



NUREG-1950

**Disposition of Public Comments and  
Technical Bases for Changes in the  
License Renewal Guidance Documents  
NUREG-1801 and NUREG-1800**



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# **Disposition of Public Comments and Technical Bases for Changes in the License Renewal Guidance Documents NUREG-1801 and NUREG-1800**

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## ABSTRACT

This document is a knowledge management and knowledge transfer document associated with Revision 2 of NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," and Revision 2 to NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants." This document updates and combines NUREG-1832, "Analysis of Public Comments on the Revised License Renewal Guidance Documents," and NUREG-1833, "Technical Bases for Revision to the License Renewal Guidance Documents," (both published in 2005) into a single document. The NRC has decided to combine these two documents because their subject matter is so closely related that there was considerable redundancy when they were two separate documents.

This document fulfills two purposes. Firstly, the technical changes that were made when revising the guidance contained in NUREG-1801 are captured in this document, along with the technical basis for the changes. Changes to NUREG-1800, many of which derive from the changes to NUREG-1801, are also discussed in this document. Consequently, this document provides the underlying rationale that the NRC used to develop the current revisions to these guidance documents.

Secondly, this document contains the NRC staff's analysis of the public comments received on the Revision 2 drafts of NUREG-1801 and NUREG-1800. Public comment drafts of the GALL Report and the Standard Review Plan for License Renewal (SRP-LR) were published on May 14, 2010, with the public comment period expiring on July 2, 2010. The disposition of comments that were accepted by the NRC staff and used as the basis for instituting a change to either the GALL Report or the SRP-LR are detailed in this document. In addition, the public comments that did not result in a change to either NUREG are also dispositioned, and a technical basis for the staff's disagreement with these comments is presented.



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## EXECUTIVE SUMMARY

### Public Comment Overview

On May 18, 2010 (75 FR 27838), the Nuclear Regulatory Commission (NRC) announced the issuance and availability of the following license renewal guidance documents (LRGDs) for public comment:

- Draft “Standard Review Plan for Review of License Renewal [SRP-LR] Applications for Nuclear Power Plants” (NUREG-1800), Revision 2
- Draft “Generic Aging Lessons Learned (GALL) Report” (NUREG-1801), Revision 2

These LRGDs described methods acceptable to the staff for implementing the license renewal rule, Title 10 of the Federal Code of Regulations (CFR)(10 CFR Part 54), as well as techniques used by the staff in evaluating applications for nuclear power plant (NPP) license renewals. The draft revisions incorporated changes that reflected past precedents and other lessons learned since Revision 1 of the LRGDs, published in 2005.

In addition to issuing the draft revisions of these LRGDs for formal public comment, the staff held several public meetings with stakeholders to discuss the content of the draft LRGDs and subsequent comments on these draft documents.

The staff took into consideration the comments received as a result of the formal solicitation described above and incorporated its dispositions into the December 2010 versions of the LRGDs. This report, NUREG-1950, provides the evaluation and disposition of public comments received by the NRC on the draft revisions of the LRGDs.

### Technical Bases Overview

This report, NUREG-1950, provides a summary of changes and a synopsis of the bases for these changes made as part of Revision 2 to the SRP-LR, and Revision 2 to the GALL Report. These changes include those that were initiated by NRC staff as well as the changes made in response to public comments, as appropriate. This document provides the underlying rationale that the NRC used in developing the Revision 2 LRGDs. Furthermore, Appendix A of this document includes a one-to-one correlation between the Aging Management Review (AMR) line-items in GALL Rev. 0, Rev.1, and Rev. 2 for easy cross-reference.

## IV ANALYSIS AND DISPOSITION OF PUBLIC COMMENTS ON MAY 2010 PUBLIC COMMENT DRAFT, REVISION 2

### IV.1 Public Comment Solicitation and Management

The NRC issued a public comment draft of NUREG-1800 and -1801, Rev. 2 on April 1, 2010. The Federal Register Notice (FR Vol. 75, No. 95 page 27838 - 27840), published on May 18, 2010, began a 45-day public comment period. In addition, the NRC conducted a public workshop from May 26-28, 2010 at its Rockville, MD headquarters to initiate a dialogue with the public and to introduce them to some of the major changes between Revisions 1 and 2 of the guidance documents. The purpose of the workshop was to provide:

- an opportunity for the staff to inform the public about the draft GALL and SRP-LR NUREGs
- an opportunity for an exchange of information about the draft NUREGs
- an opportunity for stakeholders to ask questions about the draft NUREGs
- a forum for stakeholders to provide informal feedback on the drafts

The staff was particularly interested in comments that addressed the safety review, effectiveness, and efficiency of the license renewal process. Formal comments on the draft NUREGs were to be provided through means identified in the Federal Register Notice (e.g., written letter, e-mail, fax, and web forms) and were not accepted during the workshop. The workshop was not intended as a forum to resolve comments on the draft NUREGs. The staff anticipated that some topics would not be discussed fully due to time limitations. The staff also conducted focused public meetings following the close of the comment period for in-depth technical discussions of some AMPs, particularly XI.M41.

The staff previously made available to the public a draft preliminary version of portions of the guidance documents on December 19, 2009. These preliminary drafts were also discussed at a public meeting held from January 4-6, 2010 at NRC headquarters. All public comments were put into a public comments database developed specifically for the purpose of managing and dispositioning public comments. The database allowed the input of the comments, identification of the commenter and their affiliation, acceptance or rejection of comment's recommended actions, and the technical basis of each decision. Each comment in the database received a unique comment number related to the document and chapter/subchapter or AMR Item to which it applied. This unique number can be used to identify and track comments, their disposition, and the resulting changes throughout this guidance document in the appropriate tables.

Table IV-1 presents a list of commenters, their affiliation, their reference number, and the ADAMS Accession Number for each comment. The first column contains a comment number that allows each comment to be cross-referenced in various tables throughout this document.

Over 500 public comments were received on the SRP-LR and GALL Report.

Any changes to the LRGDs that have a technical basis that states that the change is editorial in nature, simple clarification, or the correction of typographical errors does not constitute a notable technical change and will not be captured in the Tables of Section II or III in this document. For a number of public comments, the NRC staff took the liberty to clarify and/or paraphrase the comment. Those comments are denoted with a "[...]" around the text which the staff clarified and/or paraphrased.

#### IV.2 Disposition of Public Comments on the May 2010 Draft GALL Report, Rev. 2

All of the public comments on the May 2010 Public Comment Draft, GALL Report, Rev. 2 that were received as a result of the public comment period are presented in Table IV-2 through Table IV-15 below. The comments are divided by GALL Report chapter; Chapter XI is subdivided into mechanical, structural, and electrical AMP comments. Each comment has a unique comment number. The comment, along with any rationale or justification provided by the commenter, is summarized. The disposition of each comment is provided, particularly whether the comment was accepted by NRC staff and resulted in a change to the GALL Report, Rev. 1, or whether the comment was rejected and did not cause any changes to the GALL Report. Finally, the technical basis for each comment disposition is provided, explaining either why the comment was rejected, or why the changes prompted by the comments were implemented.

The summary of the comments for each GALL chapter, their dispositions, and the technical basis for the dispositions are presented in Table IV-2 through Table IV-15.

#### IV.3 Disposition of Public Comments on the May 2010 Draft SRP-LR, Rev. 2

All of the public comments on the May 2010 Public Comment Draft SRP-LR, Rev. 2 that were received as a result of the public comment period are presented in Table IV-16 through Table IV-20 below. Each comment has a unique comment number and references the comment number provided by the commenter. The comment, along with any rationale or justification provided by the commenter, is summarized. The disposition of each comment is provided, particularly whether the comment was accepted by NRC staff and resulted in a change to the SRP-LR, Rev. 1, or whether the comment was rejected and did not cause any changes to the SRP-LR. Finally, the technical basis for each comment disposition is provided, explaining either why the comment was rejected or why the changes were implemented.

The summary of the comments for each SRP-LR chapter, their dispositions, and the technical basis for the dispositions are presented in Table IV-16 through Table IV-20.

Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
<b>Boyd Taylor, Pacific Northwest National Laboratory (PNNL) 6/8/10</b>		
1	132	ML101610407
<b>Omesh Chopra 6/10/2010</b>		
1 (SRP)	130	ML101660084
2 (SRP)	131	ML101660084
<b>Nuclear Energy Institute 6/30/2010</b>		
X.M1-1	133	ML101830328
X.M1-2	134	ML101830328
X.M1-3	135	ML101830328
X.M1-4	136	ML101830328
X.M1-5	137	ML101830328
X.M1-6	138	ML101830328
X.M1-7	139	ML101830328
X.M1-8	140	ML101830328
X.M1-9	895	ML101830328
X.M1-10	142	ML101830328
X.M1-11	143	ML101830328
XI.M2-1	896	ML101830328
XI.M2-2	897	ML101830328
XI.M2-3	1037	ML101830328
XI.M3-1	1036	ML101830328
XI.M4-1	149	ML101830328
XI.M6-1	150	ML101830328
XI.M6-2	151	ML101830328
XI.M6-3	152	ML101830328
XI.M7-1	153	ML101830328
XI.M7-2	154	ML101830328
XI.M9-1	155	ML101830328
XI.M9-2	156	ML101830328
XI.M9-3	157	ML101830328
XI.M9-4	777	ML101830328

Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M9-5	778	ML101830328
XI.M9-6	779	ML101830328
XI.M9-7	780	ML101830328
XI.M11B-1	158	ML101830328
XI.M11B-2	159	ML101830328
XI.M11B-3	160	ML101830328
XI.M11B-4	161	ML101830328
XI.M12-1	162	ML101830328
XI.M12-2	163	ML101830328
XI.M12-3	164	ML101830328
XI.M16A-1	165	ML101830328
XI.M16A-2	166	ML101830328
XI.M16A-3	167	ML101830328
XI.M17-1	168	ML101830328
XI.M17-2	169	ML101830328
XI.M18-1	170	ML101830328
XI.M18-2	171	ML101830328
XI.M18-3	172	ML101830328
XI.M18-4	173	ML101830328
XI.M18-5	174	ML101830328
XI.M18-6	175	ML101830328
XI.M19-1	1038	ML101830328
XI.M19-2	1039	ML101830328
XI.M22-1	1035	ML101830328
XI.M24-1	179	ML101830328
XI.M24-2	180	ML101830328
XI.M24-3	181	ML101830328
XI.M26-1	182	ML101830328
XI.M26-2	183	ML101830328
XI.M26-3	184	ML101830328
XI.M26-4	185	ML101830328
XI.M30-1	186	ML101830328
XI.M30-2	187	ML101830328

Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M30-3	188	ML101830328
XI.M31-1	189	ML101830328
XI.M32-1	190	ML101830328
XI.M35-1	191	ML101830328
XI.M35-2	192	ML101830328
XI.M35-3	193	ML101830328
XI.M35-4	194	ML101830328
XI.M36-1	971	ML101830328
XI.M36-2	972	ML101830328
XI.M36-4	197	ML101830328
XI.M38-1	198	ML101830328
XI.M39-1	898	ML101830328
XI.M40-1	200	ML101830328
XI.M40-2	201	ML101830328
XI.M40-3	202	ML101830328
XI.S1-1	899	ML101830328
XI.S1-2	900	ML101830328
XI.S1-3	901	ML101830328
XI.S1-4	902	ML101830328
XI.S1-5	903	ML101830328
XI.S1-6	208	ML101830328
XI.S3-1	904	ML101830328
XI.S3-2	210	ML101830328
XI.S3-3	906	ML101830328
XI.S5-1	907	ML101830328
XI.S6-1	908	ML101830328
XI.S6-2	214	ML101830328
XI.S6-3	909	ML101830328
XI.S7-1	910	ML101830328
XI.S7-2	911	ML101830328
XI.S7-3	912	ML101830328
XI.S8-1	913	ML101830328
1	298	ML101830328



Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
2	299	ML101830328
3	301	ML101830328
4	306	ML101830328
5	311	ML101830328
6	313	ML101830328
7	316	ML101830328
8	318	ML101830328
10	319	ML101830328
11	321	ML101830328
12	326	ML101830328
13	338	ML101830328
14	350	ML101830328
15	351	ML101830328
16	353	ML101830328
17	356	ML101830328
18 (SRP)	358	ML101830328
19 (SRP)	360	ML101830328
20 (SRP)	361	ML101830328
21 (SRP)	362	ML101830328
22 (SRP)	363	ML101830328
23 (SRP)	364	ML101830328
24 (SRP)	365	ML101830328
25 (SRP)	366	ML101830328
4.2.2.1.1.2 (SRP)	511	ML101830328
4.2.2.1.4.1 (SRP)	512	ML101830328
4.2.3.1.1 (SRP)	513	ML101830328
4.2.3.1.1.2 (SRP)	514	ML101830328
4.2.3.1.3 (SRP)	515	ML101830328
4.2.3.1.3.1 (SRP)	516	ML101830328
4.3.2 (SRP)	517	ML101830328
4.3.1 (SRP)	518	ML101830328
4.3.2.1.1.3 (SRP)	519	ML101830328
4.3.2.1.3 (SRP)	520	ML101830328

Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
4.3.2.1.4 (SRP)	521	ML101830328
4.3.2.1.5.3 (SRP)	522	ML101830328
4.3.3.1.1.2 (SRP)	523	ML101830328
<b><i>Nuclear Energy Institute 6/30/2010</i></b>		
VI.A-1	256	ML101830328
VI.A-2	257	ML101830328
VI.A-3	258	ML101830328
XI.E1-1	259	ML101830328
XI.E1-2	260	ML101830328
XI.E1-3	261	ML101830328
XI.E1-4	262	ML101830328
XI.E1-5	263	ML101830328
XI.E1-6	264	ML101830328
XI.E2-1	265	ML101830328
XI.E3-1	266	ML101830328
XI.E3-4	267	ML101830328
XI.E3-5	268	ML101830328
XI.E3-6	269	ML101830328
XI.E3-7	270	ML101830328
XI.E3-8	277	ML101830328
XI.E3-9	278	ML101830328
XI.E3-10	279	ML101830328
XI.E3-13	281	ML101830328
XI.E3-14	282	ML101830328
XI.E4-1	283	ML101830328
XI.E4-2	284	ML101830328
XI.E4-3	285	ML101830328
XI.E4-4	286	ML101830328
XI.E4-5	287	ML101830328
XI.E4-6	288	ML101830328
XI.E4-7	289	ML101830328
XI.E5-1	290	ML101830328

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.E5-2	291	ML101830328
XI.E5-3	292	ML101830328
XI.E5-4	293	ML101830328
XI.E6-1	294	ML101830328
XI.E6-2	295	ML101830328
XI.E6-3	296	ML101830328
XI.E6-4	297	ML101830328
SRP 2.1.3-1	241	ML101830328
SRP 2.1.3-2	242	ML101830328
SRP 2.5-1	243	ML101830328
SRP 2.5-2	244	ML101830328
SRP 2.5-3	245	ML101830328
SRP 2.5-4	246	ML101830328
SRP 3.0-1	247	ML101830328
SRP 3.0-2	248	ML101830328
SRP 3.0-3	249	ML101830328
SRP 3.0-4	250	ML101830328
SRP 3.0-5	251	ML101830328
SRP 3.0-14	252	ML101830328
SRP 3.0-16	253	ML101830328
SRP 3.6-1	254	ML101830328
SRP 3.6-2	255	ML101830328
<b><i>Electric Power Research Institute BWRVIP 6/29/2010</i></b>		
1	916	ML101830255
2	917	ML101830255
3	918	ML101830255
XI.M2-1	920	ML101830255
XI.M2-2	921	ML101830255
XI.M2-3	922	ML101830255
XI.M2-4	923	ML101830255
XI.M4-1	374	ML101830255

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M4-2	375	ML101830255
XI.M4-3	376	ML101830255
XI.M6-1	377	ML101830255
XI.M7-1	378	ML101830255
XI.M7-2	379	ML101830255
XI.M8-1	380	ML101830255
XI.M8-2	381	ML101830255
XI.M8-3	382	ML101830255
XI.M8-4	383	ML101830255
XI.M9-1	384	ML101830255
XI.M9-2	385	ML101830255
XI.M9-3	386	ML101830255
XI.M9-4	387	ML101830255
XI.M9-5A	388	ML101830255
XI.M9-5B	1019	ML101830255
XI.M9-7B	1020	ML101830255
XI.M9-6	389	ML101830255
XI.M9-7A	390	ML101830255
XI.M9-8	391	ML101830255
XI.M9-9	392	ML101830255
XI.M9-10	393	ML101830255
XI.M9-11	394	ML101830255
XI.M9-12	395	ML101830255
XI.M9-13	396	ML101830255
XI.M9-14	397	ML101830255
XI.M9-15	398	ML101830255
XI.M9-16	399	ML101830255
XI.M9-17	400	ML101830255
XI.M9-18A	401	ML101830255
XI.M9-18B	1021	ML101830255
XI.M9-19A	402	ML101830255
XI.M9-19B	1022	ML101830255
XI.M9-19C	1023	ML101830255

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M9-20	403	ML101830255
<b><i>Pilgrim Watch 7/1/2010</i></b>		
XI.M41-PW1	405	ML101880267
XI.M41-PW2	410	ML101880267
XI.M41-PW3	411	ML101880267
XI.M41-PW4	504	ML101880267
XI.M41-PW5	929	ML101880267
XI.M41-PW6	930	ML101880267
XI.M41-PW7	931	ML101880267
XI.M41-PW8	932	ML101880267
XI.M41-PW9	933	ML101880267
XI.M41-PW10	934	ML101880267
XI.M41-PW11	935	ML101880267
XI.M41-PW12	936	ML101880267
XI.M41-PW13	937	ML101880267
XI.M41-PW14	938	ML101880267
XI.M41-PW15	939	ML101880267
XI.M41-PW16	940	ML101880267
XI.M41-PW17	941	ML101880267
XI.M41-PW18	942	ML101880267
<b><i>Supplemental Pilgrim Watch 7/1/2010</i></b>		
P1 (Ray Shadis, New England Coalition)	1112	ML102420742
P2 (John H Fitzgerald, III)	1119	ML102420742
PW1 (John H Fitzgerald, III)	1123	ML102420742
P3 (John H Fitzgerald, III)	1125	ML102420742
PW4 (John H Fitzgerald, III)	1128	ML102420742
PW5 (John H Fitzgerald, III)	1126	ML102420742
PW5(2) (John H Fitzgerald, III)	1129	ML102420742
PW6 (John H Fitzgerald, III)	1143	ML102420742
P7 (John H Fitzgerald, III)	1146	ML102420742

<b>Nuclear Energy Institute 7/1/2010</b>		
1	943	ML101880269
2	944	ML101880269
3	863	ML101880269
4	864	ML101880269
5	945	ML101880269
6	866	ML101880269
7	867	ML101880269
8	868	ML101880269
9	869	ML101880269
10	870	ML101880269
11	871	ML101880269
12	872	ML101880269
13	873	ML101880269
14	874	ML101880269
15	876	ML101880269
16	877	ML101880269
17	946	ML101880269
18	879	ML101880269
19	880	ML101880269
20	947	ML101880269
21	881	ML101880269
22	882	ML101880269
23	883	ML101880269
24	884	ML101880269
25	885	ML101880269
26	886	ML101880269
27	887	ML101880269
28	888	ML101880269
29	948	ML101880269
30	949	ML101880269
31	950	ML101880269
32	951	ML101880269
33	952	ML101880269
34	953	ML101880269

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
35	954	ML101880269
36	955	ML101880269
37	956	ML101880269
38	957	ML101880269
Comment 39 (SRP)	837	ML101880269
Comment 40 (SRP)	958	ML101880269
Comment 41 (SRP)	959	ML101880269
Comment 42 (SRP)	960	ML101880269
Comment 43 (SRP)	961	ML101880269
Comment 44 (SRP)	962	ML101880269
Comment 45 (SRP)	963	ML101880269
Comment 46 (SRP)	964	ML101880269
Comment 47 (SRP)	965	ML101880269
VII.K-x	434	ML101880269
VII.C1-x	505	ML101880269
VII.C1-x	430	ML101880269
VII.C2-x, VII.H2-x	437	ML101880269
VII.C1-x	438	ML101880269
V.E-x, VII.I-x, VIII.H-x	439	ML101880269
VII.C2-x, VII.H2-x, VIII.E-x	442	ML101880269
VII.C1-x	445	ML101880269
VII.C2-x	446	ML101880269
IV.E-x, V.F-x, VII.J-x, VIII.I-x	447	ML101880269
V.E-x, VII.I-x, VIII.H-x	451	ML101880269
V.E-x, VII.I-x, VIII.H-x	454	ML101880269
V.E-x, VII.I-x	457	ML101880269
VII.C1-x, VII.F2-x, VIII.G-x	459	ML101880269
III.B2-x	462	ML101880269
VII.J-x	463	ML101880269
VII.E5	506	ML101880269
IX.D	507	ML101880269

***Nuclear Energy Institute 6/7/2010 (Comments on May 2010 draft XI.M41)***

Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-1	889	ML101610406
XI.M41-2	890	ML101610406
XI.M41-3	106	ML101610406
XI.M41-4	891	ML101610406
XI.M41-5	892	ML101610406
XI.M41-6	893	ML101610406
XI.M41-7	894	ML101610406
XI.M41-8	111	ML101610406
XI.M41-9	112	ML101610406
XI.M41-10	113	ML101610406
XI.M41-11	114	ML101610406
XI.M41-12	115	ML101610406
XI.M41-13	116	ML101610406
XI.M41-14	117	ML101610406
XI.M41-15	118	ML101610406
XI.M41-16	119	ML101610406
XI.M41-17	120	ML101610406
XI.M41-18	121	ML101610406
XI.M41-19	122	ML101610406
XI.M41-20	123	ML101610406
<b><i>Nuclear Energy Institute 7/1/2010 (comments on June 18, 2010 XI.M41 draft)</i></b>		
XI.M41-1	508	ML101880269
XI.M41-2	509	ML101880269
XI.M41-3	966	ML101880269
XI.M41-4	967	ML101880269
XI.M41-5	968	ML101880269
XI.M41-6	969	ML101880269
XI.M41-7	1191	ML101880269
XI.M41-8	1192	ML101880269
XI.M41-9	1193	ML101880269
XI.M41-10	475	ML101880269
XI.M41-11	1194	ML101880269



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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-12	1195	ML101880269
XI.M41-13	478	ML101880269
XI.M41-14	1196	ML101880269
XI.M41-15	1197	ML101880269
XI.M41-16	1198	ML101880269
XI.M41-17	1199	ML101880269
XI.M41-18	1200	ML101880269
XI.M41-19	970	ML101880269
XI.M41-20	1201	ML101880269
XI.M41-21	1202	ML101880269
XI.M41-22	487	ML101880269
XI.M41-23	488	ML101880269
XI.M41-24	489	ML101880269
XI.M41-25	490	ML101880269
XI.M41-26	491	ML101880269
<b><i>Nuclear Energy Institute 8/30/2010 (supplemental comments on Aug 2010 XI.M41 draft ML102320585)</i></b>		
XI.M41-3 (sup)	1154	ML102420732
XI.M41-23 (sup)	1085	ML102420732
XI.M41-28 (sup)	1087	ML102420732
<b><i>Electric Power Research Institute PWR Internals 7/1/2010</i></b>		
1	973	ML101880266
2	974	ML101880266
3	975	ML101880266
4	976	ML101880266
5	977	ML101880266
6	978	ML101880266
7	979	ML101880266
8	980	ML101880266
9	981	ML101880266
10	982	ML101880266
11	983	ML101880266

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
12	984	ML101880266
13	985	ML101880266
14	986	ML101880266
15	987	ML101880266
16	988	ML101880266
17	989	ML101880266
18	990	ML101880266
19	991	ML101880266
20	992	ML101880266
21	993	ML101880266
22	994	ML101880266
23	995	ML101880266
24	996	ML101880266
25	997	ML101880266
26	998	ML101880266
27	999	ML101880266
28	1000	ML101880266
29	1001	ML101880266
30	1002	ML101880266
31	1003	ML101880266
32	1004	ML101880266
33	1005	ML101880266
34	1006	ML101880266
35	1007	ML101880266
36	1008	ML101880266
37	1009	ML101880266
38	1010	ML101880266
39	1011	ML101880266
40	1012	ML101880266
41	1013	ML101880266
42	1014	ML101880266
43	1015	ML101880266
44	1016	ML101880266

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
<b><i>PWR Owners Group</i></b>		
XI.M31	492	ML101890552
XI.M31-3	493	ML101890552
XI.M31-4	494	ML101890552
XI.M31-5	495	ML101890552
XI.M31-7	496	ML101890552
XI.M31-10	497	ML101890552
XI.M31-REF	498	ML101890552
<b><i>Yogen Garud 6/30/2010</i></b>		
1	524	ML101880265
2	525	ML101880265
3	526	ML101880265
4	527	ML101880265
<b><i>Paul Blanch 8/24/2010</i></b>		
XI.M41-1(a)	1152	ML102371265
XI.M41-1(b)	1232	ML102371265
XI.M41-1(c)	1203	ML102371265
XI.M41-1(d)	1204	ML102371265
XI.M41-1(e)	1205	ML102371265
XI.M41-1(f)	1206	ML102371265
XI.M41-2(a)	1153	ML102371265
XI.M41-2(b)	1207	ML102371265
XI.M41-2(c)	1208	ML102371265
XI.M41-2(d)	1209	ML102371265
XI.M41-3(a)	1231	ML102371265
XI.M41-3(b)	1210	ML102371265
XI.M41-3(c)	1211	ML102371265
XI.M41-3(d)	1212	ML102371265
XI.M41-3(e)	1213	ML102371265
XI.M41-3(f)	1214	ML102371265
XI.M41-4(a)	1156	ML102371265

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-4(b)	1215	ML102371265
XI.M41-4(c)	1216	ML102371265
XI.M41-5(a)	1159	ML102371265
XI.M41-5(b)	1217	ML102371265
XI.M41-5(c)	1218	ML102371265
XI.M41-6(a)	1161	ML102371265
XI.M41-6(b)	1219	ML102371265
XI.M41-6(c)	1220	ML102371265
XI.M41-7(a)	1221	ML102371265
XI.M41-7(b)	1163	ML102371265
XI.M41-8(a)	1222	ML102371265
XI.M41-8(b)	1164	ML102371265
XI.M41-8(c)	1223	ML102371265
XI.M41-9(a)	1165	ML102371265
XI.M41-9(b)	1229	ML102371265
XI.M41-10	1166	ML102371265
XI.M41-11	1167	ML102371265
XI.M41-12	1168	ML102371265
XI.M41-13	1169	ML102371265
XI.M41-14	1170	ML102371265
XI.M41-15	1171	ML102371265
XI.M41-16(a)	1172	ML102371265
XI.M41-16(b)	1224	ML102371265
XI.M41-17	1173	ML102371265
XI.M41-18	1174	ML102371265
XI.M41-19(a)	1175	ML102371265
XI.M41-19(b)	1225	ML102371265
XI.M41-20(a)	1176	ML102371265
XI.M41-20(b)	1226	ML102371265
XI.M41-21(a)	1177	ML102371265
XI.M41-21(b)	1227	ML102371265
XI.M41-22	1178	ML102371265
XI.M41-23	1179	ML102371265

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-24	1180	ML102371265
<b><i>Paul Blanch 8/30/2010</i></b>		
Comment 1	1181	ML102420706
Comment 2	1182	ML102420706
Comment 3	1183	ML102420706
Comment 4	1184	ML102420706
Comment 5	1185	ML102420706
Comment 6	1186	ML102420706
Comment 7	1187	ML102420706
Comment 8	1188	ML102420706
<b><i>Nuclear Energy Institute – Preliminary 8/6/2010</i></b>		
Comment 1	1092	ML102180192
Comment 2	1095	ML102180192
Comment 3	1097	ML102180192
Comment 4	1099	ML102180192
Comment 5	1101	ML102180192
<b><i>Structural Integrity Associates 8/20/10</i></b>		
Comment 1	1155	ML102350027
Comment 2	1157	ML102350027
Comment 3	1158	ML102350027
Comment 4	1160	ML102350027
Comment 5	1162	ML102350027
<b><i>Pilgrim Watch 8/24/10</i></b>		
XI.M41-PW1	1079	ML102371274
XI.M41-PW2	1080	ML102371274
XI.M41-PW3	1081	ML102371274
XI.M41-PW4	1083	ML102371274
XI.M41-PW5	1084	ML102371274
XI.M41-PW6	1086	ML102371274
XI.M41-PW7	1088	ML102371274

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-PW8	1089	ML102371274
XI.M41-PW8(2)	1090	ML102371274
XI.M41-PW9	1091	ML102371274
XI.M41-PW10	1093	ML102371274
XI.M41-PW11	1094	ML102371274
XI.M41-PW12	1096	ML102371274
XI.M41-PW13	1098	ML102371274
XI.M41-PW14	1100	ML102371274
XI.M41-PW15	1102	ML102371274
XI.M41-PW16	1103	ML102371274
XI.M41-PW17	1105	ML102371274
XI.M41-PW18	1106	ML102371274
XI.M41-PW19	1107	ML102371274
XI.M41-PW20	1108	ML102371274
XI.M41-PW21	1109	ML102371274
XI.M41-PW22	1110	ML102371274
XI.M41-PW23	1111	ML102371274
XI.M41-PW24	1113	ML102371274
XI.M41-PW25	1134	ML102371274
XI.M41-PW26	1115	ML102371274
XI.M41-PW27	1116	ML102371274
XI.M41-PW28	1117	ML102371274
XI.M41-PW29	1118	ML102371274
XI.M41-PW30	1120	ML102371274
XI.M41-PW31	1121	ML102371274
XI.M41-PW32	1122	ML102371274
XI.M41-PW33	1124	ML102371274
XI.M41-PW34	1190	ML102371274
XI.M41-PW35	1127	ML102371274
XI.M41-PW36	1130	ML102371274
XI.M41-PW37	1131	ML102371274
XI.M41-PW38	1132	ML102371274
XI.M41-PW39	1133	ML102371274

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Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-PW40	1114	ML102371274
XI.M41-PW41	1135	ML102371274
XI.M41-PW42	1136	ML102371274
XI.M41-PW43	1137	ML102371274
XI.M41-PW44	1138	ML102371274
XI.M41-PW45	1139	ML102371274
XI.M41-PW46	1140	ML102371274
XI.M41-PW47	1141	ML102371274
XI.M41-PW48	1142	ML102371274
XI.M41-PW49	1144	ML102371274
XI.M41-PW50	1145	ML102371274
XI.M41-PW51	1147	ML102371274
XI.M41-PW52	1148	ML102371274
XI.M41-PW53	1149	ML102371274
XI.M41-PW54	1150	ML102371274
XI.M41-PW55	1151	ML102371274
<b><i>Nuclear Energy Institute 8/20/10</i></b>		
XI.M41-1	1051	ML102320585
XI.M41-2	1053	ML102320585
XI.M41-3	1054	ML102320585
XI.M41-4	1055	ML102320585
XI.M41-5	1056	ML102320585
XI.M41-6	1057	ML102320585
XI.M41-7	1058	ML102320585
XI.M41-8	1059	ML102320585
XI.M41-9	1060	ML102320585
XI.M41-10	1061	ML102320585
XI.M41-10(2)	1062	ML102320585
XI.M41-11	1063	ML102320585
XI.M41-12	1064	ML102320585
XI.M41-13	1065	ML102320585
XI.M41-14	1066	ML102320585

Table IV-1. Identification of Public Comments on May 2010 Draft GALL Report, Rev. 2, Originator, and ADAMS Accession Number

Commenter Ref. No.	Comment No.	ADAMS Accession No.
XI.M41-15	1067	ML102320585
XI.M41-16	1068	ML102320585
XI.M41-17	1069	ML102320585
XI.M41-18	1070	ML102320585
XI.M41-19	1071	ML102320585
XI.M41-20	1072	ML102320585
XI.M41-21	1073	ML102320585
XI.M41-22	1074	ML102320585
XI.M41-23	1075	ML102320585
XI.M41-24	1076	ML102320585
XI.M41-25	1077	ML102320585
XI.M41-26	1078	ML102320585
<b><i>Beyond Nuclear 7/2/2010</i></b>		
XI.M41-1	1228	ML101930270
<b><i>Structural Integrity Associates, Inc., Steve Biagiotti</i></b>		
XI.M41	1230	ML102500311