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September 21, 2015

Mr. Christopher G. Miller
Director, Division of License Renewal
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Response to July 28, 2015, NRC Public Meeting on Electrical Cable Aging Management Programs for Subsequent License Renewal

Project Number: 689

Dear Mr. Miller:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ is providing feedback on a meeting NRC conducted on July 28, 2015, to discuss proposed changes to the Electrical Cable Aging Management Programs (AMP) for Subsequent License Renewal (SLR). The purpose of this meeting was to seek to understand the technical basis for expanding the scope of the SLR Fuse Holder AMP to include frequently manipulated fuse holders located in active equipment and making the SLR Electric Cable Connections AMP periodic.

The NRC staff stated that the proposed SLR Fuse Holder (E5) AMP will not include frequently manipulated fuse holders located in active equipment in its scope. We agree with this position and concur that the fuse holders inside enclosures of active components are not subject to an AMR.

The NRC staff stated that the proposed SLR Electric Cable Connections (E6) AMP will be a periodic AMP performed every 10 years. We disagree that this AMP is required to be performed every 10 years during the second period of extended operation. Our position is that implementing the SLR Electric Cable Connections

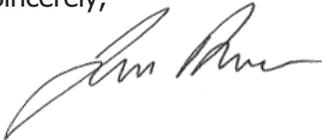
¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial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

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(E6) AMP as a one-time inspection program prior to the second period of extended operation provides reasonable assurance that the intended functions of the metallic parts of electrical cable connections (not subject to the environmental qualification requirements of 10 CFR 50.49) and susceptible to age-related degradation are maintained consistent with the current licensing basis through the second period of extended operation. Correspondingly, if the acceptance criteria are not met, the corrective action program will evaluate changes to the one-time testing program that may include an increased inspection frequency. This position is in alignment with the *Federal Register* Notice for LR-ISG-2007-02: Changes to Generic Aging Lesson Learned (GALL) Report Aging Management Program (AMP) XI.E6, "Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements" dated September 6, 2007. It states, in part, that "the staff determined that although the current GALL AMP XI.E6 was based on technical bases of Electric Power Research Institute documents, Sandia National Laboratories Report, SAND 96-0344, and thermography data, few operating experiences related to failed connection due to aging had been identified. Most of the operating experiences related to failed connections are due to human errors or maintenance practices. The operating experience cannot support a periodic inspection as currently recommended in GALL AMP XI.E6."

We appreciate the opportunity to provide comments for your consideration, as well as the NRC staff's presentation of the material. If you have any questions, please contact either me or Jerud Hanson (202-739-8053; jeh@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Remer", written in a cursive style.

Jason Remer

Attachment

c: Mr. Steven D. Bloom, NRR/DLR/RSRG, NRC