



NUCLEAR ENERGY INSTITUTE

Mark A. Richter
SENIOR PROJECT MANAGER
ENGINEERING AND OPERATIONS SUPPORT
NUCLEAR GENERATION DIVISION

3/20/2012
77FR 16270

May 21, 2012

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Ms. Cindy K. Bladey
Chief, Rules, Announcements and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RECEIVED

JUN 21 2012
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RULES AND DIRECTIVES

Subject: Comments on Draft License Renewal Interim Staff Guidance, LR-ISG-2011-04, "Updated Aging Management Criteria for PWR Reactor Vessel Internal Components." Docket ID NRC-2012-0070

Project Number: 689

Dear Ms. Bladey:

The NRC, through *Federal Register* notice 77 FR 16270, issued for public comment, draft Interim Staff Guidance (ISG) titled "Updated Aging Management Criteria for PWR Reactor Vessel Internal Components." Comments on the draft ISG were requested by May 21, 2012. On behalf of the industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to submit the attached comments for NRC consideration. In addition, NEI endorses the comments submitted by the Electric Power Research Institute (EPRI) on behalf of the EPRI Materials Reliability Program and the Pressurized Water Reactor Owners' Group Materials Subcommittee.

The draft ISG is intended to update the aging management guidance for pressurized water reactor vessel internal components contained in NUREG-1801, Revision 2, "Generic Aging Lessons Learned Report" (GALL), and in NUREG-1800, Revision 2, "Standard Review Plan for License Renewal Applications for Nuclear Power Plants" (SRP-LR). The guidance documents' proposed changes in the

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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draft ISG are based on the conclusions of the NRC's revised safety evaluation (SE) dated December 16, 2011. The SE is the staff's review of the Electric Power Research Institute's "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-Rev. 0)."

The attached comments address a number of areas including inspection scope, acceptance criteria, materials aging effects, plant-specific evaluations and the relationship between the ISG and other referenced documents. There are several comments that are associated with Applicant and Licensee Action Items (A/LAIs). Specifically, the comments call for greater clarity regarding A/LAIs and the information or documentation required in an Aging Management Plan, including documentation associated with deviation from the requirements of the MRP-227 Program: "Pressurized Water Reactor Internals Inspection and Evaluation Guidelines."

The comments submitted by EPRI and NEI are extensive and involve complex issues. NEI requests a follow-up meeting with the NRC staff to discuss resolution of the comments, and if appropriate, an additional comment period.

If you have any questions or require additional information, please contact me (202-739-8106; mar@nei.org).

Sincerely,



Mark A. Richter

Attachment

Comments and Proposed Changes to LR-ISG-2011-04**Submitted by NEI- May 21, 2012**

Cmt #	Page #	Line # or Section Number	Comment	Proposed Change
1	A-51	IV.B2.RP -300	Alignment and interfacing components, such as hold down springs, are addressed in MRP-227-A. Based on MRP-227-A, the intent of the GALL was only to apply to hold down springs made from Type 304 SS. The possibility of thermal embrittlement of hold down springs made from Type 403 martensitic SS is not addressed. The issue is, however, discussed in the proposed SRP section 3.1.2.2.9.A.6 and in applicant action item 7 of the SER(rev.1).	Include the words "applicable to hold down springs fabricated from Type 304 SS" and add a line item to address thermal embrittlement for hold down springs fabricated for Type 403 stainless steel.
2	A-16	3.1.2.2.9 .A.3, 2nd Para	There is little guidance on Applicant Action Item #2 related to additional RVI piece parts and what was used during the development of MRP 191. Utilities are left to draw a conclusion that unless the utility implemented a modification beyond the vendor's recommendation, all of the piece parts in the reactor vessel were considered during the development of MRP-189, 191 and 227-A.	Add verbiage to provide additional guidance to allow utilities to make the assumption that unless a utility implemented modifications beyond that recommended by the vendor of the RVI, then all of the piece parts of the RVI were considered during the development of MRP-189, 191 and 227-A.
3	A-16	3.1.2.2.9 .A.3	The words in the third paragraph are confusing and it is not clear what is meant by plant specific AMR line items or why Note E would be appropriate. For those applicants whose plant-specific review results in identification of additional components for inspection or different component inspection categories from those identified in MRP-227-A, the applicant is requested to identify the changes in the component inspection categories as either plant-specific AMR line items or NEI Note E consistent with GALL AMR items (whichever is applicable) in their Table 2 AMR line items for their PWR RVI	It is suggested that if only a component line item or two that is not in GALL is being added then an exception can be taken to the program and justification be added that includes inspection specifics such as method and acceptance criteria such that the whole program doesn't have to be evaluated as a plant specific program.

			components.	
4	A-5, A-15	Last paragraph on page, 3.1.2.2.9 .1.2	The document does not provide clear direction as to what goes into an inspection plan.	Add verbiage to allow utilities to better determine what the inspection plan should consist of (e.g., A Westinghouse design plant should provide unit specific information in the Inspection Plan consistent with tables 4-3, 4-6 and 4-9 of MRP-227-A and the A/LAs.)
5	A-34	Table 3.1-1 Item 27a	It is not clear that this line item is only applicable to hold down springs fabricated from Type 304 SS.	Add Type 304 SS hold down springs
6	A-31	Table 3.1-1 Item 3	Under 'Further Evaluation Recommended' column, it is not clear what "It" stands for?	Provide an explanation.
7	A-65	IV.B2.RP -280	There is confusion regarding what comprises the lower core barrel flange weld for Westinghouse designed plants. This component is still listed in MRP-191, and 227-A for Westinghouse designed plants. MRP-227-A indicates it may be the weld between the core barrel and the lower support forging or casting.	Provide an explanation regarding what this component is.
8	A-17	3.1.2.2.9 .A.4	In the subject paragraph, it appears the NRC wanted an exception not an enhancement: For those component inspections that do not achieve the inspection coverage criteria stated in the NRC SE (Rev. 1) on MRP-227, the applicant is requested to take a deviation from the MRP-defined inspection criteria and describe the process and type of evaluation that will be implemented to evaluate the impact of the aging effects on the inaccessible regions of the components. In this case, the applicant is requested to identify this process as an applicable enhancement of the "monitoring and trending" program element of its RVI Program.	Clarify what is expected.

9	A-65	IV.B2.RP -280	It is not clear how Note 3 in the "Further Evaluation" column is applicable to this GALL Line Item.	Clarify the applicability.
10	3		In the last paragraph of the Discussion section only table 3-1 is listed for justification of TE for the materials. Tables 3-2 and 3-3 should be mentioned since 3-1 is only for B&W internals.	Add Tables 3-2 and 3-3.
11	A-7	3.0 Param Monit.	The second paragraph in this Section refers to condition monitoring tables in MRP-227-A. There are no tables with this title in MRP-227-A	Change to Aging Management Requirement tables.
12	A-9	6	Only Table 5-1 is listed for acceptance criteria when MRP-227-A contains three tables, 5-1 thru 5-3	Change to read " Section 5 and Tables 5-1 thru 5-3 of MRP-227"
13	A-10	6	The first paragraph on the page says "The program adopts the acceptance criteria for the physical measurement monitoring methods recommended in MRP-227-A, as qualified in Section 3.3.5 and A/LAI No. 5 in Rev. 1 of the NRC SE on MRP-227". Section 3.3.5 of the MRP does not specify acceptance criteria so there is nothing to be adopted. It only requires it be developed as discussed in footnote 3.	Change sentence to read "The program includes acceptance criteria for the physical measurement monitoring methods as recommended in MRP-227-A, Section 3.3.5 and A/LAI No. 5 in Rev. 1 of the NRC SE on MRP-227".
14	A-12	10	The following sentence relates to notification criteria: "The evaluation in Section 3.5 of Revision 1 of the SE on MRP-227 provides the staff's basis for endorsing the NEI 03-08 implementation process for these programs. This includes NRC's endorsement of the NEI 03-08 criteria for notifying the NRC of any deviation from the I&E methodology in MRP-227-A and justification of the deviation no later than 45 days after approval by a licensee executive."	Delete this sentence as it already is discussed in element 9 where it is appropriate.
15	A-8	4 and 3.1.2.2.9 .A.7	The justification required for the use of VT-3 to detect cracking over that specified in MRP-227A and approved by the staff in the SE that allows its use without the additional limitations and analyses is not needed.	Eliminate need for additional justification if requirements as specified in SER and MRP are met.
16	A-22	3.1.2.2.9 .C.1	The justification required for the use of VT-3 to detect cracking over that specified in MRP-227A and approved by	Eliminate need for additional justification if requirements as specified in SER and

			the staff in the SE that allows its use without the additional limitations and analyses is not needed.	MRP are met.
17	A-23	3.1.2.2.9 .C.3	The option presented as (3), as an alternative basis for accepting the design basis fatigue analyses in accordance with the TLAA acceptance requirement in 10 CFR 54.21(c)(1)(iii) does not make sense when compared to options 1 and 2	Add the word "the EVT-1 is used" at the beginning
18	A-25	3.1.2.2.9 .D.1	There is no need for a plant-specific enhancement of the "preventative actions" program element for their RVI Program enhancement to be identified if an applicant confirms that the welds were appropriately stress -relieved. An enhancement doesn't seem appropriate since the action has already been taken.	Eliminate the need for an enhancement
19	A-30	table 3.0-1	There is no need for the words "or to applicable NRC further evaluation "acceptance criteria" recommendations in Section 3.1.2.2 of the SRP-LR (i.e., the latest NRC issued version of NUREG-1800)". Specific acceptance criteria do not need to be part of a SAR description. If it is an enhancement it will already be a commitment.	Delete
20	A-51	Table IV.B2	There is no need for specifying the Examination technique in the Program column.	Delete
21	A-77	Notes	For note 6, see comments 15 and 16 above on why no justification for using VT-3 exam is required when it was acceptable in SER for 227. This applies to CE and B&W tables that also contain a similar note.	Delete the note
22	A-102	Note 1	"In conjunction" is repeated in the second sentence.	Delete second in conjunction
23	A-103	Note 8	4th line "No.2 above, and is so" should be and if so.	Correct
24	A-54	Table IV.B2	Water chemistry is not listed as an AMP, with the aging effect of SCC and IASCC such as in line items IV.B2.RP-270a, 345, 399, 299a. This mainly occurs in new line items and also	Add XI.M2 as an AMP

			shows up in Table IV.B3 and IV.B4	
25	A-76	IV.B2.RP -399	As indicated in Table 4-9 of MRP-227-A and the associated note 2, the clevis insert bolts are inspected for wear. To the extent cracking would be visible in the VT-3 inspection, it would of course be addressed; but, the intent of the inspection is to look for wear.	Eliminate this line as an existing inspection program element, or change the AMP description to note the inspection is for gross effects of cracking
26	A-67	IV.B2.RP -285	As described in MRP-191, the clevis bolts and inserts are not in a high flux region and irradiation embrittlement is not a significant aging mechanism. As indicated in Table 4-9 of MRP-227-A and the associated note 2, the clevis insert bolts are inspected for wear. Also, Note 5 is applied to the further evaluation column; however, Note 5 refers to reduction of fracture toughness due to thermal embrittlement in stainless steel components, while the material listed for this line is nickel alloy.	Eliminate the aging mechanism of loss of fracture toughness from this line and remove note 5 from the further evaluation column.
27	A-63	IV.B2.RP -345	As indicated in Table 5-1 of MRP-191, cracking of the core barrel flange is a concern for the weld rather than the base metal. Table 4-3 specifically identifies the welds as primary components to be inspected for cracking. While inspections of the welds would identify cracking in the adjacent base metal, separately adding cracking as an aging effect to the base metal as an existing component is not consistent with MRP-227-A or existing inspections.	Eliminate base metal cracking as an aging effect in this line.
28	A-9	25	Flaw evaluation methods include recommendations for flaw depth sizing and for crack growth determinations as well for performing applicable load limit. It should read "growth determinations as well as for performing."	Change to include missing "as."
29	A-49		In the first paragraph under Systems, Structures, and Components thermal shield assembly should be changed to thermal shield or neutron pad assembly to address the newer Westinghouse plants. Also, the component type neutron pad is not addressed in Table B2 or MRP-227.	Address recommended change.

30	Table B2		The environment "Reactor coolant and neutron flux" is used for all line items/components in Table B2, however not all the components listed in Table B2 will experience a neutron fluence exceeding 10^{17} n/cm ² (E>1MeV) at the end of the period of extended operation. The environment should be more specific based on the location (fluence) of the components.	The Table should note exceptions to the neutron fluence level.
31	Table 3.1-1 item 27		Component was changed to nickel alloy guide tube support pins, however associated Table B2 line items IV.B2.RP-355 and IV.B2.RP-356 were changed to include both nickel alloy and stainless steel.	Clarify.
32	A-49	last paragraph	Sentence "EPR MRP methodology left some..." should be changed.	Should read "EPRI MRP methodology left some..."
33	various		The following acronyms are used but not included in Appendix B of this ISG; CUF, NRC, SE, and USAR.	Update Appendix B to include all acronyms.
34	Appendix B		The page numbers for Appendix B are A-165 and A-166, the last page of Appendix A is A-144.	Verify correct pagination.
35	A-18	3.1.2.2.9 .A item 5	For re-inspection greater than 10 years, further evaluation is redundant and inconsistent with standard GALL AMR and AMP formatting and presentation. Inspection frequencies would be evaluated in AMP element 4 for consistency with MRP-227-A chapter 4 primary, expansion, and existing components inspection tables. If the inspection frequency is identified that is not consistent with MRP-227-A Chapter 4 tables, an exception must be identified and justified.	Delete further evaluation 3.1.2.2.9.A item 5. Item to be addressed by AMP element 4.
36	A-19	3.1.2.2.9 .A item 7	For VT-3 Inspection, further evaluation is redundant and inconsistent with standard GALL AMR and AMP formatting and presentation. VT-3 inspection requirements should be addressed as part of AMP element 3 for consistency with MRP-227-A requirements. Potential enhancements noted by the ISG further evaluation would be addressed by an AMP	Delete further evaluation 3.1.2.2.9.A item 7. Item to be addressed by AMP element 3.

			enhancement.	
37	A-21	3.1.2.2.9.B item 2	For Westinghouse Hold Down Springs, further evaluation is redundant and inconsistent with standard GALL AMR and AMP formatting and presentation. Definition of physical measurement techniques for Westinghouse hold down springs should be addressed as part of AMP element 3. Acceptance criteria for the hold down spring inspections would be addressed by AMP element 6.	Delete further evaluation 3.1.2.2.9.B item 2. Item to be addressed by AMP elements 3 and 6.
38	A-59	IV.B2.RP-297	For CASS CRGT Lower Flanges, the ISG revision to the stainless steel definition in GALL Section IX.C requires that CASS be specifically designated in an AMR line item when thermal and neutron embrittlement susceptibility are identified. MRP-227-A Table 3-3 identifies the material of construction for CRGT lower flanges as CF-8 and thermal and neutron embrittlement identified as considerations for primary component classification.	Identify CASS as an additional material in GALL IB.B2.RP-297
39	A-73	IV.B2.RP-268	It appears that the primary purpose for the Inaccessible Locations AMR line item is to provide a further evaluation of inaccessible locations in partially accessible components susceptible to cracking due to SCC and IASCC using further evaluation note 3 (SRP-LR Section 3.1.2.2.9A Part A). This further evaluation is redundant to the note 3 further evaluation required by other AMR lines.	Delete IV.B2.RP-268
40	A-73	IV.B2.RP-269	It appears that the primary purpose for the Inaccessible Locations AMR line item is to provide a further evaluation of inaccessible locations in partially accessible components susceptible to Loss of fracture toughness due to neutron and irradiation embrittlement using further evaluation note 3 (SRP-LR Section 3.1.2.2.9A Part A). This further evaluation is redundant to the note 3 further evaluation required by other AMR lines	Delete IV.B2.RP-269
41	A-74	IV.B2.RP	No additional measures (Cracking due to SCC and IASCC) in Section 3.3.1 of MRP-227-A defines the no additional	Change the aging effect column and AMP column for IV.B2.RP-265 to be consistent

		-265	measures category as: those PWR internals for which the effects of all eight aging mechanisms are below the screening criteria. Additional components were placed in the No Additional Measures group as a result of FMECA and the functionality assessment. No further action is required by the MRP-227-A for managing the aging of the No Additional Measures components. Simply put, there are no aging effects requiring aging management.	with other GALL AMR "none-none" line Items and move the lines to GALL Section IV.E, Common Miscellaneous Material Environment Combinations.
42	A-74	IV.B2.RP-267	No additional measures (Loss of fracture toughness due to neutron and irradiation embrittlement) in Section 3.3.1 of MRP-227-A defines the no additional measures category as: those PWR internals for which the effects of all eight aging mechanisms are below the screening criteria. Additional components were placed in the No Additional Measures group as a result of FMECA and the functionality assessment. No further action is required by the MRP-227-A for managing the aging of the No Additional Measures components. Simply put, there are no aging effects requiring aging management.	Change the aging effect column and AMP column for IV.B2.RP-267 to be consistent with other GALL AMR "none-none" line Items and move the lines to GALL Section IV.E, Common Miscellaneous Material Environment Combinations.
43	A-6		Clarification is needed relative to the relationship between the SRP-LR and the GALL documents.	
44	A-11	8	Wording awkward	Delete "that" at the beginning of line 8.
45	A-17		There is a concern that "monitoring and trending" program elements and "corrective action" program elements are buried in the Acceptance Criteria section.	
46	A-20,21		The statement "To satisfy the requirements of ASME Code Section III...." is confusing if not all plants are committed to Subsection NG.	The statement should be modified to include a qualifying statement like "if the plant is committed to Subsection NG."
47	A-25	D.1	The intended meaning of the word "appropriately" in D.1, second paragraph. Is not clear.	Clarify meaning.
48	A-142		Spell out variable name in 1.0 of "Further Evaluation Recommendations"	

49	A-5	<p>GALL Rev. 2 (page XI.M16A-2) and LR-ISG-2011-04 (draft, page A-5) state: The integrated program is implemented by the applicant through an inspection plan that is submitted to the NRC for review and approval with the application for license renewal.</p> <p>RIS 2011-07 (page 6) states: Applicants will be expected to submit an AMP for vessel internals that is consistent with MRP-227-A for NRC staff review and approval.</p> <p>Safety Evaluation Rev. 1 for MRP-227 (page 34) states: The submittal shall include the information identified in Section 3.5.1 of this SE.</p> <p>Section 3.5.1 of the Safety Evaluation (page 25) states: Applicants who submit applications for LR after the issuance of the SE shall, in accordance with NUREG-1801, Revision 2, submit the information provided in the following items for staff review and approval.</p> <ol style="list-style-type: none"> 1. An AMP for the facility that addresses the 10 program elements as defined in NUREG-1801, Revision 2, AMP XI.M16A. 2. To ensure the MRP-227 program and the plant-specific action items will be carried out by applicants/licenses, applicants/licensees are to submit an inspection plan which addresses the identified plant-specific action items for staff review and approval consistent with the licensing basis for the plant. If an applicant/licensee plans to implement an AMP which deviates from the recommendations of MRP-227, as approved by the NRC, the applicant/licensee shall identify where their program deviates from the recommendations of MRP-227, as approved by the NRC, and shall provide a justification for any deviation which includes a consideration of how the deviation affects both "Primary" and "Expansion" inspection category components. 	<p>Revise Section 3.5.1 as follows:</p> <p>Applicants who submit applications for LR after the issuance of the SE shall, in accordance with NUREG-1801, Revision 2, have available the information provided in the following items (1) through (5) for staff audit and inspection.</p> <ol style="list-style-type: none"> 1. An AMP for the facility that addresses the 10 program elements as defined in NUREG-1801, Revision 2, AMP XI.M16A. 2. To ensure the MRP-227 program and the plant-specific action items will be carried out by applicants/licenses, applicants/licensees are to provide an inspection plan which addresses the identified plant-specific action items consistent with the licensing basis for the plant. If an applicant/licensee plans to implement an AMP which deviates from the recommendations of MRP-227, as approved by the NRC, the applicant/licensee shall identify where their program deviates from the recommendations of MRP-227, as approved by the NRC, and shall provide a justification for any deviation which includes a consideration of how the deviation affects both "Primary" and "Expansion" inspection category components.
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			<p>It is unclear what actually goes into the LRA and the format. The above verbiage implies that the AMP and inspection plan are separate documents that are submitted with the application but are reviewed and approved by the NRC as unique documents. A quick search of the GALL indicates that PWR Vessel Internals is the only program that requires the AMP and an inspection plan to be submitted for NRC review and approval.</p>	
50	A-6		<p>GALL Rev 2 (page XI M16A-3) states: The responses to the LR A/LAIs on MRP-227 are provided in Appendix C of the LRA.</p> <p>LR-ISG-2011-04 (page A-6) deleted this requirement, however LR-ISG-2011-04 (page A-14, 15) states: Applicants applying for license renewal for their PWR facilities are requested to provide their specific responses to the A/LAIs on the MRP-227-A methodology in Appendix C of their LRAs, and to address the information requested in the LRA sections that respond to the specific SRP-LR further evaluation "acceptance criteria" that are based on these A/LAIs. It is unclear where the licensee action items should be addressed. Wording implies that the applicant /licensee action items should be addressed in Appendix C and in the associated further evaluation section.</p>	<p>Revise LR-ISG-2011-04 (page A-6) as follows: Applicants applying for license renewal for their PWR facilities are requested to provide their specific responses to the A/LAIs on the MRP-227-A methodology in Appendix C of their LRAs, or address the information requested in the LRA sections that respond to the specific SRP-LR further evaluation "acceptance criteria" that are based on these A/LAIs.</p>
51			<p>XI.M16A, PWR Vessel Internals elements 1. Scope of Program, 5. Monitoring and Trending, and 6. Acceptance Criteria refer to the latest NRC approved version of WCAP-17096-NP and the associated applicant/licensee action items. It is our understanding that WCAP-17096-NP has been submitted for approval however it has not been approved at this time. A program cannot be developed based on an unapproved document or unknown A/LAIs.</p>	<p>Remove any reference to WCAP-17096-NP or delay issuance of LR-ISG-2011-04 until WCAP-17096-NP is approved by the NRC.</p>
52			<p>Many of the A/LAIs specified in the Acceptance Criteria section of LR-ISG-2011-04 request that the applicant make enhancements or augmented enhancements to various</p>	<p>Revise A/LAIs to clearly state that additional justification/information is only required to be included in the "further</p>

			program elements as a result of the responses to the "further evaluations". It would be simpler if the NRC specified an acceptable method of addressing an issue in the XI.M16A program elements and then if the licensee/applicant wanted to do something different take an exception rather than requiring each licensee/applicant to develop a unique set of enhancements for their program	evaluation" responses if the applicant/licensee is deviating from the requirements of MRP-227-A.
53			A simplified method of addressing reactor internals in the GALL tables B.2, B.3, and B.4 would be to have line items based on component classification (Primary, Expansion, Existing, and No Additional Measures) as defined in MRP-227-A rather than individual component types (Alignment and Interfacing components: internals hold down spring, Alignment and interfacing components: upper core plate alignment pins, etc). Making this change would allow multiple line items to apply to several component types and reduce the number of Table 2 line items simplifying this section.	Revise NUREG-1801 tables B.2, B.3, and B.4 to have line items associated with component classification (Primary, Expansion, Existing Program, and No Additional Measures) and refer to MRP-227-A for the specific components in the four classification groups.
54			Several of the applicant/licensee action items (A/LAI) identified in the Safety Evaluation for MRP-227 (pages 32 – 34) required plant-specified evaluations or analyses to be submitted as part of the application. A/LAI Number 5 requires the applicant/licensee include its proposed acceptance criteria and an explanation of how the proposed acceptance criteria are consistent with the plants' licensing basis and the need to maintain the functionality of the component being inspected under all licensing basis conditions of operation during the period of extended operation as part of their submittal to apply the approved version of MRP-227. A/LAI Number 7 requires a plant-specific analysis to be performed on Westinghouse lower support column bodies made of CASS be included as part of their submittal to apply the approved version of MRP-227.	Revise A/LAI Numbers 5 and 7 to allow for the applicants/licensees to commit to perform an analysis prior to the period of extended operation. This would allow applicants/licensees that are submitting in the near future (2013 timeframe) to perform the analyses on normal schedule rather than an expedited schedule.
55	A-17		In the last paragraph it states: For those component inspections that do not achieve the inspection coverage criteria stated in the NRC SE (Rev. 1) on MRP-227, the	These actions should be included as program elements, not in the further

			<p>applicant is requested to identify a deviation from the MRP-defined inspection criteria and describe the process and type of evaluation that will be implemented to evaluate the impact of the aging effects on the integrity of those components in the population that were inaccessible to the inspection technique, and to identify this process as an applicable enhancement of the "monitoring and trending" program element of its RVI Program.</p> <p>The SRP is specifying actions for applicants to perform as part of an aging management program which is more appropriately addressed within program requirements.</p>	evaluation sections of the SRP.
56	A-19 to A-20	Further Evaluation A.9	<p>In the third paragraph the further evaluation states: "To satisfy the requirements of the ASME Code, Section III, Subsection NG-2160 and NG-3121, the existing fatigue CUF analysis shall include the effects of the reactor coolant water environment."</p> <p>The December 26, 1999, Generic Safety Issue (GSI) 190 close-out memorandum from Ashok C. Thadani, Director of the Office of Regulatory Research, to William D. Travers, Executive Director for Operations, provides the basis for consideration of the effects of the reactor coolant water environment. . It should be noted that GSI-190 concerns are limited to pipe leakage, which is not applicable to RVI components since they do not form a portion of the reactor coolant pressure boundary and are therefore not subject to leakage.</p>	Delete the referenced sentence in the third paragraph of Further Evaluation A.9.