



NUCLEAR ENERGY INSTITUTE

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September 5, 2006

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** NEI White Paper on GALL AMP XI E6 (Electrical Cables)

**PROJECT NUMBER: 690**

Enclosed is a Nuclear Energy Institute (NEI)<sup>1</sup> White Paper that discusses our position on Generic Aging Lessons Learned (GALL) Aging Management Program (AMP) XI.E6 (Electrical Cables). As you are aware, NEI has disagreed with certain portions of the electrical section within the GALL since its most recent revision. Therefore, NEI submits the enclosed White Paper as a basis for revision to the subject AMP section of the GALL.

NEI is concerned that the required program elements of AMP XI.E6 duplicate already defined and accepted aging management activities. We are also concerned that the expanded scope of the program includes all voltage ranges regardless of operating experience evidence that shows that lower voltage connections are not a significant aging management concern. In addition, NEI identified wording added after the formal commenting period that expands the E6 program to include connections in or related to active equipment, which is contrary to the 10 CFR 54 Statement of Considerations.

In light of the concerns listed above, NEI asks that the staff review the enclosure and discuss this topic with industry in one of our future license renewal activities conference calls. NEI seeks to encourage the Nuclear Regulatory Commission

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<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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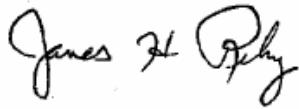
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(NRC) to eliminate the E6 program or minimize its scope and redundancy so that plants will not be burdened with activities that have no actual aging management benefit.

If you have any questions, please contact James Ross at 202-739-8101; [jr@nei.org](mailto:jr@nei.org).

Sincerely,

A handwritten signature in black ink that reads "James H. Riley". The signature is written in a cursive style with a large, prominent initial "J".

James H. Riley

Enclosure

c: Mr. Frank P. Gillespie, NRC  
Dr. P.T. Kuo, Program NRC  
Mr. Jacob Zimmerman, NRC  
Mr. Kenneth C. Chang, NRC