

RE1200024



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

*NFD*

November 1, 2000

Note to: Noel Dudley, Senior Staff Engineer  
Advisory Committee on Reactor Safeguards

FROM: Christopher Grimes, Chief *C. Grimes*  
License Renewal and Standardization Branch  
Division of Regulatory Improvement Programs, NRR

Subject: ACRS SUBCOMMITTEE FOLLOW-UP ACTIONS

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During the ACRS subcommittee meeting on October 19-20, 2000, we made several commitments related to background information and follow-up actions. The purpose of this note is to provide the background information and confirm the commitments for future actions.

In response to the specific request from Dr. Shack, attached are samples of typical Nuclear Energy Institute (NEI) comments on pre-August draft Generic Aging Lessons Learned (GALL) report and draft Standard Review Plan (SRP) for License Renewal attached. Industry comments on the August draft of GALL and SRP from Union of Concern Scientist (UCS) are included in ADAMS; the accession number for UCS comments is ML003763009. We shall provide you with the accession number for NEI comments dated, October 13, 2000, as soon as we have confirmed it is in ADAMS. If you prefer we can provide you with the hard copies of those comments.

During the subcommittee meeting, we committed to take the following additional actions relative to the improved renewal guidance in GALL and the SRP:

1. We will review the transcript of the subcommittee meeting to identify ACRS suggestions for improvements of the, for example (a) clarifying table of contents, (b) expanding the description of dams in the table, and (c) clarifying where one-time inspections are recommended;
2. We will be prepared to explain the treatment of the FSAR supplement, technical specifications and the environmental review in more detail during the ACRS subcommittee meeting on the ANO-1 application;
3. We will plan on publication of GALL and SRP in loose-leaf form to facilitate future updates;
4. We will share the summary of all the public comments on the improved renewal guidance that will be prepared for the Commission meeting on December 4, 2000, as soon as available.

If the subcommittee has any questions or comments about our plans, please contact m

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*RE-120*

**ATTACHMENT**  
**SAMPLE NEI PRE-AUGUST COMMENTS ON GALL**

Comment No.	GALL Page No.	Comment and Basis	Recommendation
1	VI A-0	<p>Electric Cables is too broad a term since, by its name, it does not distinguish it from grounding system conductors and transmission conductors. The critical distinguishing factor for electric cables is whether they are insulated or uninsulated. It makes sense to review all insulated cables together since they have similar functions to maintain related to the insulating materials. The term "insulated cables" would also distinguish it from other, non-electric cables since non-electric cables (e.g., crane cables) are not insulated.</p>	Change "Electric Cables" to "Insulated Cables".
2	VI A-4	<p>The paragraph for case (ii) states "..., and the period of time prior to the end of qualified life when the reanalysis will be completed." Case (ii) are those TLAA's that "have been" projected. The reanalyses have already been performed at the time of application. This language was probably meant for case (iii).</p>	Remove this statement from the case (ii) discussion.
3	IIA1-5,9	<p>The Aging Management Programs imply that there are additional requirements for in-service inspection of inaccessible areas when there are no indications of degradation for accessible areas.</p>	<p>These implications should be removed. Basis: implying such requirements is equal to additional rule-making over and above 10 CFR 50.55a without adhering to the rule-making process.</p>

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