

PWROG Comments on Revised SER

1. The revised SER refers to PWROG letter OG-09-454 which was submitted to the NRC on December 1, 2009. An updated implementation plan was sent to the NRC in PWROG letter OG-10-238 on July 12, 2010. However, PWROG letter OG-10-238 is not referenced anywhere in the revised SER.
2. An item, #6, has been added to Section 3.4 of the SER: "Submit Proposed Change." This new item indicates "Licensees seeking second or additional interval extensions shall provide the information and analyses requested in Section (e) of 10 CFR 50.61a." In all plant-specific ISI interval extensions that have been approved to date, when ASME Section XI Appendix VIII data was available, these analyses have been performed and the information has been provided in plant relief requests. It is anticipated that the vast majority of future plant submittals will be for plants that have performed an Appendix VIII qualified examination. Therefore, in many cases, the information is available such that these analyses can be performed for the first interval extension and not just the second or additional interval extension. The PWROG suggests that item #6 be revised to require that the information and analyses requested in Section (e) of 10 CFR 50.61a be provided in the first relief request if an inservice inspection that meets the requirements of ASME Section XI, Appendix VIII has previously been performed. It is suggested that this change also be made in the revised SER to the last paragraph of Section 4.0, the third paragraph of Appendix B, and item #5 of Appendix B.
3. The original SER to WCAP-16168-NP contained a requirement for licensees to submit a license amendment request (LAR) coincident with their relief request to implement the extended ISI interval. The purpose of this LAR was to require that plants not implementing 10 CFR 50.61a submit the information and analyses required by Section (e) of 10 CFR 50.61a to the NRC for review and approval within one year of completing the ISI of their Section XI Category B-A and B-D welds. The original intent of the LAR was to eliminate the need to resubmit relief requests every 20 years. Shortly after the issuance of the original SER, the NRC set a precedent by (1) requesting that Entergy withdraw their LAR for Waterford 3 and (2) indicating that relief requests would be required for each 20-year interval. Based on this precedent, it was requested by the PWROG in letter OG-09-454 that the license amendment request (LAR) be removed in the revised SER. However, a similar requirement to submit a license amendment request remains in the third paragraph and item #5 of Appendix B of the revised SER. This LAR requirement is ambiguous and unnecessary. For the following reasons, this requirement should be removed entirely.
 - a. Item #6 of Section 3.4 and Section 4.0 of the revised SER already require that the information and analyses required by Section (e) of 10 CFR 50.61a be provided in the plant relief requests for plants seeking second or additional interval extensions. Therefore, for these plants, the LAR

requirement would result in the same information being provided to the NRC for review and approval twice.

- b. The effect of the LAR requirement seems to be that the results of the ISI evaluation required by 10 CFR 50.61a would be provided to the Staff within one year of the exam being performed, as opposed to ~9 years later in the subsequent relief request. It is understood that the NRC has an interest in obtaining the ISI data as soon as possible in order to better establish the credibility of the ISI interval extension and the 10 CFR 50.61a. However, the PWROG believes that this information can be obtained by the NRC through other means without placing this requirement on utilities. One such means would be through the PWROG providing the data when available, as suggested in comment #2.
- c. The LAR requirement indicates that the "...information and analyses...be submitted for NRC staff review and approval." If a licensee has not submitted a relief request at the time this information is provided to the Staff, it is not clear what the Staff intends to approve.
- d. The revised SER does not provide an expectation as to when the LAR is intended to be submitted.