

NUREG 1801, Rev. 2, “Draft”

NEI Civil/Structural Working Group (CSWG) Comments

Significant Topics

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*High-Level License Renewal NRC Workshop
(May 26, 2010 – Washington DC)*

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Significant Topics

- **Protective Coating Program Requirements**
- **High Strength Structural Bolt Inspections**
- **Containment Penetration Inspections**
- **Structural Inspection Frequency**

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Protective Coating Program Requirements –

A Protective Coating Monitoring and Maintenance Program consistent with the previously approved Regulatory Guide 1.54 Rev. 0 is the current licensing basis at a number of plants and should remain acceptable for the XI.S8 AMP as well. The XI.S8 AMP should not be required to meet Regulatory Guide 1.54 Rev. 1 or later (related to Protective Coating Monitoring and Maintenance Program AMP) .

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High Strength Structural Bolt Inspections –

Volumetric or surface examinations for cracking of high strength bolts should not be generically required for all bolts with actual yield strength of 150 ksi or more and greater than 1" diameter. Structural high strength bolts, including A325 and A490 bolts, do not have a history of stress corrosion cracking in most environments (related to Structures Monitoring, IWF, and RG 1.127 Water Control Structures AMPs and associated line items and SRP sections).

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Containment Penetration Inspections -

***Surface* examinations (in addition to visual inspections and Appendix J testing) of containment penetration sleeves, associated steel components and bellows is not warranted by operating experience (related to IWE AMP, and associated primary containment related line items, SRP, etc).**

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Structural Inspection Frequency -

The frequency for Structures Monitoring and Masonry Wall inspections should not be restricted to 5 years. Inspection frequencies are addressed as a part of the Maintenance Rule implementation and are as per industry guidance (related to Structures Monitoring and Masonry Walls AMPs).