



NUCLEAR ENERGY INSTITUTE

James H. Riley
DIRECTOR
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NUCLEAR GENERATION DIVISION

September 14, 2009

Mr. Brian E. Holian
Division of License Renewal
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on NUREG-1801, "Generic Aging Lessons Learned (GALL) Report".

Project Number: 689

Dear Mr. Holian:

During our quarterly License Renewal meetings, you have indicated that your staff is working on revising the Generic Aging Lessons Learned (GALL) Report to reflect lessons learned from the plants which have gone through the license renewal process. To aid you in your effort, we have previously provided comments on Aging Management Programs, electrical Aging Management Reviews (AMRs), and structural AMRs. As a follow-up to our previous submittals, we are providing the following comments in the attachments to this letter:

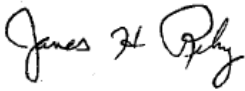
- Mechanical AMR lines for new Material-Environment-Aging Effect-Aging Management Program (MEAP) combinations
- Changes in existing mechanical AMR lines
- Other GALL changes (Chapter IX and addition of Waste Water Systems)
- Electrical changes to clarify SBO scoping

We appreciate the opportunity to provide our input and the willingness of your Staff to work with us on this endeavor. Specifically, Mr. Robert Gramm has coordinated this effort and has provided communication to allow us to understand and resolve any questions the NRC may have on our comments.

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If there are any questions regarding these comments, please contact me at 202-739-8137; jhr@nei.org or Julie Keys at 202-739-8128; jyk@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, looped initial "J".

James H. Riley

Enclosure

c: Ms. Tanya M. Mensah, NRR/ADRO/DPR/PSP, NRC