

November 1, 2011

Ms. Julie Keys  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

SUBJECT: DRAFT LICENSE RENEWAL INTERIM STAFF GUIDANCE  
LR-ISG-2011-01: AGING MANAGEMENT OF STAINLESS STEEL  
STRUCTURES AND COMPONENTS IN TREATED BORATED WATER

Dear Ms. Keys:

I am writing to inform the Nuclear Energy Institute of the opportunity to comment on the draft license renewal interim staff guidance (LR-ISG), LR-ISG-2011-01, "Aging Management of Stainless Steel Structures and Components in Treated Borated Water." Enclosed is a copy of the *Federal Register* notice that announces the NRC's request for comments and provides instructions on how to submit comments.

The NRC staff has determined that existing guidance in the Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (SRP-LR) and Generic Aging Lessons Learned (GALL) Report may not adequately address aging management of stainless steel structures and components exposed to treated borated water. Specifically, for pressurized water reactors, the guidance inappropriately credits boron as a corrosion inhibitor in place of other aging management activities. As a result, aging effects such as loss of material, cracking, and reduction of heat transfer may not be adequately managed. The staff has proposed to revise the SRP-LR and GALL Report to align the guidance for treated borated water with that for treated (i.e., non-borated) water. The revisions include adding the One-Time Inspection Program to verify the effectiveness of the Water Chemistry Program to manage loss of material and cracking of stainless steel structures and components exposed to treated borated water and adding reduction of heat transfer due to fouling as an aging effect requiring management for stainless steel heat exchanger tubes exposed to treated borated water.

If you have any questions, please contact Dr. John Wise of my staff by telephone at 301-415-8489 or by e-mail at [John.Wise@nrc.gov](mailto:John.Wise@nrc.gov).

J. Keys

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To inform other stakeholders of the opportunity to provide comments on the draft LR-ISG-2011-01, courtesy copies of this letter are being sent to subscribers of an NRC electronic mailing list on general license renewal topics.

Sincerely,

**/RA/**

Melanie A. Galloway, Acting Director  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

cc w/encls: Reactor License Renewal Stakeholder  
Group Listserv

J. Keys

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Melanie A. Galloway, Acting Director  
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