

March 1, 2012

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-2011-03:  
CHANGES TO THE GENERIC AGING LESSONS LEARNED (GALL) REPORT  
REVISION 2 AMP XI.M41, "BURIED AND UNDERGROUND PIPING AND  
TANKS"

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-2011-03, "Changes to Generic Aging Lessons Learned (GALL) Report Revision 2 Aging Management Program (AMP) XI.M41, 'Buried and Underground Piping and Tanks'." Enclosed is a copy of the *Federal Register* notice that announces the U.S. Nuclear Regulatory Commission's (NRC's) request for comments and provides instructions on how to submit comments.

Based on the staff's review of several license renewal applications' buried and underground piping and tank aging management programs and stakeholder input, the staff has determined that existing guidance in NUREG-1800, "Standard Review Plan for License Renewal Applications for Nuclear Power Plants" (SRP-LR), and GALL Report should be revised. These changes include:

- inspection recommendations for plants that will not have a cathodic protection system in the period of extended operation;
- removal of the recommendation to volumetrically inspect underground piping to detect internal corrosion;
- basing further increased inspection sample sizes on an analysis of extent of cause and extent of condition when adverse conditions are detected in the initial and subsequent doubled sample size, rather than continuing to double the sample size;
- adding a recommendation that where damage to the coating is significant and the damage was caused by non-conforming backfill, an extent of condition evaluation should be conducted to ensure that the as-left condition of backfill in the vicinity of observed damage will not lead to further degradation;
- adding specific acceptance criteria for cathodic protection surveys;
- adding the specific preventive and mitigative actions utilized by the AMP in the final safety analysis report (FSAR) Supplement description of the program; and
- miscellaneous and editorial changes.

J. Keys

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To inform other stakeholders of the opportunity to provide comments on the draft LR-ISG-2011-03, courtesy copies of this letter are being sent to subscribers of an NRC electronic mailing list on general license renewal topics.

If you have any questions, please contact William Holston of my staff by telephone at (301) 415-8573 or by e-mail at [William.Holston@nrc.gov](mailto:William.Holston@nrc.gov).

Sincerely,

*/RA/*

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

Enclosures:  
As stated

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Group Listserv

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**/RA/**

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

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