



NUCLEAR ENERGY INSTITUTE

Julie Y. Keys
SENIOR PROJECT MANAGER
ENGINEERING AND OPERATIONS SUPPORT
NUCLEAR GENERATION DIVISION

June 3, 2011

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

Subject: Corrections to Generic Aging Lesson Learned (GALL), Revision 2 Aging Management Program (AMP) XI.M41, "*Buried, Underground, and Limited-Access Piping and Tanks.*"

Project Number: 689

Dear Mr. Holian:

In December 2010, the NRC staff issued NUREG-1800 and NUREG-1801, "Generic Aging Lessons Learned (GALL) report, Revision 2 followed by the issuance of NUREG-1950, "Disposition of Public Comments and Technical Bases for Changes in the License Renewal Guidance Documents NUREG-1801 and NUREG-1800" in April 2011. However, in our implementation of GALL AMP XI.M41, "*Buried, Underground, and Limited-Access Piping and Tanks*" we have encountered two discrepancies in NUREG-1801. The purpose of this letter is to request NRC's action to issue an Interim Staff Guidance (ISG) or other appropriate correspondence to resolve the following discrepancies.

1. GALL AMP XI.M41, Table 2a, footnote 6 for Polymer material states: "Backfill not meeting this standard, in either the initial or subsequent inspections, is acceptable if the inspections conducted in program element 4 of this AMP do not reveal evidence of mechanical damage to pipe coatings due to the backfill." However, polymer piping is not coated nor does GALL AMP XI.M41 require it to be coated as shown in Table 2a. Therefore, we believe that the footnote should read, "Backfill not meeting this standard, in either the initial or subsequent inspections, is acceptable if the inspections conducted in program element 4 of this AMP do not reveal evidence of mechanical damage to the pipe, due to backfill, that exceed the minimum wall thickness." This requested change clarifies that the subject pipe is not, nor is it required to be, coated and that mechanical pipe damage from the backfill is the appropriate inspection criteria.

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2. GALL AMP XI.M41, Element 4 item c.iv states: "Underground pipes are inspected visually to detect external corrosion and by a volumetric technique such as UT to detect internal corrosion." However, as documented in NUREG-1950, Page IV-175, Comment Number 1070, NEI submitted a comment to delete volumetric examinations to detect internal corrosion in this item because this program is concerned with the pipe exterior and other programs are in place for the interior of the piping. The NRC documented their agreement with this comment and indicated that the change was made in the GALL report. However no change was made. We request that NRC correct this oversight.

We believe issuance of an ISG or other document to correct AMP M41 will ensure that the AMP will continue to be implemented appropriately and reduce the need for Licensee exceptions to the AMP program.

We request an opportunity to further discuss any comments you do not agree with prior to final resolution of discrepancies identified in this letter. Please contact me at (202) 739-8128; jyk@nei.org should you have any questions.

Sincerely,



Julie Keys

c: Ms. Melanie A. Galloway, NRR/DLR, NRC
Mr. Robert A. Gramm, NRR/DLR/RARB, NRC
Mr. David L. Pelton, NRR/DLR/RAPB, NRC
Mr. David W. Alley, NRR/DCI/CPNB, NRC
Mr. William C. Holston, NRR/DLR/RAPB, NRC
NRC Document Control Desk