-1 (Appendix A.1 of this standard review plan).

3.6.2.4 FSAR Supplement

The summary description of the programs and activities for managing the effects of aging for the period of extended operation in the FSAR supplement should be appropriate such that later changes can be controlled by 10 CFR 50.59. The description should contain information associated with the bases for determining that aging effects are managed during the period of extended operation. The description should also contain any future aging management activities, including enhancements and commitments, to be completed before the period of extended operation. Examples of the type of information required are provided in Table 3.6-2 of this standard review plan.

3.6.3 Review Procedures

For each area of review, the following review procedures are to be followed:

3.6.3.1 AMR Results Consistent with the GALL Report for Which No Further Evaluation is Recommended

The applicant may reference the GALL report in its license renewal application, as appropriate, and demonstrate that the aging management reviews and programs at its facility are consistent with those reviewed and approved in the GALL report. The reviewer should not conduct a re-review of the substance of the matters described in the GALL report. If the applicant has provided the information necessary to adopt the finding of program acceptability as described and evaluated in the GALL report, the staff should find acceptable the applicant's reference to GALL in its license renewal application. In making this determination, the reviewer confirms that the applicant has provided a brief description of the system, components, materials, and environment. The reviewer also confirms that the applicant has stated that the applicable aging effects and industry and plant-specific operating experience have been reviewed by the applicant and are evaluated in the GALL Report.

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Furthermore, the reviewer should confirm that the applicant has addressed operating experience identified after the issuance of the GALL report. Performance of this review requires the reviewer to confirm that the applicant has identified those aging effects for the electrical and I&C components that are contained in GALL as applicable to its plant.

The reviewer confirms that the applicant has identified the appropriate AMPs as described and evaluated in the GALL report. If the applicant commits to an enhancement to make its aging management program consistent with a GALL AMP, then the reviewer is to confirm that this enhancement when implemented will indeed make the LRA AMP consistent with the GALL AMP. If an aging management program in the LRA identifies an exception to the GALL AMP to which it is claiming to be consistent, the reviewer is to confirm that the LRA AMP with the exception will satisfy the criteria of 10 CFR 54.21(a)(3). If the reviewer identifies a difference, not identified by the LRA, between the LRA AMP and the GALL AMP, with which the LRA claims to be consistent, the reviewer should confirm that the LRA AMP with this difference satisfies 10 CFR 54.21(a)(3). The reviewer should document the basis for accepting enhancements, exceptions or differences. The AMPs evaluated in GALL pertinent to the electrical and I&C components are summarized in Table 3.6-1 of this standard review plan. In this table, the ID column provides a row identifier useful in matching the information presented in the corresponding table in the GALL report Vol. 1. The Related Item column identifies the item number in the GALL report Vol. 2, Chapters II through VIII, presenting detailed information summarized by this row.

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3.6.3.2 AMR Results Consistent with the GALL Report for Which Further Evaluation is Recommended

The basic review procedures defined in 3.6.3.1 apply to all of the AMRs and AMPs provided in this section. In addition, if the GALL AMR line-item to which the LRA AMR line-item is compared identifies that "further evaluation is recommended," then additional criteria apply as identified by the GALL report for each of the following aging effect/aging mechanism combinations.

3.6.3.2.1 Electrical Equipment Subject to Environmental Qualification

Environmental qualification is a TLAA as defined in 10 CFR 54.3. TLAAs are required to be evaluated in accordance with 10 CFR 54.21(c)(1). The staff reviews the evaluation of this TLAA separately following the guidance in Section 4.4 of this standard review plan.

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3.6.3.2.2 Degradation of Insulator Quality due to Presence of Any Salt Deposits and Surface Contamination; and Loss of Material due to Mechanical Wear

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The GALL report recommends a plant-specific aging management program for the management of degradation of insulator quality due to presence of any salt deposits and surface contamination, and loss of material due to mechanical wear caused by wind blowing on transmission conductors in high voltage insulators. The staff reviews the applicant's proposed

program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.

3.6.3.2.3 Loss of Material due to Wind Induced Abrasion and Fatigue; Loss of Conductor Strength due to Corrosion; and Increased Resistance of Connection due to Oxidation or Loss of Pre-load

The GALL report recommends a plant-specific aging management program for the management of loss of material due to wind induced abrasion and fatigue; loss of conductor strength due to corrosion; and increased resistance of connection due to oxidation or loss of pre-load in transmission conductors and connections; and in switchyard bus and connections. The staff reviews the applicant's proposed program on a case-by-case basis to ensure that an adequate program will be in place for the management of these aging effects.

3.6.3.2.4 Quality Assurance for Aging Management of Nonsafety-Related Components

The applicant's aging management programs for license renewal should contain the elements of corrective actions, the confirmation process, and administrative controls. Safety-related components are covered by 10 CFR Part 50, Appendix B, which is adequate to address these program elements. However, Appendix B does not apply to non safety-related components that are subject to an AMR for license renewal. Nevertheless, the applicant has the option to expand the scope of its 10 CFR Part 50, Appendix B program to include these components and address these program elements. If the applicant chooses this option, the reviewer verifies that the applicant has documented such a commitment in the FSAR supplement. If the applicant chooses alternative means, the branch responsible for quality assurance should be requested to review the applicant's proposal on a case-by-case basis.

3.6.3.3 AMR Results Not Consistent with or Not Addressed in GALL Report

The reviewer should confirm that the applicant, in the license renewal application, has identified applicable aging effects, listed the appropriate combination of materials and environments, and aging management programs that will adequately manage the aging effects. The aging management program credited could be an AMP that is described and evaluated in the GALL report or a plant-specific program. Review procedures are described in Branch Technical Position RLSB-1 (Appendix A.1 of this standard review plan).

3.6.3.4 FSAR Supplement

The reviewer confirms that the applicant has provided information equivalent to that in Table 3.6-2 in the FSAR supplement for aging management of the Electrical and I&C System for license renewal. The reviewer also confirms that the applicant has provided information equivalent to that in Table 3.6-2 in the FSAR supplement for SRP-LR Subsection 3.6.3.3, "Aging Management Evaluations that Are Different from or Not Addressed in the GALL Report."

The staff expects to impose a license condition on any renewed license to require the applicant to update its FSAR to include this FSAR supplement at the next update required pursuant to 10 CFR 50.71(e)(4). As part of the license condition, until the FSAR update is complete, the applicant may make changes to the programs described in its FSAR supplement without prior NRC approval, provided that the applicant evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59.

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As noted in Table 3.6-2, an applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should confirm that the applicant has identified and committed in the license renewal application to any future aging management activities, [including enhancements and commitments](#) to be completed before the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.

3.6.4 Evaluation Findings

If the reviewer has confirmed that the applicant has provided information sufficient to satisfy the provisions of this review plan section, an evaluation finding similar to the following text should be included in the staff's safety evaluation report:

On the basis of its review, the staff concludes that the applicant has adequately identified the aging effects and the AMPs credited with managing these aging effects for the engineered safety features systems, such that there is reasonable assurance that the component intended functions will be maintained consistent with the CLB during the period of extended operation. The staff also reviewed the applicable FSAR supplement program descriptions and concludes that the FSAR supplement provides an adequate program description of the AMPs credited for managing aging effects, as required by 10 CFR 54.21(d).

3.6.5 Implementation

Except in those cases in which the applicant proposes an acceptable alternative method for complying with specified portions of the NRC's regulations, the method described herein will be used by the staff in its evaluation of conformance with NRC regulations.

3.6.6 References

1. NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," U.S. Nuclear Regulatory Commission, July 1981.
2. Draft NUREG-1801, "Generic Aging Lessons Learned (GALL)," U.S. Nuclear Regulatory Commission, Revision 1, September 2005.

Table 3.6-1. Summary of Aging Management Programs for the Electrical Components, Evaluated in Chapter VI of the GALL Report

ID	Type	Component	Aging Effect/ Mechanism	Aging Management Programs	Further Evaluation Recommended	Related Item
1	BWR/PWR	Electrical equipment subject to 10 CFR 50.49 environmental qualification (EQ) requirements	Degradation due to various aging mechanisms	Environmental qualification of electric components	Yes, TLAA (see Subsection 3.6.2.2.1)	L-05
2	BWR/PWR	Electrical cables, connections and fuse holders (insulation) not subject to 10 CFR 50.49 EQ requirements	Embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced insulation resistance (IR); electrical failure due to thermal/thermooxidative degradation of organics; radiolysis and photolysis (ultraviolet [UV] sensitive materials only) of organics; radiation-induced oxidation; and moisture intrusion	Aging management program for electrical cables and connections not subject to 10 CFR 50.49 EQ requirements	No	L-01, LP-03

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Table 3.6-1. Summary of Aging Management Programs for the Electrical Components, Evaluated in Chapter VI of the GALL Report

ID	Type	Component	Aging Effect/ Mechanism	Aging Management Programs	Further Evaluation Recommended	Related Item
3	BWR/PWR	Electrical cables and connections used in instrumentation circuits not subject to 10 CFR 50.49 EQ requirements that are sensitive to reduction in conductor insulation resistance (IR)	Embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced IR; electrical failure due to thermal/thermooxidative degradation of organics; radiation-induced oxidation; and moisture intrusion	Aging management program for electrical cables and connections used in instrumentation circuits not subject to 10 CFR 50.49 EQ requirements	No	L-02
4	BWR/PWR	Inaccessible medium-voltage (2 kV to 15 kV) cables (e.g., installed in conduit or direct buried) not subject to 10 CFR 50.49 EQ requirements	Formation of water trees, localized damage leading to electrical failure (breakdown of insulation); water trees due to moisture intrusion	Aging management program for inaccessible medium-voltage cables not subject to 10 CFR 50.49 EQ requirements	No	L-03
5	PWR	Electrical connectors not subject to 10 CFR 50.49 EQ requirements that are exposed to borated water leakage	Corrosion of connector contact surfaces due to intrusion of borated water	Boric acid corrosion	No	L-04
6	BWR/PWR	Fuse holders – metallic clamp	Fatigue due to ohmic heating, thermal cycling, electrical transients, frequent manipulation, vibration, chemical contamination, corrosion, and oxidation	Aging management program for fuse holders	No	LP-01

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Table 3.6-1. Summary of Aging Management Programs for the Electrical Components, Evaluated in Chapter VI of the GALL Report

ID	Type	Component	Aging Effect/ Mechanism	Aging Management Programs	Further Evaluation Recommended	Related Item
7	BWR/PWR	Phase bus - Bus/connections	Loosening of bolted connections due to thermal cycling and ohmic heating	Aging management program for bus duct	No	LP-04
8	BWR/PWR	Phase bus – Insulation/insulators	Embrittlement, cracking, melting, discoloration, swelling, or loss of dielectric strength leading to reduced insulation resistance (IR); electrical failure due to thermal/thermooxidative degradation of organics/thermoplastics, radiation-induced oxidation; moisture/debris intrusion, and ohmic heating	Aging management program for bus duct	No	LP-05
9	BWR/PWR	Phase bus – Enclosure assemblies	Loss of material due to general corrosion	Structures Monitoring Program	No	LP-06
10	BWR/PWR	Phase bus – Enclosure assemblies	Hardening and loss of strength/ elastomers degradation	Structures Monitoring Program	No	LP-10

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Table 3.6-1. Summary of Aging Management Programs for the Electrical Components, Evaluated in Chapter VI of the GALL Report

ID	Type	Component	Aging Effect/ Mechanism	Aging Management Programs	Further Evaluation Recommended	Related Item
11	BWR/PWR	High voltage insulators	Degradation of insulation quality due to presence of any salt deposits and surface contamination; Loss of material caused by mechanical wear due to wind blowing on transmission conductors	Plant specific	Yes, plant specific (see subsection 3.6.2.2.5)	LP-07, LP-11
12	BWR/PWR	Transmission conductors and connections, Switchyard bus and connections	Loss of material due to wind induced abrasion and fatigue; Loss of conductor strength due to corrosion; Increased resistance of connection due to oxidation or loss of pre-load	Plant specific	Yes, plant specific (see subsection 3.6.2.2.6)	LP-08, LP-09
13	BWR/PWR	Cable Connections – Metallic parts	Loosening of bolted connections due to thermal cycling, ohmic heating, electrical transients, vibration, chemical contamination, corrosion, and oxidation	Aging management program for electrical cable connections not subject to 10 CFR 50.49 environmental qualification requirements	No	LP-12
14	BWR/PWR	Fuse Holders (Not Part of a Larger Assembly) Insulation material	None	None	N/A	LP-02

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Table 3.6-2. FSAR Supplement for Aging Management of Electrical and Instrumentation and Control System

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Program	Description of Program	Implementation Schedule*
<p>Aging management program for non-environmentally qualified electrical cables and connections exposed to an adverse localized environment caused by heat, radiation, or moisture.</p>	<p>Accessible electrical cables and connections installed in adverse localized environments are visually inspected at least once every 10 years for cable and connection jacket surface anomalies, such as embrittlement, discoloration, cracking, swelling, or surface contamination, which are precursor indications of conductor insulation aging degradation from heat, radiation or moisture. An adverse localized environment is a condition in a limited plant area that is significantly more severe than the specified service condition for the electrical cable or connection.</p>	<p>First inspection for license renewal should be completed before the period of extended operation</p>
<p>Aging management program for non-environmentally qualified electrical cables and connections used in instrumentation circuits that are sensitive to reduction in conductor insulation resistance, and are exposed to an adverse localized environment caused by heat, radiation, or moisture.</p>	<p>Electrical cables and connections used in circuits with sensitive, low-level signals, such as radiation monitoring and nuclear instrumentation, are <u>calibrated</u> as part of the instrumentation loop calibration at the normal calibration frequency, which provides sufficient indication of the need for corrective actions based on acceptance criteria related to instrumentation loop performance. <u>The review of calibration results is performed once every 10 years.</u></p> <p><u>In cases where cables are not part of calibration or surveillance program, a proven cable test (such as insulation resistance tests, time domain reflectometry tests, or other tests judged to be effective) for detecting deterioration of the insulation system are performed. The test frequency is based on engineering evaluation not to exceed 10 years.</u></p>	<p>First <u>review of calibration results or cable</u> tests for license renewal should be completed before the period of extended operation</p>

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Table 3.6-2. FSAR Supplement for Aging Management of Electrical and Instrumentation and Control System

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Program	Description of Program	Implementation Schedule*
<p>Aging management program for non-environmentally qualified inaccessible medium-voltage cables exposed to an adverse localized environment caused by moisture and voltage exposure</p>	<p>In-scope, medium-voltage cables exposed to significant moisture and significant voltage are tested at least once every 10 years to provide an indication of the condition of the conductor insulation. The specific type of test performed will be determined prior to the initial test, and is to be a proven test for detecting deterioration of the insulation system due to wetting, such as power factor, partial discharge, or polarization index, as described in EPRI TR-103834-P1-2, or other testing that is state-of-the-art at the time the test is performed. Significant moisture is defined as periodic exposures that last more than a few days (e.g., cable in standing water). Periodic exposures that last less than a few days (e.g., normal rain and drain) are not significant. Significant voltage exposure is defined as being subjected to system voltage for more than 25% of the time. The moisture and voltage exposures described as significant in these definitions are not significant for medium-voltage cables that are designed for these conditions (e.g., continuous wetting and continuous energization are not significant for submarine cables). In addition, inspection for water collection is performed following significant moisture exposure due to weather related events. However, the inspection frequency should not exceed two years.</p>	<p>First tests or first inspections for license renewal should be completed before the period of extended operation</p>

Table 3.6-2. FSAR Supplement for Aging Management of Electrical and Instrumentation and Control System (continued)

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Program	Description of Program	Implementation Schedule*
Boric acid corrosion.	The program consists of (1) visual inspection of external surfaces that are potentially exposed to boric acid water leakage, (2) timely discovery of leak path and removal of the boric acid residues, (3) assessment of the damage, and (4) follow-up inspection for adequacy. This program is implemented in response to GL 88-05.	Existing program
Plant-specific AMP	The description should contain information associated with the basis for determining that aging effects will be managed during the period of extended operation.	Program should be implemented before the period of extended operation.
Aging management program for fuse holders	Fuse holders within the scope of license renewal will be tested at least once every 10 years to provide an indication of degradation of the metallic clamp portion of the fuse holders. Testing may include thermography, contact resistance testing, or other appropriate testing methods.	First tests for license renewal should be completed before the period of extended operation
Aging management program for bus ducts	Internal portions of bus ducts are visually inspected at least once every 10 years for cracks, corrosion, foreign debris, excessive dust buildup, and evidence of water intrusion. The bus insulating system is inspected for signs of embrittlement, cracking, melting, swelling, or discoloration, which may indicate overheating or aging degradation. The (internal) bus supports are inspected for structural integrity and signs of cracks. A sample of accessible bolted connections on the internal bus work is checked for proper torque, or check for connection resistance.	First inspection for license renewal should be completed before the period of extended operation.
Aging management program for non-environmentally qualified electrical cable connections	A representative sample of electrical cable connections within the scope of license renewal will be tested at least once every 10 years. Testing may include thermography, contact resistance testing, or other appropriate testing methods.	First tests for license renewal should be completed before the period of extended operation
Structures monitoring	The program consists of periodic inspection and monitoring the condition of structures and structure component supports to ensure that aging degradation leading to loss of intended functions will be detected and that the extent of degradation can be determined. This program is implemented in accordance with NUMARC 93-01, Rev. 2 and RG 1.160, Rev. 2.	Existing program

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Table 3.6-2. FSAR Supplement for Aging Management of Electrical and Instrumentation and Control System (continued)

Program	Description of Program	Implementation Schedule*
Quality assurance	The 10 CFR Part 50, Appendix B program provides for corrective actions, the confirmation process, and administrative controls for aging management programs for license renewal. The scope of this existing program will be expanded to include non safety-related structures and components that are subject to an AMR for license renewal.	Program should be implemented before the period of extended operation
<p>* An applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should verify that the applicant has identified and committed in the license renewal application to any future aging management activities to be completed before the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.</p>		

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