

# **Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report**

Draft Report for Comment

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# **Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report**

Draft Report for Comment

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## COMMENTS ON DRAFT REPORT

Any interested party may submit comments on this report for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Comments may be accompanied by additional relevant information or supporting data. Please specify the report number **NUREG-2191, Volume 1**, in your comments, and send them by the end of the comment period specified in the *Federal Register* notice announcing the availability of this report.

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**Federal Rulemaking Website:** Go to <http://www.regulations.gov> and search for documents filed under Docket ID **NRC-2015-0251**. Address questions about NRC dockets to Carol Gallagher at 301-415-3463 or by e-mail at [Carol.Gallagher@nrc.gov](mailto:Carol.Gallagher@nrc.gov).

**Mail comments to:** Cindy Bladey, Chief, Rules, Announcements, and Directives Branch (RADB), Division of Administrative Services, Office of Administration, Mail Stop:

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For any questions about the material in this report, please contact: Bennett Brady, Senior Project Manager, 301-415-2981 or by e-mail at [Bennett.Brady@nrc.gov](mailto:Bennett.Brady@nrc.gov).

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## ABSTRACT

1  
2 The U.S. Nuclear Regulatory Commission (NRC) staff has defined subsequent license renewal  
3 (SLR) to be the period of extended operation from 60 years to 80 years of nuclear power plant  
4 operation. NUREG–2191, “Generic Aging Lessons Learned for Subsequent License Renewal  
5 Report,” provides guidance for SLR applicants. The Generic Aging Lessons Learned for  
6 Subsequent License Renewal (GALL-SLR) Report contains the NRC staff’s generic evaluation  
7 of plant aging management programs (AMPs) and establishes the technical basis for their  
8 adequacy. The GALL-SLR Report contains recommendations on specific areas for which  
9 existing AMPs should be augmented for SLR. An applicant may reference this report in an SLR  
10 application to demonstrate that the AMPs at the applicant’s facility correspond to those  
11 described in the GALL-SLR Report. If an applicant credits an AMP in the GALL-SLR Report, it  
12 is incumbent on the applicant to ensure that the conditions and operating experience (OE) at the  
13 plant are bounded by the conditions and OE for which the GALL-SLR Report program was  
14 evaluated. If these bounding conditions are not met, it is incumbent on the applicant to address  
15 any additional aging effects and augment the AMPs for SLR. For AMPs that are based on the  
16 GALL-SLR Report, the NRC staff will review and verify whether the applicant’s AMPs are  
17 consistent with those described in the GALL-SLR Report, including applicable plant conditions  
18 and OE. The focus of the NRC staff’s review of an SLR application is on those AMPs that an  
19 applicant has enhanced to be consistent with the GALL-SLR Report, those AMPs for which the  
20 applicant has taken an exception to the program described in the GALL-SLR Report, and  
21 plant-specific AMPs not described in the GALL-SLR Report. The information in the GALL-SLR  
22 Report has been incorporated into the NUREG–2192, “Standard Review Plan for Review of  
23 Subsequent License Renewal Applications for Nuclear Power Plants,” as directed by the  
24 Commission, to improve the efficiency of the SLR process.



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## LIST OF CONTRIBUTORS<sup>1</sup>

### Division of License Renewal, Office of Nuclear Reactor Regulation

B. Holian	Division Director
C. Miller	Division Director
J. Lubinski	Division Director
R. Caldwell	Deputy Division Director
M. Delligatti	Deputy Division Director
M. Galloway	Deputy Division Director
J. Marshall	Deputy Division Director
S. Weerakkody	Deputy Division Director
S. Bloom	Branch Chief
Y. Diaz	Branch Chief
M. Marshall	Branch Chief
D. Morey	Branch Chief
B. Pham	Branch Chief
B. Wittick	Branch Chief
A. Hiser	Senior Technical Advisor
B. Brady	Technical Project Manager Lead
W. Burton	Regulatory Project Manager Lead
A. Billoch	Lead Project Manager
H. Jones	Lead Project Manager
J. Mitchell	Lead Project Manager
R. Plasse	Lead Project Manager
B. Rogers	Lead Project Manager
E. Sayoc	Lead Project Manager
E. Gettys	Public Coordination
A. Kazi	Public Coordination
A. Bufford	Structural Engineering
D. Brittner	Project Manager
C. Doutt	Electrical Engineering
B. Fu	Mechanical Engineering
W. Gardner	Mechanical Engineering
J. Gavula	Mechanical Engineering
B. Grange	Project Manager
K. Green	Mechanical Engineering
W. Holston	Mechanical Engineering

---

<sup>1</sup>The titles in this List of Contributions refer to the NRC staff's role in the development of this document, not their current position.

C. Hovanec Mechanical Engineering  
R. Kalikian Mechanical Engineering  
B. Litkett Project Manager

**Division of License Renewal, Office of Nuclear Reactor Regulation**

J. Medoff Mechanical Engineering  
S. Min Mechanical Engineering  
A. Prinaris Structural Engineering  
M. Sadollah Structural Engineering  
G. Thomas Structural Engineering  
M. Yoo Mechanical Engineering

**Office of Nuclear Reactor Regulation**

D. Alley Branch Chief  
S. Bailey Branch Chief  
R. Dennig Branch Chief  
C. Jackson Branch Chief  
A. Klein Branch Chief  
G. Kulesa Branch Chief  
T. Lupold Branch Chief  
S. Rosenberg Branch Chief  
J. Zimmerman Branch Chief  
R. Hardies Senior Level Advisor  
K. Karwoski Senior Level Advisor  
L. Banic Project Manager  
G. Cheruvenki Materials Engineering  
J. Collins Materials Engineering  
S. Cumblidge Materials Engineering  
A. Erickson Structural Engineering  
C. Fairbanks Materials Engineering  
M. Hardgrove Mechanical Engineering  
K. Hoffman Materials Engineering  
A. Johnson Reactor Operations Engineering  
S. Jones Reactor Systems Engineering  
B. Lee Reactor Systems Engineering  
B. Lehman Structural Engineering  
R. Mathew Electrical Engineering  
I. Naeem Fire Protection Engineering  
C. Ng Mechanical Engineering  
D. Nguyen Electrical Engineering  
A. Obodoako Materials Engineering  
B. Parks Reactor Engineering  
J. Poehler Materials Engineering

**Office of Nuclear Reactor Regulation**

P. Purtscher	Materials Engineering
S. Ray	Electrical Engineering
S. Sheng	Materials Engineering
A. Tsirigotis	Mechanical Engineer
O. Yee	Reactor Systems Engineering
M. Yoder	Chemical Engineering
P. Verdi	Foreign Assignee

**Region II**

P. Cooper	Sr. Reactor Inspector
J. Rivera-Ortiz	Reactor Inspector

**Region III**

N. Feliz-Adorno	Sr. Reactor Inspector
M. Holmberg	Sr. Reactor Inspector
C. Tilton	Sr. Reactor Inspector

**Region IV**

S. Graves	Sr. Reactor Inspector
G. Pick	Sr. Reactor Inspector
M. Williams	Reactor Inspector

**Office of New Reactors**

J. Xu	Branch Chief
A. Istar	Structural Engineering

**Office of Nuclear Materials and Safeguards**

A. Csontos	Branch Chief
J. Wise	Materials Engineering

**Office of Nuclear Regulatory Research**

J. Burke	Branch Chief
S. Frankl	Branch Chief
M. Gavrilas	Branch Chief
J. Nakoski	Branch Chief
W. Ott	Branch Chief
D. Rudland	Branch Chief
M. Salley	Branch Chief
R. Sydnor	Branch Chief
J. Ake	Senior Technical Advisor—Geophysical Engineering
T. Nicholson	Senior Technical Advisor—Radionuclide Transport
R. Tregoning	Senior Technical Advisor—Materials Engineering
A. Hull	Team Leader

## Office of Nuclear Regulatory Research

K. Arai	Materials Engineering
M. Benson	Materials Engineering
E. Focht	Materials Engineering
M. Fuhrman	Geochemistry
C. Harris	Materials Engineering
M. Hiser	Materials Engineering
M. Homiack	Mechanical Engineering
M. Kirk	Materials Engineering
B. Lin	Mechanical Engineering
S. Malik	Materials Engineering
K. Miller	Electrical Engineering
W. Norris	Materials Engineering
G. Oberson	Materials Engineering
R. Perkins	Reliability & Risk Engineering
I. Prokofiev	Materials Engineering
J. Philip	Geotechnical Engineering
A. Pulvirenti	Materials Engineering
S. Rao	Materials Engineering
M. Rossi	Materials Engineering
M. Sircar	Structural Engineering
M. Srinivasan	Materials Engineering
G. Stevens	Materials Engineering
D. Stroup	Fire Protection Engineering
G. Wang	Mechanical Engineering

### Center for Nuclear Waste Regulatory Analyses, Southwest Research Institute®

G. Adams	Computer/Industrial Engineering
L. Howard	Project Manager/Nuclear Engineering
L. Naukam	Program Support/Technical Editing
Y. Pan	Materials Engineering
A. Ramos	Program Support/Technical Editing

## ABBREVIATIONS

ACAR	aluminum conductor aluminum alloy reinforced
ACSR	aluminum conductor steel reinforced
ACI	American Concrete Institute
ADAMS	Agencywide Documents Access and Management System
ADS	automatic depressurization system
AEA	Atomic Energy Act
AEC	Atomic Energy Commission
AFW	auxiliary feedwater
AERM	aging effect requiring management
AISC	American Institute of Steel Construction
Al	Aluminum
ALARA	as low as reasonably achievable
AMPs	aging management programs
AMR	aging management review
ANSI	American National Standards Institute
ASCE	American Society of Civil Engineers
ASME	American Society of Mechanical Engineers
ASTM	ASTM International
B&PV	boiler and pressure vessel
B&W	Babcock & Wilcox
BWR	boiling water reactor
BWRVIP	Boiling Water Reactor Vessel and Internals Project
CASS	cast austenitic stainless steel
CB	core barrel
CCCW	closed-cycle cooling water
CE	Combustion Engineering
CEA	control element assembly
CFR	<i>Code of Federal Regulations</i>
CFS	core flood system
CLB	current licensing basis
CRD	control rod drive
CRDM	control rod drive mechanism
CRDRL	control rod drive return line
CRGT	control rod guide tube
CVCS	chemical and volume control system
DC	direct current
DHR	decay heat removal
DLR	Division of License Renewal

DOE	U.S. Department of Energy
DSCSS	drywell and suppression chamber spray system
EDG	emergency diesel generator
EMDA	Expanded Materials Degradation Assessment
EPDM	ethylene propylene diene monosomer
EPR	ethylene-propylene rubber
EPRI	Electric Power Research Institute
EQ	environmental qualification
FAC	flow-accelerated corrosion
FERC	Federal Energy Regulatory Commission
FRN	Federal Register Notice
FSAR	Final Safety Analysis Report
FW	feedwater
GALL	Generic Aging Lessons Learned
GALL-SLR	Generic Aging Lessons Learned for Subsequent License Renewal
GE	General Electric
GL	generic letter
HDPE	high density polyethylene
HELB	high-energy line break
HP	high pressure
HPCI	high-pressure coolant injection
HPCS	high-pressure core spray
HPSI	high-pressure safety injection
HVAC	heating, ventilation, and air conditioning
IAEA	International Atomic Energy Agency
I&C	instrumentation and control
IASCC	irradiation assisted stress corrosion cracking
IC	isolation condenser
ID	inside diameter
IEB	inspection and enforcement bulletin
IEEE	Institute of Electrical and Electronics Engineers
IGA	intergranular attack
IGSCC	intergranular stress corrosion cracking
IMI	incore monitoring instrumentation
IN	information notice
INPO	Institute of Nuclear Power Operations
IPA	integrated plant assessment

IR	insulation resistance
IRM	intermediate range monitor
IRS	Incident Reporting System
ISG	interim staff guidance
ISI	inservice inspection
LERs	licensee event reports
LG	lower grid
LOCA	loss of coolant accident
LP	low pressure
LPCI	low-pressure coolant injection
LPCS	low-pressure core spray
LPM	loose part monitoring
LPRM	low-power range monitor
LPSI	low-pressure safety injection
LRA	license renewal application
LR-ISG	License Renewal Interim Staff Guidance
LRT	leak rate test
LWR	light water reactor
MEAP	material/environment/aging effect/program
MIC	microbiologically influenced corrosion
MRP	Materials Reliability Program
MS	main steam
MSR	moisture separator/reheater
MT	magnetic particle testing
NDE	nondestructive examination
NEA	Nuclear Energy Agency
NEI	Nuclear Energy Institute
NFPA	National Fire Protection Association
NPAR	nuclear plant aging research
NPP	nuclear power plant
NPS	nominal pipe size
NRC	Nuclear Regulatory Commission
NRMS	normalized root mean square
NRR	Office of Nuclear Reactor Regulation
NSAC	Nuclear Safety Analysis Center
NSSS	nuclear steam supply system
NUMARC	Nuclear Management and Resources Council

OCCW	open-cycle cooling water
OD	outside diameter
ODSCC	outside diameter stress corrosion cracking
OECD	Organization for Economic Co-operation and Development
OE	operating experience
OM	operation and maintenance
PT	penetrant testing
PVC	polyvinyl chloride
PWR	pressurized water reactor
PWSCC	primary water stress corrosion cracking
QA	quality assurance
RCCA	rod control cluster assemblies
RCIC	reactor core isolation cooling
RCP	reactor coolant pump
RCPB	reactor coolant pressure boundary
RCS	reactor coolant system
RES	Office of Nuclear Regulatory Research
RG	Regulatory Guide
RHR	residual heat removal
RMS	root mean square
RWCU	reactor water cleanup
RWST	refueling water storage tank
RWT	refueling water tank
SAW	submerged arc weld
SBO	station blackout
SCs	structures and components
SCC	stress corrosion cracking
SDC	shutdown cooling
SFP	spent fuel pool
SG	steam generator
S/G	standards and guides
SIL	services information letter
SIT	safety injection tank
SLC	standby liquid control
SLR	subsequent license renewal
SLRAs	subsequent license renewal applications
SLRAAI	subsequent license renewal applicant action items
SOCs	Statement of Considerations

SOER	significant operating experience report
SRM	source range monitor
SRM	staff requirements memorandum
SRP-LR	Standard Review Plan for License Renewal
SS	stainless steel
SSCs	systems, structures, and components
TGSCC	transgranular stress corrosion cracking
TLAA	time-limited aging analysis
UCS	Union of Concerned Scientists
UHS	ultimate heat sink
USI	unresolved safety issue
UT	ultrasonic testing
UV	ultraviolet
XPLE	cross-linked polyethylene



1

## INTRODUCTION

2 NUREG–2191, “Generic Aging Lessons Learned for Subsequent License Renewal  
3 (GALL-SLR) Report,” is referenced as a technical basis document in NUREG–2192, “Standard  
4 Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants  
5 (SRP-SLR).” The Generic Aging Lessons Learned for Subsequent License Renewal  
6 (GALL-SLR) Report lists generic aging management reviews (AMRs) of systems, structures,  
7 and components (SSCs) that may be in the scope of subsequent license renewal applications  
8 (SLRAs) and identifies aging management programs (AMPs) that are determined to be  
9 acceptable to manage aging effects of SSCs in the scope of license renewal, as required by  
10 10 CFR Part 54, “Requirements for Renewal of Operating Licenses for Nuclear Power Plants.”  
11 If an applicant credits an AMP described in the GALL-SLR Report in the SLRA, the applicant  
12 should ensure that the conditions and operating experience (OE) at the plant are bounded by  
13 the conditions and OE for which the GALL-SLR Report program was evaluated. If these  
14 bounding conditions are not met, the applicant should address any additional aging effects and  
15 augment the AMPs for subsequent license renewal (SLR). If an SLRA references the  
16 GALL-SLR Report as the approach used to manage aging effect(s), the U.S. Nuclear  
17 Regulatory Commission (NRC) staff will use the GALL-SLR Report as a basis for the SLRA  
18 assessment consistent with guidance specified in the SRP-SLR.



## BACKGROUND

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The Atomic Energy Act (AEA) of 1954, as amended, allows the U.S. Nuclear Regulatory Commission (NRC) to issue licenses for commercial nuclear power reactors to operate for up to 40 years. The NRC regulations permit these licenses to be renewed beyond the initial 40-year term for an additional period of time, limited to 20-year increments per renewal, based on the outcome of an assessment to determine if the nuclear facility can continue to operate safely during the proposed period of extended operation. There are no limitations in the AEA or the NRC regulations restricting the number of times a license may be renewed.

The focus of license renewal, as described in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54, is to identify aging effects that could impair the ability of systems, structures, and components (SSCs) within the scope of license renewal to perform their intended functions, and to demonstrate that these effects will be adequately managed during the period of extended operation. The regulatory requirements for both initial and subsequent license renewal (SLR) are established by 10 CFR Part 54. To address the unique aspects of material aging and degradation that would apply to SLR (e.g., to permit plants to operate to 80 years), the Office of Nuclear Reactor Regulation (NRR) requested support from the Office of Nuclear Regulatory Research (RES) to develop technical information to evaluate the feasibility of SLR. RES has memoranda of understanding with both the U.S. Department of Energy (DOE) and the Electric Power Research Institute (EPRI) to cooperate in nuclear safety research related to long-term operations beyond 60 years. Under these memoranda, the NRC and the DOE held two international conferences, in 2008 and 2011, on reactor operations beyond 60 years. In May 2012, the NRC and the DOE also co-sponsored the Third International Conference on Nuclear Power Plant Life Management for Long-Term Operations, organized by the International Atomic Energy Agency (IAEA). In February 2013, the Nuclear Energy Institute (NEI) held a forum on long-term operations and SLR. These conferences laid out the technical issues that would need to be addressed to provide assurance for safe operation beyond 60 years.

Based on the information gathered from these conferences and forums, and from other sources over the past several years, the most significant technical issues identified as challenging operation beyond 60 years are: reactor pressure vessel embrittlement; irradiation-assisted stress corrosion cracking (SCC) of reactor internals; concrete structures and containment degradation; and electrical cable environmental qualification (EQ), condition monitoring and assessment. Throughout this process, the NRC staff has emphasized that it is the industry's responsibility to resolve these and other issues to provide the technical bases to ensure safe operation beyond 60 years.

The NRC, in cooperation with the DOE, completed the Expanded Materials Degradation Assessment (EMDA) in 2014 (ADAMS Accession Nos. ML14279A321, ML14279A331, ML14279A349, ML14279A430, and ML14279A461). The EMDA uses an expert elicitation process to identify materials and components which could be susceptible to significant degradation during operation beyond 60 years. The EMDA covers the reactor vessel, primary system piping, reactor vessel internals, concrete, and electrical cables and qualification. The NRC staff used the results of the EMDA to identify gaps in the current technical knowledge or issues not being addressed by planned industry or DOE research, and to identify AMPs that will require modification for SLR.

On May 9, 2012 (ADAMS Accession No. ML12158A545) and subsequently on November 1, 13, and 14, 2012, the NRC staff and interested stakeholders met to discuss issues and receive comments for consideration for SLR. In addition to working with external stakeholders, the NRC

1 staff conducted aging management program (AMP) effectiveness audits at three units that were  
2 at least 2 years into the period of extended operation. The purpose of these audits was to  
3 better understand how licensees are implementing the license renewal AMPs, in terms of both  
4 the findings and the effectiveness of the programs, and to develop recommendations for  
5 updating license renewal guidance. The NRC staff used the information gathered from these  
6 audits to ensure that SLR guidance is fully informed by the licensee's aging management  
7 activities during the first license renewals. A summary of the first two AMP effectiveness audits  
8 can be found in the May 2013 report, "Summary of Aging Management Program Effectiveness  
9 Audits to Inform Subsequent License Renewal: R.E. Ginna NPP and Nine Mile Point Nuclear  
10 Station, Unit 1" (ADAMS Accession No. ML13122A007). The summary of the third audit can be  
11 found in the August 5, 2014, report, "H.B. Robinson Steam Electric Plant, Unit 2, Aging  
12 Management Program Effectiveness Audit" (ADAMS Accession No. ML14017A289).

13 The NRC staff reviewed domestic operating experience (OE) as reported in licensee event  
14 reports and NRC generic communications related to failures and degradation of passive  
15 components. Similarly the NRC staff reviewed the following international OE databases:  
16 (i) International Reporting System, jointly operated by the IAEA; (ii) IAEA's International Generic  
17 Ageing Lessons Learned Programme; (iii) Organization for Economic Co-operation and  
18 Development (OECD)/Nuclear Energy Agency (NEA) Component Operational Experience and  
19 Degradation and Ageing Programme database; and (iv) OECD/NEA Cable Aging Data and  
20 Knowledge database.

21 The NRC staff reviewed the results from AMP audits, findings from the EMDA, domestic and  
22 international OE, and public comments to identify technical issues that need to be considered  
23 for assuring the safe operation of NRC-licensed nuclear power plant (NPPs). By letter dated  
24 August 6, 2014 (ADAMS Accession No. ML14253A104), NEI documented the industry's views  
25 and recommendations for updating NUREG-1801 Revision 2, "Generic Aging Lessons Learned  
26 (GALL) Report," and NUREG-1800 Revision 2, "Standard Review Plan for Review of License  
27 Renewal Applications for Nuclear Power Plants," to support SLR. Between fiscal years 2014  
28 and 2015, the NRC staff reviewed the comments and recommendations and drafted the  
29 GALL-SLR Report to ensure that sufficient guidance was in place to support review of an SLR  
30 application in 2018 or 2019.

31 The staff requirements memorandum (SRM) on SECY-14-0016 "Ongoing Staff Activities to  
32 Assess Regulatory Considerations for Power Reactor Subsequent License Renewal"  
33 (ADAMS Accession No. ML14241A578) directed the staff to continue to update the license  
34 renewal guidance, as needed, to provide additional clarity on the implementation of the license  
35 renewal regulatory framework. The SRM also directed the staff to keep the Commission  
36 informed on the progress in resolving the following technical issues related to SLR: (i) reactor  
37 pressure vessel neutron embrittlement at high fluence, (ii) irradiation assisted SCC of reactor  
38 internals and primary system components, (iii) concrete and containment degradation, and  
39 (iv) electrical cable qualification and condition assessment. In addition, the SRM directed that  
40 the staff should keep the Commission informed regarding the staff's readiness for accepting an  
41 application and any further need for regulatory process changes, rulemaking, or research.

42 The GALL-SLR report also includes the NRC staff's resolutions of License Renewal Interim  
43 Staff Guidance's (LR-ISGs) from 2011 through 2015. Under the LR-ISG process, the NRC staff,  
44 industry, or stakeholders can propose a change to certain license renewal guidance documents.  
45 The NRC staff evaluates the issue, develops the proposed LR-ISG, issues it for public  
46 comment, evaluates any comments received, and, if necessary, issues the final LR-ISG.

1 The LR-ISG is then used until the NRC staff incorporates the revised guidance into a formal  
2 license renewal guidance document revision. The LR-ISGs addressed in the GALL-SLR report  
3 are:

- 4 • LR-ISG-2011-01: Aging Management of Stainless Steel Structures and Components in  
5 Treated Borated Water, Revision 1
- 6 • LR-ISG-2011-02: Aging Management Program for Steam Generators
- 7 • LR-ISG-2011-03: Generic Aging Lessons Learned (GALL) Report Revision 2 AMP  
8 XI.M41, "Buried and Underground Piping and Tanks"
- 9 • LR-ISG-2011-04: Updated Aging Management Criteria for Reactor Vessel Internal  
10 Components of Pressurized Water Reactors
- 11 • LR-ISG-2011-05: Ongoing Review of Operating Experience
- 12 • LR-ISG-2012-01: Wall Thinning Due to Erosion Mechanisms
- 13 • LR-ISG-2012-02: Aging Management of Internal Surfaces, Fire Water Systems,  
14 Atmospheric Storage Tanks, and Corrosion Under Insulation
- 15 • LR-ISG-2013-01: Aging Management of Loss of Coating or Lining Integrity for Internal  
16 Coatings/Linings on In-Scope Piping, Piping Components, Heat Exchangers, and Tanks
- 17 • LR-ISG-2015-01: Changes to Buried and Underground Piping and  
18 Tank Recommendations



# OVERVIEW OF THE GENERIC AGING LESSONS LEARNED FOR SUBSEQUENT LICENSE RENEWAL REPORT EVALUATION PROCESS

The Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report contains 11 chapters and two appendices. The majority of the chapters contain summary descriptions and tabulations of evaluations of aging management programs (AMPs) for a large number of structures and components (SCs) in major plant systems found in light-water reactor nuclear power plants (NPPs). The major plant systems include the containment structures (Chapter II), structures and component supports (Chapter III), reactor vessel, internals and reactor coolant system (Chapter IV), engineered safety features (Chapter V), electrical components (Chapter VI), auxiliary systems (Chapter VII), and steam and power conversion system (Chapter VIII).

Chapter I of the GALL-SLR Report addresses the application of the American Society of Mechanical Engineers (ASME) code for subsequent license renewal (SLR). Chapter IX contains definitions of a selection of standard terms used within the GALL-SLR Report. Chapter X contains examples of AMPs that may be used to demonstrate the acceptance of time-limited aging analysis (TLAAs) in accordance with 10 CFR 54.21(c)(1)(iii). Chapter XI contains the AMPs for the mechanical, structural and electrical components. The appendices of the GALL-SLR Report address quality assurance for AMPs and operating experience (OE).

The evaluation process for the AMPs and the application of the GALL-SLR Report is described in this document. The aging management review (AMR) items for the GALL-SLR Report are presented in tabular format as described in Table 1. Table 1 describes the information presented in each column of the tables in Chapters II through VIII contained in this report.

The staff's evaluation of the adequacy of each generic AMP to manage certain aging effects for particular SCs is based on its review of the following 10 program elements in each AMP, as defined in Table 2.

On the basis of its evaluation, if the staff determines that a program is adequate to manage certain aging effects for a particular SC without change, the "Further Evaluation" entry will indicate that no further evaluation is recommended for SLR.

Chapters X and XI of the GALL-SLR Report contain generic AMPs that the staff finds to be sufficient to manage aging effects in the subsequent period of extended operation, such as the ASME Section XI inservice inspection, water chemistry, or structures monitoring program.

<b>Column Heading</b>	<b>Description</b>
New (N), Modified (M), Deleted (D) Item	Identifies the item as new to GALL-SLR Report, modified from GALL Revision 2, deleted from GALL Revision 2, or if blank, is unchanged from GALL Revision 2. The NRC will publish the technical bases for these new, modified, and deleted AMR items in a NUREG containing the disposition of public comments and the technical bases for changes in the guidance documents when the final SLR guidance documents are published.
Item	Identifies a unique number for the item (i.e., VII.G.A-91). The first part of the number indicates the chapter and AMR system (e.g., VII.G is in the auxiliary systems, fire protection system), and the second part is a unique chapter-specific identifier within a chapter (e.g., A-91 for auxiliary systems).
SRP Item (Table, ID)	For each row in the subsystem tables, this item identifies the corresponding row identifier from the SRP-SLR to provide the crosswalk to the SRP system table items.
Structure and/or Component	Identifies the structure or components to which the row applies.
Material	Identifies the material of construction. See Chapter IX.C of this report for further information.
Environment	Identifies the environment applicable to this row. See Chapter IX.D of this report for further information.
Aging Effect/ Mechanism	Identifies the applicable aging effect and mechanism(s). See Chapters IX.E and IX.F of this report for more information on applicable aging effects/mechanisms.
Aging Management Program (AMP)/TLAA	Identifies an AMP/TLAA found acceptable for adequately managing the effects of aging. See Chapters X and XI of this report.
Further Evaluation	Identifies whether a further evaluation is needed.

<b>AMP Element</b>	<b>Description</b>
1. Scope of the Program	The scope of the program should include the specific structures and components subject to an AMR.
2. Preventive Actions	Preventive actions should mitigate or prevent the applicable aging effects.
3. Parameters Monitored or Inspected	This identifies the aging effects that the program manages and provides a link between the parameter or parameters that will be monitored and how the monitoring of these parameters will ensure adequate aging management.
4. Detection of Aging Effects	Detection of aging effects should occur before there is a loss of any structure and component intended function. This element describes aspects such as method or technique (i.e., visual, volumetric, surface inspection), frequency, sample size, data collection, and timing of new/one-time inspections to ensure timely detection of aging effects.
5. Monitoring and Trending	Monitoring and trending should provide for an estimate of the extent of the effects of aging and timely corrective or mitigative actions.
6. Acceptance Criteria	Acceptance criteria, against which the need for corrective action will be evaluated, should ensure that the particular structure and component's intended functions are maintained under all current licensing basis conditions during the subsequent period of extended operation.
7. Corrective Actions	Description of corrective actions that will be implemented if the acceptance criteria of the program are not met.
8. Confirmation Process	The confirmation process should ensure that preventive actions are adequate and that appropriate corrective actions have been completed and are effective.
9. Administrative Controls	Administrative controls should provide a formal review and approval process.
10. Operating Experience	Operating experience applicable to the AMP, including past corrective actions resulting in program enhancements or additional programs, should provide objective evidence to support the conclusion that the effects of aging will be managed adequately so that the structure- and component intended function(s) will be maintained during the subsequent period of extended operation. In addition, an ongoing review of both plant-specific and industry OE ensures that the AMP is effective in managing the aging effects for which it is credited. The AMP is either enhanced or new AMPs are developed, as appropriate, when it is determined through the evaluation of OE that the effects of aging may not be adequately managed.



## **APPLICATION OF THE GENERIC AGING LESSONS LEARNED FOR SUBSEQUENT LICENSE RENEWAL REPORT**

The Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report is a technical basis document to the Standard Review Plan for Subsequent License Renewal (SRP-SLR), which provides the staff with guidance in reviewing a subsequent license renewal application (SLRA). The GALL-SLR Report should be treated in the same manner as an approved topical report that is generically applicable. An applicant may reference the GALL-SLR Report in a SLRA to demonstrate that the aging management programs (AMPs) at the applicant's facility correspond to those reviewed and approved in the GALL-SLR Report.

If an applicant takes credit for an AMP in GALL-SLR Report, it is incumbent on the applicant to ensure that the plant AMP contains all the elements of the referenced GALL-SLR program. In addition, the conditions and operating experience (OE) at the plant must be bounded by the conditions and OE for which the GALL-SLR Report AMP was evaluated, otherwise it is incumbent on the applicant to augment the GALL-SLR Report AMP as appropriate to address the impact of the plant-specific OE on the AMP element criteria. The documentation for the above verifications must be available on-site in an auditable form.

The GALL-SLR Report contains one acceptable way to manage aging effects for SLR. An applicant may propose alternatives for staff review in its plant-specific SLRA. The use of the GALL-SLR Report is not required, but its use should facilitate both preparation of an SLRA by an applicant and timely, consistent review by the U.S. Nuclear Regulatory Commission (NRC) staff.

The GALL-SLR Report does not address scoping of structures and components (SCs) for license renewal; this is addressed in SRP-SLR Chapter 2. Scoping is plant-specific, and the results depend on the plant design and current licensing basis. The inclusion of a certain structure or component in the GALL-SLR Report does not imply that this particular structure or component is within the scope of license renewal for all plants. Conversely, the omission of a certain structure or component in the GALL-SLR Report does not imply that this particular structure or component is not within the scope of SLR for any plants.

The GALL-SLR Report contains an evaluation of a large number of SCs that may be in the scope of a typical SLRA. The evaluation results documented in the GALL-SLR Report indicate that many existing, typical generic AMPs are adequate to manage aging effects for particular structures or components for SLR without change. The GALL-SLR Report also contains recommendations on specific areas for which existing generic AMPs should be augmented (require further evaluation) for SLR and documents the technical basis for each such determination. The GALL-SLR Report identifies certain systems, structures, and components (SSCs) that may or may not be subject to particular aging effects, and those for which industry is developing generic AMPs or investigating whether aging management is warranted.

Appendix A of the GALL-SLR Report addresses quality assurance (QA) for AMPs. Those aspects of the aging management review (AMR) process that affect the quality of safety-related SSCs are subject to the QA requirements of Appendix B to 10 CFR Part 50. For nonsafety-related-SCs subject to an AMR, the existing 10 CFR Part 50, Appendix B, QA program may be used by an applicant to address the elements of the corrective actions, confirmation process, and administrative controls for an AMP for subsequent license renewal (SLR).

- 1 The GALL-SLR Report provides a technical basis for crediting existing plant AMPs and
- 2 recommending areas for AMP augmentation and further evaluation. The incorporation of the
- 3 GALL-SLR Report information into the SRP-SLR, as directed by the Commission, should
- 4 improve the efficiency of the SLR review process and the use of staff resources.

1

## CHAPTER IX

2

### **USE OF TERMS FOR STRUCTURES, COMPONENTS, MATERIALS, ENVIRONMENTS, AGING EFFECTS, AND AGING MECHANISMS**

3



1 **IX USE OF TERMS FOR STRUCTURES, COMPONENTS, MATERIALS,**  
2 **ENVIRONMENTS, AGING EFFECTS, AND AGING MECHANISMS**

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3 A. INTRODUCTION

4 B. STRUCTURES AND COMPONENTS

5 C. MATERIALS

6 D. ENVIRONMENTS

7 E. AGING EFFECTS

8 F. SIGNIFICANT AGING MECHANISMS

9 G. REFERENCES



1 **A. INTRODUCTION**

2 This chapter is designed to clarify the usage of terms in the aging management review (AMR)  
3 tables in Chapters II–VIII of this report. The format and content of the AMR tables have been  
4 revised from the Generic Aging Lessons Learned (GALL) Report, Revision 2, to enhance the  
5 report’s applicability to future subsequent license renewal applications (SLRA). The U.S.  
6 Nuclear Regulatory Commission (NRC) has also added several new terms, and removed, and  
7 clarified some of those that were in the GALL Report, Revision 2.



1 **B. STRUCTURES AND COMPONENTS**

2 The Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
3 does not address scoping of structures and components (SCs) for subsequent license renewal  
4 (SLR). Scoping is plant-specific, and the results depend on individual plant design and its  
5 current licensing basis (CLB). The inclusion of a certain structure or component in the  
6 GALL-SLR Report does not mean that this particular structure or component is within the scope  
7 of SLR for all plants. Conversely, the omission of a certain structure or component in the  
8 GALL-SLR Report does not mean that this particular structure or component is omitted from the  
9 scope of SLR for any plant.

IX.B Use of Terms for Structures and Components	Term	Usage in this document
Bolting		Bolting can refer to structural bolting, closure bolting, or all other bolting. Within the scope of license renewal, both Class 1 and non-Class 1 systems and components contain bolted closures that are necessary for the pressure boundary of the components being joined or closed. Closure bolting in high-pressure or high-temperature systems is defined as that in which the pressure exceeds 275 psi or 93 °C [200 °F]. Closure bolting is used to join pressure boundaries or where a mechanical seal is required.
Ducting and components		Ducting and components include HVAC components. Examples include ductwork, ductwork fittings, access doors, equipment frames and housing, housing supports, including housings for valves, dampers (including louvers and gravity), and ventilation fans (including exhaust fans, intake fans, and purge fans). In some cases, this includes HVAC closure bolts or HVAC piping.
Encapsulation components/ valve chambers		These are airtight enclosures that function as a secondary containment boundary to completely enclose containment sump lines and isolation valves. Encapsulation components and features (e.g., emergency core cooling system, containment spray system, and containment isolation system, and refueling water storage tank, etc.) can include encapsulation vessels, piping, and valves.
External surfaces		In the context of SCs, the term “external surfaces” is used to represent the external surfaces of SCs, such as tanks, that are not specifically listed elsewhere.
Heat exchanger components		A heat exchanger is a device that transfers heat from one fluid to another without the fluids coming in contact with each other. This includes air handling units and other devices that cool or heat fluids. Heat exchanger components may include, but are not limited to, air handling unit cooling and heating coils, piping/tubing, shell, plates/frames, tubesheets, tubes, valves, and bolting. Although tubes are the primary heat transfer components, heat exchanger internals, including tubesheets and fins, contribute to heat transfer and may be affected by reduction of heat transfer due to fouling [Ref. 1]. The inclusion of components such as tubesheets is dependent on manufacturer specifications.
High voltage insulators		An insulator is an insulating material in a configuration designed to physically support a conductor and separate the conductor electrically from other conductors or objects. The high voltage insulators that are evaluated for license renewal are those used to support and insulate high voltage electrical components in switchyards, switching stations and transmission lines.
Inaccessible Areas of Structural Components for non- ASME structural AMPs		With regard to access for routine visual examination of steel and concrete structures and components within the scope of the Structures Monitoring program and other structural AMPs not based on the ASME Code, areas considered inaccessible are as defined below: <ul style="list-style-type: none"> <li>• below-grade surfaces exposed to foundation soil/material, backfill, or ground water</li> <li>• portions of concrete surfaces that are covered by metallic liners</li> </ul>

IX.B Use of Terms for Structures and Components	Term	Usage in this document
		<ul style="list-style-type: none"> <li>portions of surfaces where visual access is obstructed by adjacent permanent plant structures, components, equipment, parts, or appurtenances</li> <li>portions of steel components, supports, connections, parts, and appurtenances that are embedded or encased in concrete or encapsulated or otherwise made inaccessible during construction or as a result of repair/replacement activities.</li> </ul> <p>Wetted surfaces of submerged areas or areas covered or obstructed by insulation, protective coatings, microorganisms, biofouling or vegetation are not considered inaccessible.</p>
Metal enclosed bus		<p>“Metal enclosed bus” (MEB) is the term used in electrical and industry standards (IEEE and ANSI) for electrical buses installed on electrically-insulated supports constructed with all phase conductors enclosed in a metal enclosure.</p>
Piping, piping components, piping elements, and tanks		<p>This general category includes features of the piping system within the scope of license renewal. Examples include piping, fittings, tubing, flow elements/indicators, demineralizers, nozzles, orifices, flex hoses, pump casings and bowls, safe ends, sight glasses, spray heads, strainers, thermowells, and valve bodies and bonnets. For reactor coolant pressure boundary components in Chapter IV that are subject to cumulative fatigue damage, this category also can include flanges, nozzles and safe ends, penetrations, instrument connections, vessel heads, shells, welds, weld inlays and weld overlays, stub tubes, and miscellaneous Class 1 components (e.g., pressure housings, etc.).</p> <p>As used in GALL-SLR Report AMP XI.M41, buried piping and tanks are in direct contact with soil or concrete (e.g., a wall penetration). Underground piping and tanks are below grade, but are contained within a tunnel or vault such that they are in contact with air and are located where access for inspection is restricted.</p>
Piping elements		<p>The category of “piping elements” is a subcategory of piping, piping components, and piping elements that in the GALL-SLR Report, applies only to components made of glass (e.g., sight glasses and level indicators, etc.) In the GALL-SLR Report, Chapters V, VII, and VIII, piping elements are thus called out separately.</p>
Pressure housing		<p>The term “pressure housing” only refers to pressure housing for the CRD head penetration (it is only of concern in Section A2 for PWR reactor vessels).</p>
Reactor coolant pressure boundary components		<p>Reactor coolant pressure boundary components include, but are not limited to, piping, piping components, piping elements, flanges, nozzles, safe ends, pressurizer vessel shell heads and welds, heater sheaths and sleeves, penetrations, and thermal sleeves.</p>
Seals, gaskets, and moisture barriers (caulking, flashing, and other sealants)		<p>This category includes elastomer components used as sealants or gaskets.</p>
Steel elements: liner; liner anchors;		<p>This category includes steel liners used in suppression pools or spent fuel pools.</p>

<b>IX.B Use of Terms for Structures and Components</b>	
<b>Term</b>	<b>Usage in this document</b>
integral attachments	
Switchyard bus	Switchyard bus is the uninsulated, unenclosed, rigid electrical conductor or pipe used in switchyards and switching stations to connect two or more elements of an electrical power circuit, such as active disconnect switches and passive transmission conductors.
Tanks	Tanks are large reservoirs used as hold-up volumes for liquids or gases. Tanks may have an internal liquid and/or vapor space and may be partially buried or in close proximity to soils or concrete. Tanks are treated separately from piping due to their potential need for different AMPs. One example is GALL-SLR Report AMP XI.M29, "Aboveground Metallic Tanks," for tanks partially buried or in contact with soil or concrete that experience general corrosion as the aging effect at the soil or concrete interface.
Transmission conductors	Transmission conductors are uninsulated, stranded electrical cables used in switchyards, switching stations, and transmission lines to connect two or more elements of an electrical power circuit, such as active disconnect switches, power circuit breakers, and transformers and passive switchyard bus.
Vibration isolation elements	This category includes nonsteel supports used for supporting components prone to vibration.

1 **C. MATERIALS**

2 The following table defines many generalized materials used in the preceding Generic Aging  
3 Lessons Learned for Subsequent License Renewal (GALL-SLR) Aging Management Review  
4 (AMR) tables in Chapters II through VIII of the GALL-SLR Report.

IX.C Use of Terms for Materials	
Term	Usage in this document
Aluminum	Aluminum (Al) alloy and heat treatment temper designations are used in accordance with ANSI document: ANSI H35.1/H35.1(M).
Boraflex	Boraflex is a material that is composed of 46 percent silica, 4 percent polydimethylsiloxane polymer, and 50 percent boron carbide, by weight. It is a neutron-absorbing material used in spent fuel storage racks. Degradation of Boraflex panels under gamma radiation can lead to a loss of their ability to absorb neutrons in spent fuel storage pools. The AMP for Boraflex is found in GALL-SLR Report AMPX1.M22, "Boraflex Monitoring."
Boral <sup>®</sup> , boron steel	Boron steel is steel with a boron content ranging from one to several percent. Boron steel absorbs neutrons and is often used as a control rod to help control the neutron flux.  Boral <sup>®</sup> is a cermet consisting of a core of Al and boron carbide powder sandwiched between sheets of Al. Boral refers to patented Aluminum-Boron master alloys; these alloys can contain up to 10 percent boron as AlB <sub>12</sub> intermetallics.
Cast austenitic stainless steel	Cast austenitic stainless steel (CASS) alloys, such as CF-3, CF-8, CF-3M, and CF-8M, have been widely used in LWRs. These CASS alloys are similar to wrought grades Type 304L, Type 304, Type 316L, and Type 316, except CASS typically contains 5 to 25 percent ferrite. CASS is susceptible to loss of fracture toughness due to thermal and neutron irradiation embrittlement.
Coatings/Linings	Coatings/linings include inorganic (e.g., zinc-based, cementitious) or organic (e.g., elastomeric or polymeric) coatings, linings (e.g., rubber, cementitious), paints, and concrete surfacers designed to adhere to a component to protect its surface.
Concrete and cementitious material	When used generally, this category of concrete applies to concrete in many different configurations (block, cylindrical, etc.) and prestressed or reinforced concrete. Cementitious material can be defined as any material having cementing properties, which contributes to the formation of hydrated calcium silicate compounds. When mixing concrete, the following have cementitious properties: (i) Portland cement, (ii) blended hydraulic cement, (iii) fly ash, (iv) ground granulated blast furnace slag, (v) silica fume, (vi) calcined clay, (vii) metakaolin, (viii) calcined shale, and (ix) rice husk ash. This category may include asbestos cement.
Copper alloy (≤15% Zn and ≤8% Al)	This category applies to those copper alloys whose critical alloying elements are below than the thresholds that make them susceptible to stress corrosion cracking, selective leaching, and boric acid corrosion. For example, copper, copper nickel, brass, bronze ≤15% Zn, and aluminum bronze ≤8% Al are resistant to SCC, selective leaching, and boric acid corrosion [Ref. 2]
Copper alloy (>15% Zn or >8% Al)	This category applies to those copper alloys whose critical alloying elements are above the thresholds that make them susceptible to stress corrosion cracking (SCC), selective leaching and boric acid corrosion. Copper-zinc alloys >15% Zn are susceptible to SCC, selective leaching and boric corrosion. Additional copper alloys, such as aluminum bronze > 8% Al, also may be susceptible to SCC or leaching. The elements that are most commonly alloyed with copper are Zn (forming brass), tin (forming bronze), nickel, silicon, Al (forming aluminum-bronze), cadmium, and beryllium. Additional copper alloys may be susceptible to these aging effects if they fall above the threshold for the critical

IX.C Use of Terms for Materials	Usage in this document
Term	alloying element. [Ref. 2]
Elastomers	Elastomer is an encompassing term used to refer to a variety of viscoelastic polymers including natural and synthetic rubbers. Elastomers include flexible materials such as rubber, EPT, EPDM, PTFE, ETFE, viton, vitril, neoprene, and silicone elastomer.
Electrical insulation	Electrical insulation is a material used to inhibit/prevent the conduction of electric current.  Electrical insulating materials in this category—include bakelite, phenolic melamine, molded polycarbonate, organic polymers (e.g., EPR (ethylene-propylene rubber), SR (silicone rubber), EPDM (ethylene propylene diene monomer), and XLPE (crosslinked polyethylene) and or ceramics.
Galvanized steel	Galvanized steel is steel coated with Zn, usually by immersion or electrodeposition. The Zn coating protects the underlying steel because the corrosion rate of the Zn coating in dry, clean air is very low. In the presence of moisture, galvanized steel is classified under the category “Steel.”
Glass	This category includes any glass material. Glass is a hard, amorphous, brittle, super-cooled liquid made by fusing together one or more of the oxides of silicon, boron, or phosphorous with certain basic oxides (e.g., Na, Mg, Ca, K), and cooling the product rapidly to prevent crystallization or devitrification.
Graphitic tool steel	Graphitic tool steels (such as AISI O6, which is oil-hardened, and, AISI A10, which is air-hardened), have excellent nonseizing properties. The graphite particles provide self-lubricity and hold applied lubricants.
Gray cast iron	Gray cast iron is an iron alloy made by adding larger amounts of carbon to molten iron than would be used to make steel. Most steel has less than about 1.2 percent by weight carbon, while cast irons typically have between 2.5 to 4 percent. Gray cast iron contains flat graphite flakes that reduce its strength and form cracks, inducing mechanical failures. They also cause the metal to behave in a nearly brittle fashion, rather than experiencing the elastic, ductile behavior of steel. Fractures in this type of metal tend to take place along the flakes, which give the fracture surface a gray color, hence the name of the metal. Gray cast iron is susceptible to selective leaching, resulting in a significant reduction of the material's strength due to the loss of iron from the microstructure, leaving a porous matrix of graphite. In some environments, gray cast iron is categorized with the group “Steel.”
Low-alloy steel, yield strength > 150 ksi	Low-alloy steel includes AISI steels 4140, 4142, 4145, 4140H, 4142H, and 4145H (UNS#: G41400, G41420, G41450, H41400, H41420, H41450).  Low-alloy steel bolting material, SA 193 Gr. B7, is a ferritic, low-alloy steel for high-temperature service. High-strength low-alloy (Fe-Cr-Ni-Mo) steel bolting materials have a maximum tensile strength of <1172 megapascal (MPa) [<170 kips/square inch (ksi)]. They may be subject to SCC if the actual measured yield strength, $S_y$ , $\geq$ 150 ksi (1,034 MPa). Bolting fabricated from high-strength (actual measured yield strength, $S_y$ , $\geq$ 150 ksi or 1,034 MPa) low-alloy steel, SA 193 Gr. B7, is susceptible to stress corrosion cracking.  Examples of high-strength alloy steels that comprise this category include SA540-Gr. B23/24, SA193-

IX.C Use of Terms for Materials	Usage in this document
Term	
Lubrite®	<p>Gr. B8, and Grade L43 (AISI4340).</p> <p>Lubrite® refers to a patented technology in which the bearing substrate (bronze is commonly used, but in unusual environments can range from SS and nodular-iron to tool-steel) is fastened to lubricant. Lubrite is often defined as bronze attached to ASTM B22, alloy 905, with G10 lubricant.</p> <p>Even though Lubrite bearings are characterized as maintenance-free because of the differences in installation, fineness of the surfaces, and lubricant characteristics, they can experience mechanical wear and fretting.</p> <p>Bearings generally have not shown adverse conditions related to the use of Lubrite. The unique environment and precise installation tolerances required for installing the bearings require bearing-specific examinations. The vendor's (Lubrite® Technologies) literature shows 10 lubricant types used in the bearings, ranging from G1 (General Duty) to AE7 (temperature- and radiation-tested) lubricants. The type of lubricant used depends on the plant-specific requirements. Careful installation and clearing out any obstructions during installation ensures that the required tolerances of the bearings are met and reduces the likelihood of functional problems during challenging loading conditions (such as DBA or SSE). The associated aging effects could include malfunctioning, distortion, dirt accumulation, and fatigue under vibratory and cyclic thermal loads. The potential aging effects could be managed by incorporating its periodic examination in ASME Section XI, Subsection IWF (GALL-SLR Report AMP XI.S3) or in Structures Monitoring (GALL-SLR Report AMP XI.S6).</p>
Malleable iron	<p>The term "Malleable iron" usually means malleable cast iron, characterized by exhibiting some elongation and reduction in area in a tensile test. Malleable iron is one of the materials in the category of "Porcelain, Malleable iron, Al, galvanized steel, cement."</p>
Nickel alloys	<p>Nickel alloys are nickel-chromium-iron (molybdenum) alloys and include the Alloys 600 and 690. Examples of nickel alloys include Alloy 182, 600, and 690, Gr. 688 (X-750), Inconel 182, Inconel 82, NiCrFe, SB-166, -167, and -168, and X-750. [Ref. 3]</p>
Porcelain	<p>Hard-quality porcelain is used as an insulator for supporting high-voltage electrical insulators. Porcelain is a hard, fine-grained ceramic that consists of kaolin, quartz, and feldspar fired at high temperatures.</p>
SA508-CI 2 forgings clad with stainless steel using a high-heat-input welding process	<p>This category consists of quenched and tempered vacuum-treated carbon and alloy steel forgings for pressure vessels. As shown in AMR line-item R-85, growth of intergranular separations (underclad cracks) in low-alloy steel forging heat affected zone under austenitic SS cladding is a TLAA to be evaluated for the period of extended operation for all the SA 508-CI 2 forgings where the cladding was deposited with a high heat input welding process per ASME Section XI Code.</p>
Stainless Steel	<p>Products grouped under the term stainless steel (SS) include austenitic, ferritic, martensitic, PH, or duplex SS (Cr content &gt;11%). These SSs may be fabricated using a wrought or cast process. These materials are susceptible to a variety of aging effects and mechanisms, including loss of material due to pitting and crevice corrosion, and cracking due to SCC. In some cases, when an aging effect is</p>

IX.C Use of Terms for Materials	Term
	<p align="center"><b>Usage in this document</b></p> <p>applicable to all of the various SS categories, it can be assumed that the term “SS” in the “Material” column of an AMR line-item in the GALL-SLR Report encompasses all SS types. CASS is quite susceptible to loss of fracture toughness due to thermal and neutron irradiation embrittlement. In addition, MRP-227-A indicates that PH SSs or martensitic SSs may be susceptible to loss of fracture toughness by a thermal aging mechanism. Therefore, when loss of fracture toughness due to thermal and neutron irradiation embrittlement is an applicable aging effect and mechanism for a component in the GALL-SLR Report, the CASS, PH SS, or martensitic SS designation is specifically identified in an AMR line-item.</p> <p>Steel with SS cladding also may be considered SS when the aging effect is associated with the SS surface of the material, rather than the composite volume of the material.</p> <p>Examples of SS designations that comprise this category include A-286, SA193-Gr. B8, SA193-Gr. B8M, Gr. 660 (A-286), SA193-6, SA193-Gr. B8 or B-8M, SA453, Type 416, Type 403, 410, 420, and 431 martensitic SSs, Type 15-5, 17-4, and 13-8-Mo PH SSs, and SA-193, Grade B8 and B8M bolting materials.</p> <p>Examples of wrought austenitic stainless materials that comprise this category include Type 304, 304NG, 304L, 308, 308L, 309, 309L, 316 and 347. Examples of CASS that comprise this category include CF3, CF3M, CF8 and CF8M. [Ref. 4, 5, 6].</p>
Steel	<p>In some environments, carbon steel, alloy steel, cast iron, gray cast iron, malleable iron, and high-strength low-alloy steel are vulnerable to general, pitting, and crevice corrosion, even though the rates of aging may vary. Consequently, these metal types are generally grouped under the broad term “steel.” Note that this does not include SS, which has its own category. However, gray cast iron also is susceptible to selective leaching, and high-strength low-alloy steel is susceptible to SCC. Therefore, when these aging effects are being considered, these materials are specifically identified. Galvanized steel (Zn-coated carbon steel) is also included in the category of “steel” when exposed to moisture. Malleable iron is specifically called out in the phrase “Porcelain, Malleable iron, Al, galvanized steel, cement,” which is used to define the high voltage insulators in GALL-SLR Chapter VI.</p> <p>Examples of steel designations included in this category are ASTM A36, ASTM A285, ASTM A759, SA36, SA106-Gr. B, SA155-Gr. KCF70, SA193-Gr. B7, SA194 -Gr. 7, SA302-Gr B, SA320-Gr. L43 (AISI 4340), SA333-Gr. 6, SA336, SA508-64, class 2, SA508-CI 2 or CI 3, SA516-Gr. 70, SA533-Gr. B, SA540-Gr. B23/24, and SA582. [Ref. 4, 5]</p>
Superaustenitic stainless steel	<p>Superaustenitic stainless steels (SSs) have the same structure as the common austenitic alloys, but they have enhanced levels of elements such as chromium, nickel, molybdenum, copper, and nitrogen, which give them superior strength and corrosion resistance. Compared to conventional austenitic</p>

IX.C Use of Terms for Materials	Usage in this document
Term	
Thermal Insulation	<p>SSs, superaustenitic materials have a superior resistance to pitting and crevice corrosion in environments containing halides. Several nuclear power plants have installed superaustenitic SS (AL-6XN) buried piping.</p> <p>Thermal insulation is a material used to inhibit/prevent heat transfer across a thermal gradient.</p> <p>Thermal insulation materials include calcium silicate, fiberglass, Foamglas<sup>®</sup>, glass dust, cellular glass, and other materials with appropriate thermal conductivities.</p>
Titanium	<p>The category titanium includes unalloyed titanium (ASTM grades 1-4) and various related alloys (ASTM grades 5, 7, 9, and 12). The corrosion resistance of titanium is a result of the formation of a continuous, stable, highly adherent protective oxide layer on the metal surface.</p> <p>Titanium and titanium alloys may be susceptible to crevice corrosion in saltwater environments at elevated temperatures &gt;71 °C [<math>&gt;160</math> °F]. Titanium Grades 5 and 12 are resistant to crevice corrosion in seawater at temperatures as high as 500 °F. SCC of titanium and its alloys is considered applicable in seawater or brackish raw water systems if the titanium alloy contains more than 6% Al or more than 0.30 percent oxygen or any amount of tin [Ref. 7]. ASTM Grades 1, 2, 7, 11, or 12 are not susceptible to SCC in seawater or brackish raw water [Ref. 8].</p>
Various Organic Polymers	<p>Polymers used in electrical applications include EPR, SR, EPDM, and XLPE. XLPE is a cross-linked polyethylene thermoplastic resin, such as polyethylene and polyethylene copolymers. EPR and EPDM are EPRs in the category of thermosetting elastomers.</p>
Various polymeric materials	<p>Polymers used in mechanical <u>applications</u> are addressed as specific to their material types [e.g., PVC, HDPE, fiberglass] or generically as elastomers used in different components types (e.g., piping, seals, linings, fire barriers)].</p>
Wood	<p>Wood piles or sheeting exposed to flowing or standing water is subject to loss of material or changes in material properties due to weathering, chemical degradation, insect infestation, repeated wetting and drying, or fungal decay.</p>
Zircaloy-4	<p>Zircaloy-4, (Zry-4), is a member in the group of high-Zr alloys. Such zircalloys are used in nuclear technology, as Zr has very low absorption cross-section of thermal neutrons. In the GALL-SLR Report, Zry-4 is referenced in AMR Item IV.B3.RP-357 for incore instrumentation thimble tubes. Zry-4 consists of 98.23 weight % zirconium with 1.45% tin, 0.21% iron, 0.1% chromium, and 0.01% hafnium.</p>

1 **D. ENVIRONMENTS**

2 The following table defines many of the standardized environments used in the preceding  
3 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Aging  
4 Management Review (AMR) tables in Chapters II through VIII of the GALL-SLR Report. The  
5 usage of temperature thresholds for describing aging effects are continued as in the Generic  
6 Aging Lessons Learned (GALL) Report, Revision 2.

7 Temperature Threshold of 35 °C [95 °F] for Thermal Stresses in Elastomers: In general, if the  
8 ambient temperature is less than about 35°C [95°F], then thermal aging may be considered not  
9 significant for rubber, butyl rubber, neoprene, nitrile rubber, silicone elastomer, fluoroelastomer,  
10 ethylene-propylene rubber (EPR), and ethylene propylene diene monomer (EPDM) [Ref. 9].  
11 Hardening and loss of strength of elastomers can be induced by thermal aging, exposure to  
12 ozone, oxidation, photolysis (due to ultraviolet light), and radiation. When applied to the  
13 elastomers used in electrical cable insulation, it should be noted that most cable insulation is  
14 manufactured as either 75 °C [167 °F] or 90 °C [194 °F] rated material.

15 Temperature threshold of 60 °C [140 °F] for stress corrosion cracking (SCC) in stainless steel  
16 (SS): SCC occurs very rarely in austenitic SSs below 60°C [140°F]. Although SCC has been  
17 observed in stagnant, oxygenated borated water systems at lower temperatures than this 60°C  
18 [140°F] threshold, all of these instances have identified a significant presence of contaminants  
19 (halogens, specifically chlorides) in the failed components. With a harsh enough environment  
20 (e.g., significant contamination), SCC can occur in austenitic SS at ambient temperature. In a  
21 water environment where the concentration of contaminants (e.g., sulfates, chlorides, fluorides)  
22 is maintained consistent with a water chemistry program, these conditions are considered  
23 event-driven, resulting from a breakdown of chemistry controls. However in environments  
24 where the chemistry is not controlled (e.g., air-outdoor, soil) SCC can occur at ambient  
25 temperature. In air-outdoor environments, surface temperatures exposed directly to sunlight will  
26 be higher than ambient air conditions [Ref. 8, 10, 11].

27 Temperature threshold of 250 °C [482 °F] for thermal embrittlement in cast austenitic stainless  
28 steel (CASS): CASS subjected to sustained temperatures below 250 °C [482 °F] will not result  
29 in a reduction of room temperature Charpy impact energy below 50 foot-pound (ft-lb) for  
30 exposure times of approximately 300,000 hours (for CASS with ferrite content of 40 percent and  
31 approximately 2,500,000 hours for CASS with ferrite content of 14 percent) [Fig. 2; Ref. 12]. For  
32 a maximum exposure time of approximately 420,000 hours (48 EFPY), a screening temperature  
33 of 250 °C [482 °F] is conservatively chosen because (1) the majority of nuclear grade materials  
34 is expected to contain a ferrite content well below 40 percent, and (2) the 50 ft-lb limit is very  
35 conservative when applied to cast austenitic materials. It is typically applied to ferritic materials  
36 (e.g., 10 CFR Part 50 Appendix G). For CASS components in the reactor coolant pressure  
37 boundary, this threshold is supported by the GALL-SLR Report AMP XI.M12, “Thermal Aging  
38 Embrittlement of Cast Austenitic Stainless Steel (CASS),” with the exception of  
39 niobium-containing steels, which require evaluation on a case-by-case basis.

IX.D Use of Terms for Environments		Usage in this document
Term		
Adverse localized environment		An adverse localized environment is an environment limited to the immediate vicinity of a component that is hostile to the component material, thereby leading to potential aging effects. Electrical insulation used for electrical cables can be subjected to an adverse localized environment. Adverse localized environment can be due to any of the following: (1) exposure to significant moisture, or (2) heat, radiation, or moisture and are represented by specific GALL-SLR AMR items.
Aggressive environment (steel in concrete)		This environment affects steel embedded in concrete with a pH <5.5 or a chloride concentration >500 ppm or sulfate >1,500 ppm. [Ref. 13]
Air-indoor controlled		This environment is one to which the specified internal or external surface of the component or structure is exposed; a humidity-controlled (i.e., air conditioned) environment. For electrical purposes, control must be sufficient to eliminate the cited aging effects of contamination and oxidation without affecting the resistance.
Air-indoor uncontrolled		Uncontrolled indoor air is associated with systems with temperatures higher than the dew point (i.e., condensation can occur, but only rarely; equipment surfaces are normally dry).
Air-outdoor		The outdoor environment consists of moist, possibly salt-laden atmospheric air, ambient temperatures and humidity, and exposure to weather, including precipitation and wind. The component is exposed to air and local weather conditions, including salt water spray (if present). A component is considered susceptible to a wetted environment when it is submerged, has the potential to collect water, or is subject to external condensation.
Air with borated water leakage		Air and untreated borated water leakage on indoor or outdoor systems with temperatures either above or below the dew point. The water from leakage is considered to be untreated, due to the potential for water contamination at the surface (germane to PWRs).
Air with leaking secondary-side water and/or steam		This environment applies to steel components in the pressure boundary and structural parts of the once-through steam generator that may be exposed to air with leaking secondary-side water and/or steam.
Air with metal temperature up to 288 °C [550 °F]		This environment is synonymous with the more commonly-used phrase "system temperature up to 288 °C [550 °F]."
Air with reactor coolant leakage		Air and reactor coolant or steam leakage on high temperature systems (germane to BWRs).
Air with steam or water leakage		Air and untreated steam or water leakage on indoor or outdoor systems with temperatures above or below the dew point.
Air, dry		Air that has been treated to reduce its dew point well below the system operating temperature. Within piping, unless otherwise specified, this encompasses either internal or external.
Air, moist		Air with enough moisture to facilitate the loss of material in steel caused by general, pitting, and crevice corrosion. Moist air in the absence of condensation also is potentially aggressive (e.g., under conditions where hygroscopic surface contaminants are present, etc.).
Any		This could be any indoor or outdoor environment where the aging effects are not dependent on environmental conditions.

IX.D Use of Terms for Environments	Term	Usage in this document
Buried and underground	<p>As referenced in GALL-SLR Report AMP XI.M41, "Buried and Underground Piping and Tanks," buried piping and tanks are those in direct contact with soil, or those in contact with concrete where water could be present (e.g., a wall penetration).</p> <p>Underground piping and tanks are below grade, but are contained within a tunnel or vault such that they are in contact with air and are located where access for inspection is limited (e.g., special lifting equipment is required to gain access to the vault).</p>	
Closed-cycle cooling water	<p>Treated water subject to the closed-cycle cooling water (CCCW) chemistry program is included in this environment. CCCW &gt;60 °C [<math>&gt; 140^{\circ}\text{F}</math>] makes the SCC of SS possible. Examples of descriptors that comprise this category can include: (i) chemically-treated, (ii) borated water, and (iii) treated component cooling water demineralized water on one side and CCCW (treated water) on the other side chemically-treated, borated water on the tube side and CCCW on the shell side.</p>	
Concrete	<p>This environment consists of components embedded in concrete.</p>	
Condensation (internal/external)	<p>Condensation on the surfaces of systems at temperatures below the dew point is considered "raw water" due to the potential for internal or external surface contamination. Under certain circumstances, the former terms "moist air" or "warm moist air" are subsumed by the usage of "condensation," which describes an environment where there is enough moisture for corrosion to occur.</p> <p>Condensation can form between thermal insulation and a component when air intrusion occurs through minor gaps in the insulation and the operating temperature of the component is below the dew point of the penetrating air.</p>	
Containment environment (inert)	<p>A drywell environment is made inert with nitrogen to render the primary containment atmosphere nonflammable by maintaining the oxygen content below 4 percent by volume during normal operation.</p>	
Diesel exhaust Fuel oil	<p>This environment consists of gases, fluids, and particulates present in diesel engine exhaust. Diesel oil, No. 2 oil, or other liquid hydrocarbons used to fuel diesel engines. Fuel oil used for combustion engines may be contaminated with water, which may promote additional aging effects.</p>	
Gas	<p>Internal gas environments include dry air or inert, nonreactive gases. This generic term is used only with "Common Miscellaneous Material/Environment," where aging effects are not expected to degrade the ability of the structure or component to perform its intended function for the period of extended operation.</p> <p>The term "gas" is not meant to comprehensively include all gases in the fire suppression system. The GALL-SLR Report AMP XI.M26, "Fire Protection," is used for the periodic inspection and testing of the halon/carbon dioxide fire suppression system.</p>	
Ground water/soil	<p>Ground water is subsurface water that can be detected in wells, tunnels, or drainage galleries, or that flows naturally to the earth's surface via seeps or springs. Soil is a mixture of organic and</p>	

IX.D Use of Terms for Environments	Term	Usage in this document
		inorganic materials produced by the weathering of rock and clay minerals or the decomposition of vegetation. Voids containing air and moisture can occupy 30 to 60 percent of the soil volume [Ref. 14]. Concrete subjected to a ground water/soil environment can be vulnerable to an increase in porosity and permeability, cracking, loss of material (spalling, scaling), or aggressive chemical attack. Other materials with prolonged exposures to ground water or moist soils are subject to the same aging effects as those systems and components exposed to raw water.
Lubricating oil		Lubricating oils are low-to-medium viscosity hydrocarbons that can contain contaminants and/or moisture. This usage also functionally encompasses hydraulic oil (nonwater based). These oils are used for bearing, gear, and engine lubrication. The GALL-SLR Report AMP XI.M39, Lubricating Oil Analysis, addresses this environment. Piping, piping components, and piping elements, whether copper, SS, or steel, when exposed to lubricating oil with some water, will have limited susceptibility to aging degradation due to general or localized corrosion.
Raw water		Raw water consists of untreated surface or ground water, whether fresh, brackish, or saline in nature. This includes water for use in OCCW systems and may include potable water, water that is used for drinking or other personal use. See also "condensation."
Reactor coolant		Reactor coolant is treated water in the reactor coolant system and connected systems at or near full operating temperature, including steam associated with BWRs.
Reactor coolant >250 °C [>482°F]		Treated water above the thermal embrittlement threshold for CASS.
Reactor coolant >250 °C [>482°F] and neutron flux		Treated water in the reactor coolant system and connected systems above the thermal embrittlement threshold for CASS.
Reactor coolant and high fluence (>1 × 10 <sup>21</sup> n/cm <sup>2</sup> E >0.1 MeV)		Reactor coolant subjected to a high fluence (>1 × 10 <sup>21</sup> n/cm <sup>2</sup> E >0.1 MeV).
Reactor coolant and neutron flux		The reactor core environment that will result in a neutron fluence exceeding 10 <sup>17</sup> n/cm <sup>2</sup> (E >1 MeV) at the end of the license renewal term.
Reactor coolant and secondary feedwater/steam		Water in the reactor coolant system and connected systems at or near full operating temperature and the PWR feedwater or steam at or near full operating temperature, subject to the secondary water chemistry program (GALL-SLR Report AMP XI.M2).
Secondary feedwater		Within the context of the recirculating steam generator, components such as steam generator feedwater impingement plate and support may be subjected to loss of material due to erosion in a secondary feedwater environment. More generally, the environment of concern is a secondary feedwater/steam combination.
Secondary feedwater/steam		PWR feedwater or steam at or near full operating temperature, subject to the secondary water chemistry program (GALL-SLR Report AMP XI.M2).
Sodium pentaborate solution		Treated water that contains a mixture of borax and boric acid.
Soil		Soil is a mixture of inorganic materials produced by the weathering of rock and clay minerals, and organic material produced by the decomposition of vegetation. Voids containing air and moisture occupy 30 to 60 percent of the soil volume [Ref. 14]. Properties of soil that can affect degradation kinetics include moisture content, pH, ion exchange capacity, density, and hydraulic conductivity.

IX.D Use of Terms for Environments	Usage in this document	
Term		
Steam		External environments included in the soil category consist of components at the air/soil interface, buried in the soil, or exposed to ground water in the soil. See also "ground water/soil." The steam environment is managed by the BWR water chemistry program or PWR secondary plant water chemistry program. Defining the temperature of the steam is not considered necessary for analysis.
System temperature up to 288 °C [550 °F]		This environment consists of a metal temperature of BWR components <288 °C [550 °F].
System temperature up to 340 °C [644 °F]		This environment consists of a maximum metal temperature <340 °C [644 °F].
Treated borated water		Borated (PWR) water is a controlled water system. The CVCS maintains the proper water chemistry in the reactor coolant system while adjusting the boron concentration during operation to match long-term reactivity changes in the core.
Treated borated water >250 °C [>482 °F]		Treated water with boric acid above the 250 °C [>482 °F] thermal embrittlement threshold for CASS.
Treated borated water >60 °C [>140 °F]		Treated water with boric acid in PWR systems above the 60 °C [>140 °F] SCC threshold for SS.
Treated water		Treated water is water whose chemistry has been altered and is maintained (as evidenced by testing) in a state which differs from naturally-occurring sources so as to meet a desired set of chemical specifications.
		Treated water generally falls into one of two categories.  (1) The first category is based on demineralized water and, with the possible exception of boric acid (for PWRs only), generally contains minimal amounts of any additions. This water is generally characterized by high purity, low conductivity, and very low oxygen content. This category of treated water is generally used as BWR coolant and PWR primary and secondary water.  (2) The second category may be but need not be based on demineralized water. It contains corrosion inhibitors and also may contain biocides or other additives. This water will generally be comparatively higher in conductivity and oxygen content than the first category of treated water. This category of treated water is generally used in HVAC systems, auxiliary boilers, and diesel engine cooling systems. CCCW is a subset of this category of treated water.
Treated water >60 °C [>140 °F]		Treated water above the 60 °C [140 °F] SCC threshold for SS.
Waste water		Radioactive, potentially radioactive, or nonradioactive waters that are collected from equipment and floor drains. Waste waters may contain contaminants, including oil and boric acid, depending on location, as well as originally treated water that is not monitored by a chemistry program.
Water-flowing		Water that is refreshed; thus, it has a greater impact on leaching and can include rainwater, raw water, ground water, or water flowing under a foundation.
Water-standing		Water that is stagnant and unrefreshed, thus possibly resulting in increased ionic strength up to saturation.



1 **E. AGING EFFECTS**

2 The following table explains the selected usage of many of the standardized aging effects due  
3 to associated aging mechanisms used in the preceding Generic Aging Lessons Learned for  
4 Subsequent License Renewal (GALL-SLR) aging management review (AMR) tables in  
5 Chapters II through VIII of the GALL-SLR Report.

IX.E Use of Terms for Aging Effects	Term	Usage in this document
Changes in dimensions		Changes in dimension can result from various phenomena, such as void swelling and, on a macroscopic level, denting.
Concrete cracking and spalling		Cracking and exfoliation of concrete as the result of freeze-thaw, aggressive chemical attack, and reaction with aggregates.
Corrosion of connector contact surfaces		Corrosion of exposed connector contact surfaces when caused by borated water intrusion.
Crack growth		Increase in crack size attributable to cyclic loading.
Cracking		This term is synonymous with the phrase “crack initiation and growth” in metallic substrates. Cracking in concrete when caused by restraint shrinkage, creep, settlement, and aggressive environment.
Cracks; distortion; increase in component stress level		Within concrete structures, cracks, distortion, and increase in component stress level when caused by settlement. Although settlement can occur in a soil environment, the symptoms can be manifested in either an air-indoor uncontrolled or air-outdoor environment.
Cumulative fatigue damage		Cumulative fatigue damage is due to fatigue, as defined by ASME Boiler and Pressure Vessel Code.
Denting		Denting in steam generators can result from corrosion of carbon steel tube support plates.
Expansion and cracking		Within concrete structures, expansion and cracking can result from reaction with aggregates.
Fatigue		Fatigue in metallic fuse holder clamps can result from ohmic heating, thermal cycling, electrical transients, frequent manipulation, and vibration. [Ref. 15]
Flow blockage		Flow blockage is the reduction of flow or pressure, or both, in a component due to fouling, which can occur from an accumulation of debris such as particulate fouling (e.g., eroded coatings, corrosion products), biofouling, or macro fouling. Flow blockage can result in a reduction of heat transfer or the inability of a system to meet its intended safety function, or both. This usage is consistent with the usage of the term “pressure boundary” as found in SRP-SLR Table 2.1-4(b), “Typical ‘Passive’ Component-Intended Functions.”
Hardening and loss of strength		Hardening (loss of flexibility) and loss of strength (loss of ability to withstand tensile or compressive stress) can result from elastomer degradation of seals and other elastomeric components. Degraded elastomers can experience increased hardness, shrinkage, loss of sealing, cracking, and loss of strength. Hardening and loss of strength of elastomers can be induced by elevated temperature {over about [95 °F or 35 °C], and additional aging factors (e.g., exposure to ozone, oxidation, photolysis (due to ultraviolet light), and radiation)}. [Ref. 9]
Increase in porosity and permeability, cracking, loss of material (spalling, scaling), loss of strength		Porosity and permeability, cracking, and loss of material (spalling, scaling) in concrete can increase due to aggressive chemical attack. In concrete, the loss of material (spalling, scaling) and cracking can result from the freeze-thaw processes. Loss of strength can result from leaching of calcium hydroxide in the concrete.
Reduction in impact strength		Long-term (2 years or longer) exposure of PVC piping, piping components, and piping elements to sunlight can result in a reduction in impact strength. Other polymeric materials are subject to

IX.E Use of Terms for Aging Effects	Term	Usage in this document
Increased resistance of connection	<p>embrittlement due to environmental conditions such as sunlight, ozone, chemical vapors, or loss of plasticizers due to evaporation. [Ref. 16]</p> <p>Increased resistance of connection is an aging effect that can be caused by the loosening of bolts resulting from thermal cycling and ohmic heating. [ Ref. 17, 18]</p> <p>In Chapter VI AMR line-items, increased resistance to connection is also said to be caused by the following aging mechanisms:</p> <ul style="list-style-type: none"> <li>• Chemical contamination, corrosion, and oxidation (in an air, indoor controlled environment, increased resistance of connection due to chemical contamination, corrosion and oxidation do not apply)</li> <li>• Thermal cycling, ohmic heating, electrical transients, vibration, chemical contamination, corrosion, and oxidation</li> <li>• Fatigue caused by frequent manipulation or vibration</li> <li>• Corrosion of connector contact surfaces caused by intrusion of borated water</li> <li>• Oxidation or loss of preload.</li> </ul>	
Ligament cracking	<p>Steel tube support plates can experience ligament cracking due to corrosion. As previously noted in IN 96-09, tube support plate signal anomalies found during eddy-current testing of SG tubes may be indicative of support plate damage or ligament cracking.</p>	
Loss of Coating or Lining Integrity	<p>Loss of coating or lining integrity is the disbondment of a coating/lining from its substrate. Loss of coating or lining integrity can be due to a variety of aging mechanisms such as blistering, cracking, flaking, peeling, delamination, rusting, or physical damage, and spalling for cementitious coatings/linings.</p> <p>Where the aging mechanism results in exposure of the base material, loss of material of the base material can occur.</p> <p>Where the aging mechanism results in the coating/lining not remaining adhered to the substrate, the coating/lining can become debris that could prevent an in-scope component from satisfactorily accomplishing any of its functions identified under 10 CFR 54.4(a)(1) or (a)(3) (e.g., reduction in flow, drop in pressure, reduction in heat transfer).</p>	
Loss of conductor strength	<p>Transmission conductors can experience loss of conductor strength due to corrosion.</p>	
Loss of fracture toughness	<p>Loss of fracture toughness can result from various aging mechanisms, including thermal aging embrittlement and neutron irradiation embrittlement.</p>	
Loss of leak tightness	<p>Steel airlocks can experience loss of leak tightness in the closed position resulting from mechanical wear of locks, hinges, and closure mechanisms.</p>	
Loss of material	<p>Loss of material in mechanical components may be due to general corrosion, boric acid corrosion,</p>	

IX.E Use of Terms for Aging Effects	Term	Usage in this document
		<p>pitting corrosion, galvanic corrosion, crevice corrosion, erosion, fretting, flow-accelerated corrosion, microbiologically-induced corrosion, fouling, selective leaching, wastage, and wear.</p> <p>In concrete structures, loss of material can also be caused by aggressive chemical attack, abrasion, cavitation or corrosion of embedded steel.</p> <p>For high-voltage insulators, loss of material can be attributed to mechanical wear or wind-induced abrasion. [Ref. 17]</p>
Loss of material, loss of form		<p>In earthen water-control structures, the loss of material and loss of form can result from erosion, settlement, sedimentation, frost action, waves, currents, surface runoff, and seepage.</p>
Loss of mechanical function		<p>Loss of mechanical function in Class 1 piping and components (such as constant and variable load spring hangers, guides, stops, sliding surfaces, and vibration isolators) fabricated from steel or other materials, such as Lubrite<sup>®</sup>, can occur through the combined influence of a number of aging mechanisms. Such aging mechanisms can include corrosion, distortion, dirt accumulation, overload, fatigue due to vibratory and cyclic thermal loads, or elastomer hardening. Clearances being less than the design requirements can also contribute to loss of mechanical function.</p>
Loss of preload		<p>Loss of preload can be due to gasket creep, thermal effects (including differential expansion and creep or stress relaxation), and self-loosening (which includes vibration, joint flexing, cyclic shear loads, thermal cycles). [Ref. 19]</p>
Loss of prestress		<p>Loss of prestress in structural steel anchorage components can result from relaxation, shrinkage, creep, or elevated temperatures.</p>
Loss of sealing; leakage through containment		<p>Loss of sealing and leakage through containment in such materials as seals, elastomers, rubber, and other similar materials can result from deterioration of seals, gaskets, and moisture barriers (caulking, flashing, and other sealants). Loss of sealing in elastomeric phase bus enclosure assemblies can result from moisture intrusion.</p>
None		<p>Certain material/environment combinations may not be subject to significant aging mechanisms; thus, there are no relevant aging effects that require management.</p>
Reduction in concrete anchor capacity due to local concrete degradation		<p>Reduction in concrete anchor capacity due to local concrete degradation can result from a service-induced cracking or other concrete aging mechanisms.</p>
Reduction in foundation strength, cracking, differential settlement		<p>Reduction in foundation strength, cracking, and differential settlement can result from erosion of porous concrete subfoundation.</p>
Reduction of heat transfer		<p>Reduction of heat transfer can result from fouling on the heat transfer surface. Although in heat exchangers the tubes are the primary heat transfer component, heat exchanger internals, including tubesheets and fins, contribute to heat transfer and may be affected by the reduction of heat transfer due to fouling. Although GALL-SLR Report does not include reduction of heat transfer for any heat exchanger surfaces other than tubes, reduction in heat transfer is of concern for other heat exchanger surfaces.</p>

<b>IX.E Use of Terms for Aging Effects</b>	
<b>Term</b>	<b>Usage in this document</b>
Reduced electrical insulation resistance	<p>Reduced electrical insulation resistance is the decrease in the effectiveness of the electrical insulation to inhibit/prevent the conduction of an electric current.</p> <p>Reduced electrical insulation resistance is an aging effect associated with the following aging mechanisms:</p> <ul style="list-style-type: none"> <li>• Thermal/thermooxidative degradation of organics/thermoplastics, radiation-induced oxidation, moisture/debris intrusion, and ohmic heating</li> <li>• Presence of salt deposits or surface contamination</li> <li>• Thermal/thermooxidative degradation of organics, radiolysis, and photolysis (UV sensitive materials only) of organics; radiation-induced oxidation; moisture intrusion moisture</li> <li>• Moisture</li> </ul>
Reduced thermal insulation resistance	<p>Reduced thermal insulation resistance is a decrease in the effectiveness of the thermal insulation to inhibit/prevent heat transfer across a thermal gradient.</p> <p>Reduced thermal insulation resistance can be the result of moisture intrusion and/or the exposure to moisture.</p>
Reduction of neutron-absorbing capacity	Reduction of neutron-absorbing capacity can result from Boraflex degradation.
Reduction of strength and modulus	In concrete, reduction of strength and modulus can be attributed to elevated temperatures (>66 °C [ $>150$ °F] general; $>93$ °C [ $>200$ °F] local).
Reduction or loss of isolation function	Reduction or loss of isolation function in polymeric vibration isolation elements can result from elastomers exposed to radiation hardening, temperature, humidity, sustained vibratory loading.
Wall thinning	Wall thinning is a specific type of loss of material attributed in the AMR items to general corrosion, flow-accelerated corrosion, and erosion mechanisms including cavitation, flashing, droplet impingement, or solid particle impingement.



1 **F. SIGNIFICANT AGING MECHANISMS**

2 An aging mechanism is considered to be significant when it may result in aging effects that  
3 produce a loss of functionality of a component or structure during the current or license renewal  
4 period if allowed to continue without mitigation.

5 The following table defines many of the standardized aging mechanisms used in the preceding  
6 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) aging  
7 management review (AMR) line item tables in Chapters II through VIII of GALL-SLR Report.

IX.F Use of Terms for Aging Mechanisms	Term	Usage in this document
Abrasion	As used in the context of the GALL-SLR Report, Chapter III, "Structures and Component Supports," as water migrates over a concrete surface, it may transport material that can abrade the concrete. The passage of water also may create a negative pressure at the water/air-to-concrete interface that can result in abrasion and cavitation degradation of the concrete. This may result in pitting or aggregate exposure due to loss of cement paste. [Ref. 20]	
Aggressive chemical attack	Concrete, being highly alkaline (pH >12.5), is degraded by strong acids. Chlorides and sulfates of potassium, sodium, and magnesium may attack concrete, depending on their concentrations in soil/ground water that comes into contact with the concrete. Exposed surfaces of Class 1 structures may be subject to sulfur-based acid-rain degradation. The minimum thresholds causing concrete degradation are 500 ppm chlorides and 1,500 ppm sulfates. [Ref. 20]	
Boraflex degradation	Boraflex degradation may involve gamma radiation-induced shrinkage of Boraflex and the potential to develop tears or gaps in the material. A more significant potential degradation is the gradual release of silica and the depletion of boron carbide from Boraflex, following gamma irradiation and long-term exposure to the wet pool environment. The loss of boron carbide from Boraflex is characterized by slow dissolution of the Boraflex matrix from the surface of the Boraflex and a gradual thinning of the material.  The boron carbide loss can result in a significant increase in the reactivity within the storage racks. An additional consideration is the potential for silica transfer through the fuel transfer canal into the reactor core during refueling operations and its effect on the fuel-clad heat transfer capability. [Ref. 21]	
Boric acid corrosion	Corrosion by boric acid, which can occur where there is borated water leakage in an environment described as air with borated water leakage (see Corrosion).	
Cavitation	Formation and instantaneous collapse of innumerable tiny voids or cavities within a liquid subjected to rapid and intense pressure changes. Cavitation caused by severe turbulent flow can potentially lead to cavitation damage.	
Chemical contamination	Presence of chemicals that do not occur under normal conditions at concentrations that could result in the degradation of the component.	
Cladding degradation	This refers to the degradation of the SS cladding via any applicable degradation process and is a precursor to cladding breach.  It is only used to describe the loss of material due to pitting and crevice corrosion (only for steel after cladding degradation) of piping, piping components, and piping elements fabricated from steel, with SS cladding.	
Corrosion	Chemical or electrochemical reaction between a material, usually a metal, and the environment or between two dissimilar metals that produces a deterioration of the material and its properties.	
Corrosion of carbon steel tube support plate	Corrosion can occur on the carbon steel tube support plates, which are plate-type components providing tube-to-tube mechanical support for the tubes in the tube bundle of the steam generator	

IX.F Use of Terms for Aging Mechanisms	
Term	Usage in this document
Corrosion of embedded steel	(recirculating) system of a PWR. The tubes pass through drilled holes in the plate. The secondary coolant flows through the tube supports via flow holes between the tubes. [Ref. 22, 23] If the pH of concrete in which steel is embedded is reduced below 11.5 by intrusion of aggressive ions (e.g., chlorides > 500 ppm) in the presence of oxygen, embedded steel may corrode. A reduction in pH may be caused by the leaching of alkaline products through cracks, entry of acidic materials, or carbonation. Chlorides may be present in the constituents of the original concrete mix. The severity of the corrosion is affected by the properties and types of cement, aggregates, and moisture content. [Ref. 24]
Creep	Creep, for a metallic material, refers to a time-dependent continuous deformation process under constant stress. It is an elevated temperature process and is not a concern for low-alloy steel below 371 °C [700 °F], for austenitic alloys below 538 °C [1,000 °F], or for Ni-based alloys below 982 °C [1,800 °F]. [Ref. 25, 26]  Creep, in concrete, is related to the loss of absorbed water from the hydrated cement paste. It is a function of the modulus of elasticity of the aggregate. It may result in loss of prestress in the tendons used in prestressed concrete containment. [Ref. 22]
Crevice corrosion	Crevice corrosion occurs in a wetted or buried environment when a crevice or area of stagnant or low flow exists that allows a corrosive environment to develop in a component. It occurs most frequently in joints and connections, or points of contact between metals and nonmetals, such as gasket surfaces, lap joints, and under bolt heads. Carbon steel, cast iron, low alloy steels, SS, copper, and nickel base alloys are all susceptible to crevice corrosion. Steel can be subject to crevice corrosion in some cases after lining/cladding degradation. Localized corrosion of a metal surface at, or immediately adjacent to, an area that is shielded from full exposure to the environment because of the close proximity of the metal to the surface of another dissimilar material.
Cyclic loading	Cyclic loading can cause cracking by periodic application of mechanical and thermal loads on a component. Examples of cyclic loading are pressure and thermally-induced loads due to thermal-hydraulic transients of piping components. Fatigue cracking is a typical result of cyclic loadings on metal components.
Distortion	The aging mechanism of distortion (as associated with component supports in the GALL-SLR Report, Chapter III.B2) can be caused by time-dependent strain or by gradual elastic and plastic deformation of metal that is under constant stress at a value lower than its normal yield strength.
Elastomer degradation	Elastomer degradation is an encompassing term related to various aging mechanisms that result in hardening and loss of strength of elastomers. Degradation can occur in elastomers due to thermal aging (elevated temperature over about 35 °C [95 °F], exposure to ozone, oxidation, photolysis (due to ultraviolet light), and radiation. [Ref. 9]  Degradation may include mechanisms such as cracking, crazing, fatigue breakdown, abrasion, chemical attacks, and change in material properties. [Ref. 27, 28]

IX.F Use of Terms for Aging Mechanisms	Usage in this document
Electrical transients	An electrical transient is a stressor caused by a voltage spike that can contribute to aging degradation. Certain types of high-energy electrical transients can contribute to electromechanical forces, ultimately resulting in fatigue or loosening of bolted connections. Transient voltage surges are a major contributor to the early failure of sensitive electrical components.
Elevated temperature	Elevated temperature is referenced as an aging mechanism only in the context of LWR containments (GALL-SLR Chapter II). In concrete, reduction of strength and modulus can be attributed to elevated temperatures {>66 °C [>150°F] general; >93 °C [>200 °F] local}.
Erosion	Erosion is the progressive loss of material due to the mechanical interaction between a surface and a moving fluid. Different forms of erosion include cavitation, flashing, droplet impingement, and solid particle impingement.
Erosion settlement	Erosion settlement is the subsidence of a containment structure that may occur due to changes in the site conditions, (e.g., erosion or changes in the water table). The amount of settlement depends on the foundation material. [Ref. 24]
Erosion, settlement, sedimentation, frost action, waves, currents, surface runoff, seepage	Another synonymous term is “erosion of the porous concrete subfoundation.”
Fatigue	In earthen water-control structures, the loss of material and loss of form can result from erosion, settlement, sedimentation, frost action, waves, currents, surface runoff, and seepage.
Flow-accelerated corrosion	Fatigue is a phenomenon leading to fracture under repeated or fluctuating stresses having a maximum value less than the tensile strength of the material. Fatigue fractures are progressive, and grow under the action of the fluctuating stress. Fatigue due to vibratory and cyclic thermal loads is defined as the structural degradation that can occur from repeated stress/strain cycles caused by fluctuating loads (e.g., from vibratory loads) and temperatures, giving rise to thermal loads. After repeated cyclic loading of sufficient magnitude, microstructural damage may accumulate, leading to macroscopic crack initiation at the most vulnerable regions. Subsequent mechanical or thermal cyclic loading may lead to growth of the initiated crack. Vibration may result in component cyclic fatigue, as well as in cutting, wear, and abrasion, if left unabated. Vibration is generally induced by external equipment operation. It may also result from flow resonance or movement of pumps or valves in fluid systems.  Crack initiation and growth resistance is governed by factors including stress range, mean stress, loading frequency, surface condition, and the presence of deleterious chemical species. [Ref. 29]
Fouling	Flow-accelerated corrosion (FAC) is a corrosion mechanism, which results in wall thinning of carbon steel components exposed to moving, high temperature, low-oxygen water, such as PWR primary and secondary water, and BWR reactor coolant. FAC is the result of dissolution of the surface film of the steel, which is transported away from the site of dissolution by the movement of water. [Ref. 30]
	Fouling is an accumulation of deposits on the surface of a component or structure. This term includes accumulation and growth of aquatic organisms on a submerged metal surface or the accumulation of deposits (usually inorganic). Biofouling, a subset of fouling, can be caused by either macroorganisms

IX.F Use of Terms for Aging Mechanisms	
Term	Usage in this document
	<p>(e.g., barnacles, Asian clams, zebra mussels, or others found in fresh and salt water) or microorganisms (e.g., algae, microfouling tubercles).</p> <p>Fouling also can be categorized as particulate fouling (e.g., sediment, silt, dust, eroded coatings, and corrosion products), biofouling, or macrofouling (e.g., delaminated coatings, debris). Fouling can occur on the piping, valves, and heat exchangers. Fouling can result in a reduction of heat transfer or flow blockage. For "fouling that leads to corrosion," fouling can be an indirect contributor to corrosion but does not directly cause loss of material.</p>
Freeze-thaw, frost action	<p>Repeated freezing and thawing can cause severe degradation of concrete, characterized by scaling, cracking, and spalling. The cause is water freezing within the pores of the concrete, creating hydraulic pressure. If unrelieved, this pressure will lead to freeze-thaw degradation.</p> <p>If the temperature cannot be controlled, other factors that enhance the resistance of concrete to freeze-thaw degradation are (a) adequate air content (i.e., within ranges specified in ACI 301-84), (b) low permeability, (c) protection until adequate strength has developed, and (d) surface coating applied to frequently wet-dry surfaces. [Ref. 24, 31]</p>
Fretting	<p>Fretting is a wear process that occurs at the interface between contacting surfaces that experience a slight, differential oscillatory movement. Fretting can lead to loss of material.</p>
Galvanic corrosion	<p>Galvanic corrosion is accelerated corrosion of a metal because of an electrical contact with a more noble metal or nonmetallic conductor in a corrosive electrolyte. It is also called bimetallic corrosion, contact corrosion, dissimilar metal corrosion, or two-metal corrosion. For example, galvanic corrosion is an applicable aging mechanism for steel materials coupled to more noble metals in heat exchangers; galvanic corrosion of copper is of concern when coupled with the nobler SS.</p> <p>Galvanic corrosion was removed from the AMR line item tables as a specific aging mechanism. The most effective means of mitigating or preventing galvanic corrosion involve design and maintenance activities. For example: (a) selecting dissimilar metals that are as close to each other in the galvanic series; (b) avoiding localized small anodes and large cathodes; (c) instituting means to insulate the dissimilar metals from each other; (d) coatings and (e) sacrificial anodes.</p> <p>Although galvanic corrosion has been removed from the AMR line item tables as a specific aging mechanism, several AMPs support the mitigation or prevention of galvanic corrosion. For example: GALL-SLR Report AMP XI.M42, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks," manages loss of coating integrity. A licensee experienced accelerated galvanic corrosion when loss of coating integrity occurred in the vicinity of carbon steel components attached to AL6XN components. [Ref. 32] GALL-SLR Report AMP XI.M10, "Boric Acid Corrosion," inspections can detect boric acid residue spanning dissimilar metals, which can result in a galvanic corrosion cell. A licensee experienced galvanic corrosion of a steel nozzle when boric acid residue</p>

IX.F Use of Terms for Aging Mechanisms	Usage in this document
Term	
	<p>spanned the steel nozzle and attached SS piping. The galvanic corrosion resulted in corrosion rates 1.5 times higher than expected. [Ref. 33] Cracking or pitting of SS or nickel alloy cladding can lead to localized galvanic attack. AMPs XI.M32, "One-Time Inspection," and XI.M21A, "Closed Treated Water Systems," are used to detect cracking due to SSC and loss of material due to pitting and crevice corrosion for clad steel components. [Ref. 33]</p> <p>Any of the AMPs used to detect loss of material due to general, pitting, or crevice corrosion can also detect loss of material due to galvanic corrosion.</p>
General corrosion	<p>General corrosion, also known as uniform corrosion, proceeds at approximately the same rate over a metal surface. Loss of material due to general corrosion is an aging effect requiring management for low-alloy steel, carbon steel, and cast iron in outdoor environments.</p> <p>Some potential for pitting and crevice corrosion may exist even when pitting and crevice corrosion is not explicitly listed in the aging effects/aging mechanism column in GALL-SLR Report-AMR items and when the descriptor may only be loss of material due to general corrosion. For example, the GALL-SLR Report AMP XI.M36, "External Surfaces Monitoring of Mechanical Components," calls for the inspection of general corrosion of steel through visual inspection of external surfaces for evidence of material loss and leakage. It acts as a de facto screening for pitting and crevice corrosion, since the symptoms of general corrosion will be noticed first. Wastage is thinning of component walls due to general corrosion.</p>
Intergranular attack	<p>In austenitic SSs, the precipitation of chromium carbides, usually at grain boundaries, on exposure to temperatures of about 550–850 °C [1,022–1,562 °F], leaves the grain boundaries depleted of Cr and, therefore, susceptible to preferential attack [intergranular attack (IGA)] by a corroding (oxidizing) medium.</p>
Intergranular stress corrosion cracking	<p>Intergranular stress corrosion cracking (IGSCC) is SCC in which the cracking occurs along grain boundaries.</p>
Irradiation assisted stress corrosion cracking	<p>Failure by intergranular cracking in aqueous environments of stressed materials exposed to ionizing radiation has been termed irradiation assisted stress corrosion cracking (IASCC). Irradiation by high-energy neutrons can promote SCC by affecting material microchemistry (e.g., radiation-induced segregation of elements such as P, S, Si, and Ni to the grain boundaries), material composition and microstructure (e.g., radiation hardening), as well as water chemistry (e.g., radiolysis of the reactor water to make it more aggressive).</p>
Leaching of calcium hydroxide and carbonation	<p>Water passing through cracks, inadequately prepared construction joints, or areas that are not sufficiently consolidated during placing may dissolve some calcium-containing products (of which calcium hydroxide is the most-readily soluble, depending on the solution pH) in concrete. Once the calcium hydroxide has been leached away, other cementitious constituents become vulnerable to chemical decomposition, finally leaving only the silica and alumina gels behind with little strength. The water's aggressiveness in the leaching of calcium hydroxide depends on its salt content, pH, and</p>

IX.F Use of Terms for Aging Mechanisms	Term	Usage in this document
		temperature. This leaching action is effective only if the water passes through the concrete. [Ref. 24]
Low-temperature crack propagation		LTCP is IGSCC at low temperatures ~54–77 °C [-130–170 °F].
Long-term loss of material		Long term loss of material is associated with general corrosion of steel components exposed to a water environment that has not included corrosion inhibitors as a preventive action [i.e., treated water, reactor coolant, raw water, or waste water]. Loss of material is managed by conducting volumetric examinations in order to determine whether general corrosion could challenge the component's structural integrity such that a loss of intended function might occur during periods of extended operation [e.g., pressure boundary, leakage boundary (spatial), structural integrity (attached)], as defined in SRP-SLR Table 2.1-4(b)].
Mechanical loading		Applied loads of mechanical origins rather than from other sources, such as thermal.
Mechanical wear		See "Wear."
Microbiologically-induced corrosion		Any of the various forms of corrosion induced by the presence and activities of such microorganisms as bacteria, fungi, and algae, and/or the products produced in their metabolism. Degradation of material that is accelerated due to conditions under a biofilm or microfouling tubercle, for example, anaerobic bacteria that can set up an electrochemical galvanic reaction or inactivate a passive protective film, or acid-producing bacterial that might produce corrosive metabolites.
Moisture intrusion		Influx of moisture through any viable process.
Neutron irradiation embrittlement		Irradiation by neutrons results in embrittlement of carbon and low-alloy steels. It may produce changes in mechanical properties by increasing tensile and yield strengths with a corresponding decrease in fracture toughness and ductility. The extent of embrittlement depends on neutron fluence, temperature, and trace material chemistry. [Ref. 26]
Ohmic heating		Ohmic heating is induced by current flow through a conductor and can be calculated using first principles of electricity and heat transfer. Ohmic heating is a thermal stressor and can be induced by conductors passing through electrical penetrations, for example. Ohmic heating is especially significant for power circuit penetrations. [Ref. 17]
Outside diameter stress corrosion cracking		Outside diameter stress corrosion cracking (ODSCC) is SCC initiating in the outer diameter (secondary side) surface of steam generator tubes. The secondary side is part of the secondary system consisting of the shell side of the steam generator, high- and low-pressure turbines, moisture/separator reheaters, main electrical stages and interconnecting piping.  This differs from PWSCC, which describes inner diameter (SG primary side) initiated cracking. [Ref. 23]. The primary loop basically consists of the reactor vessel, reactor coolant pumps, pressurizer steam generator tubes, and interconnecting piping.
Overload		Overload is one of the aging mechanisms that can cause loss of mechanical function in Class 1 piping and components, such as constant and variable load spring hangers, guides, stops, sliding surfaces, and vibration isolators, fabricated from steel or other materials, such as Lubrite®.
Oxidation		Oxidation involves two types of reactions: (a) an increase in valence resulting from a loss of electrons, or (b) a corrosion reaction in which the corroded metal forms an oxide. [Ref. 27]

<b>IX.F Use of Terms for Aging Mechanisms</b>	
<b>Term</b>	<b>Usage in this document</b>
Photolysis	Chemical reactions induced or assisted by light.
Pitting corrosion	Localized corrosion of a metal surface, confined to a point or small area, which takes the form of cavities called pits.
Presence of any salt deposits	The surface contamination (and increased electrical conductivity) resulting from the aggressive environment associated with the presence of salt deposits can degrade high voltage insulator quality. Although this aging mechanism may be due to temporary, transient environmental conditions, the net result may be long-lasting and cumulative for plants located in the vicinity of saltwater bodies.
Primary water stress corrosion cracking	Primary water stress corrosion cracking (PWSCC) is an intergranular cracking mechanism that requires the presence of high applied and/or residual stress, susceptible tubing microstructures (few intergranular carbides), and also high temperatures. This aging mechanism is most likely a factor for nickel alloys in the PWR environment. [Ref. 22]
Radiation hardening, temperature, humidity, sustained vibratory loading	Reduction or loss of isolation function in polymeric vibration isolation elements can result from a combination of radiation hardening, temperature, humidity, and sustained vibratory loading.
Radiation-induced oxidation	Two types of reactions that are affected by radiation are (a) an increase in valence resulting from a loss of electrons, or (b) a corrosion reaction in which the corroded metal forms an oxide. This is a very limited form of oxidation and is referenced in GALL-SLR Chapter VI for MEB insulation. [Ref. 27]
Radiolysis	Radiolysis is a chemical reaction induced or assisted by radiation. Radiolysis and photolysis aging mechanisms can occur in UV-sensitive organic materials.
Reaction with aggregate	The presence of reactive alkalis in concrete can lead to subsequent reactions with aggregates that may be present. These alkalis are introduced mainly by cement, but also may come from admixtures, salt-contamination, seawater penetration, or solutions of deicing salts. These reactions include alkali-silica reactions, cement-aggregate reactions, and aggregate-carbonate reactions. These reactions may lead to expansion and cracking. [Ref. 14, 34]
Recurring internal corrosion	Recurring internal corrosion is identified by both the number of occurrences of internal aging effects with the same aging mechanism and the extent of degradation at each localized site. In regard to the number of occurrences, aging effects are considered recurring if the search of plant-specific OE reveals repetitive occurrences (e.g., one per refueling outage cycle that has occurred over three or more sequential or nonsequential cycles for a 10-year OE search, or two or more sequential or nonsequential cycles for a 5-year OE search) of aging effects with the same aging mechanism. In regard to the extent of degradation, aging effects are considered recurring if the aging effect resulted in the component not meeting either plant-specific acceptance criteria or experiencing a reduction in wall thickness of greater than 50 percent (regardless of the minimum wall thickness). Recurring internal corrosion is evaluated based on the aging mechanisms observed. For example, multiple occurrences of LOM due to microbiologically-induced corrosion, LOM due to pitting, or LOM due to galvanic corrosion would be considered three separate occurrences of aging mechanisms that could be grouped as recurring internal corrosion but that would be evaluated separately.
Restraint shrinkage	Restraint shrinkage can cause cracking in concrete transverse to the longitudinal construction joint.
Selective leaching	Selective leaching is also known as dealloying (e.g., dezincification or graphitic corrosion) and

IX.F	Use of Terms for Aging Mechanisms
Term	Usage in this document
Service-induced cracking or other concrete aging mechanisms	involves selective corrosion of one or more components of a solid solution alloy. Cracking of concrete under load over time of service (e.g., from shrinkage or creep, or other concrete aging mechanisms) that may include freeze-thaw, leaching, aggressive chemicals, reaction with aggregates, corrosion of embedded steels, elevated temperatures, irradiation, abrasion, and cavitation. [Ref. 20]
Settlement	This term is referenced as an aging mechanism in GALL-SLR Chapter II, <i>Containment Structures</i> . Settlement of a containment structure may occur due to changes in the site conditions (e.g., water table, etc.). The amount of settlement depends on the foundation material. [Ref. 23]
Stress corrosion cracking	Stress corrosion cracking (SCC) is the cracking of a metal produced by the combined action of corrosion and tensile stress (applied or residual), especially at elevated temperature. SCC is highly chemically specific in that certain alloys are likely to undergo SCC only when exposed to a small number of chemical environments. For PWR internal components, in Chapters IV.B2, IV.B3 and IV.B4, SCC includes intergranular SCC, transgranular SCC, primary water SCC, and low temperature crack propagation as aging mechanisms.
Stress relaxation	Many of the bolts in reactor internals are stressed to a cold initial preload. When subject to high operating temperatures, over time these bolts may loosen and the preload may be lost. Radiation can also cause stress relaxation in highly stressed members such as bolts. [Ref. 15]. Relaxation in structural steel anchorage components can be an aging mechanism contributing to the aging effect of loss of prestress.
Surface contamination	Contamination of the surfaces by corrosive constituents or fouling.
Sustained vibratory loading	Vibratory loading over time.
Thermal aging embrittlement	Also termed “thermal aging” or “thermal embrittlement.” At operating temperatures of 260 °C to 343 °C [500 to 650 °F], CASS exhibit a spinoidal decomposition of the ferrite phase into ferrite-rich and chromium-rich phases. This may give rise to significant embrittlement (reduction in fracture toughness), depending on the amount, morphology, and distribution of the ferrite phase and the composition of the steel.  Thermal aging of materials other than CASS is a time- and temperature-dependent degradation mechanism that decreases material toughness. It includes temper embrittlement and strain aging embrittlement. Ferritic and low-alloy steels are subject to both of these types of embrittlement, but wrought SS is not affected by either of these processes. [Ref. 26]
Thermal effects, gasket creep, and self-loosening	Loss of preload due to gasket creep, thermal effects (including differential expansion and creep or stress relaxation), and self-loosening (which includes vibration, joint flexing, cyclic shear loads, thermal cycles). [Ref. 18, 19]
Thermal and mechanical loading	Loads (stress) due to mechanical or thermal (temperature) sources.
Thermal degradation of organic materials	Organic materials, in this case, are polymers. This category includes both short-term thermal degradation and long-term thermal degradation. Thermal energy absorbed by polymers can result in crosslinking and chain scission. Crosslinking will generally result in such aging effects as increased

IX.F Use of Terms for Aging Mechanisms	Usage in this document
Term	
Thermal fatigue	<p>tensile strength and hardening of material, with some loss of flexibility and eventual decrease in elongation-at-break and increased compression set. Scission generally reduces tensile strength. Other reactions that may occur include crystallization and chain depolymerization.</p> <p>Fatigue is the progressive and localized structural damage that occurs when a material is subjected to cyclic loading. The maximum stress values are less than the ultimate tensile stress limit, and may be below the yield stress limit of the material. Higher temperatures generally decrease fatigue strength. Thermal fatigue can result from phenomena such as thermal loading, thermal cycling, where there is cycling of the thermal loads, and thermal stratification and turbulent penetration. Thermal stratification is a thermo-hydraulic condition with a definitive hot and cold water boundary inducing thermal fatigue of the piping. Turbulent penetration is a thermo-hydraulic condition where hot and cold water mix as a result of turbulent flow conditions, leading to thermal fatigue of the piping. The GALL-SLR Report AMP XI.M32, "One-Time Inspection," inspects for cracking induced by thermal stratification, and for turbulent penetration via volumetric (RT or UT) techniques.</p>
Thermoxidative degradation of organics/thermoplastics	<p>Degradation of organics/thermoplastics via oxidation reactions (loss of electrons by a constituent of a chemical reaction) and thermal means (see Thermal degradation of organic materials). [Ref. 25]</p>
Transgranular stress corrosion cracking	<p>Transgranular stress corrosion cracking (TGSCC) is SCC in which cracking occurs across the grains.</p>
Void swelling	<p>Vacancies created in reactor (metallic) materials as a result of irradiation may accumulate into voids that may, in turn, lead to changes in dimensions (swelling) of the material. Void swelling may occur after an extended incubation period.</p>
Water trees	<p>Water trees occur when the insulating materials are exposed to long-term electrical stress and moisture; these trees eventually result in breakdown of the dielectric and ultimate failure. The growth and propagation of water trees is somewhat unpredictable. Water treeing is a degradation and long-term failure phenomenon.</p>
Wear	<p>Wear is defined as the removal of surface layers due to relative motion between two surfaces or under the influence of hard, abrasive particles. Wear occurs in parts that experience intermittent relative motion, frequent manipulation, or in clamped joints where relative motion is not intended, but may occur due to a loss of the clamping force. [Ref. 26]. Loss of material due to wear can also occur in polymeric components buried in soil containing deleterious materials that move over time due to seasonal change effects on the soil.</p>
Weathering	<p>Weathering is the mechanical or chemical degradation of external surfaces of materials when exposed to an outside environment.</p>
Wind-induced abrasion	<p>(See Abrasion) The fluid carrier of abrading particles is wind rather than water/liquids.</p>

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1

## CHAPTER X

2

**AGING MANAGEMENT PROGRAMS THAT MAY BE USED TO  
DEMONSTRATE ACCEPTABILITY OF TIME-LIMITED AGING  
ANALYSES IN ACCORDANCE WITH 10 CFR 54.21(c)(1)(III)**

3

4



1 **X** **AGING MANAGEMENT PROGRAMS THAT MAY BE USED TO**  
2 **DEMONSTRATE ACCEPTABILITY OF TIME-LIMITED AGING**  
3 **ANALYSES IN ACCORDANCE WITH 10 CFR 54.21(c)(1)(iii)**

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4 This chapter of the Generic Aging Lessons Learned for Subsequent License Renewal  
5 (GALL-SLR) Report provides the following aging management programs (AMPs) that are used  
6 to demonstrate acceptance of specific types of generic time-limited aging analyses (TLAAs) in  
7 accordance with the requirements in 10 CFR 54.21(c)(1)(iii) and to demonstrate that the impacts  
8 of the effects of aging on the intended functions of the components in the analyses will be  
9 adequately managed during the subsequent license renewal (SLR) period:

- 10 X.M1 CYCLIC LOAD MONITORING
- 11 X.M2 NEUTRON FLUENCE MONITORING
- 12 X.S1 CONCRETE CONTAINMENT UNBONDED TENDON PRESTRESS
- 13 X.E1 ENVIRONMENTAL QUALIFICATION (EQ) OF ELECTRIC COMPONENTS
- 14 TABLE X-01 FSAR SUPPLEMENT SUMMARIES FOR GALL-SLR REPORT  
15 CHAPTER X AGING MANAGEMENT PROGRAMS
- 16 TABLE X-02 FSAR SUPPLEMENT SUMMARIES FOR GALL-SLR REPORT AGING  
17 MANAGEMENT PROGRAMS DISCUSSED IN SRP-SLR CHAPTER 4



# 1 X.M1 CYCLIC LOAD MONITORING

## 2 Program Description

3 This aging management program (AMP) provides an acceptable basis for managing SCs that  
4 are the subject of fatigue or cycle-based time-limited aging analyses (TLAAs) or other analyses  
5 that assess fatigue or cyclical loading, in accordance with the requirements in 10 CFR  
6 54.21(c)(1)(iii). Examples of cycle-based fatigue analyses for which this AMP may be used  
7 include, but are not limited to: (a) cumulative usage factor (CUF) analyses or their equivalent  
8 (e.g.,  $I_r$ -based fatigue analyses, as defined in specific design codes) that are performed in  
9 accordance with American Society of Mechanical Engineers (ASME) design code requirements  
10 for specific mechanical or structural components; (b) fatigue analysis calculations for assessing  
11 environmentally-assisted fatigue; (c) implicit fatigue analyses, as defined in the USAS B31.1  
12 design code or ASME Section III rules for Class 2 and Class 3 components; (d) fatigue flaw  
13 growth analyses that are based on cyclical loading assumptions; (e) fracture mechanics  
14 analyses that are based on cycle-based loading assumptions; and (f) fatigue waiver or  
15 exemption analyses that are based on cycle-based loading assumptions. This program may be  
16 used for fatigue analyses that apply to mechanical or structural components.

17 Fatigue of components is managed by monitoring one or more relevant fatigue parameters,  
18 which include, but are not limited to, the CUF factors, the environmentally-adjusted ( $CUF_{en}$ ),  
19 transient cycle limits, and the predicted flaw size (for a fatigue crack growth analysis). The limit  
20 of the fatigue parameter is established by the applicable fatigue analysis and may be a design  
21 limit, for example from an ASME Code fatigue evaluation, an analysis-specific value, for  
22 example based on the number of cyclic load occurrences assumed in a fatigue exemption  
23 evaluation, or the acceptable size of a flaw identified during an inservice inspection.

24 This program has two aspects, one that verifies the continued acceptability of existing analyses  
25 through cycle counting and the other that provides periodically updated evaluations of the  
26 fatigue analyses to demonstrate that they continue to meet the appropriate limits. In the former,  
27 the program assures that the number of occurrences and severity of each transient remains  
28 within the limits of the fatigue analyses, which in turn ensure that the analyses remain valid. For  
29 the latter, actual plant operating conditions monitored by this program can be used to inform  
30 updated evaluations of the fatigue analyses to ensure they continue to meet the design or  
31 analysis-specific limit. Technical specification requirements may apply to these activities.

32 CUF is a computed parameter used to assess the likelihood of fatigue damage in components  
33 subjected to cyclic stresses. Crack initiation is assumed to begin in a mechanical or structural  
34 component when the CUF at a point on or in the component reaches the value of 1.0, which is  
35 the ASME Code Section III design limit on CUF values. (Note that other values may be used as  
36 CUF design limits, for example, values used for high energy line break considerations.) In order  
37 not to exceed the design limit on CUF, the AMP monitors and tracks the number of occurrences  
38 of each of the critical thermal and pressure transients for the selected components, and  
39 verifies that the severity of each of the monitored transients is bounded by the design  
40 transient definitions.

41  $CUF_{en}$  is CUF adjusted to account for the effects of the reactor water environment on  
42 component fatigue life. For a plant, the effects of reactor water environment on fatigue are  
43 evaluated by assessing a set of sample critical components for the plant. Examples of critical  
44 components are identified in NUREG/CR-6260; however, plant-specific component locations in  
45 the reactor coolant pressure boundary may be more limiting than those considered in

1 NUREG/CR-6260, and thus should also be considered. Environmental effects on fatigue for  
2 these critical components may be evaluated using the guidance in Regulatory Guide (RG)  
3 1.207, Revision 1. Similar to monitoring of CUF limits, the AMP monitors and tracks the number  
4 of occurrences and severity of each of the critical thermal and pressure transients for the  
5 selected components in order to maintain the  $CUF_{en}$  below the design limit of 1.0. This program  
6 also relies on the Generic Aging Lessons Learned for Subsequent License Renewal Report  
7 (GALL-SLR Report) AMP XI.M2, "Water Chemistry," to provide monitoring of appropriate  
8 environmental parameters for calculating environmental fatigue multipliers ( $F_{en}$  values).

9 Some of the design fatigue analyses are implicit evaluations or fatigue waivers. Both of these  
10 analyses provide the basis for not requiring detailed fatigue analyses (e.g., CUF,  $CUF_{en}$ ).  
11 Implicit evaluations specify allowable stress levels based on the number of anticipated full  
12 thermal range transient cycles. As an example, piping components designed to USAS  
13 ANSI B31.1 requirements and ASME Code Class 2 and 3 components designed to  
14 ASME Section III design requirements include implicit cycle-based maximum allowable stress  
15 range calculations. Fatigue waivers are based on transient cycle limits. Fatigue waivers may  
16 have been permitted such that a detailed fatigue calculation was not required if a  
17 component conformed to certain criteria, such as those established in ASME Code, Section III,  
18 NB-3222.4(d). The AMP monitors and tracks the number of critical thermal and pressure  
19 transient occurrences for the selected components and verifies that the severity of the  
20 monitored transients is bounded by the design transient definitions in order to ensure these  
21 implicit fatigue evaluations or fatigue waivers remain valid.

22 In some cases, flaw tolerance evaluations are used to establish inspection frequencies for  
23 components that, for example, exceed CUF or  $CUF_{en}$  fatigue limits. As an example,  
24 ASME Code, Section XI, Nonmandatory Appendix L provides guidance on the performance of  
25 fatigue flaw tolerance evaluations to determine acceptability for continued service of reactor  
26 coolant system and primary pressure boundary components and piping subjected to cyclic  
27 loadings. In flaw tolerance evaluations, the predicted size of a postulated fatigue flaw, whose  
28 initial size is typically based on the resolution of the inspection method, is a computed  
29 parameter that is used to determine the appropriate inspection frequency. The AMP monitors  
30 and tracks the number of occurrences and severity of critical thermal and pressure transients for  
31 the selected components that are used in the fatigue flaw tolerance evaluations to verify that the  
32 inspection frequencies remain appropriate.

33 When a flaw is identified by inservice inspection, ASME Code, Section XI, Nonmandatory  
34 Appendices A and C provide guidance on the performance of fatigue flaw crack growth  
35 evaluations to determine acceptability for continued service of reactor coolant system pressure  
36 boundary components and piping subjected to cyclic loadings. In such a case, the predicted  
37 size of an identified flaw is a computed parameter suitable for determining the appropriate  
38 inspection frequency through a fatigue crack growth evaluation. The AMP monitors and tracks  
39 the number of occurrences and severity of each of the critical thermal and pressure transients  
40 for the selected components that are used in the crack growth evaluations to verify that the  
41 inspection frequencies remain appropriate.

## 42 **Evaluation and Technical Basis**

43 1. **Scope of Program:** The scope includes those mechanical or structural components  
44 with a fatigue TLAA or other analysis that depends on the number of occurrences and  
45 severity of transient cycles. The program monitors and tracks the number of  
46 occurrences and severity of thermal and pressure transients for the selected

1 components, to ensure that they remain within the plant-specific limits. The program  
2 ensures that the fatigue analyses remain within their allowable limits, thus minimizing the  
3 likelihood of failures from fatigue-induced cracking of the components caused by cyclic  
4 strains in the component's material. In addition, the program can be used to monitor  
5 actual plant operating conditions to perform updated evaluations of the fatigue analyses  
6 to ensure they continue to meet the design limits.

7 For the purposes of ascertaining the effects of the reactor water environment on fatigue,  
8 applicants include  $CUF_{en}$  calculations for a set of sample reactor coolant system  
9 components. This sample set includes the locations identified in NUREG/CR-6260 and  
10 additional plant-specific component locations in the reactor coolant pressure boundary if  
11 they may be more limiting than those considered in NUREG/CR-6260.

12 Component locations within the scope of this program are updated based on operating  
13 experience, plant modifications, and inspection findings.

14 2. **Preventive Actions:** This program does not involve preventive actions.

15 3. **Parameters Monitored or Inspected:** The program monitors all applicable plant  
16 transients that cause cyclic strains and contribute to fatigue, as specified in the fatigue  
17 analyses, and appropriate environmental parameters that contribute to  $F_{en}$  values. The  
18 number of occurrences, the severity of the plant transients, and actual plant water  
19 chemistry that contribute to the fatigue analyses for each component are monitored.  
20 More detailed monitoring of pressure, thermal, and water chemistry conditions at the  
21 component location may be performed to allow the fatigue analyses to be assessed for  
22 the specified critical locations.

23 4. **Detection of Aging Effects:** The program uses applicant defined activities or methods  
24 to track the number of occurrences and severity of transients, and water chemistry  
25 conditions. Technical specification requirements may apply to these activities.

26 5. **Monitoring and Trending:** Monitoring and trending of the number of occurrences of  
27 each of the transient cycles and their severity is used to track the occurrences of all  
28 transients needed to ensure the continued acceptability of the fatigue analyses, or to  
29 update the analyses. Monitoring of water chemistry conditions is used to ensure  
30 calculated  $F_{en}$  values remain valid. Trending is performed to ensure that the fatigue  
31 analyses are managed and that the fatigue parameter limits will not be exceeded during  
32 the subsequent period of extended operation, thus minimizing the possibility of fatigue  
33 crack initiation of metal components caused by cyclic strains or water chemistry  
34 conditions. The program provides for revisions to the fatigue analyses or other  
35 corrective actions (e.g., revising augmented inspection frequencies) on an as-needed  
36 basis, if the values assumed for fatigue parameters are approached, transient severities  
37 exceed the design or assumed severities, transient counts exceed the design or  
38 assumed quantities, transient definitions have changed, unanticipated new fatigue  
39 loading events are discovered, or the geometries of components are modified.

40 6. **Acceptance Criteria:** The acceptance criterion is maintaining the value of all relevant  
41 fatigue parameters to values less than or equal to the limits established in the fatigue  
42 analyses, with consideration of reactor water environmental effects, where appropriate,  
43 as described in the program description and scope of program.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
6 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
7 safety-related and nonsafety-related structures and components (SCs) within the scope  
8 of this program.

9 The program also provides for corrective actions to prevent the appropriate limits of the  
10 fatigue analyses from being exceeded during the subsequent period of extended  
11 operation. Acceptable corrective actions include repair of the component, replacement  
12 of the component, and a more rigorous analysis of the component to demonstrate that  
13 the design limit will not be exceeded during the subsequent period of extended  
14 operation. In addition, a flaw tolerance analysis with appropriate (e.g., inclusion of  
15 environmental effects) crack growth rate curves and associated inspections performed in  
16 accordance with Appendix L of ASME Section XI is an acceptable correction action. For  
17  $CUF_{en}$  analyses, scope expansion includes consideration of other locations with the  
18 highest expected  $CUF_{en}$  values.

19 8. **Confirmation Process:** The confirmation process is addressed through those specific  
20 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
21 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
22 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
23 confirmation process element of this AMP for both safety-related and nonsafety-related  
24 SCs within the scope of this program.

25 9. **Administrative Controls:** Administrative controls are addressed through the QA  
26 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
27 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
28 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
29 fulfill the administrative controls element of this AMP for both safety-related and  
30 nonsafety-related SCs within the scope of this program.

31 10. **Operating Experience:** The program reviews industry experience relevant to fatigue  
32 cracking. Applicable operating experience relevant to fatigue cracking is to be  
33 considered in selecting the locations for monitoring. As discussed in the U.S. Nuclear  
34 Regulatory Commission (NRC) Regulatory Issue Summary (RIS) 2008-30, the use of  
35 certain simplified analysis methodology to demonstrate compliance with the ASME Code  
36 fatigue acceptance criteria could be nonconservative; therefore a confirmatory analysis  
37 is recommended, if such a methodology is used. Furthermore, as discussed in NRC  
38 RIS 2011-14, the staff has identified concerns regarding the implementation of computer  
39 software packages used to calculate fatigue usage during plant transient associated with  
40 plant transient operations.

41 The program is informed and enhanced when necessary through the systematic and  
42 ongoing review of both plant-specific and industry operating experience, as discussed in  
43 Appendix B of the GALL-SLR Report.

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## 1 X.M2 NEUTRON FLUENCE MONITORING

### 2 Program Description

3 This aging management program (AMP) provides an acceptable basis for managing neutron  
4 fluence-based time-limited aging analysis (TLAAs) in accordance with requirements in  
5 10 CFR 54.21(c)(1)(iii). This program monitors neutron fluence for reactor pressure vessel  
6 (RPV) components and reactor vessel internal (RVI) components and is used in conjunction  
7 with the guidance in Generic Aging Lessons Learned for Subsequent License Renewal  
8 (GALL-SLR) AMP XI.M31, "Reactor Vessel Surveillance." Neutron fluence is a time-dependent  
9 input parameter for evaluating the loss of fracture toughness due to neutron irradiation  
10 embrittlement. Accurate neutron fluence values are also necessary to identify the location of  
11 the RPV beltline region for which neutron fluence is projected to exceed  $1 \times 10^{17}$  n/cm<sup>2</sup>  
12 ( $E > 1$  MeV) during the subsequent period of extended operation.

13 The assessment of neutron fluence is an input to a number of RPV irradiation embrittlement  
14 analyses that are mandated by specific regulations in 10 CFR Part 50. These analyses are  
15 TLAAs for subsequent license renewal applications (SLRAs) and are the topic of the  
16 acceptance criteria and review procedures in Standard Review Plan for Subsequent License  
17 Renewal (SRP-SLR) Section 4.2, "Reactor Vessel Neutron Embrittlement Analyses." The  
18 neutron irradiation embrittlement TLAAs that are managed by this AMP include, but are not  
19 limited to: (a) neutron fluence, (b) pressurized thermal shock (PTS) analyses for pressurized  
20 water reactors (PWRs), as mandated by 10 CFR 50.61 or alternatively [if applicable for the  
21 current licensing basis (CLB)] by 10 CFR 50.61a; (c) RPV upper-shelf energy (USE) analyses,  
22 as mandated by Section IV.A.1 of 10 CFR Part 50, Appendix G, and (d) pressure-temperature  
23 (P-T) limit analyses that are mandated by Section IV.A.2 of 10 CFR Part 50, Appendix G and  
24 controlled by plant Technical Specifications (TS) update and reporting requirements (i.e., the  
25 10 CFR 50.90 license amendment process for updates of P-T limit curves located in the TS  
26 limiting conditions of operation, or TS administrative control section requirements for updates of  
27 P-T limit curves that have been relocated into a pressure-temperature limits report (PTLR).

28 The calculations of neutron fluence also factor into other analyses or technical report  
29 methodologies that assess irradiation-related aging effects. Examples include, but are not  
30 limited to: (a) determination of the RPV beltline as defined in Regulatory Issue Summary (RIS)  
31 2014-11, "Information On Licensing Applications For Fracture Toughness Requirements For  
32 Ferritic Reactor Coolant Pressure Boundary Components," (b) evaluation of the susceptibility of  
33 RVI components to neutron radiation damage mechanisms, including irradiation embrittlement  
34 (IE), irradiation assisted stress corrosion cracking (IASCC), irradiation-enhanced stress  
35 relaxation or creep (IESRC) and void swelling or neutron induced component distortion; and  
36 (c) evaluating the dosimetry data obtained from an RPV surveillance program.

37 Guidance on acceptable methods and assumptions for determining reactor vessel neutron  
38 fluence is described in the U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide  
39 (RG) 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron  
40 Fluence." The methods developed and approved using the guidance contained in RG 1.190 are  
41 specifically intended to calculate neutron fluence in the region of the RPV close to the active fuel  
42 region of the core and are not intended to apply to vessel regions significantly above and below  
43 the active fuel region of the core, nor to RVI components. Therefore, the use of RG 1.190-  
44 adherent methods to estimate neutron fluence for the RPV regions significantly above and  
45 below the active fuel region of the core and RVI components may require additional justification,  
46 even if those methods were approved by the NRC for RPV neutron fluence calculations. This

1 program monitors in-vessel or ex-vessel dosimetry capsules and evaluates the dosimetry data,  
2 as needed. The implementation of such dosimetry capsules may be needed when the reactor  
3 surveillance program has exhausted the available capsules for in-vessel exposure.

#### 4 **Evaluation and Technical Basis**

5 1. **Scope of Program:** The scope of the program includes RPV and RVI components that  
6 are subject to a neutron embrittlement TLAA or other analysis involving time-dependent  
7 neutron irradiation. The program monitors neutron fluence throughout the subsequent  
8 period of extended operation for determining the susceptibility of the components to IE,  
9 IASCC, IESRC, and void swelling or distortion. The program also continues to ensure  
10 the adequacy of the neutron fluence estimates by: (a) monitoring plant and core  
11 operating conditions relative to the assumptions used in the neutron fluence calculations,  
12 and (b) continuously updating the qualification database associated with the neutron  
13 fluence method as new calculational and measurement data become available for  
14 benchmarking. This program is used in conjunction with GALL-SLR Report AMP  
15 XI.M31, "Reactor Vessel Surveillance."

16 Updated neutron fluence calculations, plant modifications, and RPV surveillance  
17 program data are used to identify component locations within the scope of this program,  
18 including the beltline region of the RPV. Applicable requirements in 10 CFR Part 50,  
19 and if appropriate, plant Technical Specifications (TSs), related to calculating neutron  
20 fluence estimates and incorporating those calculations into neutron irradiation analyses  
21 for the RPVs and RVIs must be met.

22 2. **Preventive Actions:** This program is a condition monitoring program through  
23 calculation of neutron fluence values, and thus there are no specific preventive actions.  
24 Because this program can be used to ensure that the inputs and assumptions  
25 associated with neutron fluence in the irradiation embrittlement TLAA's (described in  
26 SRP-SLR Section 4.2) remain within their respective limits, this program can prevent  
27 those TLAA's from being outside of the acceptance criteria that are set as regulatory or  
28 design limits in the analyses. Since the program is used to ensure that the inputs and  
29 assumptions associated with neutron fluence in irradiation embrittlement TLAA's will  
30 remain within their respective limits, this program does have some preventative aspects  
31 to it.

32 3. **Parameters Monitored or Inspected:** The program monitors component neutron  
33 fluence as determined by the neutron fluence analyses, and appropriate plant and core  
34 operating parameters that affect the calculated neutron fluence. The calculational  
35 methods, benchmarking, qualification, and surveillance data are monitored to ensure the  
36 adequacy of neutron fluence calculations. Neutron fluence levels in specific  
37 components are monitored to ensure component locations within the scope of this  
38 program are identified.

39 Neutron fluence is estimated using a computational method that incorporates the  
40 following major elements: (1) determination of the geometrical and material input data  
41 for the reactor core, vessel and internals, and cavity; (2) determination of the  
42 characteristics of the neutron flux emitting from the core; (3) transport of the neutrons  
43 from the core to the vessel, and into the cavity; and (4) qualification of the  
44 calculational procedure.

1 Guidance on acceptable methods and assumptions for determining RPV neutron fluence  
2 is described in NRC RG 1.190. The use of RG 1.190-adherent methods to estimate  
3 neutron fluence for the RPV beltline regions significantly above and below the active  
4 field region of the core, and RVI components may require additional justification, even if  
5 those methods were approved by the NRC for RPV neutron fluence calculations.

- 6 4. **Detection of Aging Effects:** The program uses applicant-defined activities or methods  
7 to track the RPV and RVI component neutron fluence levels. The neutron fluence levels  
8 estimated in this program are used as input to the evaluation for determining applicable  
9 aging effects for RPV and RVI components, including evaluation of TLAAs as described  
10 in SRP-SLR Section 4.2.

- 11 5. **Monitoring and Trending:** Monitoring and trending of neutron fluence is needed to  
12 ensure the continued adequacy of various neutron fluence analyses as identified as  
13 TLAAs for the SLRA. When applied to RVI components and to components significantly  
14 above and below the active field region of the core, the program also assesses and  
15 justifies whether the current neutron fluence methodology for the CLB is acceptable for  
16 monitoring and projecting the neutron fluence values for these components during the  
17 subsequent period of extended operation, or else appropriately enhances (with  
18 justification) the program's monitoring and trending element activities accordingly on an  
19 as-needed basis. Trending is performed to ensure that plant and core operating  
20 conditions remain consistent with the assumptions used in the neutron fluence analyses  
21 and that the analyses are updated as necessary.

22 Neutron fluence estimates are typically determined using a combination of plant and  
23 core operating history data that address past plant operating conditions, and projections  
24 that are intended to address future operation. Although projections for future operation  
25 may conservatively over-estimate the core neutron flux to cover potential variations in  
26 plant and core operation and increases in neutron flux at any given time, there is no  
27 explicit requirement to do so. Therefore, projections for future plant and core operation  
28 should be periodically verified to ensure that any projections used in the neutron fluence  
29 calculations remain bounding with respect to actual plant operating conditions.

30 This program monitors in-vessel or ex-vessel dosimetry capsules and evaluates the  
31 dosimetry data, as needed. Additional dosimetry capsules may be needed when  
32 the reactor surveillance program has exhausted the available capsules for  
33 in-vessel exposure.

- 34 6. **Acceptance Criteria:** There are no specified acceptance values for neutron fluence;  
35 the acceptance criteria relate to the different parameters that are evaluated using  
36 neutron fluence, as described in SRP-SLR Section 4.2.

37 NRC RG 1.190 provides guidance for acceptable methods to determine neutron  
38 fluence for the RPV beltline region. It should be noted, however, that applying  
39 RG 1.190-adherent methods to determine neutron fluence in locations other than those  
40 close to the active fuel region of the core may require additional justification regarding,  
41 for example, the level of detail used to represent the core neutron source, the methods  
42 to synthesize the three-dimensional flux field, and the order of angular quadrature used  
43 in the neutron transport calculations. The applicability of existing qualification data may  
44 also require additional justification.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
6 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
7 safety-related and nonsafety-related structures and components (SCs) within the scope  
8 of this program.

9 The program provides for corrective actions by updating the analyses for the RPV  
10 components, or assessing the need for revising the augmented inspection bases for RVI  
11 components, if the neutron fluence assumptions in RPV analyses or augmented  
12 inspection bases for RVI components are projected to be exceeded during the  
13 subsequent period of extended operation. Acceptable corrective actions include  
14 revisions to the neutron fluence calculations to incorporate additional operating history  
15 data, as such data become available; use of improved modeling approaches to obtain  
16 more accurate neutron fluence estimates; and rescreening of RPV and RVI  
17 components when the estimated neutron fluence exceeds threshold values for specific  
18 aging mechanisms.

19 When the fluence monitoring activities are used to confirm the validity of existing RPV  
20 neutron irradiation embrittlement analyses and result in the need for an update of an  
21 analysis that is mandated by a specific 10 CFR Part 50 regulation, the corrective actions  
22 to be taken follow those prescribed in the applicable regulation.

23 8. **Confirmation Process:** The confirmation process is addressed through those specific  
24 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
25 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
26 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
27 confirmation process element of this AMP for both safety-related and nonsafety-related  
28 SCs within the scope of this program.

29 9. **Administrative Controls:** Administrative controls are addressed through the QA  
30 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
31 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
32 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
33 fulfill the administrative controls element of this AMP for both safety-related and  
34 nonsafety-related SCs within the scope of this program.

35 10. **Operating Experience:** The program reviews industry and plant operating experience  
36 relevant to neutron fluence. Applicable operating experience affecting the neutron  
37 fluence estimate is to be considered in selecting the components for monitoring.  
38 RG 1.190 provides expectations for updating the qualification database for the neutron  
39 fluence methods via the operational experience gathered from RPV material surveillance  
40 program data. This operational experience is in accordance with the requirements of  
41 10 CFR Part 50 Appendix H.

42 The program is informed and enhanced when necessary through the systematic and  
43 ongoing review of both plant-specific and industry operating experience, as discussed in  
44 Appendix B of the GALL Report.

1 **References**

- 2 10 CFR Part 50, Appendix B. "Quality Assurance Criteria for Nuclear Power Plants."  
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- 4 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
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1 **X.S1 CONCRETE CONTAINMENT UNBONDED TENDON PRESTRESS**

2 **Program Description**

3 This time-limited aging analysis (TLAA) aging management program (AMP) provides reasonable  
4 assurance of the adequacy of prestressing forces in unbonded tendons of prestressed concrete  
5 containments, during the subsequent period of extended operation, under Title 10 of the *Code of*  
6 *Federal Regulations* (10 CFR) 54.21(c)(1)(iii). The program consists of an assessment of  
7 measured tendon prestress forces from required examinations performed in accordance with  
8 Subsection IWL of the American Society of Mechanical Engineers (ASME) Code, Section XI, as  
9 incorporated by reference in 10 CFR 50.55a, and as further supplemented herein. The  
10 assessment related to the adequacy of the prestressing force for each tendon group based on  
11 type (i.e., hoop, vertical, dome, inverted-U, helical) and other considerations (e.g. geometric  
12 dimensions, whether affected by repair/replacement, etc.) establishes (a) acceptance criteria in  
13 accordance with ASME Section XI, Subsection IWL and (b) trend lines constructed based on the  
14 guidance provided in the U.S. Nuclear Regulatory Commission (NRC) Information Notice (IN)  
15 99-10, "Degradation of Prestressing Tendon Systems in Prestressed Concrete Containments."  
16 The NRC Regulatory Guide (RG) 1.35.1, "Determining Prestressing Forces for Inspection of  
17 Prestressed Concrete Containments," may be used for guidance related to calculation of  
18 prestressing losses and predicted forces.

19 **Evaluation and Technical Basis**

- 20 1. **Scope of Program:** The program addresses the assessment of unbonded tendon  
21 prestressing forces measured in accordance with ASME Section XI, Subsection IWL,  
22 when an applicant performs the concrete containment prestressing force TLAA using  
23 10 CFR 54.21(c)(1)(iii).
- 24 2. **Preventive Actions:** This is primarily a condition monitoring program, which periodically  
25 measures and evaluates tendon forces such that corrective action can be taken, if  
26 required, prior to tendon forces falling below minimum required values established in the  
27 design. Maintaining the prestressing above the minimum required value (MRV)  
28 [prestressing force], as described under the acceptance criteria below, provides  
29 reasonable assurance that the structural and functional adequacy of the concrete  
30 containment is maintained.
- 31 3. **Parameters Monitored:** The parameters monitored are the concrete containment  
32 tendon prestressing forces in accordance with ASME Section XI, Subsection IWL. The  
33 prestressing forces are measured on common (control) tendons and tendons selected  
34 by random sampling of each tendon group using lift-off or equivalent method.
- 35 4. **Detection of Aging Effects:** The loss of concrete containment tendon prestressing  
36 forces is detected by measuring tendon forces, and analyzing (predicting) tendon forces  
37 and trending the data obtained as part of ASME Section XI, Subsection IWL examinations.
- 38 5. **Monitoring and Trending:** In addition to Subsection IWL examination requirements,  
39 the estimated and all measured prestressing forces up to the current examination are  
40 plotted against time. The predicted lower limit (PLL) line, MRV, and trend line are  
41 developed for each tendon group examined for the subsequent period of extended  
42 operation. The trend line represents the general variation of prestressing forces with  
43 time based on the actual measured forces in individual tendons of the specific tendon

1 group. The trend line for each tendon group is constructed by regression analysis of all  
2 measured prestressing forces in individual tendons of that group obtained from all  
3 previous examinations. The PLL line, MRV, and trend line for each tendon group are  
4 projected to the end of the subsequent period of extended operation. The trend lines are  
5 updated at each scheduled examination.

6 6. **Acceptance Criteria:** The prestressing force trend line (constructed as indicated in the  
7 Monitoring and Trending program element) for each tendon group must indicate that  
8 existing prestressing forces in the concrete containment tendon would not fall below the  
9 appropriate MRV prior to the next scheduled examination. If the trend line crosses the  
10 PLL line, its cause should be determined, evaluated and corrected. The trend line  
11 crossing the PLL line is an indication that the existing prestressing forces in concrete  
12 containment could fall below the MRV. Any indication in the trend line that the overall  
13 prestressing force in any tendon group(s) could potentially fall below the MRV during the  
14 subsequent period of extended operation is evaluated, the cause(s) is/are documented,  
15 and corrective action(s) is/are performed in a timely manner.

16 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
17 conditions adverse to quality or significant conditions adverse to quality under those  
18 specific portions of the quality assurance (QA) program that are used to meet  
19 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
20 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
21 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
22 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
23 related structures and components (SCs) within the scope of this program.

24 If acceptance criteria are not met then either systematic retensioning of tendons or a  
25 reanalysis of the concrete containment is warranted to ensure the design adequacy of  
26 the containment.

27 8. **Confirmation Process:** The confirmation process is addressed through those specific  
28 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
29 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
30 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
31 confirmation process element of this AMP for both safety-related and nonsafety-related  
32 SCs within the scope of this program.

33 The confirmation process ensures that condition monitoring leads to preventive actions  
34 that are adequate and appropriate, and that required corrective actions have been  
35 completed and are effective.

36 9. **Administrative Controls:** Administrative controls are addressed through the QA  
37 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
38 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
39 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
40 fulfill the administrative controls element of this AMP for both safety-related and  
41 nonsafety-related SCs within the scope of this program.

42 10. **Operating Experience:** The program incorporates a review of the relevant operating  
43 experience that has occurred at the applicant's plant as well as at other plants.  
44 NUREG/CR-7111, "A Summary of Aging Effects and their Management in Reactor

1 Spent Fuel Pools, Refueling Cavities, Tori, and Safety-Related Concrete Structures,”  
2 summarizes observations on low prestress forces recorded in some plants. However,  
3 tendon operating experience may vary at different plants with prestressed concrete  
4 containments. The difference could be due to the prestressing system design  
5 (e.g., button-headed, wedge, or swaged anchorages), environment, and type of reactor  
6 [i.e., pressurized water reactor (PWR) and boiling water reactor (BWR)] and possible  
7 concrete containment modifications. Thus, the applicant's plant-specific operating  
8 experience is reviewed and evaluated in detail for the subsequent period of extended  
9 operation. Applicable portions of the experience with prestressing systems described in  
10 NRC IN 99-10 could be useful.

11 If plant-specific operating experience indicates degradation and/or losses that may fall  
12 below minimum required values established in the design, additional examinations may  
13 be required to determine the condition of an expanded tendon group. Upward trending  
14 group prestress forces or tendon measurements shall be further assessed as part of the  
15 operating experience.

16 The program is informed and enhanced when necessary through the systematic and  
17 ongoing review of both plant-specific and industry operating experiences, as discussed in  
18 Appendix B of the GALL-SLR Report.

## 19 **References**

20 10 CFR Part 50, Appendix B. “Quality Assurance Criteria for Nuclear Power Plants.”  
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22 10 CFR 50.55a. “Codes and Standards.” Washington, DC: U.S. Nuclear Regulatory  
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27 Subsection IWL, “Requirements for Class CC Concrete Components of Light-Water Cooled  
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29 NRC. NUREG/CR-7111, “A Summary of Aging Effects and their Management in Reactor Spent  
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33 Information Notice 99-10. ML031500244. Washington DC: U.S. Nuclear Regulatory  
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37 Regulatory Commission. July 1990.



1 **X.E1 ENVIRONMENTAL QUALIFICATION OF ELECTRIC COMPONENTS**

2 **Program Description**

3 The U.S. Nuclear Regulatory Commission (NRC) has established nuclear station environmental  
4 qualification (EQ) requirements in 10 CFR Part 50, Appendix A, Criterion 4, and 10 CFR 50.49.  
5 10 CFR 50.49 specifically requires that an EQ program be established to demonstrate that  
6 certain electrical equipment located in harsh plant environments (that is, those areas of the plant  
7 that could be subject to the harsh environmental effects of a loss of coolant accident (LOCA),  
8 high energy line break (HELB) and post-LOCA environment are qualified to perform their safety  
9 function in those harsh environments after the effects of inservice aging. 10 CFR 50.49 requires  
10 that the effects of significant aging mechanisms be addressed as part of EQ.

11 For equipment located in a harsh environment, the objective of EQ is to demonstrate with  
12 reasonable assurance that electric equipment important to safety, for which a qualified life has  
13 been established, can perform its safety function(s) without experiencing common cause  
14 failures before, during or after applicable design basis events.

15 For equipment located in a mild environment (an environment that at no time would be  
16 significantly more severe than the environment occurring during normal operation, including  
17 anticipated operational occurrences as defined in 10 CFR 50.49), the demonstration that the  
18 equipment can meet its functional requirements during normal environmental conditions and  
19 anticipated operational occurrences is in accordance with the plant design and licensing basis.  
20 Equipment important to safety located in a mild environment is not part of an EQ program per  
21 10 CFR 50.49(c). Documents that demonstrate that a component is qualified or designed for a  
22 mild environment include design/purchase specifications, seismic test qualification reports, an  
23 evaluation or certificate of conformance.

24 Operating plants requesting subsequent license renewal shall meet the qualification  
25 requirements of 10 CFR 50.49 and license renewal aging management provisions of 10 CFR  
26 Part 54 for certain electrical equipment important to safety. 10 CFR 50.49 defines the scope of  
27 equipment to be included in an EQ program, requires the preparation and maintenance of a list  
28 of in-scope equipment, and requires the preparation and maintenance of a qualification file that  
29 contains the qualification report, with applicable equipment performance specifications,  
30 electrical characteristics, and the environmental conditions to which the equipment could be  
31 subjected. Licensees are required to maintain a record of qualification in auditable form  
32 [10 CFR 50.49(j)] for the entire period during which each covered item installed in the nuclear  
33 power plant or is stored for future use.

34 Additionally, 10 CFR 50.49(e) states that electric equipment qualification programs must include  
35 and be based on temperature, pressure, humidity, chemical effects, radiation, aging,  
36 submergence, and synergistic effects. The requirements of 10 CFR 50.49(e) also includes the  
37 application of margins to account for unquantified uncertainties, including production variations,  
38 and in accuracies in test instruments. These margins are in addition to any conservatism  
39 applied during the derivation of local environmental conditions of the equipment unless these  
40 conservatisms can be quantified and shown to contain the appropriate margins. Aging  
41 provisions contained in 10 CFR 50.49(e)(5) contains provisions for preconditioning equipment to  
42 its end-of-installed life condition that requires, in part, consideration of all significant types of  
43 aging degradation (e.g., thermal, radiation, vibration, plant specific operational aging, and cyclic  
44 aging) that can affect the function of electrical equipment. For equipment preconditioned to less  
45 than an end-of-installed life condition (i.e., designated life) 10 CFR 50.49(e)(5) requires the

1 equipment to be replaced or refurbished at the end of its designated life unless additional life is  
2 established through reanalysis or ongoing qualification.

3 Four methods are established by 10 CFR 50.49(f) to demonstrate qualification for aging and  
4 accident conditions. Additionally 10 CFR 50.49(k) and (i) permit different qualification criteria to  
5 apply based on plant and electrical equipment vintage.

6 Supplemental EQ regulatory guidance for compliance with these different qualification criteria is  
7 provided in the Division of Operating Reactors (DOR) Guidelines; "Guidelines for Evaluating  
8 Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors,"  
9 NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related  
10 Electrical Equipment (Category 1 and Category 2 requirements)," and Regulatory Guide  
11 (RG) 1.89, Rev. 1, "Environmental Qualification of Certain Electric Equipment Important to  
12 Safety for Nuclear Power Plants," as applicable. Compliance with 10 CFR 50.49 provides  
13 reasonable assurance that the equipment can perform its intended function during accident  
14 conditions after experiencing the effects of in-service aging.

15 EQ programs manage equipment aging through the use of aging evaluations based on  
16 10 CFR 50.49(f) qualification methods. As required by 10 CFR 50.49, EQ equipment not  
17 qualified for the current license term are refurbished, replaced, or have their qualification  
18 extended prior to reaching the designated life aging limits established in the evaluation. Aging  
19 evaluations for EQ equipment that specify a qualification of at least 40 to 60 years are  
20 considered time-limited aging analysis (TLAAs) for subsequent license renewal (SLR).

21 Under 10 CFR 54.21(c)(1)(iii), plant EQ programs, which implement the requirements of  
22 10 CFR 50.49 (as further defined and clarified by the DOR Guidelines, NUREG-0588, and  
23 RG 1.89, Rev. 1) along with GALL-SLR Report AMP X.E1 used to demonstrate acceptability of  
24 the TLAA analysis under 10 CFR 54.21(c)(1) are considered AMPs for license renewal.

25 Reanalysis of an aging evaluation to extend the qualification of equipment qualified under the  
26 program requirements of 10 CFR 50.49(e) is performed as part of an EQ program. Important  
27 attributes for the reanalysis of an aging evaluation include analytical methods, data collection  
28 and reduction methods, underlying assumptions, acceptance criteria, and corrective actions (if  
29 acceptance criteria are not met). These attributes are discussed in the "EQ Equipment  
30 Reanalysis Attributes" section.

31 Extension of equipment environmental qualification (qualified life) for the subsequent period of  
32 extended operation may be accomplished through the following: (1) the retention and continued  
33 aging of a test sample from the original EQ test program with demonstration that the qualified  
34 life is bounding for the subsequent period of extended operation, (2) removal and type-testing of  
35 additional EQ equipment installed in identical service conditions with a greater period of  
36 operational aging, (3) evaluation of original attributes, assumptions and conservatisms for  
37 environmental conditions and other factors (reanalysis) that allow equipment qualified life to be  
38 increased or (4) replacement.

39 This reanalysis can be applied to EQ equipment now qualified for the current operating term  
40 (i.e., equipment qualified for 60 years). As evaluated below, an existing EQ program  
41 incorporating a reanalysis program, consistent with Generic Aging Lessons Learned for  
42 Subsequent License Renewal (GALL-SLR) Report aging management programs (AMP) X.E1 is  
43 an acceptable AMP. Thus, no further evaluation is recommended for subsequent license  
44 renewal (SLR) if an applicant's EQ program supports this option under 10 CFR 54.21(c)(1)(iii) to

1 evaluate the TLAA of EQ of electrical equipment and the reanalysis shows that a 80-year  
2 qualification is established prior to the plant entering the subsequent period of  
3 extended operation.

4 As is required by 10 CFR 50.49(j) for the initial environmental qualification, a record of the  
5 qualification must be maintained in an auditable form for the entire subsequent period of  
6 extended operation during which the covered item is installed in the nuclear power plant (NPP)  
7 or is stored for future use. This permits verification that each item of electric equipment  
8 important to safety covered by this section is (a) qualified for its application and (b) meets its  
9 specified performance requirements when it is subjected to the conditions predicted to be  
10 present and when it must perform a safety function up to the end of qualified life.

### 11 **Environmental Qualification Equipment Reanalysis Attributes**

12 The reanalysis of an aging evaluation is normally performed to extend the qualification by  
13 reevaluating original attributes, assumptions and conservatisms in environmental conditions and  
14 other factors to identify excess conservatisms incorporated in the prior evaluation. Reanalysis  
15 of an aging evaluation to extend the qualification of electrical equipment is performed pursuant  
16 to 10 CFR 50.49(e) as part of an EQ program. While an electrical equipment life limiting  
17 condition may be due to thermal, radiation, or cyclical aging, the majority of electrical equipment  
18 aging limits are based on thermal conditions. Conservatism may exist in aging evaluation  
19 parameters, such as the assumed service conditions [environmental—including temperature and  
20 radiation, loading, power, signal conditions, cycles, and application (e.g., deenergized versus  
21 energized)], or an unrealistically low activation energy. The reanalysis of an aging evaluation is  
22 performed according to the station's quality assurance (QA) program requirements, which  
23 requires the verification of assumptions and conclusions including the maintenance of  
24 required margins.

25 As already noted, important attributes of a reanalysis include analytical methods, data collection  
26 and reduction methods, underlying assumptions, acceptance criteria, and corrective actions  
27 (if acceptance criteria are not met). These attributes are discussed below.

28 **Analytical Methods:** The analytical models used in the reanalysis of an aging evaluation are  
29 the same as those previously applied during the prior evaluation. The Arrhenius methodology is  
30 an acceptable thermal model for performing a thermal aging evaluation. The analytical method  
31 used for a radiation aging evaluation is to demonstrate qualification for the total integrated dose  
32 (that is, normal radiation dose for the projected installed life plus accident radiation dose). For  
33 license renewal, one acceptable method of establishing the 80-year normal radiation dose is to  
34 multiply the initial 40-year normal radiation dose by 2.0 (that is, 80 years/40 years). The result  
35 is added to the accident radiation dose to obtain the total integrated dose for the component.  
36 For cyclical aging, a similar approach may be used. Other models may be justified on a  
37 case-by-case basis.

38 **Data Collection and Reduction Methods:** The identification of excess conservatism in  
39 electrical equipment service conditions used in the prior aging evaluation is the chief method  
40 used for a reanalysis. For example, temperature data and uncertainties used in an equipment  
41 EQ evaluation may be based on anticipated plant design temperatures found to be conservative  
42 when compared to actual plant temperature data. When used, plant temperature data can be  
43 obtained in several ways, including monitors used for technical specification compliance; other  
44 installed monitors, measurements made by plant operators during rounds, or dedicated  
45 monitoring equipment for EQ.

1 A representative number of temperature measurements over a sufficient period of time are  
2 evaluated to establish the temperatures used in an aging evaluation. Plant temperature data  
3 may be used in an aging evaluation in different ways, such as (a) directly applying the plant  
4 temperature data in the evaluation or (b) using the plant temperature data to demonstrate  
5 conservatism when using plant design temperatures for an evaluation. The methodology for  
6 environmental monitoring, data collection and the analysis of localized EQ equipment  
7 environmental data (including temperature and radiation) used in the reanalysis is justified in the  
8 record of the reanalysis qualification report.

9 Environmental monitoring data used in the analysis that is collected one time, or is of limited  
10 duration, is justified with respect to the applicability of such data to the reanalysis. Any changes  
11 to material activation energy values included as part of a reanalysis are justified by the applicant  
12 on a plant-specific basis. Similar methods of identifying excess conservatism in the equipment  
13 service condition evaluation can be used for radiation and cyclical aging.

14 ***Underlying Assumptions:*** EQ equipment aging evaluations account for environmental  
15 changes occurring due to plant modifications and events. A reanalysis demonstrates that  
16 adequate margin is maintained consistent with the original analysis in accordance with  
17 10 CFR 50.49 requiring certain margins and accounting for the unquantified uncertainties  
18 established in the EQ aging evaluation of the equipment. Reanalysis that utilizes initial  
19 qualification conservatisms and/or in-service environmental conditions (e.g., actual temperature  
20 and radiation conditions) are part of an EQ program.

21 In areas within a NPP, the actual ambient environments (e.g., temperature, radiation, or  
22 moisture) may be less severe than the anticipated plant design environment. However, in a  
23 limited number of localized areas, the actual environments may be more severe than the plant  
24 design environment. These localized areas are characterized as adverse localized  
25 environments that represent conditions in a limited plant area that are significantly more severe  
26 than the plant design environment considered for EQ equipment (e.g., cable or connection  
27 insulation material). Adverse localized environments are addressed in an EQ reanalysis.

28 An adverse localized environment may increase the rate of aging of a component or have an  
29 adverse effect on the basis for equipment qualification. An adverse localized environment is an  
30 environment that exceeds the most limiting qualified condition for temperature, radiation, or  
31 moisture for the component material (e.g., cable or connection insulation). Accessible electrical  
32 EQ equipment is visually inspected and the equipment environment evaluated to identify in-  
33 scope electrical equipment subjected to an adverse localized environment. EQ equipment is  
34 evaluated to assess the impact of the adverse localized environment on equipment EQ  
35 including qualified life.

36 Adverse localized environments are identified through the use of an integrated approach. This  
37 approach includes but is not limited to, (a) the review of EQ zone maps that show radiation  
38 levels and temperatures for various plant areas, (b) recorded information from equipment or  
39 plant instrumentation, (c) plant spaces scoping and screening, (d) as-built and field walk down  
40 data, and (e) the review of relevant plant-specific and industry operating experience including:

- 41 • Review of maintenance procedures for work practices that may subject in-scope EQ  
42 equipment to an “adverse localized environment.”
- 43 • Review corrective actions applicable to in-scope EQ equipment (e.g., cables and  
44 connections electrical insulation material) previously subjected to an adverse localized

1 environment that could affect the functional capability of the equipment during SLR  
2 (e.g., equipment disposition based on current operating term).

- 3 • Visual inspection of equipment and environmental monitoring (e.g., periodic  
4 environmental monitoring) of accessible EQ equipment including, as appropriate, EQ  
5 equipment identified by (a, b, c, d, and e above).

6 Accessible electrical EQ equipment is visually inspected and the EQ equipment environment  
7 evaluated every 10 years to identify in-scope electrical equipment subjected to an adverse  
8 localized environment and evaluate the impact on EQ electrical equipment including qualified  
9 life. The first periodic inspection is to be performed prior to the subsequent period of  
10 extended operation.

11 The periodic visual inspection is specifically intended to address EQ electrical equipment where  
12 most if not all equipment subjected to an adverse localized environment is accessible. EQ  
13 equipment from accessible areas is inspected and the applicant shows that it represents, with  
14 reasonable assurance, all in-scope EQ equipment in the adverse localized environment.  
15 Adverse conditions identified during periodic inspections or by operational or maintenance  
16 activities that affect the operating environment of EQ equipment are evaluated and appropriate  
17 corrective actions are taken, which may include changes to the qualified life.

18 **Acceptance Criteria and Corrective Actions:** Reanalysis of an aging evaluation is used to  
19 extend the qualification of the component. If the qualification cannot be extended by reanalysis,  
20 the equipment is refurbished, replaced, or requalified prior to exceeding the current qualified life.  
21 A reanalysis is performed in a timely manner (that is, sufficient time is available to refurbish,  
22 replace, or requalify the equipment if the result is unfavorable).

23 **Ongoing Qualification:** As an alternative to reanalysis when assessed margins,  
24 conservatism, or assumptions do not support extending qualified life, the use of ongoing  
25 qualification techniques including condition monitoring or condition based methodologies may  
26 be implemented as a means to provide reasonable assurance that equipment environmental  
27 qualification (qualified life), is maintained for the subsequent period of extended operation.  
28 Ongoing qualification of electric equipment important to safety subject to the requirements of  
29 10 CFR 50.49 involves the inspection, observation, measurement, or trending of one or more  
30 indicators, which can be correlated to the condition or functional performance of the  
31 EQ equipment.

32 Ongoing qualification techniques including condition based monitoring provide information that  
33 may be used in the determination of a component's ability to perform its safety function and  
34 remaining qualified life for the subsequent period of extended operation. Ongoing qualification  
35 techniques for EQ equipment include periodic testing, inspections, mitigation, and sampling  
36 (e.g., subsequent EQ qualification testing of inservice or representative EQ equipment with  
37 established acceptance criteria and corrective actions, mitigation, replacement or refurbishment)  
38 consistent with endorsed standards and regulatory guidance. A modification to qualified life  
39 either by reanalysis or ongoing qualification must demonstrate that adequate margin is  
40 maintained consistent with the original analysis including unquantified uncertainties established  
41 in the original EQ equipment ageing valuation.

1 **Evaluation and Technical Basis**

- 2 1. **Scope of Program:** EQ programs apply to certain electrical equipment that are  
3 important to safety and could be exposed to harsh environment accident conditions, as  
4 defined in 10 CFR 50.49 and RG 1.89, Rev.1.
- 5 2. **Preventive Actions:** 10 CFR 50.49 does not require actions that prevent aging effects.  
6 EQ program actions that could be viewed as preventive actions include (a) establishing  
7 the equipment service condition tolerance and aging limits (for example, qualified life or  
8 condition limit) and (b) where applicable, requiring specific installation, inspection,  
9 monitoring, or periodic maintenance actions (e.g., identification of adverse localized  
10 environments to maintain electrical equipment aging within the bounds of the  
11 qualification basis (e.g., shielding for temperature or radiation).
- 12 3. **Parameters Monitored or Inspected:** Qualified life is not based on condition or  
13 performance monitoring. However, pursuant to RG 1.89, Rev. 1, such monitoring  
14 programs are an acceptable basis to modify a qualified life through reanalysis or ongoing  
15 qualification to establish a qualified condition. Monitoring or inspection of certain  
16 environmental conditions, including adverse localized environments, or equipment  
17 parameters may be used to ensure that the equipment is within the bounds of its  
18 qualification basis, or as a means to modify the qualified life.
- 19 4. **Detection of Aging Effects:** 10 CFR 50.49 does not require the detection of aging  
20 effects for in-service equipment. EQ program actions that could be viewed as detection  
21 of aging effects including, (a) inspecting or testing equipment periodically with particular  
22 emphasis on condition assessment of equipment EQ including a 10 year periodic  
23 inspection of accessible in-scope EQ components to identify EQ components subject to  
24 an adverse localized environment and, (b) monitoring of plant environmental conditions  
25 or component parameters that are be used to ensure that the equipment is within the  
26 bounds of its environmental qualification basis including attributes, assumptions, and  
27 conservatisms for equipment/environmental conditions and other factors. Monitoring or  
28 inspection of certain environmental conditions or component parameters may also  
29 provide a means to assess equipment qualified life.

30 The first periodic visual inspection is to be performed prior to the subsequent period of  
31 extended operation. Visual inspection (and the use of additional diagnostic tools such  
32 as thermography) of EQ components is performed as appropriate, by opening junction  
33 boxes, pull boxes, or terminal boxes. Scaffolding may be used if available. The purpose  
34 of the visual inspection is to identify adverse localized environments that may impact an  
35 EQ components qualified life. Potential adverse localized environments are evaluated  
36 through the applicant's corrective action program.

- 37 5. **Monitoring and Trending:** 10 CFR 50.49 does not require monitoring and trending of  
38 component condition or performance parameters of in-service equipment to manage the  
39 effects of aging, but may be applicable to condition monitoring including condition based  
40 ongoing qualification methodologies. Monitoring, inspection, or trending may be used to  
41 ensure that equipment is within the bounds of its qualification basis, or as a means to  
42 modify the qualification (e.g., service life or qualified life).

43 Specifically, a monitoring, inspection, or trending program used to ensure that electrical  
44 equipment is within the bounds of its qualification basis, or as a means to modify

1 qualified life (e.g., programs for monitoring, inspection, or trending of environmental  
2 conditions (such as temperature, radiation, equipment condition or component  
3 parameters), may be implemented for EQ equipment). The monitoring and trending  
4 frequency is established and adjusted based on the results of EQ equipment monitoring,  
5 inspection, or trending.

- 6 6. **Acceptance Criteria:** 10 CFR 50.49 acceptance criteria are that in-service EQ  
7 equipment is maintained within the bounds of its qualification basis, including (a) its  
8 established qualified life and (b) continued qualification for the projected accident  
9 conditions. 10 CFR 50.49 requires refurbishment, replacement, or requalification prior to  
10 exceeding the qualified life of each installed device. When monitoring is used to modify  
11 equipment qualified life, plant-specific acceptance criteria are established based on  
12 applicable 10 CFR 50.49(f) qualification methods.

- 13 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
14 conditions adverse to quality or significant conditions adverse to quality under those  
15 specific portions of the QA program that are used to meet Criterion XVI, "Corrective  
16 Action," of 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes  
17 how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
18 corrective actions element of this AMP for both safety-related and nonsafety-related  
19 structures and components (SCs) within the scope of this program.

20 If an EQ component is found to be outside the bounds of its qualification basis,  
21 corrective actions are implemented in accordance with the station's corrective action  
22 program. When an unexpected adverse localized environment or condition is identified  
23 during operational or maintenance activities that affect the qualification of electrical  
24 equipment, the affected EQ equipment is evaluated and appropriate corrective actions  
25 are taken, which may include changes to qualified life.

- 26 8. **Confirmation Process:** The confirmation process is addressed through those specific  
27 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
28 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
29 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
30 confirmation process element of this AMP for both safety-related and nonsafety-related  
31 SCs within the scope of this program.

- 32 9. **Administrative Controls:** Administrative controls are addressed through the QA  
33 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
34 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
35 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
36 fulfill the administrative controls element of this AMP for both safety-related and  
37 nonsafety-related SCs within the scope of this program.

38 EQ programs are implemented through the use of station policy, directives, and  
39 procedures. EQ programs continue to comply with 10 CFR 50.49 throughout the  
40 subsequent period of extended operation, including development and maintenance of  
41 qualification documentation demonstrating reasonable assurance that electrical  
42 equipment can perform required functions during design basis accidents that result in  
43 harsh environment conditions. EQ program documents identify the applicable  
44 environmental conditions for the equipment locations. EQ program qualification files are  
45 maintained at the plant site in an auditable form for the duration of the installed life of the

1 equipment or stored for future use. Program documentation is controlled under the  
2 station's QA program.

3 10. **Operating Experience:** EQ programs include consideration of operating experience to  
4 modify qualification bases and conclusions, including qualified life such that the impact  
5 on the EQ program is evaluated and any necessary actions or modifications to the  
6 program are performed. Compliance with 10 CFR 50.49 provides reasonable assurance  
7 that EQ equipment can perform their intended functions during accident conditions after  
8 experiencing the effects of operational aging.

9 The program is informed and enhanced when necessary through the systematic and  
10 ongoing review of both plant-specific and industry operating experience, consistent with  
11 the discussion in Appendix B of the GALL-SLR Report.

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Table X-01 FSAR Supplement Summaries for GALL-SLR Report Chapter X Aging Management Programs That May Be Used to Demonstrate Acceptability of Time-Limited Aging Analyses in Accordance with 10 CFR 54.21(c)(1)(iii)		Applicable GALL-SLR Report and SRP-SLR Chapter References		
GALL-SLR AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
X.M1	Cyclic Load Monitoring	The aging management program monitors and tracks the number of occurrences and severity of each of the thermal and pressure transients and requires corrective actions to ensure that applicable fatigue analyses remain within their allowable limits, including those in applicable CUF analyses, CUF <sub>en</sub> analyses, maximum allowable stress range reduction analyses for ANSI B31.1 and ASME Code Class 2 and 3 components, ASME III fatigue waiver analyses, and cycle-based flaw growth, flaw tolerance, or fracture mechanics analyses. The program manages cracking induced by fatigue or cyclic loading occurrences in plant structures and components by monitoring one or more relevant fatigue parameters, which include the CUF, the CUF <sub>en</sub> , transient cycle limits, and the predicted flaw size. The program has two aspects, one to verify the continued acceptability of existing analyses through cycle counting and the other to provide periodically updated evaluations of the fatigue analyses to demonstrate that they continue to meet the appropriate limits. Plant technical specification requirements may apply to these activities.	Existing Program	GALL IV / SRP 4.3
X.M2	Neutron Fluence Monitoring	This program monitors and tracks increasing neutron fluence exposures (integrated, time-dependent neutron flux exposures) to reactor pressure vessel and reactor internal components to ensure that applicable reactor pressure vessel neutron irradiation embrittlement analyses (i.e., TLAAAs) and radiation-induced aging effect assessment for reactor internal components will remain within their applicable limits. This program has two aspects, one to verify the continued acceptability of existing analyses through neutron fluence monitoring and the other to provide periodically updated evaluations of the analyses involving neutron fluence inputs to demonstrate that they continue to meet the appropriate limits defined in the current licensing basis (CLB).	SLR Program Should be Implemented Prior to the Subsequent Period of Extended Operation	GALL IV / SRP 4.3

Table X-01 FSAR Supplement Summaries for GALL-SLR Report Chapter X Aging Management Programs That May Be Used to Demonstrate Acceptability of Time-Limited Aging Analyses in Accordance with 10 CFR 54.21(c)(1)(iii)		Applicable GALL-SLR Report and SRP-SLR Chapter References
GALL-SLR AMP	GALL-SLR Program	Implementation Schedule*
	<p><b>Description of Program</b></p> <p>Monitoring is performed in accordance with neutron flux determination methods and neutron fluence projection methods that are defined for the CLB in NRC-approved reports. For fluence monitoring activities that apply to components located in the beltline region of the reactor pressure vessel(s), the monitoring methods are performed in a manner that is consistent with the monitoring methodology guidelines in Regulatory Guide (RG) 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence," March 2001. Additional justifications may be necessary for neutron fluence monitoring methods that are applied to reactor pressure vessel component locations outside of the beltline region of the vessels or to reactor internal components.</p> <p>This program's results are compared to the neutron fluence parameter inputs used in the neutron embrittlement analyses for reactor pressure vessel components. This includes but is not limited to the neutron fluence inputs for the reactor pressure vessel upper shelf energy analyses (or equivalent margin analyses, as applicable to the CLB), pressure-temperature analyses, and low temperature overpressure protection (LTOP, PWRs only) that are required to be performed in accordance in 10 CFR Part 50, Appendix G requirements, and for PWRs, those safety analyses that are performed to demonstrate adequate protection of the reactor pressure vessels against the consequences of pressurized thermal shock (PTS) events, as required by 10 CFR 50.61 or 10 CFR 50.61a and applicable to the CLB. Comparisons to the neutron fluence inputs for other analyses (as applicable to the CLB) may include those for mean RT<sub>NDT</sub> and probability of failure analyses for BWR reactor pressure vessel circumferential and axial shell welds, BWR core reflood design analyses, and aging effect assessments for PWR and</p>	

Table X-01 FSAR Supplement Summaries for GALL-SLR Report Chapter X Aging Management Programs That May Be Used to Demonstrate Acceptability of Time-Limited Aging Analyses in Accordance with 10 CFR 54.21(c)(1)(iii)		Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
GALL-SLR AMP	GALL-SLR Program	Description of Program	
		<p>BWR reactor internals that are induced by neutron irradiation exposure mechanisms.</p> <p>Reactor vessel surveillance capsule dosimetry data obtained in accordance with 10 CFR Part 50, Appendix H requirements and through implementation of the applicant's Reactor Vessel Surveillance Program (Refer to GALL-SLR Report AMP XI.M31) may provide inputs to and have impacts on the neutron fluence monitoring results that are tracked by this program. In addition, regulatory requirements in the plant technical specifications or in specific regulations of 10 CFR Part 50 may apply, including those in 10 CFR Part 50, Appendix G; 10 CFR 50.55a; and for PWRs, the PTS requirements in 10 CFR 50.61 or 10 CFR 50.61a, as applicable for the CLB.</p>	
X.S1	Concrete Containment Tendon Prestress	<p>The prestressing tendons are used to impart compressive forces in the prestressed concrete containments to resist the internal pressure inside the containment that would be generated in the event of a LOCA. The prestressing forces generated by the tendons diminish over time due to losses in prestressing forces in the tendons and in the surrounding concrete. The prestressing force analysis and evaluation has been completed and determined to remain within allowable limits to the end of the subsequent period of extended operation, and the trend lines of the measured prestressing forces will stay above the minimum required prestressing forces for each group of tendons to the end of this period.</p>	GALL II / SRP 4.5
X.E1	Environmental Qualification (EQ) of Electric Components	<p>This program implements the environmental qualification (EQ) requirements in 10 CFR Part 50, Appendix A, Criterion 4, and 10 CFR 50.49. 10 CFR 50.49 specifically requires that an EQ program be established to demonstrate that certain electrical equipment located in harsh plant environments will perform their safety function in those harsh environments after the effects of in-service aging.</p>	GALL VI / SRP 4.4

Table X-01 FSAR Supplement Summaries for GALL-SLR Report Chapter X Aging Management Programs That May Be Used to Demonstrate Acceptability of Time-Limited Aging Analyses in Accordance with 10 CFR 54.21(c)(1)(iii)		Applicable GALL-SLR Report and SRP-SLR Chapter References
GALL-SLR AMP	GALL-SLR Program	Description of Program
		<p>10 CFR 50.49 requires that the effects of significant aging mechanisms be addressed as part of environmental qualification.</p> <p>As required by 10 CFR 50.49, EQ equipment not qualified for the current license term is refurbished, replaced, or have their qualification extended prior to reaching the designated life aging limits established in the evaluation. Aging evaluations for EQ equipment that specify a qualification of at least 60 years are time-limited aging analyses (TLAAs) for subsequent license renewal.</p> <p>Reanalysis of an aging evaluation to extend the qualification of equipment qualified under the program requirements of 10 CFR 50.49(e) is performed as part of an EQ program. Important attributes for the reanalysis of an aging evaluation include analytical methods, data collection and reduction methods, underlying assumptions, acceptance criteria, and corrective actions (if acceptance criteria are not met). The analytical models used in the reanalysis of an aging evaluation are the same as those previously applied during the prior evaluation. The identification of excess conservatism in electrical equipment service conditions (for example, temperature, radiation, and cycles) used in the prior aging evaluation is the chief method used for a reanalysis. A reanalysis demonstrates that adequate margin is maintained consistent with the original analysis in accordance with 10 CFR 50.49 requiring certain margins and accounting for the unquantified uncertainties established in the EQ aging evaluation of the equipment. Reanalysis of an aging evaluation is used to extend the environmental qualification of the component. If the qualification cannot be extended by reanalysis, the equipment is refurbished, replaced, or requalified prior to exceeding the current</p>
		Implementation Schedule*

Table X-01 FSAR Supplement Summaries for GALL-SLR Report Chapter X Aging Management Programs That May Be Used to Demonstrate Acceptability of Time-Limited Aging Analyses in Accordance with 10 CFR 54.21(c)(1)(iii)		Applicable GALL-SLR Report and SRP-SLR Chapter References
GALL-SLR AMP	GALL-SLR Program	Description of Program
		<p>qualified life.</p> <p>When the reanalysis assessed margins, conservatisms, or assumptions do not support reanalysis (e.g., extending qualified life) of an EQ component, the use of on-going qualification techniques including condition monitoring or condition based methodologies may be implemented. Ongoing qualification is an alternative means to provide reasonable assurance that an equipment environmental qualification is maintained for the subsequent period of extended operation. Ongoing qualification of electric equipment important to safety subject to the requirements of 10 CFR 50.49 involves the inspection, observation, measurement, or trending of one or more indicators, which can be correlated to the condition or functional performance of the EQ equipment.</p> <p>This program is implemented in accordance 10 CFR 50.49 and 10 CFR 54.21(c)(1)(iii). Along with GALL-SLR Report AMP X.E1 the environmental qualification program demonstrates the acceptability of the TLAA analysis under 10 CFR 54.21(c)(1) and is considered an aging management program (AMP) for the subsequent period of extended operation.</p> <p>This program is informed and enhanced when necessary through the systematic and ongoing review of both plant-specific and industry operating experience including research and development (e.g., test methods, aging models, acceptance criterion) such that the effectiveness of the AMP is evaluated consistent with the discussion in Appendix B of the GALL-SLR Report.</p> <p>The FSAR Summary description also includes a plant</p>
		Implementation Schedule*

Table X-01 FSAR Supplement Summaries for GALL-SLR Report Chapter X Aging Management Programs That May Be Used to Demonstrate Acceptability of Time-Limited Aging Analyses in Accordance with 10 CFR 54.21(c)(1)(iii)		Applicable GALL-SLR Report and SRP-SLR Chapter References
GALL-SLR AMP	GALL-SLR Program	Description of Program
		<p><b>Implementation Schedule*</b></p> <p>specific discussion of applicable commitments, license conditions, enhancements, or exceptions applied to the applicants aging management program]</p>

Table X-02 FSAR Supplement Summaries for GALL-SLR Report Aging Management Programs Discussed in SRP-SLR Chapter 4			
SRP-SLR Section	TLAA	Description of Evaluation	Implementation Schedule*
4.2	USE	10 CFR Part 50 Appendix G paragraph IV.A.1 requires that the reactor vessel beltline materials must maintain Charpy upper-shelf energy of no less than 50 ft-lb (68 J) throughout the life of the reactor vessel unless otherwise approved by the NRC. The upper-shelf energy has been determined to exceed 50 ft-lb (68 J) to the end of the period of extended operation.	Completed
4.2	Pressurized thermal shock (for PWRs)	For PWRs, 10 CFR 50.61 requires the "reference temperature RT <sub>PTS</sub> " for reactor vessel beltline materials to be less than the "PTS screening criteria" at the expiration date of the operating license unless otherwise approved by the NRC. The "PTS screening criteria" are 270°F (132°C) for plates, forgings, and axial weld materials, or 300°F (149°C) for circumferential weld materials. The "reference temperature" has been determined to be less than the "PTS screening criteria" at the end of the period of extended operation.	Completed
4.2	P-T limits	10 CFR Part 50 Appendix G requires that heatup and cooldown of the RPV be accomplished within established P-T limits. These limits specify the maximum allowable pressure as a function of reactor coolant temperature. As the RPV becomes embrittled and its fracture toughness is reduced, the allowable pressure is reduced. 10 CFR Part 50 Appendix G requires periodic update of P-T limits based on projected embrittlement and data from a material surveillance program. The P-T limits will be updated to consider the period of extended operation.	Update should be completed before the subsequent period of extended operation
4.2	Elimination of circumferential weld inspection and analysis of axial welds (for BWRs)	NRC has granted relief from the reactor vessel circumferential shell weld inspections because the applicant has demonstrated through plant-specific analysis that the plant meets the staff-approved BWR/IP-74-A Report and has provided sufficient information that the probability of vessel failure due to embrittlement of axial welds is low. If the applicant indicates that relief from circumferential weld examination will be made under 10 CFR 50.55a(a)(z), the applicant will manage this TLAA in accordance with 10 CFR 54.21(c)(1)(iii).	Resubmittal under 10 CFR 50.55a(a)(z) should be completed before the period of extended operation
4.2	Other miscellaneous TLAA's on RV neutron embrittlement	Provide sufficient information on how the calculations for plant-specific TLAA's were performed, what the limiting TLAA parameter was calculated to be in accordance with the neutron fluence projected for the period of extended operation, and why the TLAA is acceptable under either 10 CFR 54.21(c)(1)(i), (ii), or (iii).	
4.3	Components Evaluated for Fatigue Parameters Other than CUF <sub>en</sub>	[Applicant to identify and provide adequate description of the specific metal fatigue parameter evaluation]  The number of occurrences and severity of each of the thermal and pressure transients, projected to the end of the subsequent license renewal operating period, demonstrate that the [Applicant to insert Name of the TLAA] remains valid during	Completed (prior to submittal of an application for SLR)

Table X-02 FSAR Supplement Summaries for GALL-SLR Report Aging Management Programs Discussed in SRP-SLR Chapter 4		Implementation Schedule*
SRP-SLR Section	TLAA	Description of Evaluation
4.3	Components Evaluated for CUF <sub>en</sub>	<p>the subsequent license renewal operating period and therefore, that this TLAA is acceptable in accordance with the criterion in 10 CFR 54.21(c)(1)(i).</p> <p>[Applicant to identify and provide adequate description of the specific metal fatigue evaluation for evaluating environmentally assisted fatigue in ASME Code Class 1 or Safety Class 1 components]</p> <p>The effects of the water environment on component fatigue life have been addressed by assessing the impact of the water environment on the limiting component locations, using the positions described in Regulatory Guide 1.207, Revision 1.</p> <p>The number of occurrences and severity of each of the thermal and pressure transients, projected to the end of the subsequent license renewal operating period, and consideration of the water chemistry parameters demonstrate that the TLAA on environmentally assisted fatigue remains valid during the subsequent license renewal operating period and therefore, that this TLAA is acceptable in accordance with 10 CFR 54.21(c)(1)(i).</p>
4.3	Components Evaluated for Fatigue Parameters Other than CUF <sub>en</sub>	<p>[Applicant to identify and provide adequate description of the specific metal fatigue parameter evaluation]</p> <p>The analysis has been projected to the end of the subsequent license renewal operating period, considering the number of occurrences and severity of each of the thermal and pressure transients, and demonstrates that the TLAA is acceptable in accordance with 10 CFR 54.21(c)(1)(ii).</p>
4.3	Components Evaluated for CUF <sub>en</sub>	<p>Applicant to identify and provide adequate description of the specific metal fatigue evaluation for evaluating environmentally assisted fatigue in ASME Code Class 1 or Safety Class 1 components]</p> <p>The effects of the water environment on component fatigue life have been addressed by assessing the impact of the water environment on the limiting component locations, using the positions described in Regulatory Guide 1.207, Revision 1.</p> <p>The analysis for environmentally-assisted fatigue has been projected to the end of the subsequent license renewal operating period, considering the number of occurrences and severity of each of the thermal and pressure transients and the</p>

Table X-02 FSAR Supplement Summaries for GALL-SLR Report Aging Management Programs Discussed in SRP-SLR Chapter 4			
SRP-SLR Section	TLAA	Description of Evaluation	Implementation Schedule*
4.3	Components Evaluated for Fatigue Parameters Other than CUF <sub>en</sub>	<p>water chemistry parameters, and demonstrates that the TLAA is acceptable in accordance with 10 CFR 54.21(c)(1)(ii).</p> <p>Fatigue evaluations were performed to ensure the continued validity of the metal fatigue analyses for the subsequent license renewal operating period.</p> <p>[Applicant to provide adequate description of the specific metal fatigue parameter evaluation]</p> <p>The aging management program monitors and tracks the number of occurrences and severity of thermal and pressure transients, and requires corrective actions to ensure that applicable fatigue analyses remain within their allowable limits. The effects of aging due to fatigue will be managed by the aging management program for the subsequent license renewal operating period in accordance with 10 CFR 54.21(c)(1)(iii).</p>	Program should be implemented before the subsequent period of extended operation
4.3	Components Evaluated for CUF <sub>en</sub>	<p>The effects of the water environment on component fatigue life will be addressed by assessing the impact of the water environment on the limiting component locations, using the positions described in Regulatory Guide 1.207, Revision 1. A limiting sample of critical components can be evaluated by applying environmental adjustment factors to the existing CUF analyses or by performing more refined calculations.</p> <p>The aging management programs monitor and track the number of occurrences and severity of thermal and pressure transients, monitor water chemistry, and require corrective actions to ensure that the applicable fatigue analyses remain within their allowable limits. The effects of aging due to environmentally assisted fatigue will be managed by the aging management programs for the subsequent license renewal operating period in accordance with 10 CFR 54.21(c)(1)(iii).</p>	Program should be implemented before the subsequent period of extended operation
4.4	Environmental qualification of electric equipment	<p>The original environmental qualification qualified life has been shown to remain valid for the period of extended operation.</p> <p>[Plant specific identification and summary descriptions of commitments, license conditions, enhancements or exceptions are also described as applicable]</p>	
4.4	Environmental qualification of electric equipment	The environmental qualification has been projected to the end of the period of	Completed

Table X-02 FSAR Supplement Summaries for GALL-SLR Report Aging Management Programs Discussed in SRP-SLR Chapter 4			Implementation Schedule*
SRP-SLR Section	TLAA	Description of Evaluation	
		<p>extended operation.</p> <p>[The summary report addresses the key reanalysis attributes of analytical methods, data collection and reduction methods, underlying assumptions, acceptance criteria, and corrective actions].</p> <p>[Plant specific identification and summary descriptions of commitments, license conditions, enhancements or exceptions are also described as applicable]</p>	
4.4	Environmental qualification of electric equipment	<p>The applicant's environmental qualification process, in accordance with 10 CFR 50.49, will adequately manage aging of environmental qualification equipment for the period of extended operation because equipment will be replaced prior to reaching the end of its qualified life.</p> <p>[The summary report addresses the key reanalysis attributes of methods, data collection and reduction methods, underlying assumptions, acceptance criteria, and corrective actions.]</p> <p>[The applicant states that its environmental qualification program contains the same elements evaluated in the GALL-SLR Report.]</p>	Existing program
4.5	Concrete containment tendon prestress	<p>[Plant specific identification and summary descriptions of commitments, license conditions, enhancements or exceptions are also described as applicable]</p> <p>The prestressing tendons are used to impart compressive forces in the prestressed concrete containments to resist the internal pressure inside the containment that would be generated in the event of a LOCA. The prestressing forces generated by the tendons diminish over time due to losses in prestressing forces in the tendons and in the surrounding concrete. The prestressing force review and evaluation has been completed and determined to remain valid to the end of the subsequent period of extended operation, and the trend lines of the measured prestressing forces will stay above the minimum required prestressing forces for each group of tendons to the end of this period.</p>	Completed
4.5	Concrete containment tendon prestress	<p>The prestressing tendons are used to impart compressive forces in the prestressed concrete containments to resist the internal pressure inside the containment that would be generated in the event of a LOCA. The prestressing forces generated by</p>	Completed

Table X-02 FSAR Supplement Summaries for GALL-SLR Report Aging Management Programs Discussed in SRP-SLR Chapter 4			
SRP-SLR Section	TLAA	Description of Evaluation	Implementation Schedule*
		the tendons diminish over time due to losses in prestressing forces in the tendons and in the surrounding concrete. The prestressing force analysis and evaluation has been completed and determined to remain within allowable limits to the end of the subsequent period of extended operation, and the trend lines of the measured prestressing forces will stay above the minimum required prestressing forces for each group of tendons to the end of this period.	
4.5	Concrete containment tendon prestress	The prestressing tendons are used to impart compressive forces in the prestressed concrete containments to resist the internal pressure inside the containment that would be generated in the event of a LOCA. The prestressing forces generated by the tendons diminish over time due to losses of prestressing forces in the tendons and in the surrounding concrete. The [identify the aging management program] developed to monitor the prestressing forces will ensure that, during each inspection, the trend lines of the measured prestressing forces show that they meet the requirements of the ASME Code, Section XI, Subsection IWL, as incorporated by reference in 10 CFR 50.55a and supplemented. If the trend lines cross the PLLs, corrective actions should be taken. The program incorporates plant-specific and industry operating experience.	Program should be implemented before the subsequent period of extended operation.
4.6	Containment liner plates, metal containments, and penetrations fatigue	The containment liner plates, metal containments, and penetrations provide an essentially leak-tight barrier. Current fatigue parameter evaluations remain valid during the subsequent period of extended operation.	Completed
4.6	Containment liner plates, metal containments, and penetrations fatigue	The containment liner plates, metal containments, and penetrations provide an essentially leak-tight barrier. Fatigue parameter evaluations have been reevaluated based on revised numbers of occurrences and severities of cyclic loads projected for the subsequent period of extended operation. The revised fatigue parameter values remain within allowable limits for the subsequent period of extended operation.	Completed
4.6	Containment liner plates, metal containments, and penetrations fatigue	The containment liner plates, metal containments, and penetrations provide an essentially leak-tight barrier. The applicant identifies an aging management program to manage the effects of fatigue on such components during the subsequent period of extended operation. The program monitors and tracks the number of cycles and occurrences and severity of relevant transients. The program is effective when fatigue evaluations and/or fatigue usage remain within the allowable limits or requires corrective actions (e.g., re-analyses and/or component replacement) when the limits are exceeded. If the component is replaced, the	Proposed TLAA AMP should be implemented before the subsequent period of extended operation.

Table X-02 FSAR Supplement Summaries for GALL-SLR Report Aging Management Programs Discussed in SRP-SLR Chapter 4		
SRP-SLR Section	TLAA	Implementation Schedule*
		fatigue parameter value CUF for the replacement should be shown to be less than the allowable limit during the subsequent period of extended operation.
*An applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should verify that the applicant has identified and committed in the subsequent license renewal application to any future aging management activities to be completed before the period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities by no later than the committed date.		

1

## **CHAPTER XI**

2

## **AGING MANAGEMENT PROGRAMS**



1 **XI: AGING MANAGEMENT PROGRAMS**

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2 GUIDANCE ON USE OF LATER EDITIONS/REVISIONS OF VARIOUS INDUSTRY  
3 DOCUMENTS

4 XI.M1 ASME SECTION XI INSERVICE INSPECTION, SUBSECTIONS IWB,  
5 IWC, AND IWD

6 XI.M2 WATER CHEMISTRY

7 XI.M3 REACTOR HEAD CLOSURE STUD BOLTING

8 XI.M4 BWR VESSEL ID ATTACHMENT WELDS

9 XI.M5 BWR FEEDWATER NOZZLE

10 XI.M6 DELETED

11 XI.M7 BWR STRESS CORROSION CRACKING

12 XI.M8 BWR PENETRATIONS

13 XI.M9 BWR VESSEL INTERNALS

14 XI.M10 BORIC ACID CORROSION

15 XI.M11B CRACKING OF NICKEL-ALLOY COMPONENTS AND LOSS OF MATERIAL  
16 DUE TO BORIC ACID-INDUCED CORROSION IN REACTOR COOLANT  
17 PRESSURE BOUNDARY COMPONENTS (PWRS ONLY)

18 XI.M12 THERMAL AGING EMBRITTLEMENT OF CAST AUSTENITIC STAINLESS  
19 STEEL (CASS)

20 XI.M16A DELETED

21 XI.M17 FLOW-ACCELERATED CORROSION

22 XI.M18 BOLTING INTEGRITY

23 XI.M19 STEAM GENERATORS

24 XI.M20 OPEN-CYCLE COOLING WATER SYSTEM

25 XI.M21A CLOSED TREATED WATER SYSTEMS

26 XI.M22 BORAFLEX MONITORING

27 XI.M23 INSPECTION OF OVERHEAD HEAVY LOAD AND LIGHT LOAD (RELATED TO  
28 REFUELING) HANDLING SYSTEMS

29 XI.M24 COMPRESSED AIR MONITORING

1 **XI: AGING MANAGEMENT PROGRAMS (continued)**

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2	XI.M25	BWR REACTOR WATER CLEANUP SYSTEM
3	XI.M26	FIRE PROTECTION
4	XI.M27	FIRE WATER SYSTEM
5	XI.M29	ABOVEGROUND METALLIC TANKS
6	XI.M30	FUEL OIL CHEMISTRY
7	XI.M31	REACTOR VESSEL MATERIAL SURVEILLANCE
8	XI.M32	ONE-TIME INSPECTION
9	XI.M33	SELECTIVE LEACHING
10	XI.M35	ASME CODE CLASS 1 SMALL-BORE PIPING
11	XI.M36	EXTERNAL SURFACES MONITORING OF MECHANICAL COMPONENTS
12	XI.M37	FLUX THIMBLE TUBE INSPECTION
13	XI.M38	INSPECTION OF INTERNAL SURFACES IN MISCELLANEOUS PIPING
14		AND DUCTING COMPONENTS
15	XI.M39	LUBRICATING OIL ANALYSIS
16	XI.M40	MONITORING OF NEUTRON-ABSORBING MATERIALS OTHER
17		THAN BORAFLEX
18	XI.M41	BURIED AND UNDERGROUND PIPING AND TANKS
19	XI.M42	INTERNAL COATINGS/LININGS FOR IN SCOPE PIPING, PIPING
20		COMPONENTS, HEAT EXCHANGERS, AND TANKS
21	XI.S1	ASME SECTION XI, SUBSECTION IWE
22	XI.S2	ASME SECTION XI, SUBSECTION IWL
23	XI.S3	ASME SECTION XI, SUBSECTION IWF
24	XI.S4	10 CFR 50, APPENDIX J
25	XI.S5	MASONRY WALLS
26	XI.S6	STRUCTURES MONITORING
27	XI.S7	INSPECTION OF WATER-CONTROL STRUCTURES ASSOCIATED WITH
28		NUCLEAR POWER PLANTS

1 **XI: AGING MANAGEMENT PROGRAMS (continued)**

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2	XI.S8	PROTECTIVE COATING MONITORING AND MAINTENANCE
3	XI.E1	ELECTRICAL INSULATION FOR ELECTRICAL CABLES AND CONNECTIONS
4		NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL QUALIFICATION
5		REQUIREMENTS
6	XI.E2	ELECTRICAL INSULATION FOR ELECTRICAL CABLES AND CONNECTIONS
7		NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL QUALIFICATION
8		REQUIREMENTS USED IN INSTRUMENTATION CIRCUITS
9	XI.E3A	ELECTRICAL INSULATION FOR INACCESSIBLE MEDIUM VOLTAGE POWER
10		CABLES NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL
11		QUALIFICATION REQUIREMENTS
12	XI.E3B	ELECTRICAL INSULATION FOR INACCESSIBLE INSTRUMENT AND
13		CONTROL CABLES NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL
14		QUALIFICATION REQUIREMENTS
15	XI.E3C	ELECTRICAL INSULATION FOR INACCESSIBLE LOW VOLTAGE POWER
16		CABLES NOT SUBJECT TO 10 CFR 50.49 ENVIRONMENTAL
17		QUALIFICATION REQUIREMENTS
18	XI.E4	METAL-ENCLOSED BUS
19	XI.E5	FUSE HOLDERS
20	XI.E6	ELECTRICAL CABLE CONNECTIONS NOT SUBJECT TO 10 CFR 50.49
21		ENVIRONMENTAL QUALIFICATION REQUIREMENTS
22	XI.E7	HIGH VOLTAGE INSULATORS
23	TABLE XI-01	FSAR SUPPLEMENT SUMMARIES FOR GALL-SLR CHAPTER XI GALL-
24		AGING MANAGEMENT PROGRAMS



1                                   **GUIDANCE ON USE OF LATER EDITIONS/REVISIONS OF**  
2                                   **VARIOUS INDUSTRY DOCUMENTS**

3    To aid applicants in the development of their subsequent license renewal applications (SLRAs),  
4    the staff has developed a list of aging management programs (AMPs) in the Generic Aging  
5    Lessons Learned for Subsequent License Renewal (GALL-SLR) Report that are based entirely  
6    or in part on specific editions/revisions of various industry codes [other than the American  
7    Society of Mechanical Engineers (ASME) Code], standards, and other industry-generated  
8    guidance documents. Subsequent license renewal applicants may use later editions/revisions  
9    of these industry generated documents, subject to the following provisions:

- 10   (i)     If the later edition/revision has been explicitly reviewed and approved/endorsed by the  
11            U.S. Nuclear Regulatory Commission (NRC) staff for license renewal via a NRC  
12            Regulatory Guide (RG) endorsement, a safety evaluation for generic use [such as for a  
13            Boiling Water Reactor Vessel and Internals Project (BWRVIP)], incorporation into  
14            10 CFR, or license renewal interim staff guidance (ISG).
- 15   (ii)    If the later edition/revision has been explicitly reviewed and approved on a plant-specific  
16            basis by the NRC staff in their Safety Evaluation Report (SER) for another applicant's  
17            SLRA (a precedent exists). Applicants may reference this and justify applicability to their  
18            facility via the exception process in Nuclear Energy Institute (NEI) 95-10.

19   If either of these methods is used as justification for adopting a later edition/revision than  
20   specified in the Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR)  
21   Report, the applicant shall make available for the staff's review the information pertaining to the  
22   NRC endorsement/approval of the later edition/revision.



1 **XI.M1 ASME SECTION XI INSERVICE INSPECTION, SUBSECTIONS**  
2 **IWB, IWC, AND IWD**

3 **Program Description**

4 Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, imposes the inservice inspection  
5 (ISI) requirements of the American Society of Mechanical Engineers (ASME) boiler and  
6 pressure vessel (B&PV) Code, Section XI, Rules for ISI of Nuclear Power Plant Components for  
7 Class 1, 2, and 3 pressure-retaining components and their integral attachments in light-water  
8 cooled power plants. The rules of Section XI require a mandatory program of examinations,  
9 testing and inspections to demonstrate adequate safety and to manage deterioration and aging  
10 effects. Inspection of these components is covered in Subsections IWB, IWC, and IWD,  
11 respectively, in the 2007 edition, with 2008 addenda.<sup>1</sup> The program generally includes periodic  
12 visual, surface, and/or volumetric examination and leakage test of Class 1, 2, and 3  
13 pressure-retaining components and their integral attachments. Repair/replacement activities for  
14 these components are covered in Subsection IWA of the ASME Code.

15 The ASME Section XI ISI program, in accordance with Subsections IWA, IWB, IWC, and IWD,  
16 has been shown to be generally effective in managing aging effects in Class 1, 2, and 3  
17 components and their integral attachments in light-water cooled power plants. 10 CFR 50.55a  
18 imposes additional conditions and augmentations of ISI requirements specified in ASME Code,  
19 Section XI, and those conditions or augmentations described in 10 CFR 50.55a are included as  
20 part of this program. In certain cases, the ASME ISI program is augmented to manage effects  
21 of aging for license renewal and is so identified in the Generic Aging Lessons Learned for  
22 Subsequent License Renewal (GALL-SLR) Report.

23 **Evaluation and Technical Basis**

- 24 1. **Scope of Program:** The ASME Section XI program provides the requirements for ISI,  
25 repair, and replacement of Class 1, 2, and 3 pressure-retaining components and their  
26 integral attachments in light-water cooled nuclear power plants (NPP). The components  
27 within the scope of the program are specified in ASME Code, Section XI, Subsections  
28 IWB-1100, IWC-1100, and IWD-1100 for Class 1, 2, and 3 components, respectively.  
29 The components described in Subsections IWB-1220, IWC-1220, and IWD-1220 are  
30 exempt from the volumetric and surface examination requirements, but not exempt from  
31 VT-2 visual examination and pressure testing requirements of Subsections IWB-2500,  
32 IWC-2500, and IWD-2500.
- 33 2. **Preventive Actions:** This is a condition monitoring program; therefore, this program  
34 does not implement preventive actions.
- 35 3. **Parameters Monitored or Inspected:** The ASME Section XI ISI program detects  
36 degradation of components by using the examination and inspection requirements  
37 specified in ASME Section XI Tables IWB-2500-1, IWC-2500-1, and IWD-2500-1 for  
38 Class 1, 2, and 3 components, respectively.

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<sup>1</sup>Refer to the GALL Report, Chapter I, for applicability of other editions of the ASME Code, Section XI.

1 The program uses three types of examination—visual, surface, and volumetric—in  
2 accordance with the requirements of Subsection IWA-2000. Visual VT-1 examination  
3 detects discontinuities and imperfections, such as cracks, corrosion, wear, or erosion, on  
4 the surface of components. Visual VT-2 examination detects evidence of leakage from  
5 pressure-retaining components, as required during the system pressure test. Visual  
6 VT-3 examination (a) determines the general mechanical and structural condition of  
7 components and their supports by verifying parameters such as clearances, settings,  
8 and physical displacements; (b) detects discontinuities and imperfections, such as loss  
9 of integrity at bolted or welded connections, loose or missing parts, debris, corrosion,  
10 wear, or erosion; and (c) observes conditions that could affect operability or functional  
11 adequacy of constant-load and spring-type components and supports.

12 Surface examination uses magnetic particle, liquid penetrant, or eddy current  
13 examinations to indicate the presence of surface discontinuities and flaws. Volumetric  
14 examination uses radiographic, ultrasonic, or eddy current examinations to indicate the  
15 presence of discontinuities or flaws throughout the volume of material included in the  
16 inspection program.

17 4. **Detection of Aging Effects:** The extent and schedule of the inspection and test  
18 techniques prescribed by the program are designed to maintain structural integrity and  
19 ensure that aging effects are discovered and repaired before the loss of intended  
20 function of the component. Inspection can reveal cracking, loss of material due to  
21 corrosion, leakage of coolant, and indications of degradation due to wear or stress  
22 relaxation (such as changes in clearances, settings, physical displacements, loose or  
23 missing parts, debris, wear, erosion, or loss of integrity at bolted or welded connections).

24 Components are examined and tested as specified in Tables IWB-2500-1, IWC-2500-1,  
25 and IWD-2500-1 for Class 1, 2, and 3 components, respectively. The tables specify the  
26 extent and schedule of the inspection and examination methods for the components of  
27 the pressure-retaining boundaries.

28 5. **Monitoring and Trending:** For Class 1, 2, and 3 components, the inspection schedule  
29 of IWB-2400, IWC-2400, and IWD-2400, and the extent and frequency of IWB-2500-1,  
30 IWC-2500-1, and IWD-2500-1, respectively, provides for timely detection of degradation.  
31 The sequence of component examinations established during the first inspection interval  
32 is repeated during each successive inspection interval, to the extent practical.  
33 Volumetric and surface examination results are compared with recorded preservice  
34 examination and prior inservice examinations. Flaw conditions or relevant conditions of  
35 degradation are evaluated in accordance with IWB-3100, IWC-3100, and IWD-3100.

36 Examinations that reveal indications that exceed the acceptance standards described  
37 below are extended to include additional examinations in accordance with IWB-2430,  
38 IWC-2430, and IWD-2430 for Class 1, 2, and 3 components, respectively. Examination  
39 results that exceed the acceptance standards below are repaired/replaced or accepted  
40 by analytical evaluation in accordance with IWB-3600, IWC-3600 and IWD-3600, as  
41 applicable. Those items accepted by analytical evaluation are reexamined during the  
42 next three inspection periods of IWB-2410 for Class 1 components, IWC-2410 for  
43 Class 2 components, and IWD-2410 for Class 3 components.

44 6. **Acceptance Criteria:** Any indication or relevant conditions of degradation are evaluated  
45 in accordance with IWB-3000, IWC-3000, and IWD-3000 for Class 1, 2, and 3

1 components, respectively. Examination results are evaluated in accordance with  
2 IWB-3100, IWC-3100, and IWD-3100 by comparing the results with the acceptance  
3 standards of IWB-3400 and IWB-3500 for Class 1, IWC-3400 and IWC-3500 for Class 2,  
4 and IWD-3400 and IWD-3500 for Class 3 components. Flaws that exceed the size of  
5 allowable flaws, as defined in IWB-3500, IWC-3500 and IWD-3500 may be evaluated by  
6 using the analytical procedures of IWB-3600, IWC-3600 and IWD-3600 for Class 1, 2  
7 and 3 components, respectively.

- 8 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
9 conditions adverse to quality or significant conditions adverse to quality under those  
10 specific portions of the quality assurance (QA) program that are used to meet  
11 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
12 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
13 Appendix B, QA program to fulfill the corrective actions element of this aging  
14 management program (AMP) for both safety-related and nonsafety-related structures  
15 and components (SCs) within the scope of this program.

16 Repair and replacement activities are performed in conformance with IWA-4000.

- 17 8. **Confirmation Process:** The confirmation process is addressed through those specific  
18 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
19 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
20 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
21 confirmation process element of this AMP for both safety-related and nonsafety-related  
22 SCs within the scope of this program.

- 23 9. **Administrative Controls:** Administrative controls are addressed through the QA  
24 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
25 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
26 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
27 fulfill the administrative controls element of this AMP for both safety-related and  
28 nonsafety-related SCs within the scope of this program.

- 29 10. **Operating Experience:** Because the ASME Code is a consensus document that has  
30 been widely used over a long period, it has been shown to be generally effective in  
31 managing aging effects in Class 1, 2, and 3 components and their integral attachments  
32 in light-water cooled power plants (see Chapter I of the GALL-SLR Report).

33 Some specific examples of operating experience of component degradation are  
34 as follows:

35 **Boiling Water Reactor (BWR):** Cracking due to intergranular stress corrosion cracking  
36 (IGSCC) has occurred in small- and large-diameter BWR piping made of austenitic SSs  
37 and nickel alloys. IGSCC has also occurred in a number of vessel internal components,  
38 such as core shrouds, access hole covers, top guides, and core spray spargers  
39 (U.S. Nuclear Regulatory Commission (NRC) Bulletin 80-13, NRC Information Notice  
40 (IN) 95-17, NRC Generic Letter (GL) 94-03, and NUREG-1544). Cracking due to  
41 thermal and mechanical loading has occurred in high-pressure coolant injection piping  
42 (NRC IN 89-80) and instrument lines [Licensee Event Report (LER) 50-249/99-003-01].  
43 Jet pump BWRs are designed with access holes in the shroud support plate at the  
44 bottom of the annulus between the core shroud and the reactor vessel wall. These

1 holes are used for access during construction and are subsequently closed by welding a  
2 plate over the hole. Both circumferential (NRC IN 88-03) and radial cracking  
3 (NRC IN 92-57) have been observed in access hole covers. Failure of the isolation  
4 condenser tube bundles due to thermal fatigue and transgranular stress corrosion  
5 cracking (TGSCC) caused by leaky valves has also occurred (NRC LER 50-219/98-014-  
6 00).

7 *Pressurized Water Reactor (PWR) Primary System:* Although the primary pressure  
8 boundary piping of PWRs has generally not been found to be affected by stress  
9 corrosion cracking (SCC) because of low dissolved oxygen levels and control of primary  
10 water chemistry, SCC has occurred in safety injection lines (NRC IN 97-19 and 84-18),  
11 charging pump casing cladding (NRC IN 80-38 and 94-63), instrument nozzles in safety  
12 injection tanks (NRC IN 91-05), control rod drive seal housing (NRC Inspection  
13 Report 50-255/99012), and safety-related stainless steel (SS) piping systems that  
14 contain oxygenated, stagnant, or essentially stagnant borated coolant (NRC IN 97-19).  
15 Cracking has occurred in SS baffle former bolts in a number of foreign plants  
16 (NRC IN 98-11) and has been observed in plants in the United States. Cracking due to  
17 thermal and mechanical loading has occurred in high-pressure injection and safety  
18 injection piping (NRC IN 97-46 and NRC Bulletin 88-08). Through-wall circumferential  
19 cracking has been found in reactor pressure vessel head control rod drive penetration  
20 nozzles (NRC IN 2001-05). Evidence of reactor coolant leakage, together with crack-like  
21 indications, has been found in bottom-mounted instrumentation nozzles (NRC IN 2003-  
22 11 and IN 2003-11, Supplement 1). Cracking in pressurizer safety and relief line nozzles  
23 and in surge line nozzles has been detected (NRC IN 2004-11), and circumferential  
24 cracking in SS pressurizer heater sleeves has also been found (NRC IN 2006-27). Also,  
25 primary water stress corrosion cracking (PWSCC) has been observed in steam  
26 generator drain bowl welds inspected as part of a licensee's Alloy 600/82/182 program  
27 (NRC IN 2005-02).

28 *PWR Secondary System:* Steam generator tubes have experienced outside diameter  
29 stress corrosion cracking (ODSCC), intergranular attack, wastage, and pitting (NRC  
30 IN 97-88). Carbon steel support plates in steam generators have experienced general  
31 corrosion. Steam generator shells have experienced pitting and SCC (NRC INs 82-37,  
32 85-65, and 90-04).

33 The program is informed and enhanced when necessary through the systematic and  
34 ongoing review of both plant-specific and industry operating experience, as discussed in  
35 Appendix B of the GALL-SLR Report.

## 36 **References**

37 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
38 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

39 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
40 Commission. 2015.

- 1 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components,  
2 The ASME Boiler and Pressure Vessel Code." New York, New York: The American Society of  
3 Mechanical Engineers. 2013.<sup>2</sup>
- 4 EPRI. BWRVIP-03, "BWR Vessel and Internals Project, Reactor Pressure Vessel and Internals  
5 Examination Guidelines (EPRI TR-105696 R1, March 30, 1999)." July 1999.
- 6 Licensee Event Report LER 50-249/99-003-01, "Supplement to Reactor Recirculation B Loop,  
7 High Pressure Flow Element Venturi Instrument Line Steam Leakage Results in Unit 3  
8 Shutdown Due to Fatigue Failure of Socket Welded Pipe Joint."  
9 <https://lersearch.inl.gov/LERSearchCriteria.aspx>. August 1999.
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11 Bundles due to Thermal Stresses/Transgranular Stress Corrosion Cracking Caused by Leaky  
12 Valve." <https://lersearch.inl.gov/LERSearchCriteria.aspx>. October 1998.
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15 Regulatory Commission. December 2006.
- 16 \_\_\_\_\_. NRC Information Notice 2005-02, "Pressure Boundary Leakage Identified on Steam  
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- 19 \_\_\_\_\_. NRC Information Notice 2004-11, "Cracking in Pressurizer Safety and Relief Nozzles  
20 and in Surge Line Nozzles." Washington, DC: U.S. Nuclear Regulatory Commission.  
21 May 2004.
- 22 \_\_\_\_\_. NRC Information Notice 2003-11, Supplement 1, "Leakage Found on Bottom-Mounted  
23 Instrumentation Nozzles." Washington, DC: U.S. Nuclear Regulatory Commission.  
24 January 2004.
- 25 \_\_\_\_\_. NRC Information Notice 2003-11, "Leakage Found on Bottom-Mounted Instrumentation  
26 Nozzles." Washington, DC: U.S. Nuclear Regulatory Commission. August 2003.
- 27 \_\_\_\_\_. NRC Information Notice 2001-05, "Through-Wall Circumferential Cracking of Reactor  
28 Pressure Vessel Head Control Rod Drive Mechanism Penetration Nozzles at Oconee Nuclear  
29 Station, Unit 3." Washington, DC: U.S. Nuclear Regulatory Commission. April 2001.
- 30 \_\_\_\_\_. NRC Inspection Report 50-255/99012, "Palisades Inspection Report. Item E8.2,  
31 Licensee Event Report 50-255/99-004, "Control Rod Drive Seal Housing Leaks and Crack  
32 Indications." Washington, DC: U.S. Nuclear Regulatory Commission. January 2000.
- 33 \_\_\_\_\_. NRC Information Notice 98-11, "Cracking of Reactor Vessel Internal Baffle Former Bolts  
34 in Foreign Plants." Washington, DC: U.S. Nuclear Regulatory Commission. March 1998.

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<sup>2</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

1 \_\_\_\_\_. NRC Information Notice 97-88, "Experiences During Recent Steam Generator  
2 Inspections." Washington, DC: U.S. Nuclear Regulatory Commission. December 1997.

3 \_\_\_\_\_. NRC Information Notice 97-46, "Unisolable Crack in High-Pressure Injection Piping."  
4 Washington DC: U.S. Nuclear Regulatory Commission. July 1997.

5 \_\_\_\_\_. NRC Information Notice 97-19, "Safety Injection System Weld Flaw at Sequoyah  
6 Nuclear Power Plant, Unit 2." Washington, DC: U.S. Nuclear Regulatory Commission.  
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8 \_\_\_\_\_. NUREG-1544, "Status Report: Intergranular Stress Corrosion Cracking of BWR Core  
9 Shrouds and Other Internal Components." Washington, DC: U.S. Nuclear Regulatory  
10 Commission. March 1996.

11 \_\_\_\_\_. NRC Information Notice 95-17, "Reactor Vessel Top Guide and Core Plate Cracking."  
12 Washington, DC: U.S. Nuclear Regulatory Commission. March 1995.

13 \_\_\_\_\_. Generic Letter 94-03, "Intergranular Stress Corrosion Cracking of Core Shrouds in  
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## 1 **XI.M2 WATER CHEMISTRY**

### 2 **Program Description**

3 The main objective of this program is to mitigate loss of material due to corrosion, cracking due  
4 to stress corrosion cracking (SCC) and related mechanisms, and reduction of heat transfer due  
5 to fouling in components exposed to a treated water environment. The program includes  
6 periodic monitoring of the treated water in order to minimize loss of material or cracking.

7 The water chemistry program for boiling water reactors (BWRs) relies on monitoring and control  
8 of reactor water chemistry based on industry guidelines contained in the Boiling Water Reactor  
9 Vessel and Internals Project (BWRVIP)-190 [Electric Power Research Institute (EPRI)  
10 1016579]. The BWRVIP-190 has three sets of guidelines: (i) one for reactor water, (ii) one for  
11 condensate and feedwater, and (iii) one for control rod drive (CRD) mechanism cooling water.  
12 The water chemistry program for pressurized water reactors (PWRs) relies on monitoring and  
13 control of reactor water chemistry based on industry guidelines contained in EPRI 1014986,  
14 "PWR Primary Water Chemistry Guidelines," Revision 6 and EPRI 1016555, "PWR Secondary  
15 Water Chemistry Guidelines," Revision 7.

16 The water chemistry programs are generally effective in removing impurities from intermediate  
17 and high flow areas. The Generic Aging Lessons Learned for Subsequent License Renewal  
18 (GALL-SLR) Report identifies those circumstances in which the water chemistry program is to  
19 be augmented to manage the effects of aging for license renewal. For example, the water  
20 chemistry program may not be effective in low flow or stagnant flow areas. Accordingly, in  
21 certain cases as identified in the GALL-SLR Report, verification of the effectiveness of the  
22 chemistry control program is undertaken to ensure that significant degradation is not occurring  
23 and the component's intended function is maintained during the period of extended operation.  
24 For these specific cases, an acceptable verification program is a one-time inspection of selected  
25 components at susceptible locations in the system.

### 26 **Evaluation and Technical Basis**

- 27 1. **Scope of Program:** The program includes components in the reactor coolant system,  
28 the engineered safety features, the auxiliary systems, and the steam and power  
29 conversion system. This program addresses the metallic components subject to aging  
30 management review that are exposed to a treated water environment controlled by the  
31 water chemistry program.
- 32 2. **Preventive Actions:** The program includes specifications for chemical species,  
33 impurities and additives, sampling and analysis frequencies, and corrective actions for  
34 control of reactor water chemistry. System water chemistry is controlled to minimize  
35 contaminant concentration and mitigate loss of material due to general, crevice, and  
36 pitting corrosion and cracking caused by SCC. For BWRs, maintaining high water purity  
37 reduces susceptibility to SCC, and chemical additive programs such as hydrogen water  
38 chemistry or noble metal chemical application also may be used. For PWRs, additives  
39 are used for reactivity control and to control pH and inhibit corrosion.
- 40 3. **Parameters Monitored or Inspected:** The concentrations of corrosive impurities listed  
41 in the EPRI water chemistry guidelines are monitored to mitigate loss of material,  
42 cracking, and reduction of heat transfer. Water quality also is maintained in accordance  
43 with the guidance. Chemical species and water quality are monitored by in-process

1 methods or through sampling. The chemical integrity of the samples is maintained and  
2 verified to ensure that the method of sampling and storage will not cause a change in the  
3 concentration of the chemical species in the samples.

4 4. **Detection of Aging Effects:** This is a mitigation program and does not provide for  
5 detection of any aging effects of concern for the components within its scope. The  
6 monitoring methods and frequency of water chemistry sampling and testing is performed  
7 in accordance with the EPRI water chemistry guidelines and based on plant operating  
8 conditions. The main objective of this program is to mitigate loss of material due to  
9 corrosion and cracking due to SCC in components exposed to a treated  
10 water environment.

11 5. **Monitoring and Trending:** Chemistry parameter data are recorded, evaluated, and  
12 trended in accordance with the EPRI water chemistry guidelines.

13 6. **Acceptance Criteria:** Maximum levels for various chemical parameters are maintained  
14 within the system-specific limits as indicated by the limits specified in the corresponding  
15 EPRI water chemistry guidelines.

16 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
17 conditions adverse to quality or significant conditions adverse to quality under those  
18 specific portions of the quality assurance (QA) program that are used to meet  
19 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
20 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
21 Appendix B, QA program to fulfill the corrective actions element of this aging  
22 management program (AMP) for both safety-related and nonsafety-related structures  
23 and components (SCs) within the scope of this program.

24 Any evidence of aging effects or unacceptable water chemistry results are evaluated, the  
25 cause identified, and the condition corrected. When measured water chemistry  
26 parameters are outside the specified range, corrective actions are taken to bring the  
27 parameter back within the acceptable range (or to change the operational mode of the  
28 plant) within the time period specified in the EPRI water chemistry guidelines. Whenever  
29 corrective actions are taken to address an abnormal chemistry condition, increased  
30 sampling or other appropriate actions are taken and analyzed to verify that the corrective  
31 actions were effective in returning the concentrations of contaminants, such as chlorides,  
32 fluorides, sulfates, and dissolved oxygen, to within the acceptable ranges.

33 8. **Confirmation Process:** The confirmation process is addressed through those specific  
34 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
35 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
36 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
37 confirmation process element of this AMP for both safety-related and nonsafety-related  
38 SCs within the scope of this program.

39 9. **Administrative Controls:** Administrative controls are addressed through the QA  
40 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
41 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
42 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
43 fulfill the administrative controls element of this AMP for both safety-related and  
44 nonsafety-related SCs within the scope of this program.

1 10. **Operating Experience:** The EPRI guideline documents have been developed based on  
2 plant experience and have been shown to be effective over time with their widespread  
3 use. The specific examples of operating experience are as follows:

4 *BWR:* Intergranular stress corrosion cracking (IGSCC) has occurred in small- and  
5 large-diameter BWR piping made of austenitic stainless steels (SSs) and nickel-base  
6 alloys. Significant cracking has occurred in recirculation, core spray, residual heat  
7 removal systems, and reactor water cleanup system piping welds. IGSCC has also  
8 occurred in a number of vessel internal components, including core shroud, access hole  
9 cover, top guide, and core spray spargers [NRC Bulletin 80-13, NRC Information Notice  
10 (IN) 95-17, NRC Generic Letter (GL) 94-03, and NUREG-1544]. No occurrence of SCC  
11 in piping and other components in standby liquid control systems exposed to sodium  
12 pentaborate solution has ever been reported (NUREG/CR-6001).

13 *Pressurized Water Reactor (PWR) Primary System:* The potential for SCC-type  
14 mechanisms might normally occur because of inadvertent introduction of contaminants  
15 into the primary coolant system, including contaminants introduced from the free surface  
16 of the spent fuel pool (which can be a natural collector of airborne contaminants) or the  
17 introduction of oxygen during plant cooldowns (NRC IN 84-18). Ingress of demineralizer  
18 resins into the primary system has caused IGSCC of Alloy 600 vessel head penetrations  
19 (NRC IN 96-11, NRC GL 97-01). Inadvertent introduction of sodium thiosulfate into the  
20 primary system has caused IGSCC of steam generator tubes. SCC has occurred in  
21 safety injection lines (NRC INs 97-19 and 84-18), charging pump casing cladding  
22 (NRC INs 80-38 and 94-63), instrument nozzles in safety injection tanks (NRC IN 91-05),  
23 and safety-related SS piping systems that contain oxygenated, stagnant, or essentially  
24 stagnant borated coolant (NRC IN 97-19). Steam generator tubes and plugs and Alloy  
25 600 penetrations have experienced primary water SCC (NRC INs 89-33, 94-87, 97-88,  
26 90-10, and 96-11; NRC Bulletin 89-01 and its two supplements). IGSCC-induced  
27 circumferential cracking has occurred in PWR pressurizer heater sleeves  
28 (NRC IN 2006-27).

29 *PWR Secondary System:* Steam generator tubes have experienced outside diameter  
30 stress corrosion cracking (ODSCC), intergranular attack (IGA), wastage, and pitting  
31 (NRC IN 97-88, NRC GL 95-05). Carbon steel support plates in steam generators have  
32 experienced general corrosion. The steam generator shell has experienced pitting and  
33 SCC (NRC INs 82-37, 85-65, and 90-04). Extensive buildup of deposits at steam  
34 generator tube support holes can result in flow-induced vibrations and tube cracking  
35 (NRC IN 2007-37).

36 Such operating experience has provided feedback to revisions of the Electric Power  
37 Research Institute (EPRI) water chemistry guideline documents.

38 The program is informed and enhanced when necessary through the systematic and  
39 ongoing review of both plant-specific and industry operating experience, as discussed in  
40 Appendix B of the GALL-SLR Report.

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1 **XI.M3 REACTOR HEAD CLOSURE STUD BOLTING**

2 **Program Description**

3 This program includes (a) inservice inspection (ISI) in accordance with the requirements of the  
4 American Society of Mechanical Engineers (ASME) Code, Section XI, Subsection IWB,  
5 Table IWB 2500-1; and (b) preventive measures to mitigate cracking. The program also relies  
6 on recommendations delineated in the U.S. Nuclear Regulatory Commission (NRC) Regulatory  
7 Guide (RG) 1.65, Revision 1.

8 **Evaluation and Technical Basis**

9 1. **Scope of Program:** The program manages the aging effects of cracking due to stress  
10 corrosion cracking (SCC) or intergranular stress corrosion cracking (IGSCC) and loss of  
11 material due to wear or corrosion for reactor vessel closure stud bolting (studs, washers,  
12 bushings, nuts, and threads in flange) for both boiling water reactors (BWRs) and  
13 pressurized water reactors (PWRs).

14 2. **Preventive Actions:** Preventive measures may include:

15 (a) Avoiding the use of metal-plated stud bolting to prevent degradation due to  
16 corrosion or hydrogen embrittlement;

17 (b) Using manganese phosphate or other acceptable surface treatments;

18 (c) Using stable lubricants. Of particular note, use of molybdenum disulfide (MoS<sub>2</sub>)  
19 as a lubricant has been shown to be a potential contributor to SCC and should  
20 not be used

21 (d) Using bolting material for closure studs that has an actual measured yield  
22 strength less than 1,034 megapascals (MPa) (150 kilo-pounds per square inch).

23 Implementation of these mitigation measures can reduce potential for SCC or IGSCC,  
24 thus making this program effective.

25 3. **Parameters Monitored or Inspected:** The ASME Section XI ISI program detects and  
26 sizes cracks, detects loss of material, and detects coolant leakage by following the  
27 examination and inspection requirements specified in Table IWB-2500-1.

28 4. **Detection of Aging Effects:** The extent and schedule of the inspection and test  
29 techniques prescribed by the program are designed to maintain structural integrity and  
30 ensure that aging effects are discovered and repaired before the loss of intended  
31 function of the component. Inspection can reveal cracking, loss of material due to  
32 corrosion or wear, and leakage of coolant.

33 The program uses visual, surface, and volumetric examinations in accordance with the  
34 general requirements of Subsection IWA-2000. Surface examination uses magnetic  
35 particle or liquid penetrant examinations to indicate the presence of surface  
36 discontinuities and flaws. Volumetric examination uses radiographic or ultrasonic  
37 examinations to indicate the presence of discontinuities or flaws throughout the volume

- 1 of material. Visual VT-2 examination detects evidence of leakage from  
2 pressure-retaining components, as required during the system pressure test.
- 3 Components are examined and tested in accordance with ASME Code, Section XI,  
4 Table IWB-2500-1, Examination Category B-G-1, for pressure-retaining bolting greater  
5 than 2 inches in diameter. Examination Category B-P for all pressure-retaining  
6 components specifies visual VT-2 examination of all pressure-retaining boundary  
7 components during the system leakage test. Table IWB-2500-1 specifies the extent and  
8 frequency of the inspection and examination methods, and IWB-2400 specifies the  
9 schedule of the inspection.
- 10 5. **Monitoring and Trending:** The Inspection schedule of IWB-2400 and the extent  
11 and frequency of IWB-2500-1 provide timely detection of cracks, loss of material,  
12 and leakage.
- 13 6. **Acceptance Criteria:** Any indication or relevant condition of degradation in closure stud  
14 bolting is evaluated in accordance with IWB-3100 by comparing ISI results with the  
15 acceptance standards of IWB-3400 and IWB-3500.
- 16 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
17 conditions adverse to quality or significant conditions adverse to quality under those  
18 specific portions of the quality assurance (QA) program that are used to meet  
19 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
20 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
21 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
22 fulfill the corrective actions element of this aging management programs (AMP) for both  
23 safety-related and nonsafety-related structures and components (SCs) within the scope  
24 of this program.
- 25 Repair and replacement are performed in accordance with the requirements of  
26 IWA-4000 and the material and inspection guidance of Regulatory Guide (RG) 1.65.  
27 The maximum yield strength of replacement material should be limited as recommended  
28 in RG 1.65
- 29 8. **Confirmation Process:** The confirmation process is addressed through those specific  
30 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
31 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
32 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
33 confirmation process element of this AMP for both safety-related and nonsafety-related  
34 SCs within the scope of this program.
- 35 9. **Administrative Controls:** Administrative controls are addressed through the QA  
36 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
37 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
38 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
39 fulfill the administrative controls element of this AMP for both safety-related and  
40 nonsafety-related SCs within the scope of this program.
- 41 10. **Operating Experience:** SCC has occurred in BWR pressure vessel head studs  
42 (Stoller, 1991). The AMP has provisions regarding inspection techniques and  
43 evaluation, material specifications, corrosion prevention, and other aspects of reactor

1 pressure vessel (RPV) head stud cracking. Implementation of the program provides  
2 reasonable assurance that the effects of cracking due to SCC or IGSCC and loss of  
3 material due to wear are adequately managed so that the intended functions of the  
4 reactor head closure studs and bolts are maintained consistent with the current licensing  
5 basis (CLB) for the period of extended operation. Degradation of threaded bolting and  
6 fasteners in closures for the reactor coolant pressure boundary has occurred from boric  
7 acid corrosion, SCC, and fatigue loading (NRC Inspection and Enforcement Bulletin  
8 82-02, NRC Generic Letter 91-17).

9 The program is informed and enhanced when necessary through the systematic and  
10 ongoing review of both plant-specific and industry operating experience, as discussed in  
11 Appendix B of the GALL-SLR Report.

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<sup>1</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.



# 1 XI.M4 BOILING WATER REACTOR VESSEL ID ATTACHMENT WELDS

## 2 Program Description

3 This program is a condition monitoring program for detecting cracking due to stress corrosion  
4 cracking (SCC), intergranular stress corrosion cracking (IGSCC), and cyclical loading  
5 mechanisms in the reactor vessel inside diameter (ID) attachment welds of boiling water  
6 reactors (BWRs). The program includes inspection and flaw evaluation in accordance with the  
7 requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI, and  
8 the guidance in “BWR Vessel and Internals Project, Vessel ID Attachment Weld Inspection and  
9 Flaw Evaluation Guidelines” (BWRVIP-48-A) to provide reasonable assurance of the long-term  
10 integrity and safe operation of BWR vessel ID attachment welds.

11 The guidance in Boiling Water Reactor Vessel and Internals Project (BWRVIP)-48-A includes  
12 inspection recommendations and evaluation methodologies for certain attachment welds  
13 between the vessel wall and the brackets that attach components to the vessel. In some cases,  
14 the attachment is a weld attached directly to the vessel wall; in other cases, the attachment  
15 includes a weld build-up pad on the vessel wall. The BWRVIP-48-A report includes information  
16 on the geometry of the vessel ID attachments; evaluates susceptible locations and the safety  
17 consequence of failure; provides recommendations regarding the method, extent, and  
18 frequency of augmented examinations; and discusses acceptable methods for evaluating the  
19 structural integrity significance of indications detected during examinations.

## 20 Evaluation and Technical Basis

- 21 1. **Scope of Program:** This program manages the effects of cracking caused by SCC,  
22 IGSCC, or cyclical loading mechanisms for those BWR vessel ID attachment welds that  
23 are covered by BWRVIP-48-A. The program is an augmented inservice inspection (ISI)  
24 program that uses the inspection and flaw evaluation criteria in BWRVIP-48-A to detect  
25 cracking and monitor the effects of cracking on the intended functions of these  
26 components.
- 27 2. **Preventive Actions:** This program is a condition monitoring program and has no  
28 preventive actions. To mitigate SCC and IGSCC, reactor coolant water chemistry is  
29 monitored and controlled in accordance with activities that meet the guidelines in  
30 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
31 AMP XI.M2, “Water Chemistry.”
- 32 3. **Parameters Monitored or Inspected:** The program monitors for cracks caused by  
33 SCC, IGSCC, and cyclical loading mechanisms. Inspections performed in accordance  
34 with the guidance in BWRVIP-48-A and the requirements of the ASME Code, Section XI,  
35 Table IWB-2500-1 are used to interrogate the components for discontinuities that may  
36 indicate the presence of cracking.
- 37 4. **Detection of Aging Effects:** The extent and schedule of the inspections prescribed by  
38 BWRVIP-48-A and ASME Code, Section XI, are designed to maintain structural integrity  
39 and ensure that aging effects are discovered and repaired before a loss of intended  
40 function. The vessel ID attachment welds are visually examined in accordance with the  
41 requirements of ASME Code, Section XI, Table IWB-2500-1, Examination Category  
42 B-N-2. In addition, certain attachment welds are subject to augmented examinations.  
43 BWRVIP-48-A specifies the nondestructive examination methods, inspection locations,

- 1 and inspection frequencies for these augmented examinations. The nondestructive  
2 examination techniques that are appropriate for the augmented examinations, including  
3 the uncertainties inherent in delivering and executing these techniques and applicable  
4 for inclusion in flaw evaluations, are included in BWRVIP-03.
- 5 5. **Monitoring and Trending:** Inspections scheduled in accordance with ASME Code,  
6 Section XI, Subarticle IWB-2400, and BWRVIP-48-A provide for the timely detection of  
7 cracking. If indications are detected, the scope of examination is expanded. Any  
8 indications are evaluated in accordance with ASME Code, Section XI, and the  
9 guidance in BWRVIP-48-A. Guidance for the evaluation of crack growth in stainless  
10 steels (SSs), nickel alloys, and low-alloy steels is provided in BWRVIP-14-A,  
11 BWRVIP-59-A, and BWRVIP-60-A, respectively.
- 12 6. **Acceptance Criteria:** The relevant acceptance criteria are provided in BWRVIP-48-A  
13 and ASME Code, Section XI, Subsubarticle IWB-3520.
- 14 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
15 conditions adverse to quality or significant conditions adverse to quality under those  
16 specific portions of the quality assurance (QA) program that are used to meet  
17 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
18 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
19 Appendix B, QA program to fulfill the corrective actions element of this aging  
20 management program (AMP) for both safety-related and nonsafety-related structures  
21 and components (SCs) within the scope of this program.
- 22 Repair and replacement activities are conducted in accordance with the guidance in  
23 BWRVIP-52-A.
- 24 8. **Confirmation Process:** The confirmation process is addressed through those specific  
25 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
26 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
27 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
28 confirmation process element of this AMP for both safety-related and nonsafety-related  
29 SCs within the scope of this program.
- 30 9. **Administrative Controls:** Administrative controls are addressed through the QA  
31 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
32 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
33 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
34 fulfill the administrative controls element of this AMP for both safety-related and  
35 nonsafety-related SCs within the scope of this program.
- 36 10. **Operating Experience:** Cracking due to SCC, IGSCC, and cyclical loading has  
37 occurred in BWR components. The program guidelines are based on an evaluation of  
38 available information, including BWR inspection data and information on the causes of  
39 SCC, IGSCC, and cracking due to cyclical loading, to determine which attachment welds  
40 may be susceptible to cracking from any of these mechanisms. Implementation of this  
41 program provides reasonable assurance that cracking will be adequately managed and  
42 that the intended functions of the vessel ID attachments will be maintained consistent  
43 with the current licensing basis (CLB) for the subsequent period of extended operation.

1           The program is informed and enhanced when necessary through the systematic and  
2           ongoing review of both plant-specific and industry operating experience, as discussed in  
3           Appendix B of the GALL-SLR Report.

#### 4   **References**

- 5   10 CFR Part 50, Appendix B, “Quality Assurance Criteria for Nuclear Power Plants.”  
6   Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 7   10 CFR 50.55a, “Codes and Standards.” Washington, DC: U.S. Nuclear Regulatory  
8   Commission. 2015.
- 9   ASME. ASME Section XI, “Rules for Inservice Inspection of Nuclear Power Plant Components.”  
10   The ASME Boiler and Pressure Vessel Code. New York, New York: The American Society of  
11   Mechanical Engineers. 2013.<sup>1</sup>
- 12   EPRI. BWRVIP-03, Revision 16 (EPRI 105696-R16), “BWR Vessel and Internals Project,  
13   Reactor Pressure Vessel and Internals Examination Guidelines.” Palo Alto, California: Electric  
14   Power Research Institute. December 2013.
- 15   \_\_\_\_\_. BWRVIP-14-A (EPRI 1016569), “Evaluation of Crack Growth in BWR Stainless Steel  
16   RPV Internals.” Palo Alto, California: Electric Power Research Institute. September 2008.
- 17   \_\_\_\_\_. BWRVIP-59-A (EPRI 1014874), “Evaluation of Crack Growth in BWR Nickel-Base  
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19   May 2007.
- 20   \_\_\_\_\_. BWRVIP-52-A (EPRI 1012119), “*BWR Vessel and Internals Project, Shroud Support*  
21   *and Vessel Bracket Repair Design Criteria.*” Palo Alto, California: Electric Power Research  
22   Institute. September 2005.
- 23   \_\_\_\_\_. BWRVIP-48-A (EPRI 1009948), “BWR Vessel and Internals Project, Vessel ID  
24   Attachment Weld Inspection and Flaw Evaluation Guidelines.” Palo Alto, California: Electric  
25   Power Research Institute. November 2004.
- 26   \_\_\_\_\_. BWRVIP-60-A (EPRI 1008871), “BWR Vessel and Internals Project, Evaluation of  
27   Crack Growth in BWR Low Alloy Steel RPV Internals.” Palo Alto, California: Electric Power  
28   Research Institute. June 2003.

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<sup>1</sup>GALL-SLR Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.



# 1 XI.M5 BOILING WATER REACTOR FEEDWATER NOZZLE

## 2 Program Description

3 This program is a condition monitoring program for detecting cracking due to fatigue in boiling  
4 water reactor (BWR) feedwater nozzles. Cracking is detected through qualified ultrasonic  
5 examinations, the extent and frequency of which are based on the recommendations in General  
6 Electric Report GE-NE-523-A71-0594-A, Revision 1, "Alternate BWR Feedwater Nozzle  
7 Inspection Requirements." These examinations augment the inservice inspection (ISIs)  
8 specified by Section XI of the American Society of Mechanical Engineers (ASME) Code.

## 9 Evaluation and Technical Basis

10 1. **Scope of Program:** This program manages the effects of cracking due to fatigue of the  
11 BWR feedwater nozzles.

12 2. **Preventive Actions:** This is a condition monitoring program only; therefore, it has no  
13 preventive actions.

14 3. **Parameters Monitored or Inspected:** The volume of certain critical regions of the  
15 BWR feedwater nozzle is examined to detect flaws or other discontinuities that may  
16 indicate the presence of cracks.

17 4. **Detection of Aging Effects:** Cracking is detected through ultrasonic examinations of  
18 critical regions of the BWR feedwater nozzle. These critical regions cover the feedwater  
19 nozzle inner radius and bore as depicted in Zones 1, 2, and 3 on Figures 4-1 and 4-2 of  
20 GE-NE-523-A71-0594-A, Revision 1. The ultrasonic examination procedures,  
21 equipment, and personnel are qualified by performance demonstration in accordance  
22 with ASME Code, Section XI, Appendix VIII.

23 For plants without single sleeve interference fit feedwater spargers, the examination  
24 frequency for Zones 1, 2, and 3 is once every 10-year ASME Code, Section XI,  
25 ISI interval.

26 For plants with single sleeve interference fit feedwater spargers, the inspection interval  
27 for Zones 1 and 2 is in accordance with Table 6-1 of GE-NE-523-A71-0594-A,  
28 Revision 1. This inspection interval is based on the results of a plant-specific fracture  
29 mechanics analysis and the particular type of ultrasonic examination method that is  
30 employed. The plant-specific fracture mechanics analysis should use the latest ASME  
31 fatigue crack growth rates in a water environment that have been endorsed by the  
32 U.S. Nuclear Regulatory Commission (NRC). For these plants, the inspection interval  
33 for Zone 3 is twice the inspection interval established for Zones 1 and 2, not to exceed  
34 once every 10 years.

35 5. **Monitoring and Trending:** Augmented examinations in accordance with  
36 GE-NE-523-A71-0594-A, Revision 1 provide for the timely detection of cracks. For  
37 plants with single sleeve interference fit feedwater spargers, the cycles assumed in the  
38 plant-specific fracture mechanics analysis are monitored in accordance with activities  
39 that meet the guidelines in GALL-SLR Report AMP X.M1, "Cyclic Load Monitoring." This  
40 monitoring is used to assess the continued validity of the fracture mechanics analysis.

- 1 6. **Acceptance Criteria:** Examination results are evaluated in accordance with  
2 ASME Code, Section XI, Subsubsection IWB-3130.
- 3 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
4 conditions adverse to quality or significant conditions adverse to quality under those  
5 specific portions of the quality assurance (QA) program that are used to meet  
6 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
7 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
8 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
9 fulfill the corrective actions element of this aging management program (AMP) for both  
10 safety-related and nonsafety-related structures and components (SCs) within the scope  
11 of this program.
- 12 8. **Confirmation Process:** The confirmation process is addressed through those specific  
13 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
14 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
15 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
16 confirmation process element of this AMP for both safety-related and nonsafety-related  
17 SCs within the scope of this program.
- 18 9. **Administrative Controls:** Administrative controls are addressed through the QA  
19 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
20 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
21 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
22 fulfill the administrative controls element of this AMP for both safety-related and  
23 nonsafety-related SCs within the scope of this program.
- 24 10. **Operating Experience:** NUREG–0619, *BWR Feedwater Nozzle and Control Rod Drive*  
25 *Return Line Nozzle Cracking*, summarizes cracking that occurred in the feedwater  
26 nozzles of several BWRs in the late 1970's. In response to NUREG–0619, licensees  
27 implemented various hardware modifications and changes to operating procedures to  
28 decrease the magnitude and frequency of temperature fluctuations that had led to the  
29 cracking. This AMP augments the ASME Code, Section XI, inspections to provide  
30 assurance that any further cracking in BWR feedwater nozzles will be detected before  
31 there is a loss of intended function.
- 32 The program is informed and enhanced when necessary through the systematic and  
33 ongoing review of both plant-specific and industry operating experience, as discussed in  
34 Appendix B of the GALL-SLR Report.

## 35 **References**

- 36 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
37 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 38 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
39 Commission. 2015.

- 1 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."
- 2 The ASME Boiler and Pressure Vessel Code. New York, New York: The American Society of
- 3 Mechanical Engineers.<sup>1</sup>
  
- 4 GE. GE-NE-523-A71-0594-A, "Alternate BWR Feedwater Nozzle Inspection Requirements."
- 5 Revision 1. ML003723265. General Electric, May 2000.
  
- 6 NRC. NRC Generic Letter 81-11, "BWR Feedwater Nozzle and Control Rod Drive Return Line
- 7 Nozzle Cracking (NUREG-0619)." Washington, DC: U.S. Nuclear Regulatory Commission.
- 8 February 1981.

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<sup>1</sup> GALL-SLR Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this aging management program.



1 **XI.M6** **DELETED**



# 1 XI.M7 BOILING WATER REACTOR STRESS CORROSION CRACKING

## 2 Program Description

3 The program to manage intergranular stress corrosion cracking (IGSCC) in boiling water reactor  
4 (BWR) coolant pressure boundary piping made of stainless steel (SS) and nickel-based alloy  
5 components is delineated in NUREG-0313, Revision 2, and the U.S. Nuclear Regulatory  
6 Commission (NRC) Generic Letter (GL) 88-01 and its Supplement 1. The material includes  
7 base metal and welds. The comprehensive program outlined in NUREG-0313, Revision 2 and  
8 NRC GL 88-01 describes improvements that, in combination, will reduce the susceptibility to  
9 IGSCC. The elements to cause IGSCC consist of a susceptible-material, a significant tensile  
10 stress, and an aggressive environment. Sensitization of nonstabilized austenitic SSs containing  
11 greater than 0.035 weight percent carbon involves precipitation of chromium carbides at the  
12 grain boundaries during certain fabrication or welding processes. The formation of carbides  
13 creates a chromium-depleted region that, in certain environments, is susceptible to SCC.  
14 Residual tensile stresses are introduced from fabrication processes, such as welding, cold work,  
15 surface grinding, and forming. High levels of dissolved oxygen or aggressive contaminants,  
16 such as sulfates or chlorides, accelerate the stress corrosion cracking (SCC) processes. The  
17 program includes (a) preventive measures to mitigate IGSCC and (b) inspection and flaw  
18 evaluation to monitor IGSCC and its effects. The staff-approved Boiling Water Reactor Vessel  
19 and Internals Project (BWRVIP) (BWRVIP-75-A) report allows for modifications to the inspection  
20 extent and schedule described in the GL 88-01 program.

## 21 Evaluation and Technical Basis

- 22 1. **Scope of Program:** The program focuses on (a) managing and implementing  
23 countermeasures to mitigate IGSCC and (b) performing ISI to monitor IGSCC and its  
24 effects on the intended function of BWR piping components within the scope of license  
25 renewal. The program is applicable to all BWR piping and piping welds made of  
26 austenitic-SS and nickel alloy that are 4 inches or larger in nominal diameter containing  
27 reactor coolant at a temperature above 60 °C [140 °F] during power operation,  
28 regardless of code classification. The program also applies to pump casings, valve  
29 bodies, and reactor vessel attachments and appurtenances, such as head spray and  
30 vent components. Control rod drive return line nozzle caps and associated welds are  
31 included in the scope of the program. NUREG-0313, Rev. 2 and NRC GL 88-01,  
32 respectively, describe the technical basis and staff guidance regarding mitigation of  
33 IGSCC in BWRs. Attachment A of NRC GL 88-01 delineates the staff-approved  
34 positions regarding materials, processes, water chemistry, weld overlay reinforcement,  
35 partial replacement, stress improvement of cracked welds, clamping devices, crack  
36 characterization and repair criteria, inspection methods and personnel, inspection  
37 schedules, sample expansion, leakage detection, and reporting requirements.
- 38 2. **Preventive Actions:** The BWR SCC program is primarily a condition monitoring  
39 program which also relies on countermeasures. Maintaining high water purity reduces  
40 susceptibility to SCC or IGSCC. Reactor coolant water chemistry is monitored and  
41 maintained in accordance with the Water Chemistry program. The program description,  
42 evaluation and technical basis of water chemistry are addressed through implementation  
43 of the Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR)  
44 Report AMP XI.M2, "Water Chemistry." In addition, NUREG-0313, Rev. 2 and GL 88-01  
45 delineate the guidance for selection of resistant materials and processes that provide

1 resistance to IGSCC such as solution heat treatment and stress improvement  
2 processes.

3 3. **Parameters Monitored or Inspected:** The program detects and sizes cracks and  
4 detects leakage by using the examination and inspection guidelines delineated in  
5 NUREG-0313, Rev. 2, and NRC GL 88-01 or the referenced BWRVIP-75-A guideline  
6 as approved by the NRC staff.

7 4. **Detection of Aging Effects:** The extent, method, and schedule of the inspection and  
8 test techniques delineated in NRC GL 88-01 or BWRVIP-75-A are designed to maintain  
9 structural integrity and ensure that aging effects are discovered and repaired before the  
10 loss of intended function of the component. Modifications to the extent and schedule of  
11 inspection in NRC GL 88-01 are allowed in accordance with the inspection guidance in  
12 approved BWRVIP-75-A. Prior to crediting hydrogen water chemistry to modify extent  
13 and frequency of inspections in accordance with BWRVIP-75-A, the applicant should  
14 meet conditions described in the staff's safety evaluations regarding BWRVIP-62-A. The  
15 program uses volumetric examinations to detect IGSCC. Inspection can reveal cracking  
16 and leakage of coolant. The extent and frequency of inspection recommended by the  
17 program are based on the condition of each weld (e.g., whether the weldments were  
18 made from IGSCC-resistant material, whether a stress improvement process was  
19 applied to a weldment to reduce residual stresses, and how the weld was repaired, if it  
20 had been cracked).

21 5. **Monitoring and Trending:** The extent and schedule for inspection, in accordance with  
22 the recommendations of NRC GL 88-01 or approved BWRVIP-75-A guidelines, provide  
23 timely detection of cracks and leakage of coolant. Indications of cracking are evaluated  
24 and trended in accordance with the American Society of Mechanical Engineers (ASME)  
25 Code, Section XI, IWA-3000.

26 Applicable and approved BWRVIP-14-A, BWRVIP-59-A, BWRVIP-60-A, and  
27 BWRVIP-62-A reports provide guidelines for evaluation of crack growth in SSs, nickel  
28 alloys, and low-alloy steels. An applicant may use BWRVIP-61 guidelines for BWR  
29 vessel and internals induction heating stress improvement effectiveness on crack growth  
30 in operating plants.

31 6. **Acceptance Criteria:** Any cracking is evaluated in accordance with ASME Code,  
32 Section XI, IWA-3000 by comparing inspection results with the acceptance standards of  
33 ASME Code, Section XI, IWB-3000, IWC-3000 and IWD-3000 for Class 1, 2 and 3  
34 components, respectively.

35 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
36 conditions adverse to quality or significant conditions adverse to quality under those  
37 specific portions of the quality assurance (QA) program that are used to meet  
38 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
39 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
40 Appendix B, QA program to fulfill the corrective actions element of this aging  
41 management program (AMP) for both safety-related and nonsafety-related structures  
42 and components (SCs) within the scope of this program.

43 The guidance for weld overlay repair and stress improvement or replacement is provided  
44 in NRC GL 88-01. Corrective action is performed in accordance with IWA-4000

- 1 8. **Confirmation Process:** The confirmation process is addressed through those specific  
2 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
3 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
4 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
5 confirmation process element of this AMP for both safety-related and nonsafety-related  
6 SCs within the scope of this program.
- 7 9. **Administrative Controls:** Administrative controls are addressed through the QA  
8 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
9 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
10 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
11 fulfill the administrative controls element of this AMP for both safety-related and  
12 nonsafety-related SCs within the scope of this program.
- 13 10. **Operating Experience:** Intergranular SCC has occurred in small- and large-diameter  
14 BWR piping made of austenitic-SS and nickel-base alloys. Cracking has occurred in  
15 recirculation, core spray, residual heat removal, control rod drive (CRD) return line  
16 penetrations, and reactor water cleanup system piping welds (NRC GL 88-01 and NRC  
17 Information Notices (INs) 82-39, 84-41, and 2004-08). The comprehensive program  
18 outlined in NRC GL 88-01, NUREG-0313, Rev. 2, and in the staff-approved  
19 BWRVIP-75-A report addresses mitigating measures for SCC or IGSCC  
20 (e.g., susceptible material, significant tensile stress, and an aggressive environment).  
21 The GL 88-01 program, with or without the modifications allowed by the staff-approved  
22 BWRVIP-75-A report, has been effective in managing IGSCC in BWR reactor coolant  
23 pressure-retaining components and will adequately manage IGSCC degradation.
- 24 The program is informed and enhanced when necessary through the systematic and  
25 ongoing review of both plant-specific and industry operating experience, as discussed in  
26 Appendix B of the GALL-SLR Report.

## 27 **References**

- 28 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
29 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 30 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
31 Commission. 2015.
- 32 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."  
33 ASME Boiler and Pressure Vessel Code, New York, New York: The American Society of  
34 Mechanical Engineers. 2013.<sup>1</sup>
- 35 \_\_\_\_\_. ASME Code Case N-504-4, "Alternative Rules for Repair of Class 1, 2, and 3 Austenitic  
36 Stainless Steel Piping." Section XI, Division 1. New York, New York: American Society of  
37 Mechanical Engineers. July 2006.
- 38 EPRI. BWRVIP-62-A (EPRI-1021006), "BWR Vessel and Internals Project, Technical Basis for  
39 Inspection Relief for BWR Internal Components with Hydrogen Injection." Palo Alto, California:  
40 Electric Power Research Institute. April 2010.

1 \_\_\_\_\_. BWRVIP-14-A (EPRI 1016569), "BWR Vessel and Internals Project, Evaluation of  
2 Crack Growth in BWR Stainless Steel RPV Internals." Palo Alto, California: Electric Power  
3 Research Institute. September 2008.

4 \_\_\_\_\_. BWRVIP-59-A, (EPRI 1014874), "BWR Vessel and Internals Project, Evaluation of  
5 Crack Growth in BWR Nickel-Base Austenitic Alloys in RPV Internals." Palo Alto, California:  
6 Electric Power Research Institute. May 2007.

7 \_\_\_\_\_. BWRVIP-75-A (EPRI 1012621), "BWR Vessel and Internals Project, Technical Basis for  
8 Revisions to Generic Letter 88-01 Inspection Schedules (NUREG-0313)." Palo Alto, California:  
9 Electric Power Research Institute. October 2005.

10 \_\_\_\_\_. BWRVIP-60-A (EPRI 108871), "BWR Vessel and Internals Project, Evaluation of Stress  
11 Corrosion Crack Growth in Low Alloy Steel Vessel Materials in the BWR Environment."  
12 Palo Alto, California: Electric Power Research Institute. June 2003.

13 \_\_\_\_\_. BWRVIP-61 (EPRI 112076), "BWR Vessel and Internals Induction Heating Stress  
14 Improvement Effectiveness on Crack Growth in Operating Reactors." Palo Alto, California:  
15 Electric Power Research Institute. January 1999.

16 NRC Information Notice 04-08, "Reactor Coolant Pressure Boundary Leakage Attributable to  
17 Propagation of Cracking in Reactor Vessel Nozzle Welds." Washington, DC: U.S. Nuclear  
18 Regulatory Commission. April 2004.

19 \_\_\_\_\_. NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel  
20 Piping." Washington, DC: U.S. Nuclear Regulatory Commission. January 25, 1988;  
21 Supplement 1, February 1992.

22 \_\_\_\_\_. NUREG-0313, "Technical Report on Material Selection and Processing Guidelines for  
23 BWR Coolant Pressure Boundary Piping." Rev. 2. Washington DC: U.S. Nuclear Regulatory  
24 Commission. 1988.

25 \_\_\_\_\_. NRC Information Notice 84-41, "IGSCC in BWR Plants." Washington, DC:  
26 U.S. Nuclear Regulatory Commission. June 1984.

27 \_\_\_\_\_. NRC Information Notice 82-39, "Service Degradation of Thick Wall Stainless Steel  
28 Recirculation System Piping at a BWR Plant." Washington, DC: U.S. Nuclear Regulatory  
29 Commission. September 1982.

# 1 XI.M8 BOILING WATER REACTOR PENETRATIONS

## 2 Program Description

3 The program for boiling water reactor (BWR) vessel instrumentation penetrations, control rod  
4 drive (CRD) housing and incore-monitoring housing (ICMH) penetrations and standby liquid  
5 control (SLC) nozzles/Core  $\Delta P$  nozzles includes inspection and flaw evaluation in conformance  
6 with the guidelines of staff-approved Boiling Water Reactor Vessel and Internals Project  
7 (BWRVIP) Topical Reports BWRVIP-49-A, BWRVIP-47-A and BWRVIP-27-A. The program  
8 manages cracking due to cyclic loading, stress corrosion cracking (SCC) and intergranular  
9 stress corrosion cracking (IGSCC) for these BWR vessel penetrations and nozzles. The  
10 inspection and evaluation guidelines of BWRVIP-49-A, BWRVIP-47-A, and BWRVIP-27-A  
11 contain generic guidelines intended to present appropriate inspection recommendations to  
12 assure safety function integrity. The guidelines of BWRVIP-49-A provide information on the  
13 type of instrument penetration, evaluate their susceptibility and consequences of failure, and  
14 define the inspection strategy to assure safe operation. The guidelines of BWRVIP-47-A  
15 provide information on components located in the lower plenum region of BWRs, evaluate their  
16 susceptibility and consequences of failure, and define the inspection strategy to assure safe  
17 operation. The guidelines of BWRVIP-27-A are applicable to plants in which the SLC system  
18 injects sodium pentaborate into the bottom head region of the vessel (in most plants, as a pipe  
19 within a pipe of the core plate  $\Delta P$  monitoring system). The BWRVIP-27-A guidelines address  
20 the region where the  $\Delta P$  and SLC nozzle or housing penetrates the vessel bottom head and  
21 include the safe ends welded to the nozzle or housing. Guidelines for repair design criteria are  
22 provided in BWRVIP-57-A for instrumentation penetrations, BWRVIP-55-A for CRD housing and  
23 ICMH penetrations and BWRVIP-53-A for SLC line.

24 Although this is a condition monitoring program, control of water chemistry helps prevent SCC  
25 and IGSCC. The water chemistry program for BWRs relies on monitoring and control of reactor  
26 water chemistry based on industry guidelines, such BWRVIP-190 (EPRI 1016579) or later  
27 revisions. BWRVIP-190 has three sets of guidelines: (i) one for primary water, (ii) one for  
28 condensate and feedwater, and (iii) one for CRD mechanism cooling water. Adequate aging  
29 management activities for these components provide reasonable assurance that the long-term  
30 integrity and safe operation of BWR vessel instrumentation nozzles, CRD housing and ICMH  
31 penetrations and SLC nozzles/Core  $\Delta P$  nozzles.

## 32 Evaluation and Technical Basis

33 1. **Scope of Program:** The scope of this program is applicable to BWR instrumentation  
34 penetrations, CRD housing and ICMH penetrations and BWR SLC nozzles/Core  $\Delta P$   
35 nozzles. The program manages cracking due to cyclic loading or SCC and IGSCC using  
36 inspection and flaw evaluation in accordance with the guidelines of staff-approved  
37 BWRVIP-49-A, BWRVIP-47-A and BWRVIP-27-A.

38 2. **Preventive Actions:** This program is a condition monitoring program and has no  
39 preventive actions. However, maintaining high water purity reduces susceptibility to  
40 SCC or IGSCC. The program description, evaluation, and technical basis of water  
41 chemistry are presented in the Generic Aging Lessons Learned for Subsequent  
42 License Renewal (GALL-SLR) Report aging management program (AMP) XI.M2,  
43 "Water Chemistry."

1 3. **Parameters Monitored or Inspected:** The program manages the effects of cracking  
2 due to SCC/IGSCC on the intended function of the BWR instrumentation nozzles, CRD  
3 housing and ICMH penetrations, and BWR SLC nozzles/Core  $\Delta$ P nozzles. The program  
4 monitors for evidence of surface-breaking linear discontinuities if a visual inspection  
5 technique is used or for relevant flaw signals if a volumetric ultrasonic testing (UT)  
6 method is used. In addition, the program includes visual examination to confirm the  
7 absence of leakage.

8 4. **Detection of Aging Effects:** The inspection guidelines of BWRVIP-49-A,  
9 BWRVIP-47-A and BWRVIP-27-A, along with the existing inspection requirements  
10 in American Society of Mechanical Engineers (ASME) Code, Section XI, Table  
11 IWB-2500-1, are sufficient to monitor for indications of cracking in BWR instrumentation  
12 nozzles, CRD housing and ICMH penetrations and BWR SLC nozzles/Core  $\Delta$ P nozzles,  
13 and should continue to be followed for the subsequent period of extended operation.  
14 The extent and schedule of the inspection and test techniques prescribed by the  
15 staff-approved BWRVIP inspection guidelines and the ASME Code, Section XI program  
16 are designed to maintain structural integrity and ensure that aging effects are discovered  
17 and repaired before the loss of intended function of the component.

18 Instrument penetrations, CRD housing and ICMH penetrations and SLC system nozzles  
19 or housings are inspected in accordance with the staff-approved BWRVIP inspection  
20 guidelines and the requirements in the ASME Code, Section XI. These examination  
21 categories include volumetric examination methods [UT or radiography testing (RT)],  
22 surface examination methods (liquid penetrant testing or magnetic particle testing), and  
23 VT-2 visual examination methods.

24 5. **Monitoring and Trending:** Inspections scheduled in accordance with ASME Code,  
25 Section XI, IWB-2400 and approved BWRVIP-49-A, BWRVIP-47-A, or BWRVIP-27-A  
26 provides timely detection of cracks. The scope of examination and reinspection is  
27 expanded beyond the baseline inspection if flaws are detected. Any indication detected  
28 is evaluated in accordance with ASME Code, Section XI or other acceptable flaw  
29 evaluation criteria, such as the staff-approved BWRVIP-49-A, BWRVIP-47-A, or  
30 BWRVIP-27-A guidelines. Applicable and approved BWRVIP-14-A, BWRVIP-59-A, and  
31 BWRVIP-60-A documents provide additional guidelines for the evaluation of crack  
32 growth in stainless steels (SSs), nickel alloys, and low-alloy steels, respectively.

33 6. **Acceptance Criteria:** Acceptance criteria are given in BWRVIP-49-A for  
34 instrumentation nozzles, BWRVIP-47-A for CRD housing and ICMH penetrations, and  
35 BWRVIP-27A for BWR SLC nozzles/Core  $\Delta$ P nozzles.

36 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
37 conditions adverse to quality or significant conditions adverse to quality under those  
38 specific portions of the quality assurance (QA) program that are used to meet  
39 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
40 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
41 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
42 safety-related and nonsafety-related structures and components (SCs) within the scope  
43 of this program.

44 Corrective actions include repair and replacement procedures in staff-approved  
45 BWRVIP-57-A, BWRVIP-55-A, BWRVIP-58-A and BWRVIP-53-A that are equivalent to

1 those required in ASME Code, Section XI. Guidelines for repair design criteria are  
2 provided in BWRVIP-57-A for instrumentation penetrations, BWRVIP-55-A for CRD  
3 housing and ICMH penetrations, and BWRVIP-53-A for SLC line. BWRVIP-58-A  
4 provides guidelines for internal access weld repair for CRD penetrations.

- 5 8. **Confirmation Process:** The confirmation process is addressed through those specific  
6 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
7 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
8 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
9 confirmation process element of this AMP for both safety-related and nonsafety-related  
10 SCs within the scope of this program.

11 The staff finds that licensee implementation of the guidelines in BWRVIP-49-A,  
12 BWRVIP-47-A, and BWRVIP-27A, as modified, provides an acceptable level of quality  
13 for inspection and flaw evaluation of the safety-related components addressed in  
14 accordance with the 10 CFR Part 50, Appendix B confirmation process and  
15 administrative controls.

- 16 9. **Administrative Controls:** Administrative controls are addressed through the QA  
17 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
18 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
19 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
20 fulfill the administrative controls element of this AMP for both safety-related and  
21 nonsafety-related SCs within the scope of this program.

- 22 10. **Operating Experience:** Cracking due to SCC or IGSCC has occurred in BWR  
23 components made of austenitic SSs and nickel alloys. The program guidelines are  
24 based on an evaluation of available information, including BWR inspection data and  
25 information about the elements that cause IGSCC, to determine which locations may be  
26 susceptible to cracking. Implementation of the program provides reasonable assurance  
27 that cracking will be adequately managed so the intended functions of the instrument  
28 penetrations and SLC system nozzles or housings will be maintained consistent with the  
29 CLB for the period of extended operation.

30 The program is informed and enhanced when necessary through the systematic and  
31 ongoing review of both plant-specific and industry operating experience, as discussed in  
32 Appendix B of the GALL-SLR Report.

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<sup>1</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

# 1 **XI.M9 BOILING WATER REACTOR VESSEL INTERNALS**

## 2 **Program Description**

3 The program includes inspection and flaw evaluations in conformance with the guidelines of  
4 applicable and staff-approved Boiling Water Reactor Vessel and Internals Project (BWRVIP)  
5 documents to provide reasonable assurance of the long-term integrity and safe operation of  
6 boiling water reactor (BWR) vessel internal components. The program manages the effects of  
7 cracking due to stress corrosion cracking (SCC), intergranular stress corrosion cracking  
8 (IGSCC), or irradiation assisted stress corrosion cracking (IASCC), cracking due to cyclic  
9 loading (including flow-induced vibration), loss of material due to wear, loss of fracture  
10 toughness due to neutron or thermal embrittlement, and loss of preload due to thermal or  
11 irradiation-enhanced stress relaxation.

12 The BWRVIP documents provide generic guidelines intended to present the applicable  
13 inspection recommendations to assure safety function integrity of the subject safety-related  
14 reactor pressure vessel internal components. The guidelines provide information on component  
15 description and function; evaluate susceptible locations and safety consequences of failure;  
16 provide recommendations for methods, extent, and frequency of inspection; discuss acceptable  
17 methods for evaluating the structural integrity significance of flaws detected during these  
18 examinations; and recommend repair and replacement procedures.

19 In addition, this program provides screening criteria to determine the susceptibility of cast  
20 austenitic stainless steel (CASS) components to thermal aging on the basis of casting method,  
21 molybdenum content, and percent ferrite, in accordance with the criteria set forth in the  
22 May 19, 2000 letter from Christopher Grimes, U.S. Nuclear Regulatory Commission (NRC), to  
23 Mr. Douglas Walters, Nuclear Energy Institute (NEI). The susceptibility to thermal aging  
24 embrittlement of CASS components is determined in terms of casting method, molybdenum  
25 content, and ferrite content. For low-molybdenum content steels (SA-351 Grades CF3, CF3A,  
26 CF8, CF8A, or other steels with  $\leq 0.5$  wt. percent molybdenum), only static-cast steels with  
27  $>20$  percent ferrite are potentially susceptible to thermal embrittlement. Static-cast  
28 low-molybdenum steels with  $>20$  percent ferrite and all centrifugal-cast low-molybdenum steels  
29 are not susceptible. For high-molybdenum content steels (SA-351 Grades CF3M, CF3MA,  
30 CF8M or other steels with 2.0 to 3.0 wt. percent molybdenum), static-cast steels with  
31  $>14$  percent ferrite and centrifugal-cast steels with  $>20$  percent ferrite are potentially susceptible  
32 to thermal embrittlement. Static-cast high-molybdenum steels with  $\leq 14$  percent ferrite and  
33 centrifugal-cast high-molybdenum steels with  $\leq 20$  percent ferrite are not susceptible. In the  
34 susceptibility screening method, ferrite content is calculated by using the Hull's equivalent  
35 factors (described in NUREG/CR-4513, Revision 1) or a staff-approved method for calculating  
36 delta ferrite in CASS materials. A subsequent license renewal (SLR) applicant may use  
37 alternative staff-approved screening criteria in determining susceptibility of CASS to neutron and  
38 thermal embrittlement.

39 The screening criteria are applicable to all cast stainless steel (SS) primary pressure boundary  
40 and reactor vessel internal components with service conditions above  $250\text{ }^{\circ}\text{C}$  [ $482\text{ }^{\circ}\text{F}$ ]. The  
41 screening criteria for susceptibility to thermal aging embrittlement are not applicable to  
42 niobium-containing steels; such steels require evaluation on a case-by-case basis. For  
43 "potentially susceptible" components, the program considers loss of fracture toughness due to  
44 neutron embrittlement or thermal aging embrittlement.

1 This aging management program (AMP) addresses aging degradation of nickel alloy and SS  
2 that are used in BWR vessel internal components. When exposed to the BWR vessel  
3 environment, these materials can experience neutron embrittlement and a decrease in fracture  
4 toughness. CASS, PH martensitic SS (e.g., 15-5 and 17-4 PH steel) and martensitic SS  
5 (e.g., 403, 410, 431 steel) are also susceptible to thermal embrittlement. Effects of thermal or  
6 neutron embrittlement can cause failure of these materials in vessel internal components. In  
7 addition, nickel alloy in a BWR environment is susceptible to IGSCC.

## 8 **Evaluation and Technical Basis**

9 1. **Scope of Program:** The program is focused on managing the effects of cracking due to  
10 SCC, IGSCC, or IASCC, cracking due to cyclic loading (including flow-induced  
11 vibration) and loss of material due to wear. This program also includes loss of fracture  
12 toughness due to neutron or thermal embrittlement and loss of preload due to thermal or  
13 irradiation-enhanced stress relaxation. The program applies to wrought and cast reactor  
14 vessel internal components. The program contains inservice inspection (ISI) to monitor  
15 the effects of cracking on the intended function of the components, uses staff-approved  
16 BWRVIP reports as the basis for inspection, evaluation, repair and/or replacement, as  
17 needed, and evaluates the susceptibility of nickel alloy, CASS, PH martensitic SS (e.g.,  
18 15-5 and 17-4 PH steel), martensitic SS (e.g., 403, 410, 431 steel) and other SS (e.g.,  
19 304 steel) components to neutron or thermal embrittlement.

20 The scope of the program includes the following BWR reactor vessel (RV) and  
21 RV internal components as subject to the following staff-approved applicable  
22 BWRVIP guidelines:

23 *Core shroud:* BWRVIP-76-A provides guidelines for inspection and evaluation;  
24 BWRVIP-02-A, Revision 2, provides guidelines for repair design criteria.

25 *Core plate:* BWRVIP-25 provides guidelines for inspection and evaluation;  
26 BWRVIP-50-A provides guidelines for repair design criteria.

27 *Core spray:* BWRVIP-18, Revision 1-A provides guidelines for inspection and  
28 evaluation; BWRVIP-16-A and BWRVIP-19-A provide guidelines for replacement and  
29 repair design criteria, respectively.

30 *Shroud support:* BWRVIP-38 provides guidelines for inspection and evaluation;  
31 BWRVIP-52-A provides guidelines for repair design criteria.

32 *Jet pump assembly:* BWRVIP-41 provides guidelines for inspection and evaluation;  
33 BWRVIP-51-A provides guidelines for repair design criteria.

34 *Low-pressure coolant injection (LPCI) coupling:* BWRVIP-42-A provides guidelines for  
35 inspection and evaluation; BWRVIP-56-A provides guidelines for repair design criteria.

36 *Top guide:* BWRVIP-26-A and BWRVIP-183 provide guidelines for inspection and  
37 evaluation; BWRVIP-50-A provides guidelines for repair design criteria. The program  
38 inspects 5 percent of the top guide locations using enhanced visual inspection  
39 technique, EVT-1 within 6 years after entering the subsequent period of extended  
40 operation. An additional 5 percent of the top guide locations will be inspected within  
41 12 years after entering the subsequent period of extended operation.

1 Reinspection Criteria:  
2 BWR/2-5—Inspect 10 percent of the grid beam cells containing control rod drives/blades  
3 every 12 years with at least 5 percent to be performed within 6 years.  
4 BWR/6—Inspect the rim areas containing the weld and heat affected zone (HAZ) from the  
5 top surface of the top guide and two cells in the same plane/axis as the weld every  
6 6 years.

7 The top guide inspection locations are those that have high neutron fluence exceeding  
8 the IASCC threshold. The extent of the examination and its frequency will be based on  
9 a 10 percent sample of the total population, which includes all grid beam and beam-to-  
10 beam crevice slots.

11 *Control rod drive (CRD) housing and lower plenum components:* BWRVIP-47-A  
12 provides guidelines for inspection and evaluation; BWRVIP-55-A provides guidelines for  
13 repair design criteria.

14 *Steam dryer:* BWRVIP-139-A provides guidelines for inspection and evaluation for the  
15 steam dryer components; BWRVIP-181-A provides guidelines for repair design criteria.

16 2. **Preventive Actions:** The BWRVIP is a condition monitoring program and has no  
17 preventive actions. Maintaining high water purity reduces susceptibility to SCC or  
18 IGSCC. Reactor coolant water chemistry is monitored and maintained in accordance  
19 with the Water Chemistry program. The program description, evaluation and technical  
20 basis of water chemistry are presented in Generic Aging Lessons Learned for  
21 Subsequent License Renewal (GALL-SLR) Report AMP XI.M2, “Water Chemistry.”

22 3. **Parameters Monitored or Inspected:** The program manages the effects of aging on  
23 the intended function of the component by inspecting for cracking and loss of material in  
24 accordance with the guidelines of applicable and staff-approved BWRVIP documents  
25 and the requirements of the American Society of Mechanical Engineers (ASME) Code,  
26 Section XI, Table IWB 2500-1.

27 Loss of fracture toughness due to neutron embrittlement in CASS materials can occur  
28 with a neutron fluence greater than  $1 \times 10^{17}$  n/cm<sup>2</sup> [E>1 MeV]. Loss fracture toughness  
29 of CASS material due to thermal embrittlement is dependent on the material’s casting  
30 method, molybdenum content, and ferrite content in accordance with the criteria set forth  
31 in the May 19, 2000, letter from Christopher Grimes, U.S. Nuclear Regulatory  
32 Commission (NRC), to Mr. Douglas Walters, Nuclear Energy Institute (NEI). A  
33 subsequent license renewal applicant may use alternative staff-approved screening  
34 criteria in determining susceptibility of CASS to neutron and thermal embrittlement. This  
35 program does not directly monitor for loss of fracture toughness that is induced by  
36 thermal aging or neutron irradiation embrittlement. The impact of loss of fracture  
37 toughness on component integrity is indirectly managed by using visual or volumetric  
38 examination techniques to monitor for cracking in the components.

39 Loss of fracture toughness due to neutron or thermal embrittlement cannot be identified  
40 by typical inservice inspection (ISI) activities. However, by performing visual or other  
41 inspections, applicants can identify cracks that could lead to failure of a potentially  
42 embrittled component prior to component failure. Applicants can thus indirectly manage

1 the effects of embrittlement in the nickel alloy and SS components by identifying aging  
2 degradation (i.e., cracks), implementing early corrective actions, and monitoring and  
3 trending age-related degradation.

4 This program also manages loss of preload due to thermal or irradiation-enhanced  
5 stress relaxation for core plate rim holddown bolts and jet pump assembly holddown  
6 beam bolts by performing visual inspections or stress analyses to ensure adequate  
7 structural integrity.

- 8 4. **Detection of Aging Effects:** The extent and schedule of the inspection and test  
9 techniques prescribed by the applicable and staff-approved BWRVIP guidelines are  
10 designed to maintain structural integrity and ensure that aging effects will be discovered  
11 and repaired before the loss of intended function of BWR vessel internals. Vessel  
12 internal components are inspected in accordance with the requirements of  
13 ASME Section XI, Subsection IWB, Examination Category B-N-2. The ASME Section XI  
14 inspection specifies visual VT-1 examination to detect discontinuities and imperfections,  
15 such as cracks, corrosion, wear, or erosion, on the surfaces of components. This  
16 inspection also specifies visual VT-3 examination to determine the general mechanical  
17 and structural condition of the component supports by (a) verifying parameters, such as  
18 clearances, settings, and physical displacements and (b) detecting discontinuities and  
19 imperfections, such as loss of integrity at bolted or welded connections, loose or missing  
20 parts, debris, corrosion, wear, or erosion. BWRVIP program requirements provide for  
21 inspection of BWR internals to manage loss of material and cracking using appropriate  
22 examination techniques such as visual examinations (e.g., EVT-1, VT-1) and volumetric  
23 examinations [e.g., ultrasonic testing (UT)].

24 The applicable and staff-approved BWRVIP guidelines recommend more stringent  
25 inspections, such as EVT-1 examinations or ultrasonic methods of volumetric inspection,  
26 for certain selected components and locations. The nondestructive examination (NDE)  
27 techniques appropriate for inspection of BWR vessel internals, including the  
28 uncertainties inherent in delivering and executing NDE techniques in a BWR are  
29 included in BWRVIP-03.

30 Loss of fracture toughness due to neutron or thermal embrittlement is indirectly  
31 managed by performing periodic visual inspections capable of detecting cracks in the  
32 components. This program also determines whether supplemental inspections are  
33 necessary in addition to the existing BWRVIP examination guidelines to manage loss of  
34 fracture toughness for nickel alloy and SS internals, including welds. If supplemental  
35 inspections are determined necessary for BWR vessel internals, the program identifies  
36 the components to be inspected and performs supplemental inspections to adequately  
37 manage loss of fracture toughness due to neutron or thermal embrittlement. This  
38 evaluation for supplemental inspections is based on neutron fluence, thermal aging  
39 susceptibility, fracture toughness, and cracking susceptibility (i.e., applied stress,  
40 operating temperature, and environmental conditions). This program further determines  
41 whether supplemental inspections are necessary to manage cracking due to IASCC for  
42 nickel alloy and SS internals, including welds. This evaluation is based on neutron  
43 fluence and cracking susceptibility. If determined necessary, the program performs the  
44 supplemental inspections on the internal components identified in the evaluation.

45 The inspection technique is capable of detecting the critical flaw size with adequate  
46 margin. The critical flaw size is determined based on the service loading condition

1 and service-degraded material properties. One example of a supplemental  
2 examination is VT-1 examination of ASME Code, Section XI, IWA-2210. The initial  
3 inspection is performed either prior to or within 5 years after entering the subsequent  
4 period of extended operation.

5 If cracking is detected after the initial inspection, the frequency of reinspection should be  
6 justified by the applicant based on fracture toughness properties appropriate for the  
7 condition of the component. The sample size is 100 percent of the accessible  
8 component population, excluding components that may be in compression during  
9 normal operations.

- 10 5. **Monitoring and Trending:** Inspections are scheduled in accordance with the applicable  
11 and staff-approved BWRVIP guidelines provide timely detection of cracks. Each  
12 BWRVIP guideline recommends baseline inspections that are used as part of data  
13 collection towards trending. The BWRVIP guidelines provide recommendations for  
14 expanding the sample scope and reinspecting the components if flaws are detected.  
15 Any indication detected is evaluated in accordance with ASME Code, Section XI or the  
16 applicable BWRVIP guidelines. BWRVIP-14-A, BWRVIP-59-A, BWRVIP-60-A,  
17 BWRVIP-80-A and BWRVIP-99-A documents provide additional guidelines for  
18 evaluation of crack growth in SSs, nickel alloys, and low-alloy steels. BWRVIP-100-A  
19 describes flaw evaluation methodologies and fracture toughness data for SS core  
20 shroud exposed to neutron irradiation.

21 Inspections scheduled in accordance with ASME Code, Section XI, IWB-2400 and  
22 reliable examination methods provide timely detection of cracks. The fracture toughness  
23 of precipitation-hardened (PH)-martensitic steels, martensitic SSs, and nickel alloys  
24 susceptible to thermal or neutron embrittlement need to be assessed on a case-by-case  
25 basis.

- 26 6. **Acceptance Criteria:** Acceptance criteria are given in the applicable staff-approved  
27 BWRVIP documents and ASME Code, Section XI. Flaws detected in the reactor vessel  
28 internals are evaluated in accordance with the procedures in the applicable  
29 staff-approved BWRVIP documents and ASME Code, Section XI.

- 30 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
31 conditions adverse to quality or significant conditions adverse to quality under those  
32 specific portions of the quality assurance (QA) program that are used to meet  
33 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
34 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
35 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
36 safety-related and nonsafety-related structures and components (SCs) within the scope  
37 of this program.

38 Repair and replacement procedures are equivalent to those requirements in  
39 ASME Code Section XI. Repair and replacement is performed in conformance with  
40 applicable staff-approved BWRVIP guidelines. Guidelines for performing weld repairs to  
41 irradiated internals are described in BWRVIP-97-A. In addition, for core shroud repairs  
42 or other IGSCC repairs, the program maintains operating tensile stresses below a  
43 threshold limit that mitigates IGSCC of X-750 material in accordance with the guidelines  
44 in BWRVIP-84, Revision 2. For top guides where cracking is observed, sample size and  
45 inspection frequencies are increased in accordance with the BWRVIP guidelines.

1 8. **Confirmation Process:** The confirmation process is addressed through those specific  
2 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
3 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
4 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
5 confirmation process element of this AMP for both safety-related and nonsafety-related  
6 SCs within the scope of this program.

7 9. **Administrative Controls:** Administrative controls are addressed through the QA  
8 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
9 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
10 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
11 fulfill the administrative controls element of this AMP for both safety-related and  
12 nonsafety-related SCs within the scope of this program.

13 10. **Operating Experience:** There is documentation of cracking in both the circumferential  
14 and axial core shroud welds, and in shroud supports. Extensive cracking of  
15 circumferential core shroud welds has been documented in NRC Generic Letter (GL)  
16 94-03 and extensive cracking in vertical core shroud welds has been documented in  
17 NRC Information Notice (IN) 97-17. It has affected shrouds fabricated from Type 304  
18 and Type 304L SS, which is generally considered to be more resistant to SCC. Weld  
19 regions are most susceptible to SCC, although it is not clear whether this is due to  
20 sensitization and/or impurities associated with the welds or the high residual stresses in  
21 the weld regions. This experience is reviewed in NRC GL 94-03 and NUREG-1544;  
22 some experiences with visual inspections are discussed in NRC IN 94-42. In addition,  
23 IASCC was observed in the core shroud beltline region and IGSCC was observed in  
24 core shroud tie rod upper supports made of X-750 alloy (BWRVIP-76-A).

25 Both circumferential (NRC IN 88-03) and radial cracking (NRC IN 92-57) have been  
26 observed in the shroud support access hole covers that are made from Alloy 600.  
27 Instances of cracking in core spray spargers have been reviewed in NRC Bulletin 80-13,  
28 and cracking in core spray pipe has been reviewed in BWRVIP-18.

29 Cracking of the core plate has not been reported, but the creviced regions beneath the  
30 plate are difficult to inspect. BWRVIP-06R1-A and BWRVIP-25 address the safety  
31 significance and inspection requirements for the core plate assembly. Only inspection of  
32 core plate bolts (for plants without retaining wedges) or inspection of the retaining  
33 wedges is required. NRC IN 95-17 discusses cracking in top guides of United States  
34 and overseas BWRs. Related experience in other components is reviewed in NRC  
35 GL 94-03 and NUREG-1544. Cracking has also been observed in the top guide of a  
36 Swedish BWR.

37 Instances of cracking have occurred in the jet pump assembly (NRC Bulletin 80-07),  
38 hold-down beam (NRC IN 93-101), and jet pump riser pipe elbows (NRC IN 97-02).  
39 Cracking of dry tubes has been observed at 14 or more BWRs. The cracking is  
40 intergranular and has been observed in dry tubes without apparent sensitization,  
41 suggesting that IASCC may also play a role in the cracking.

42 Two control rod drive mechanism (CRDM) lead screw male couplings were fractured in a  
43 pressurized water reactor (PWR), designed by Babcock & Wilcox (B&W), at Oconee  
44 Nuclear Station (ONS), Unit 3. The fracture was due to thermal embrittlement of 17-4

1 precipitation-hardened (PH) material (NRC IN 2007-02). While this occurred at a PWR,  
2 it also needs to be considered for BWRs.

3 IGSCC in the X-750 materials of a tie rod coupling and jet pump hold-down beam was  
4 observed in a domestic plant.

5 The program guidelines outlined in applicable staff-approved BWRVIP documents are  
6 based on an evaluation of available information, including BWR inspection data and  
7 information on the elements that cause SCC, IGSCC, or IASCC, to determine which  
8 components may be susceptible to cracking. Implementation of the program provides  
9 reasonable assurance that cracking will be adequately managed so the intended  
10 functions of the vessel internal components will be maintained consistent with the  
11 current licensing basis (CLB) for the period of extended operation.

12 The program is informed and enhanced when necessary through the systematic and  
13 ongoing review of both plant-specific and industry operating experience, as discussed in  
14 Appendix B of the GALL-SLR Report.

## 15 **References**

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# 1 **XI.M10 BORIC ACID CORROSION**

## 2 **Program Description**

3 The program relies, in part, on implementation of recommendations in the U.S. Nuclear  
4 Regulatory Commission (NRC) Generic Letter (GL) 88-05 to identify, evaluate, and correct  
5 borated water leaks that could cause corrosion damage to reactor coolant pressure boundary  
6 components in pressurized water reactors (PWRs). Potential Improvements to boric acid  
7 corrosion programs have been identified because of operating experience with cracking of  
8 certain nickel alloy pressure boundary components [NRC Regulatory Issue Summary (RIS)  
9 2003-013 and NUREG-1823].

10 Borated water leakage from piping and components that are outside the scope of the program  
11 established in response to NRC GL 88-05 may affect structures and components (SCs) that are  
12 subject to aging management review (AMR). Therefore, the scope of the monitoring and  
13 inspections of this program includes all components subject to an AMR that may be adversely  
14 affected by some form of borated water leakage. The scope of the evaluations, assessments,  
15 and corrective actions include all observed leakage sources and the affected structures and  
16 components.

17 Borated water leakage may be discovered through activities other than those established  
18 specifically to detect such leakage. Therefore, the program includes provisions for triggering  
19 evaluations and assessments when leakage is discovered by other activities. The effects of  
20 boric acid corrosion on reactor coolant pressure boundary materials in the vicinity of nickel alloy  
21 components are managed by Generic Aging Lessons Learned for Subsequent License Renewal  
22 (GALL-SLR) aging management program (AMP) XI.M11B, "Cracking of Nickel-Alloy  
23 Components and Loss of Material Due to Boric Acid-induced Corrosion in Reactor Coolant  
24 Pressure Boundary Components (PWRs only)."

25 The recommended approaches described in Section 7 of WCAP-15988-NP, Revision 2,  
26 "Generic Guidance for an Effective Boric Acid Inspection Program for Pressurized Water  
27 Reactors," provide an acceptable means of fulfilling the activities of this program.

## 28 **Evaluation and Technical Basis**

29 1. **Scope of Program:** The program covers any structures or components on which boric  
30 acid corrosion may occur (e.g., steel, copper alloy, and aluminum) and electrical  
31 components onto which borated reactor water may leak. The program includes  
32 provisions in response to the recommendations of NRC GL 88-05. NRC GL 88-05 elicits  
33 a program consisting of systematic measures to ensure that corrosion caused by leaking  
34 borated water does not lead to degradation of the leakage source or adjacent structures  
35 and components, to provide assurance that the reactor coolant pressure boundary will  
36 have an extremely low probability of abnormal leakage, rapidly propagating failure, or  
37 gross rupture. Such a program provides for (a) determination of the principal location of  
38 leakage, (b) examinations and procedures for locating small leaks, and (c) engineering  
39 evaluations and corrective actions to ensure that boric acid corrosion does not lead to  
40 degradation of the leakage source or adjacent structures or components. Although  
41 NRC GL 88-05 addresses boric acid corrosion of reactor coolant pressure boundary  
42 components, the recommendations in NRC GL 88-05 are also effective in managing the  
43 aging of other in-scope components.

- 1 2. **Preventive Actions:** Minimizing borated water leakage by frequent monitoring of the  
2 locations where potential leakage could occur and timely cleaning and repair if leakage  
3 is detected prevents or mitigates boric acid corrosion. In addition, the use of  
4 corrosion-resistant materials and coatings minimizes the effects of boric acid exposure.
- 5 3. **Parameters Monitored or Inspected:** The AMP monitors the aging effects of loss of  
6 material due to boric acid corrosion on the intended function of an affected SC by  
7 detection of borated water leakage. Borated water leakage results in deposits of white  
8 boric acid crystals and the presence of moisture. Discolored boric acid crystals are an  
9 indication of corrosion. Boric acid deposits, borated water leakage, or the presence of  
10 moisture that could lead to the identification of loss of material can be monitored through  
11 visual examination.
- 12 In order to identify potential plant issues not detected during walkdowns and  
13 maintenance, the program tracks airborne radioactivity monitors, humidity monitors,  
14 temperature monitors, reactor coolant system water inventory balancing, and  
15 containment air cooler thermal performance. The program also looks for evidence of  
16 boric acid deposits on control rod drive (CRD) mechanism shroud fans, containment air  
17 recirculation fan coils, containment fan cooler units, and airborne filters.
- 18 4. **Detection of Aging Effects:** Degradation of the component due to boric acid corrosion  
19 cannot occur without leakage of borated water. Conditions leading to boric acid  
20 corrosion, such as crystal buildup and evidence of moisture, are readily detectable by  
21 visual inspection, though removal of insulation may be required in some cases.  
22 Obstructions to visual inspections are removed unless a technical justification is  
23 documented by the program owner. Criteria for removing insulation for bare-metal  
24 inspections include the safety significance of the location, evidence of leakage from  
25 under the insulation, bulging of the insulation, and operating experience. Discoloration,  
26 staining, boric acid residue, and other evidence of leakage on insulation surfaces and  
27 the surrounding area are given particular consideration as evidence of component  
28 leakage. The program delineated in NRC GL 88-05 includes guidelines for locating  
29 small leaks, conducting examinations, and performing engineering evaluations. In  
30 addition, the program includes appropriate interfaces with other site programs and  
31 activities, such that borated water leakage that is encountered by means other than the  
32 monitoring and trending established by this program is evaluated and corrected.
- 33 5. **Monitoring and Trending:** The program provides monitoring and trending activities as  
34 delineated in NRC GL 88-05, timely evaluation of evidence of borated water leakage  
35 identified by other means, and timely detection of leakage by observing boric acid  
36 crystals during normal plant walkdowns and maintenance. The program maintains a list  
37 of all borated water leaks to track the condition of components in the vicinity of leaks and  
38 to identify locations with repeat leakage.
- 39 6. **Acceptance Criteria:** Any detected borated water leakage, white or discolored crystal  
40 buildup, or rust-colored deposits are evaluated to confirm or restore the intended  
41 functions of affected SCs consistent with the design basis prior to continued service.
- 42 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
43 conditions adverse to quality or significant conditions adverse to quality under those  
44 specific portions of the QA program that are used to meet Criterion XVI, "Corrective  
45 Action," of 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes

1 how an applicant may apply its 10 CFR Part 50, Appendix B, quality assurance (QA)  
2 program to fulfill the corrective actions element of this AMP for both safety-related and  
3 nonsafety-related SCs within the scope of this program.

4 Borated water leakage and areas of resulting boric acid corrosion are evaluated and  
5 corrected in accordance with the applicable provisions of NRC GL 88-05 and the  
6 corrective action program. Any detected boric acid crystal buildup or deposits should be  
7 cleaned. NRC GL 88-05 recommends that corrective actions to prevent recurrences of  
8 degradation caused by borated water leakage be included in the program  
9 implementation. These corrective actions include any modifications to be introduced in  
10 the present design or operating procedures of the plant that (a) reduce the probability of  
11 reactor coolant leaks at locations where they may cause corrosion damage and (b) entail  
12 the use of suitable corrosion resistant materials or the application of protective coatings  
13 or claddings. When corrective actions include the use of enclosures to contain borated  
14 water leakage, the impact of the leakage environment on the potential degradation  
15 mechanisms of enclosed components is evaluated [NRC Information Notice (IN)  
16 201215]. Such modifications should allow for periodic inspections.

17 8. **Confirmation Process:** The confirmation process is addressed through those specific  
18 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
19 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
20 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
21 confirmation process element of this AMP for both safety-related and nonsafety-related  
22 SCs within the scope of this program.

23 9. **Administrative Controls:** Administrative controls are addressed through the QA  
24 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
25 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
26 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
27 fulfill the administrative controls element of this AMP for both safety-related and  
28 nonsafety-related SCs within the scope of this program.

29 10. **Operating Experience:** Boric acid corrosion has been observed in nuclear power  
30 plants (NPPs) [NRC IN 86-108 (and supplements 1 through 3), IN 2002-11, IN 2002-13,  
31 and IN 2003-02] and has resulted in significant impairment of component-intended  
32 functions in areas that are difficult to access/observe (NRC Bulletin 2002-01). Boric acid  
33 leakage can become airborne and can cause corrosion in locations other than in the  
34 vicinity of the leak [licensee event reports (LER) 250/2010-005, LER 346/2002-008].  
35 Corrosion rates may be inaccurately predicted due to the installation of a different type of  
36 material than indicated on the design documents (LER 346/1998-009) or galvanic  
37 corrosion caused by wet boric acid crystals bridging between dissimilar metals  
38 [Electric Power Research Institute (EPRI) 1000975].

39 The program is informed and enhanced when necessary through the systematic and  
40 ongoing review of both plant-specific and industry operating experience, as discussed in  
41 Appendix B of the GALL-SLR Report.

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- 1 Westinghouse Non-Proprietary Class 3 Report No. WCAP-15988-NP, Rev. 2, "Generic
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1 **XI.M11B CRACKING OF NICKEL-ALLOY COMPONENTS AND LOSS OF**  
2 **MATERIAL DUE TO BORIC ACID-INDUCED CORROSION IN**  
3 **REACTOR COOLANT PRESSURE BOUNDARY COMPONENTS**  
4 **(PRESSURIZED WATER REACTORS ONLY)**

5 **Program Description**

6 This program addresses operating experience of degradation due to primary water stress  
7 corrosion cracking (PWSCC) of components or welds constructed from certain nickel alloys  
8 (e.g., Alloy 600/82/182) and exposed to pressurized water reactor (PWR) primary coolant at  
9 elevated temperature. The initiation and growth of PWSCC cracks have been shown to be a  
10 function of several variables, including but not limited to: (i) temperature, (ii) stress,  
11 (iii) microstructure, (iv) time, and (v) water chemistry. As a result, this program is informed by  
12 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report aging  
13 management program (AMP) XI.M2, "Water Chemistry."

14 In addition to inspections designed to identify cracking of nickel alloy components, this program  
15 also contains inspections designed to potentially identify the presence of boric acid residues,  
16 which has been demonstrated by operating experience to lead to loss of material in susceptible  
17 carbon and low alloy steel components. Thus, this program is used in conjunction with  
18 GALL-SLR Report AMP XI.M10, "Boric Acid Corrosion." Except as required in 10 CFR 50.55a,  
19 it is not the general intent of this program to manage the aging of components and welds  
20 constructed from PWSCC-resistant nickel alloys (e.g., Alloy 690/52/152).

21 Plants have implemented and maintained existing programs to manage cracking due to  
22 PWSCC for nickel alloy components and welds, consistent with Electric Power Research  
23 Institute (EPRI) MRP-126. The scope of subsequent license renewal may identify additional  
24 nickel alloy components or welds to be included in the applicant's aging management  
25 program.

26 **Evaluation and Technical Basis**

- 27 1. **Scope of Program:** The scope of this program includes three basic groups of  
28 components and materials: (i) all nickel alloy components and welds which are identified  
29 at the plant in accordance with the guidelines of Electric Power Research Institute  
30 (EPRI) Materials Reliability Program (MRP)-126; (ii) nickel alloy components and welds  
31 identified in American Society of Mechanical Engineers (ASME)<sup>1</sup> Code Cases N-770,  
32 N-729 and N-722, as incorporated by reference in 10 CFR 50.55a; and (iii) components  
33 that are susceptible to corrosion by boric acid and may be impacted by leakage of boric  
34 acid from nearby or adjacent nickel alloy components previously described. This  
35 program manages cracking due to PWSCC and loss of material due to boric acid  
36 corrosion.
- 37 2. **Preventive Actions:** This program is primarily a condition monitoring program. Since  
38 the cracking of nickel alloys is affected by water quality this program is used in

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<sup>1</sup>Refer to the GALL-SLR Report, Chapter 1, for applicability of other editions of the ASME Code.

1 conjunction with GALL-SLR Report AMP XI.M2, "Water Chemistry." Additionally, in  
2 accordance with 10 CFR 50.55a, an applicant may choose to mitigate components in  
3 lieu of performing required inspections.

4 3. **Parameters Monitored or Inspected:** Components and welds within the scope of this  
5 program are inspected for evidence of PWSCC by volumetric, surface, or visual testing.  
6 In the event boric acid residues or corrosion products are discovered during these  
7 inspections, the potential for, or extent of, loss of material is evaluated by visual and  
8 quantitative methods.

9 4. **Detection of Aging Effects:** For nickel alloy components and welds addressed  
10 by regulatory requirements contained in 10 CFR 50.55a, inspections are  
11 conducted in accordance with 10 CFR 50.55a. Other nickel alloy components and welds  
12 within the scope of this program are inspected in accordance with the guidance in the  
13 EPRI MRP-126 report.

14 The program also performs a baseline volumetric or inner-diameter surface inspection of  
15 all susceptible nickel alloy branch line connections and associated welds as identified in  
16 Table 4-1 of MRP-126 if such components or welds are of a sufficient size to create a  
17 loss of coolant accident (LOCA) through a complete failure (guillotine break) or ejection of  
18 the component. The baseline inspection is performed prior to the subsequent period of  
19 extended operation using a qualified method in accordance with Appendix IV or VIII of  
20 ASME Code Section XI as incorporated by reference in 10 CFR 50.55a, or equivalent.  
21 Existing periodic inspections using volumetric or surface examination methods may be  
22 credited for the baseline inspection. If the baseline inspection indicates the occurrence  
23 of PWSCC, periodic volumetric or inner-diameter surface inspections are performed with  
24 adequate periodicity.

25 In addition, this program performs a baseline inspection of bottom-mounted  
26 instrumentation (BMI) nozzles of reactor pressure vessels (RPVs) using a qualified  
27 volumetric examination method. The inspection is conducted on all susceptible nickel  
28 alloy BMI nozzles prior to the subsequent period of extended operation. If this  
29 inspection indicates the occurrence of PWSCC, periodic volumetric inspections are  
30 performed on these nozzles and adequate inspection periodicity is established.  
31 Alternatively, applicant-proposed and staff-approved mitigation methods may be used to  
32 manage the aging effect for these components.

33 5. **Monitoring and Trending:** Reactor coolant leakage is calculated and trended on a  
34 routine basis in accordance with technical specifications to detect changes in the  
35 leakage rates [Regulatory Guide (RG) 1.45]. Flaw evaluation through 10 CFR 50.55a is  
36 a means to monitor cracking. Detected flaws are monitored and trended by performing  
37 periodic and successive inspections in accordance with ASME Code Cases N-770,  
38 N-729 and N-722, as incorporated by reference in 10 CFR 50.55a, and the guidelines in  
39 MRP-126.

40 6. **Acceptance Criteria:** Acceptance criteria are in accordance with applicable sections of  
41 Section XI of the ASME Code, as incorporated by reference in 10 CFR 50.55a. If any  
42 boric acid residue or corrosion product is detected, additional actions are performed to  
43 determine the source of leakage and the impact of boric acid corrosion on adjacent  
44 components.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
6 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
7 safety-related and nonsafety-related structures and components (SCs) within the scope  
8 of this program.

9 Components with relevant unacceptable flaw indications are corrected for further  
10 services through an implementation of appropriate repair or replacement as dictated by  
11 10 CFR 50.55a and industry guidelines (e.g., EPRI MRP-126). In addition, detection of  
12 leakage or evidence of cracking in susceptible components within the scope of this  
13 program require a scope expansion of current inspection and increased inspection  
14 frequencies for some components, as required by 10 CFR 50.55a and industry  
15 guidelines (e.g., EPRI MRP-126).

16 Repair and replacement procedures and activities must either comply with  
17 ASME Section XI, as incorporated in 10 CFR 50.55a or conform to applicable ASME  
18 Code Cases that have been endorsed in 10 CFR 50.55a by referencing the latest  
19 version of RG 1.147.

20 8. **Confirmation Process:** The confirmation process is addressed through those specific  
21 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
22 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
23 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
24 confirmation process element of this AMP for both safety-related and nonsafety-related  
25 SCs within the scope of this program.

26 9. **Administrative Controls:** Administrative controls are addressed through the QA  
27 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
28 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
29 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
30 fulfill the administrative controls element of this AMP for both safety-related and  
31 nonsafety-related SCs within the scope of this program.

32 10. **Operating Experience:** This program addresses review of related operating  
33 experience, including plant-specific information, generic industry findings, and  
34 international data. Within the current regulatory requirements, as necessary, the  
35 applicant maintains a record of operating experience through the required update of the  
36 facility's inservice inspection (ISI) program in accordance with 10 CFR 50.55a.  
37 Additionally, the applicant follows mandated industry guidelines developed to address  
38 operating experience in accordance with Nuclear Energy Institute (NEI)-03-08,  
39 "Guideline for the Management of Materials Issues."

40 PWSCC of Alloy 600 components has been observed in domestic and foreign PWRs  
41 [NRC Information Notice (IN) 90-10]. The ingress of demineralizer resins also has  
42 occurred in operating plants (NRC IN 96-11). The Water Chemistry program, GALL-SLR  
43 Report AMP XI.M2, manages the effects of such excursions through monitoring and  
44 control of primary water chemistry. NRC Generic Letter (GL) 97-01 is effective in  
45 managing the effect of PWSCC. PWSCC also has occurred in the vessel head

1 penetration (VHP) nozzle of U.S. PWRs as described in NRC Bulletins 2001-01,  
2 2002-01 and 2002-02. In addition, PWSCC was observed in reactor vessel BMI nozzles  
3 (NRC IN 2003-11, Supplement 1, and licensee event reports (LER) 50-530/2013-001-  
4 00).

5 The program is informed and enhanced when necessary through the systematic and  
6 ongoing review of both plant-specific and industry operating experience, as discussed in  
7 Appendix B of the GALL-SLR Report.

## 8 **References**

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- 11 10 CFR 50.55a, "Codes and Standards." Washington DC: U.S. Nuclear Regulatory  
12 Commission. 2015.
- 13 ASME. ASME Code Case N-770, "Alternative Examination Requirements and Acceptance  
14 Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated with UNS N06082  
15 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities."  
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- 17 \_\_\_\_\_. ASME Code Case N-722-1, "Additional Examinations for PWR Pressure Retaining  
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21 Vessel Upper Heads with Nozzles Having Pressure-Retaining Partial-Penetration Welds."  
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- 23 EPRI. EPRI MRP-126, "Generic Guidance for Alloy 600 Management." Palo Alto, California:  
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- 25 Licensee Event Report 50-530/2013-001-00, "Leakage on Reactor Vessel Bottom-Mounted  
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- 27 NEI. NEI-03-08, "Guideline for the Management of Materials Issues." Revision 2.  
28 Nuclear Energy Institute. January 2010.
- 29 NRC. NRC Inspection Manual, Inspection Procedure 71111.08, "Inservice Inspection  
30 Activities." Washington, DC: U.S. Nuclear Regulatory Commission. January 2015.
- 31 \_\_\_\_\_. NRC Regulatory Information Summary 2008-25, "Regulatory Approach for Primary  
32 Water Stress Corrosion Cracking of Dissimilar Metal Butt Welds in Pressurized Water Reactor  
33 Primary Coolant System Piping." Washington, DC: U.S. Nuclear Regulatory Commission.  
34 October 2008.
- 35 \_\_\_\_\_. NRC Regulatory Guide 1.45, Revision 1, "Guidance on Monitoring and Responding to  
36 Reactor Coolant System Leakage." Washington, DC: U.S. Nuclear Regulatory Commission.  
37 May 2008.

- 1 \_\_\_\_\_. NUREG–1823, “U.S. Plant Experience with Alloy 600 Cracking and Boric Acid  
2 Corrosion of Light-Water Reactor Pressure Vessel Materials.” Washington, DC: U.S. Nuclear  
3 Regulatory Commission. April 2005.
- 4 \_\_\_\_\_. NRC Information Notice 2003-11, “Leakage Found on Bottom-Mounted Instrumentation  
5 Nozzles.” Supplement 1. Washington, DC: U.S. Nuclear Regulatory Commission.  
6 January 2004.
- 7 \_\_\_\_\_. NRC Regulatory Guide 1.147, Revision 15, “Inservice Inspection Code Case  
8 Acceptability.” Washington, DC: U.S. Nuclear Regulatory Commission. January 2004.
- 9 \_\_\_\_\_. NRC Information Notice 2003-11, “Leakage Found on Bottom-Mounted Instrumentation  
10 Nozzles.” Washington, DC: U.S. Nuclear Regulatory Commission. August 2003.
- 11 \_\_\_\_\_. NRC Bulletin 2002-02, “Reactor Pressure Vessel Head and Vessel Head Penetration  
12 Nozzle Inspection Programs.” Washington, DC: U.S. Nuclear Regulatory Commission.  
13 August 2002.
- 14 \_\_\_\_\_. NRC Bulletin 2002-01, “Reactor Pressure Vessel Head Degradation and Reactor  
15 Coolant Pressure Boundary Integrity.” Washington, DC: U.S. Nuclear Regulatory Commission.  
16 March 2002.
- 17 \_\_\_\_\_. NRC Bulletin 2001-01, “Circumferential Cracking of Reactor Pressure Vessel Head  
18 Penetration Nozzles.” Washington, DC: U.S. Nuclear Regulatory Commission.  
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- 20 \_\_\_\_\_. NRC Generic Letter 97-01, “Degradation of Control Rod Drive Mechanism Nozzle and  
21 Other Vessel Closure Head Penetrations.” Washington, DC: U.S. Nuclear Regulatory  
22 Commission. April 1997.
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24 Stress Corrosion Cracking of Control Rod Drive Mechanism Penetrations.” Washington, DC:  
25 U.S. Nuclear Regulatory Commission. February 1996.
- 26 \_\_\_\_\_. NRC Information Notice 90-10, “Primary Water Stress Corrosion Cracking (PWSCC) of  
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# XI.M12 THERMAL AGING EMBRITTLEMENT OF CAST AUSTENITIC STAINLESS STEEL

## Program Description

The reactor coolant system components are inspected in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI. This inspection is augmented to detect the effects of loss of fracture toughness due to thermal aging embrittlement of cast austenitic stainless steel (CASS) piping components except for valve bodies. This aging management program (AMP) includes determination of the potential significance of thermal aging embrittlement of CASS components based on casting method, molybdenum content, and percent ferrite. For components for which thermal aging embrittlement is “potentially significant” as defined below, aging management is accomplished through either (a) qualified visual inspections, such as enhanced visual examination (EVT-1); (b) a qualified ultrasonic testing (UT) methodology; or (c) a component-specific flaw tolerance evaluation in accordance with the ASME Code, Section XI. Additional inspection or evaluations to demonstrate that the material has adequate fracture toughness are not required for components for which thermal aging embrittlement is not significant.

For valve bodies, based on the results of the assessment documented in the letter dated May 19, 2000, from Christopher Grimes, U.S. Nuclear Regulatory Commission (NRC), to Douglas Walters, Nuclear Energy Institute (NEI) (May 19, 2000 NRC letter), screening for significance of thermal aging embrittlement is not required. The existing ASME Code, Section XI inspection requirements are adequate for valve bodies.

Reactor vessel internal (RVI) fabricated from CASS are not within the scope of this AMP. GALL-SLR Report AMP XI.M9 contains aging management guidance for CASS RVI components of boiling water reactors (BWRs).

## Evaluation and Technical Basis

- Scope of Program:** This program manages loss of fracture toughness in ASME Code Class 1 piping components made from CASS. The program includes screening criteria to determine which CASS components have the potential for significant loss of fracture toughness due to thermal aging embrittlement and require augmented inspection. The screening criteria are applicable to all primary pressure boundary components constructed from CASS with service conditions above 250 °C [482 °F]. The screening criteria for the significance of thermal aging embrittlement are not applicable to niobium-containing steels; such steels require evaluation on a case-by-case basis.

Based on the criteria set forth in the May 19, 2000, NRC letter, the potential significance of thermal aging embrittlement of CASS materials is determined in terms of casting method, molybdenum content, and ferrite content. For low-molybdenum content steels (SA-351 Grades CF3, CF3A, CF8, CF8A or other steels with  $\leq 0.5$  weight percent [wt.%] Mo), only static-cast steels with  $>20\%$  ferrite are potentially susceptible to thermal embrittlement. Static-cast low-molybdenum steels with  $\leq 20\%$  ferrite and all centrifugal-cast low-molybdenum steels are not susceptible. For high-molybdenum content steels (SA-351 Grades CF3M, CF3MA, and CF8M or other steels with 2.0 to 3.0 wt.% Mo), static-cast steels with  $>14\%$  ferrite and centrifugal-cast steels with  $>20\%$  ferrite thermal embrittlement can be potentially significant, (i.e., screens in). For static-

1 cast high-molybdenum steels with  $\leq 14\%$  ferrite and centrifugal-cast high-molybdenum  
 2 steels with  $\leq 20\%$  ferrite, thermal aging embrittlement is not significant, (i.e. screens out).  
 3 In the significance screening method, ferrite content is calculated by using the Hull's  
 4 equivalent factors (described in NUREG/CR-4513, Revision 1) or a staff-approved  
 5 method for calculating delta ferrite in CASS materials. A fracture toughness value of  
 6 255 kilojoules per square meter ( $\text{kJ/m}^2$ ) [1,450 inch-pounds per square inch] at a crack  
 7 extension of 2.5 millimeters [0.1 inch] is used to differentiate between CASS  
 8 materials for which thermal aging embrittlement is not significant and those for  
 9 which thermal aging embrittlement is potentially significant. Extensive research  
 10 data indicate that for CASS materials without the potential for significant thermal  
 11 aging embrittlement, the saturated lower-bound fracture toughness is greater than  
 12  $255 \text{ kJ/m}^2$  (NUREG/CR-4513, Revision 1).

<b>Molybdenum (Mo) Content</b>	<b>Fe Content</b>	<b>Casting Method</b>	<b>Potentially Susceptible (Screens In)</b>	<b>Not Susceptible (Screens Out)</b>
Low or $\leq 0.5 \text{ wt.}\%$	$>20\%$ ferrite	Static	X	—
Low or $\leq 0.5 \text{ wt.}\%$	$\leq 20\%$ ferrite	Static	—	X
Low or $\leq 0.5 \text{ wt.}\%$	Any	Centrifugal	—	X
High or 2.0-3.0 wt. %	$>14\%$ ferrite	Static	X	—
High or 2.0-3.0 wt. %	$>20\%$ ferrite	Centrifugal	X	—
High or 2.0-3.0 wt. %	$\leq 14\%$ ferrite	Static	—	X
High or 2.0-3.0 wt. %	$\leq 20\%$ ferrite	Centrifugal	—	X

13 For valve bodies, screening for significance of thermal aging embrittlement is not needed  
 14 [and thus there are no AMR line items]. For valve bodies greater than 4 inches nominal  
 15 pipe size (NPS), the existing ASME Code, Section XI inspection requirements are  
 16 adequate. ASME Code, Section XI, Subsection IWB requires only surface examination  
 17 of valve bodies less than 4 inches NPS. For these valve bodies less than 4 inches NPS,  
 18 the adequacy of inservice inspection (ISI) according to ASME Code, Section XI has  
 19 been demonstrated by an NRC-performed bounding integrity analysis (May 19, 2000  
 20 letter).

21 2. **Preventive Actions:** This program is a condition monitoring program and does not  
 22 mitigate thermal aging embrittlement.

23 3. **Parameters Monitored or Inspected:** The program monitors the effects of loss of  
 24 fracture toughness on the intended function of the component by identifying the CASS  
 25 materials that are susceptible to thermal aging embrittlement.

26 The program does not directly monitor for loss of fracture toughness that is induced by  
 27 thermal aging; instead, the impact of loss of fracture toughness on component integrity is

1 indirectly managed by using visual or volumetric examination techniques to monitor for  
2 cracking in the components.

3 4. **Detection of Aging Effects:** For valve bodies, and other “not susceptible” CASS piping  
4 components, no additional inspection or evaluations are needed to demonstrate that the  
5 material has adequate fracture toughness.

6 For piping components for which thermal aging embrittlement is “potentially significant,”  
7 the AMP provides for qualified inspections of the base metal, such as EVT-1 or a  
8 qualified UT methodology, with the scope of the inspection covering the portions  
9 determined to be limiting from the standpoint of applied stress, operating time, and  
10 environmental considerations. Examination methods that meet the criteria of the  
11 ASME Code, Section XI, Appendix VIII are acceptable. Alternatively, a plant-specific or  
12 component-specific flaw tolerance evaluation, using specific geometry, stress  
13 information, material properties, and ASME Code, Section XI can be used to  
14 demonstrate that the thermally-embrittled material has adequate toughness. For CASS  
15 piping 1.6 inches or less in thickness, UT may be performed in accordance with the  
16 methodology of Code Case N-824. For CASS piping greater than 1.6 inches in  
17 thickness, current UT methodology cannot reliably detect and size cracks; thus EVT-1 is  
18 used until a qualified UT methodology can be established. A description of EVT-1 is  
19 found in Boiling Water Reactor Vessel and Internals Project (BWRVIP)-03 (Revision 6)  
20 and Materials Reliability Program (MRP)-228 for PWRs.

21 5. **Monitoring and Trending:** Inspection schedules in accordance with ASME Code,  
22 Section XI, IWB-2400 or IWC-2400, reliable examination methods, and qualified  
23 inspection personnel provide timely and reliable detection of cracks. If flaws are  
24 detected, the period of acceptability is determined from analysis of the flaw, depending  
25 on the crack growth rate and mechanism.

26 6. **Acceptance Criteria:** Flaws detected in CASS components are evaluated in  
27 accordance with the applicable procedures of ASME Code, Section XI. The most recent  
28 version of the ASME Code, Section IX incorporated by reference in 10 CFR 50.55a  
29 (2007 edition through 2008 addenda), does not contain any evaluation procedures  
30 applicable to CASS with ferrite content  $\geq 20$  percent. (Nonmandatory Appendix C to the  
31 ASME Code, Section XI states that flaw evaluation methods for CASS with  $\geq 20$  percent  
32 ferrite are currently in the course of preparation.) Therefore, methods used for  
33 evaluations of flaws detected in CASS piping or components containing  $\geq 20$  percent  
34 ferrite, and methods used for flaw tolerance evaluations of such components, must be  
35 approved by the NRC staff on a case-by-case basis until such methods are incorporated  
36 into editions of the ASME Code, Section XI or code cases that are incorporated by  
37 reference in 10 CFR 50.55a, or in NRC-approved code cases, as documented in the  
38 latest revision to Regulatory Guide (RG) 1.147. NUREG/CR-4513, Revision 1 provides  
39 methods for predicting the fracture toughness of thermally aged CASS materials with  
40 delta ferrite content up to 25 percent.

41 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
42 conditions adverse to quality or significant conditions adverse to quality under those  
43 specific portions of the quality assurance (QA) program that are used to meet  
44 Criterion XVI, “Corrective Action,” of 10 CFR Part 50, Appendix B. Appendix A of the  
45 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
46 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to

1 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
2 related structures and components (SCs) within the scope of this program.

3 Repair and replacement are performed in accordance with ASME Code, Section XI,  
4 IWA-4000

5 8. **Confirmation Process:** The confirmation process is addressed through those specific  
6 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
7 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
8 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
9 confirmation process element of this AMP for both safety-related and nonsafety-related  
10 SCs within the scope of this program.

11 9. **Administrative Controls:** Administrative controls are addressed through the QA  
12 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
13 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
14 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
15 fulfill the administrative controls element of this AMP for both safety-related and  
16 nonsafety-related SCs within the scope of this program.

17 10. **Operating Experience:** The AMP was developed by using research data obtained on  
18 both laboratory-aged and service-aged materials. Based on this information, the effects  
19 of thermal aging embrittlement on the intended function of CASS components will be  
20 effectively managed.

21 The program is informed and enhanced when necessary through the systematic and  
22 ongoing review of both plant-specific and industry operating experience, as discussed in  
23 Appendix B of the GALL-SLR Report.

24 **References**

25 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
26 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

27 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
28 Commission. 2015.

29 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."  
30 The ASME Boiler and Pressure Vessel Code. New York, New York: The American Society of  
31 Mechanical Engineers. 2013.<sup>1</sup>

32 \_\_\_\_\_. ASME Section XI, Division 1, Code Case N-824, "Ultrasonic Examination of Cast  
33 Austenitic Piping Welds From the Outside Surface." New York, New York: The American  
34 Society of Mechanical Engineers. 2012.

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<sup>1</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

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2 Vessel and Internals Examination Guidelines." Revision 6. Palo Alto, California: Electric Power  
3 Research Institute. December 2013.

4 \_\_\_\_\_. MRP-228, "The Materials Reliability Program: Inspection Standard for PWR Internals."  
5 Palo Alto, California: Electric Power Research Institute. 2009.

6 Lee, S., P.T. Kuo, K. Wichman, and O. Chopra. "Flaw Evaluation of Thermally-Aged Cast  
7 Stainless Steel in Light-Water Reactor Applications." *International Journal of Pressure Vessel  
8 and Piping*. pp 37–44. 1997.

9 Letter from Christopher I. Grimes, U.S. Nuclear Regulatory Commission, License Renewal and  
10 Standardization Branch, to Douglas J. Walters, Nuclear Energy Institute, License Renewal Issue  
11 No. 98-0030, "Thermal Aging Embrittlement of Cast Stainless Steel Components."  
12 ML003717179. May 19, 2000.

13 Letter from Mark J. Maxin, to Rick Libra (BWRVIP Chairman), Safety Evaluation for Electric  
14 Power Research Institute (EPRI) Boiling Water Reactor Vessel and Internals project (BWRVIP)  
15 Report TR-105696-R6 (BWRVIP-03), Revision 6, "BWR Vessel and Internals Examination  
16 Guidelines (TAC No MC2293)." ML081500814. June 2008.

17 NRC. Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability."  
18 Washington, DC: U.S. Nuclear Regulatory Commission. 2014.

19 \_\_\_\_\_. NUREG/CR-4513, "Estimation of Fracture Toughness of Cast Stainless Steels During  
20 Thermal Aging in LWR Systems." Revision 1. Washington, DC: U.S. Nuclear Regulatory  
21 Commission. August 1994.



1 **XI.M16A DELETED**



# 1 XI.M17 FLOW-ACCELERATED CORROSION

## 2 Program Description

3 This program manages wall thinning caused by flow-accelerated corrosion (FAC), and may also  
4 be used to manage wall thinning due to erosion mechanisms. The program is based on  
5 commitments made in response to the U.S. Nuclear Regulatory Commission (NRC) Generic  
6 Letter (GL) 89-08, and relies on implementation of the Electric Power Research Institute (EPRI)  
7 guidelines in the Nuclear Safety Analysis Center (NSAC)-202L<sup>1</sup> for an effective FAC program.  
8 The program includes (a) identifying all susceptible piping systems and components;  
9 (b) developing FAC predictive models to reflect component geometries, materials, and operating  
10 parameters; (c) performing analyses of FAC models and, with consideration of operating  
11 experience, selecting a sample of components for inspections; (d) inspecting components;  
12 (e) evaluating inspection data to determine the need for inspection sample expansion, repairs, or  
13 replacements, and to schedule future inspections; and (f) incorporating inspection data to refine  
14 FAC models. The program includes the use of predictive analytical software, such as  
15 CHECWORKS™, that uses the implementation guidance of NSAC-202L. This program may also  
16 manage wall thinning caused by mechanisms other than FAC, in situations where periodic  
17 monitoring is used in lieu of eliminating the cause of various erosion mechanisms.

## 18 Evaluation and Technical Basis

- 19 1. **Scope of Program:** The FAC program, described by the EPRI guidelines in  
20 NSAC-202L, includes procedures or administrative controls to assure that structural  
21 integrity is maintained for carbon steel piping components containing single- and  
22 two-phase flow conditions. This program also includes the pressure retaining portions of  
23 pump and valve bodies within these systems. The FAC program was originally outlined  
24 in NUREG-1344 and was further described through the NRC GL 89-08. The program  
25 may also include components that are subject to wall thinning due to erosion  
26 mechanisms such as cavitation, flashing, droplet impingement, or solid particle  
27 impingement in various water systems. Since there are no materials that are known to  
28 be totally resistant to wall thinning due to erosion mechanisms, susceptible components  
29 of any material may be included in the erosion portion of the program.
- 30 2. **Preventive Actions:** The FAC program is a condition monitoring program; no  
31 preventive action has been recommended in this program. However, it is noted that  
32 monitoring of water chemistry to control pH and dissolved oxygen content are effective  
33 in reducing FAC, and the selection of appropriate component material, geometry,  
34 and hydrodynamic conditions, can be effective in reducing both FAC and  
35 erosion mechanisms.
- 36 3. **Parameters Monitored or Inspected:** The aging management program (AMP)  
37 monitors the effects of wall thinning due to FAC and erosion mechanisms by measuring

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<sup>1</sup>As described in this AMP-R2 (Revision 2), -R3 (Revision 3), and -R4 (Revision 4) of NSAC-202L are acceptable versions of the EPRI guideline.

1 wall thicknesses. In addition, relevant changes in system operating parameters,  
2 (e.g., temperature, flow rate, water chemistry, operating time), that result from off-normal  
3 or reduced-power operations are considered for their effects on the FAC models. Also,  
4 opportunistic visual inspections of internal surfaces are conducted during routine  
5 maintenance activities to identify degradation.

- 6 4. **Detection of Aging Effects:** Degradation of piping and components occurs by wall  
7 thinning. For FAC, the inspection program delineated in NSAC-202L includes  
8 identification of susceptible locations, as indicated by operating conditions or special  
9 considerations. For periods of extended operation beyond 60 years, piping systems that  
10 have been excluded from wall thickness monitoring due to operation less than 2 percent  
11 of plant operating time (as allowed by NSAC-202L) will be reassessed to ensure  
12 adequate bases exist to justify this exclusion. If actual wall thickness information is not  
13 available for use in this assessment, a representative sampling approach can be used.  
14 This program specifies nondestructive examination methods, such as ultrasonic testing  
15 (UT) and/or radiography testing (RT), to quantify the extent of wall thinning.  
16 Opportunistic visual inspections of up-stream and down-stream piping and components  
17 are performed during periodic pump and valve maintenance or during pipe replacements  
18 to assess internal surface conditions. Wall thicknesses are also measured at locations  
19 of suspected wall thinning that are identified by internal visual inspections. A  
20 representative sample of components is selected based on the most susceptible  
21 locations for wall thickness measurements at a frequency in accordance with  
22 NSAC-202L guidelines to ensure that degradation is identified and mitigated before the  
23 component integrity is challenged. Expansion of the inspection sample is described in  
24 NSAC-202L, following identification of unexpected or inconsistent inspection results in  
25 the initial sample. The extent and schedule of the inspections ensure detection of wall  
26 thinning before the loss of intended function. Inspections are performed by personnel  
27 qualified in accordance with site procedures and programs to perform the specified task.

28 For erosion mechanisms, the program includes the identification of susceptible locations  
29 based on the extent-of-condition reviews from corrective actions in response to  
30 plant-specific and industry operating experience. Components in this category may be  
31 treated in a manner similar to other “susceptible-not-modeled” lines discussed in  
32 NSAC-202L. EPRI 1011231 provides guidance for identifying potential damage  
33 locations. EPRI TR-112657 or NUREG/–CR6031 provides additional insights for  
34 cavitation. For cavitation, in addition to wall-thinning, the extent-of-condition review may  
35 need to consider the consequences of vibrational loading caused by cavitation.

- 36 5. **Monitoring and Trending:** For FAC, CHECWORKS™ or similar predictive software  
37 calculates component wear rates and remaining service life based on inspection data  
38 and changes in operating conditions (e.g., power uprate, water chemistry). Data from  
39 each component inspection are used to calibrate the wear rates calculated in the FAC  
40 model with the observed field data. The use of such predictive software to develop an  
41 inspection schedule provides reasonable assurance that structural integrity will be  
42 maintained between inspections. The program includes the evaluation of inspection  
43 results to determine if additional inspections are needed to ensure that the extent of wall  
44 thinning is adequately determined, that intended function will not be lost, and that  
45 corrective actions are adequately identified.

46 For erosion mechanisms, the program includes trending of wall thickness measurements  
47 to adjust the monitoring frequency and to predict the remaining service life of the

1 component for scheduling repairs or replacements. Inspection results are evaluated to  
2 determine if assumptions in the extent-of-condition review remain valid. If degradation is  
3 associated with infrequent operational alignments, such as surveillances or pump  
4 starts/stops, then trending activities may need to consider the number or duration of  
5 these occurrences. Periodic wall thickness measurements of replacement components  
6 may be required and should continue until the effectiveness of corrective actions has  
7 been confirmed.

- 8 6. **Acceptance Criteria:** Components are suitable for continued service if calculations  
9 determine that the predicted wall thickness at the next scheduled inspection will meet the  
10 minimum allowable wall thickness. The minimum allowable wall thickness is the  
11 thickness needed to satisfy the component's design loads under the original code of  
12 construction, but additional code requirements may also need to be met. A conservative  
13 safety factor is applied to the predicted wear rate determination to account for  
14 uncertainties in the wear rate calculations and UT measurements. As discussed in  
15 NSAC-202L, the minimum safety factor for acceptable wall thickness and remaining service  
16 life should not be less than 1.1.

- 17 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
18 conditions adverse to quality or significant conditions adverse to quality under those  
19 specific portions of the quality assurance (QA) program that are used to meet  
20 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
21 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
22 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
23 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
24 related structures and components (SCs) within the scope of this program.

25 The program includes reevaluation, repair, or replacement of components for which the  
26 acceptance criteria are not satisfied, prior to their return to service. For FAC, long-term  
27 corrective actions could include adjusting operating parameters or replacing components  
28 with FAC-resistant materials. However, if the wear mechanism has not been identified,  
29 then the replaced components should remain in the inspection program because  
30 FAC-resistant materials do not protect against erosion mechanisms. Furthermore, when  
31 carbon steel piping components are replaced with FAC-resistant material, the susceptible  
32 components immediately downstream should be monitored to identify any increased  
33 wear due to the "entrance effect" as discussed in EPRI 1015072.

34 For erosion mechanisms, long-term corrective actions to eliminate the cause could  
35 include adjusting operating parameters and/or changing components' geometric designs;  
36 however, the effectiveness of these corrective actions should be verified. Periodic  
37 monitoring activities should continue for any component replaced with an alternate  
38 material, since a material that is completely resistant to erosion mechanisms is  
39 not available.

- 40 8. **Confirmation Process:** The confirmation process is addressed through those specific  
41 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
42 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
43 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
44 confirmation process element of this AMP for both safety-related and nonsafety-related  
45 SCs within the scope of this program.

- 1 9. **Administrative Controls:** Administrative controls are addressed through the QA  
2 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
3 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
4 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
5 fulfill the administrative controls element of this AMP for both safety-related and  
6 nonsafety-related SCs within the scope of this program.
- 7 10. **Operating Experience:** Wall-thinning problems in single-phase systems have occurred  
8 in feedwater and condensate systems [NRC IE Bulletin No. 87-01; NRC Information  
9 Notice (IN) 92-35, IN 95-11, IN 2006-08] and in two-phase piping in extraction steam  
10 lines (NRC IN 89-53, IN 97-84) and moisture separator reheater and feedwater heater  
11 drains (NRC IN 89-53, IN 91-18, IN 93-21, IN 97-84). Observed wall thinning may be  
12 due to mechanisms other than FAC or less commonly, due to a combination of  
13 mechanisms [NRC IN 99-19, LER 483/1999-003, licensee event reports (LER)  
14 499/2005-004, LER 277/2006-003, LER 237/2007-003, LER 254/2009-004]. Vibrational  
15 loading resulting from cavitation has caused problems (LER 366/2008-001,  
16 LER 499/2010-001).
- 17 The program is informed and enhanced when necessary through the systematic and  
18 ongoing review of both plant-specific and industry operating experience, as discussed in  
19 Appendix B of the GALL-SLR Report.

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## 1 **XI.M18 BOLTING INTEGRITY**

### 2 **Program Description**

3 The program manages aging of closure bolting for pressure retaining components. The  
4 program relies on recommendations for a comprehensive bolting integrity program, as  
5 delineated in NUREG–1339, and industry recommendations, as delineated in the  
6 following documents:

- 7 • NUREG–1339, “Resolution of Generic Safety Issue 29: Bolting Degradation or Failure in  
8 Nuclear Power Plants.”
- 9 • Electric Power Research Institute (EPRI) NP-5769, “Degradation and Failure of Bolting  
10 in Nuclear Power Plants” (with the exceptions noted in NUREG–1339 for safety-related  
11 bolting).
- 12 • EPRI Report 1015336, “Nuclear Maintenance Application Center: Bolted  
13 Joint Fundamentals.”
- 14 • EPRI Report 1015337, “Nuclear Maintenance Applications Center: Assembling  
15 Gasketed, Flanged Bolted Joints.”

16 The program generally includes periodic inspection of closure bolting for indication of loss of  
17 preload, cracking, and loss of material due to corrosion, rust, etc. The program also includes  
18 preventive measures to preclude or minimize loss of preload and cracking.

19 Aging Management Program (AMP) XI.M1, “ASME Section XI ISI, Subsections IWB, IWC, and  
20 IWD,” includes inspection of safety-related and nonsafety-related closure bolting and  
21 supplements this bolting integrity program. AMPs XI.S1, “ASME Section XI, Subsection IWE,”  
22 XI.S3, “ASME Section XI, Subsection IWF,” XI.S6, “Structures Monitoring,” XI.S7, “Inspection of  
23 Water-Control Structures Associated with Nuclear Power Plants,” and XI.M23, “Inspection of  
24 Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems,” manage  
25 inspection of safety-related and nonsafety-related structural bolting.

### 26 **Evaluation and Technical Basis**

- 27 1. **Scope of Program:** This program manages the effects of aging of closure bolting for  
28 pressure retaining components within the scope of license renewal, including both  
29 safety-related and nonsafety-related bolting. This program does not manage aging of  
30 reactor head closure stud bolting (GALL-SLR Report AMP XI.M3) or structural bolting  
31 (GALL-SLR Report AMPs XI.S1, XI.S3, XI.S6, XI.S7, and XI.M23).
- 32 2. **Preventive Actions:** Selection of bolting material and the use of lubricants and sealants  
33 is in accordance with the guidelines of EPRI Reports 1015336 and 1015337 and the  
34 additional recommendations of NUREG–1339 to prevent or mitigate stress corrosion  
35 cracking (SCC). Of particular note, use of molybdenum disulfide (MoS<sub>2</sub>) as a lubricant  
36 has been shown to be a potential contributor to SCC and should not be used.  
37 Preventive measures also include using bolting material that has an actual measured  
38 yield strength limited to less than 1,034 megapascals (MPa) [150 kilo-pounds per square  
39 inch (ksi)]. Bolting replacement activities include proper torquing of the bolts and  
40 checking for uniformity of the gasket compression after assembly. Maintenance

1 practices require the application of an appropriate preload based on guidance in EPRI  
2 documents, manufacturer recommendations, or engineering evaluation.

- 3 3. **Parameters Monitored or Inspected:** This program monitors the effects of aging on  
4 the intended function of bolting. Specifically, bolting for safety-related pressure retaining  
5 components is inspected for leakage, surface discontinuities and imperfections, and  
6 clearances and physical displacements for signs of loose joints. Bolting for other  
7 pressure retaining components is inspected for signs of leakage. High strength closure  
8 bolting {with actual yield strength greater than or equal to 1,034 MPa [150 ksi]}, and  
9 bolting for which yield strength is unknown, should be monitored for surface and  
10 subsurface discontinuities indicative of cracking.

- 11 4. **Detection of Aging Effects:** The ASME Section XI Inservice Inspection, Subsections  
12 IWB, IWC, and IWD program implements inspection of Class 1, Class 2, and Class 3  
13 pressure retaining bolting in accordance with requirements of ASME Code Section XI,<sup>1</sup>  
14 Tables IWB-2500-1, IWC-2500-1, and IWD-2500-1. These include volumetric and visual  
15 (VT-1) examinations, as appropriate. In addition, for both ASME Code class bolting and  
16 non ASME Code class bolting, periodic system walkdowns and inspections (at least  
17 once per refueling cycle) ensure detection of leakage at bolted joints before the leakage  
18 becomes excessive. Bolting inspections should include consideration of the guidance  
19 applicable for pressure boundary bolting in NUREG-1339 and in EPRI NP-5769.

20 Degradation of pressure boundary closure bolting due to crack initiation, loss of preload,  
21 or loss of material may result in leakage from the mating surfaces or joint connections of  
22 pressure boundary components. Periodic inspection of pressure boundary components  
23 for signs of leakage ensures that age-related degradation of closure bolting is detected  
24 and corrected before component leakage becomes excessive. Accordingly, pressure  
25 retaining bolted connections should be inspected at least once per refueling cycle. The  
26 inspections may be performed as part of ASME Code Section XI leakage tests or as part  
27 of other periodic inspection activities, such as system walkdowns or an external surfaces  
28 monitoring program.

29 Bolting in locations that preclude detection of joint leakage, such as in submerged  
30 environments, is visually inspected for loss of material during maintenance activities. In  
31 this case, bolt heads are inspected when made accessible, and bolt threads are  
32 inspected when joints are disassembled. At a minimum, in each 10-year period during  
33 the subsequent period of extended operation, the program includes the inspection of a  
34 representative sample of 20 percent of the population of bolt heads and threads  
35 (defined as bolts with the same material and environment combination) or a maximum of  
36 25 bolts per population at each unit. Otherwise, a technical justification of the  
37 methodology and sample size used for selecting components for one-time inspection is  
38 included as part of the program's documentation. For multi-unit sites where the sample  
39 size is not based on the percentage of the population, it is acceptable to reduce the total  
40 number of inspections at the site as follows. For two-unit sites, 19 bolt heads and  
41 threads are inspected per unit and for a three-unit site, 17 bolt heads and threads are  
42 inspected per unit. In order to conduct 17 or 19 inspections at a unit in lieu of 25, the

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<sup>1</sup>Refer to the GALL-SLR Report, Chapter I, for applicability of other editions of the ASME Code, Section XI.

1 applicant states in the subsequent license renewal application (SLRA) the basis for why  
2 the operating conditions at each unit are similar enough (e.g., chemistry) to provide  
3 representative inspection results. The basis should include consideration of potential  
4 differences such as the following:

- 5 • Are there any systems which have had an out-of-spec water chemistry condition  
6 for a longer period of time or out-of-spec conditions occurred more frequently?
- 7 • For lubricating or fuel oil systems, are there any components that were exposed  
8 to the more severe contamination levels?
- 9 • For raw water systems, is the water source from different sources where one or  
10 the other is more susceptible to microbiologically-induced corrosion or other  
11 aging effects?

12 When bolting is associated with submerged pumps, pump performance monitoring  
13 (e.g., operator walkdowns to confirm sump drainage) provides additional assurance of  
14 the integrity of bolted joints.

15 High strength closure bolting (with actual yield strength greater than or equal to  
16 1,034 MPa [150 ksi] may be subject to SCC. For bolting with yield strength greater than  
17 or equal to 1,034 MPa [150 ksi] and bolting for which yield strength is unknown  
18 (regardless of code classification or size of bolting), volumetric examination in  
19 accordance to that of ASME Code Section XI, Table IWB-2500-1, Examination  
20 Category B-G-1, should be performed.

21 Inspections are performed by personnel qualified in accordance with site procedures and  
22 programs to perform the specified task. Inspections within the scope of the ASME Code  
23 follow procedures consistent with the ASME code. Non-ASME Code inspections follow  
24 site procedures that include inspection parameters for items such as lighting, distance  
25 offset, and cleaning processes that ensure an adequate examination.

26 5. **Monitoring and Trending:** The inspection schedules of ASME Section XI components  
27 are effective and ensure timely detection of applicable aging effects. If a bolting  
28 connection for pressure retaining components not covered by ASME Section XI is  
29 reported to be leaking, it may be inspected daily or in accordance with the corrective  
30 action process. If the leak rate is increasing, more frequent inspections may  
31 be warranted.

32 6. **Acceptance Criteria:** Any indications of aging effects in ASME pressure retaining  
33 bolting are evaluated in accordance with Section XI of the ASME Code. For other  
34 pressure retaining bolting, indications of aging should be dispositioned in accordance  
35 with the corrective action process.

36 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
37 conditions adverse to quality or significant conditions adverse to quality under those  
38 specific portions of the quality assurance (QA) program that are used to meet  
39 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
40 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
41 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to

1 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
2 related structures and components (SCs) within the scope of this program.

3 Replacement of ASME pressure retaining bolting is performed in accordance with  
4 appropriate requirements of Section XI of the ASME Code, as subject to the additional  
5 guidelines and recommendations of EPRI Reports 1015336 and 1015337. Replacement  
6 of other pressure retaining bolting (i.e., non-ASME Code class bolting) is performed in  
7 accordance with the guidelines and recommendations of EPRI Reports 1015336  
8 and 1015337.

9 8. **Confirmation Process:** The confirmation process is addressed through those specific  
10 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
11 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
12 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
13 confirmation process element of this AMP for both safety-related and nonsafety-related  
14 SCs within the scope of this program.

15 9. **Administrative Controls:** Administrative controls are addressed through the QA  
16 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
17 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
18 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
19 fulfill the administrative controls element of this AMP for both safety-related and  
20 nonsafety-related SCs within the scope of this program.

21 10. **Operating Experience:** Degradation of threaded bolting and fasteners in closures for  
22 the reactor coolant pressure boundary has occurred from boric acid corrosion, SCC,  
23 and fatigue loading [NRC IE Bulletin 82-02, NRC Generic Letter (GL) 91-17]. SCC has  
24 occurred in high strength bolts used for nuclear steam supply system component  
25 supports (EPRI NP-5769). The bolting integrity program developed and implemented in  
26 accordance with the applicant's docketed responses to the U.S. Nuclear Regulatory  
27 Commission (NRC) communications on bolting events have provided an effective means  
28 of ensuring bolting reliability. These programs are documented in EPRI Reports  
29 NP-5769, 1015336, and 1015337 and represent industry consensus.

30 Degradation related failures have occurred in downcomer tee-quencher bolting in boiling  
31 water reactors (BWRs) designed with drywells (ADAMS Accession Number  
32 ML050730347). Leakage from bolted connections has been observed in reactor building  
33 closed cooling systems of BWRs (licensee event report (LER) 50-341/2005-001).

34 SCC of A-286 stainless steel (SS) closure bolting has occurred when seal cap  
35 enclosures have been installed to mitigate gasket leakage at valve body-to-bonnet joints  
36 [(NRC Information Notice (IN) 2012-15]. The enclosures surrounding the bolts filled with  
37 hot reactor coolant that had leaked from the joint and mixed with the oxygen-containing  
38 atmosphere trapped within the enclosure. The enclosures did not allow for inspections  
39 of the bolted joints.

40 The applicant is to evaluate applicable operating experience to support the conclusion  
41 that the effects of aging are adequately managed.

1           The program is informed and enhanced when necessary through the systematic and  
2           ongoing review of both plant-specific and industry operating experience, as discussed in  
3           Appendix B of the GALL-SLR Report.

#### 4   **References**

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<sup>2</sup>GALL-SLR Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this aging management program.



# 1 XI.M19 STEAM GENERATORS

## 2 Program Description

3 The Steam Generator program is applicable to managing the aging of steam generator tubes,  
4 plugs, sleeves, and secondary side components that are contained within the steam generator  
5 (i.e., secondary side internals).

6 The establishment of a steam generator program for ensuring steam generator tube integrity is  
7 required by plant technical specifications (TSs). The steam generator tube integrity portion of  
8 the TSs at each pressurized water reactor (PWR) contains the same fundamental requirements  
9 as outlined in the standard TS of NUREG–1430, Volume 1, Revision 4, for Babcock & Wilcox  
10 (B&W) PWRs; NUREG–1431, Volume 1, Revision 4, for Westinghouse PWRs; and NUREG–  
11 1432, Volume 1, Revision 4, for Combustion Engineering PWRs. The requirements pertaining  
12 to steam generators in these three versions of the standard TSs are essentially identical. The  
13 TSs require tube integrity to be maintained and specify performance criteria, condition  
14 monitoring requirements, inspection scope and frequency, acceptance criteria for the plugging  
15 or repair of flawed tubes, acceptable tube repair methods, and leakage monitoring  
16 requirements.

17 The nondestructive examination techniques used to inspect tubes, plugs, sleeves, and  
18 secondary side internals are intended to identify components (e.g., tubes, plugs) with  
19 degradation that may need to be removed from service or repaired.

20 The Steam Generator program at PWRs is modeled after Nuclear Energy Institute (NEI) 97-06,  
21 Revision 3, “Steam Generator Program Guidelines.” This program references a number of  
22 industry guidelines (e.g., the Electric Power Research Institute (EPRI) PWR Steam Generator  
23 Examination Guidelines, PWR Primary-to-Secondary Leak Guidelines, PWR Primary Water  
24 Chemistry Guidelines, PWR Secondary Water Chemistry Guidelines, Steam Generator Integrity  
25 Assessment Guidelines, Steam Generator *In Situ* Pressure Test Guidelines) and incorporates a  
26 balance of prevention, mitigation, inspection, evaluation, repair, and leakage monitoring  
27 measures. The NEI 97-06 document (a) includes performance criteria that are intended to  
28 provide assurance that tube integrity is being maintained consistent with the plant’s licensing  
29 basis and (b) provides guidance for monitoring and maintaining the tubes to provide assurance  
30 that the performance criteria are met at all times between scheduled inspections of the tubes.  
31 Steam generator tube integrity can be affected by degradation of steam generator plugs,  
32 sleeves, and secondary side internals. Therefore, all of these components are addressed by  
33 this aging management program (AMP). The NEI 97-06 program has been effective in  
34 managing the aging effects associated with steam generator tubes, plugs, sleeves, and  
35 secondary side internals.

## 36 Evaluation and Technical Basis

37 1. **Scope of Program:** This program addresses degradation associated with steam  
38 generator tubes, plugs, sleeves, and secondary side components that are contained  
39 within the steam generator (i.e., secondary side internals). It does not cover degradation  
40 associated with the steam generator shell, channel head, nozzles, or welds associated  
41 with these components.

42 2. **Preventive Actions:** This program includes preventive and mitigative actions for  
43 addressing degradation. Preventive and mitigative measures that are part of the Steam

1 Generator program include foreign material exclusion programs, and other primary and  
2 secondary side maintenance activities. The program includes foreign material exclusion  
3 as a means to inhibit wear degradation and secondary side maintenance activities, such  
4 as sludge lancing, for removing deposits that may contribute to degradation. Guidance  
5 on foreign material exclusion is provided in NEI 97-06. Guidance on maintenance of  
6 secondary side integrity is provided in the EPRI Steam Generator Integrity Assessment  
7 Guidelines. Primary side preventive maintenance activities include replacing plugs  
8 made with corrosion susceptible materials with more corrosion resistant materials and  
9 preventively plugging tubes susceptible to degradation.

10 Extensive deposit buildup in the steam generators could affect tube integrity. The EPRI  
11 Steam Generator Integrity Assessment Guidelines, which are referenced in NEI 97-06,  
12 provide guidance on maintaining the secondary side of the steam generator, including  
13 secondary side cleaning. Secondary side water chemistry plays an important role in  
14 controlling the introduction of impurities into the steam generator and potentially limiting  
15 their deposition on the tubes. Maintaining high water purity reduces susceptibility to  
16 stress corrosion cracking (SCC) or intergranular stress corrosion cracking (IGSCC).  
17 Water chemistry is monitored and maintained in accordance with the Water Chemistry  
18 program. The program description and evaluation and technical basis of monitoring and  
19 maintaining water chemistry are addressed in the Generic Aging Lessons Learned for  
20 Subsequent License Renewal (GALL-SLR) Report AMP XI.M2, "Water Chemistry."

- 21 3. **Parameters Monitored or Inspected:** There are currently three types of steam  
22 generator tubing used in the United States: (i) mill annealed Alloy 600, (ii) thermally  
23 treated Alloy 600, and (iii) thermally treated Alloy 690. Mill annealed Alloy 600 steam  
24 generator tubes have experienced degradation due to corrosion (e.g., primary water  
25 SCC, outside diameter SCC, intergranular attack, pitting, and wastage) and  
26 mechanically induced phenomena (e.g., denting, wear, impingement damage, and  
27 fatigue). Thermally treated Alloy 600 steam generator tubes have experienced  
28 degradation due to corrosion (primarily cracking) and mechanically induced phenomena  
29 (primarily wear). Thermally treated Alloy 690 tubes have only experienced tube  
30 degradation due to mechanically induced phenomena (primarily wear). Degradation of  
31 tube plugs, sleeves, and secondary side internals have also been observed, depending,  
32 in part, on the material of construction of the specific component.

33 The program includes an assessment of the forms of degradation to which a component  
34 is susceptible and implementation of inspection techniques capable of detecting those  
35 forms of degradation. The parameter monitored is specific to the component and the  
36 acceptance criteria for the inspection. For example, the severity of tube degradation  
37 may be evaluated in terms of the depth of degradation or measured voltage, dependent  
38 on whether a depth-based or voltage-based tube repair criteria (acceptance criteria) is  
39 being implemented for that specific degradation mechanism. Other parameters  
40 monitored include signals of excessive deposit buildup (e.g., steam generator water level  
41 oscillations), which may result in fatigue failure of tubes or corrosion of the tubes; water  
42 chemistry parameters, which may indicate unacceptable levels of impurities; primary-to-  
43 secondary leakage, which may indicate excessive tube, plug, or sleeve degradation; and  
44 the presence of loose parts or foreign objects on the primary and secondary side of the  
45 steam generator, which may result in tube damage.

46 Water chemistry parameters are also monitored as discussed in GALL-SLR Report  
47 AMP XI.M2. The EPRI PWR Steam Generator Primary-to-Secondary Leakage

1 Guidelines (EPRI 1008219) provides guidance on monitoring primary-to-secondary  
2 leakage. The EPRI Steam Generator Integrity Assessment Guidelines (EPRI 1019038)  
3 provide guidance on secondary side activities.

4 In summary, the NEI 97-06 program provides guidance on parameters to be monitored  
5 or inspected.

- 6 4. **Detection of Aging Effects:** The TSs require that a Steam Generator program be  
7 established and implemented to ensure that steam generator tube integrity is  
8 maintained. This requirement ensures that components that could compromise tube  
9 integrity are properly evaluated or monitored (e.g., degradation of a secondary side  
10 component that could result in a loss of tube integrity is managed by this program). The  
11 inspection requirements in the TSs are intended to detect degradation (i.e., aging  
12 effects), if they should occur.

13 The TSs are performance-based, and the actual scope of the inspection and the  
14 expansion of sample inspections are justified based on the results of the inspections.  
15 The goal is to perform inspections at a frequency sufficient to provide reasonable  
16 assurance of steam generator tube integrity for the period of time between inspections.

17 The general condition of some components (e.g., plugs and secondary side  
18 components) may be monitored visually, and, subsequently, more detailed inspections  
19 may be performed if degradation is detected.

20 NEI 97-06 provides additional guidance on inspection programs to detect degradation of  
21 tubes, sleeves, plugs, and secondary side internals. The frequencies of the inspections  
22 are based on technical assessments. Guidance on performing these technical  
23 assessments is contained in NEI 97-06 and the associated industry guidelines.

24 The inspections and monitoring are performed by qualified personnel using qualified  
25 techniques in accordance with approved licensee procedures. The EPRI PWR Steam  
26 Generator Examination Guidelines (EPRI 1013706) contains guidance on the  
27 qualification of steam generator tube inspection techniques.

28 The primary-to-secondary leakage monitoring program provides a potential indicator of a  
29 loss of steam generator tube integrity. NEI 97-06 and the associated EPRI guidelines  
30 provide information pertaining to an effective leakage monitoring program.

- 31 5. **Monitoring and Trending:** Condition monitoring assessments are performed to  
32 determine whether the structural- and accident-induced leakage performance criteria  
33 were satisfied during the prior operating interval. Operational assessments are  
34 performed to verify that structural and leakage integrity will be maintained for the  
35 planned operating interval before the next inspection. If tube integrity cannot be  
36 maintained for the planned operating interval before the next inspection, corrective  
37 actions are taken in accordance with the plant's corrective action program.  
38 Comparisons of the results of the condition monitoring assessment to the predictions of  
39 the previous operational assessment are performed to evaluate the adequacy of the  
40 previous operational assessment methodology. If the operational assessment was not  
41 conservative in terms of the number and/or severity of the condition, corrective actions  
42 are taken in accordance with the plant's corrective action program.

1 The TSs require condition monitoring and operational assessments to be performed  
2 (although the TSs do not explicitly require operational assessments, these assessments  
3 are necessary to ensure that the tube integrity will be maintained until the next  
4 inspection). Condition monitoring and operational assessments are done in accordance  
5 with the TS requirements and guidance in NEI 97-06 and the EPRI Steam Generator  
6 Integrity Assessment Guidelines.

7 The goal of the inspection program for all components covered by this AMP is to ensure  
8 that the components continue to function consistent with the design and licensing basis  
9 of the facility (including regulatory safety margins).

10 Assessments of the degradation of steam generator secondary side internals are  
11 performed in accordance with the guidance in the EPRI Steam Generator Integrity  
12 Assessment Guidelines to ensure the components continue to function consistent with  
13 the design and licensing basis and to ensure TS requirements are satisfied.

14 6. **Acceptance Criteria:** Assessment of tube and sleeve integrity and plugging or repair  
15 criteria of flawed and sleeved tubes is in accordance with plant TSs. The criteria for  
16 plugging or repairing steam generator tubes and sleeves are based on the U.S. Nuclear  
17 Regulatory Commission (NRC) Regulatory Guide (RG) 1.121 and are incorporated into  
18 plant TSs. Guidance on assessing the acceptability of flaws is also provided in  
19 NEI 97-06 and the associated EPRI guidelines, including the EPRI Steam Generator  
20 *In-Situ* Pressure Test Guidelines and EPRI Steam Generator Integrity Assessment  
21 Guidelines.

22 Degraded plugs, degraded secondary side internals, and leaving a loose part or a  
23 foreign object in the steam generator are evaluated for continued acceptability on a  
24 case-by-case basis. NEI 97-06 and the associated EPRI guidelines provide guidance on  
25 the performance of these evaluations. The intent of these evaluations is to ensure that  
26 the components affected by parts or objects have adequate integrity consistent with the  
27 design and licensing basis of the facility.

28 Guidance on the acceptability of primary-to-secondary leakage and water chemistry  
29 parameters also are discussed in NEI 97-06 and the associated EPRI guidelines.

30 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
31 conditions adverse to quality or significant conditions adverse to quality under those  
32 specific portions of the quality assurance (QA) program that are used to meet  
33 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
34 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
35 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
36 safety-related and nonsafety-related structures and components (SCs) within the scope  
37 of this program.

38 For degradation of steam generator tubes and sleeves (if applicable), the TSs provide  
39 requirements on the actions to be taken when the acceptance criteria are not met. For  
40 degradation of other components, the appropriate corrective action is evaluated per  
41 NEI 97-06 and the associated EPRI guidelines, the American Society of Mechanical

1 Engineers (ASME) Code Section XI,<sup>1</sup> 10 CFR 50.65, and 10 CFR Part 50, Appendix B,  
2 as appropriate.

3 8. **Confirmation Process:** The confirmation process is addressed through those specific  
4 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
5 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
6 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
7 confirmation process element of this AMP for both safety-related and nonsafety-related  
8 SCs within the scope of this program.

9 The adequacy of the preventive measures in the Steam Generator program is confirmed  
10 through periodic inspections.

11 9. **Administrative Controls:** Administrative controls are addressed through the QA  
12 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
13 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
14 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
15 fulfill the administrative controls element of this AMP for both safety-related and  
16 nonsafety-related SCs within the scope of this program.

17 10. **Operating Experience:** Several generic communications have been issued by the NRC  
18 related to the steam generator programs implemented at plants. The reference section  
19 lists many of these generic communications. In addition, NEI 97-06 provides guidance  
20 to the industry for routinely sharing pertinent steam generator operating experience and  
21 for incorporating lessons learned from plant operation into guidelines referenced in  
22 NEI 97-06. The latter includes providing interim guidance to the industry, when needed.

23 The NEI 97-06 program has been effective at managing the aging effects associated  
24 with steam generator tubes, plugs, sleeves, and secondary side components that are  
25 contained within the steam generator (i.e., secondary side internals), such that the  
26 steam generators can perform their intended safety function.

27 The program is informed and enhanced when necessary through the systematic and  
28 ongoing review of both plant-specific and industry operating experience, as discussed in  
29 Appendix B of the GALL-SLR Report.

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<sup>1</sup>Refer to the GALL-SLR Report, Chapter I, for applicability of other editions of the ASME Code, Section XI.

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<sup>2</sup>GALL-SLR Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this aging management program.

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# 1 XI.M20 OPEN-CYCLE COOLING WATER SYSTEM

## 2 Program Description

3 The program relies, in part, on implementing portions of the recommendations for the  
4 U.S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 89-13 to ensure that the  
5 effects of aging on the open-cycle cooling water (OCCW) (or service water) system will be  
6 managed for the period of extended operation. NRC GL 89-13 defines the OCCW system as a  
7 system or systems that transfer heat from safety-related systems, structures, and components  
8 (SSCs) to the ultimate heat sink. The program is comprised of the aging management aspects  
9 of the applicant's response to NRC GL 89-13 including: (a) a program of surveillance and  
10 control techniques to preclude biofouling; (b) a program to verify heat transfer capabilities of all  
11 safety-related heat exchangers cooled by the OCCW system; and (c) a program for routine  
12 inspection and maintenance to ensure that corrosion, erosion, loss of coating integrity, fouling,  
13 and biofouling cannot degrade the performance of safety-related systems serviced by the  
14 OCCW system. Since the guidance in NRC GL 89-13 was not specifically developed to  
15 address aging management, this program includes enhancements to the guidance in NRC  
16 GL 89-13 that address operating experience to ensure aging effects are adequately managed.

17 The OCCW system program manages aging effects of components in raw water systems, such  
18 as service water, by using a combination of preventive, condition monitoring, and performance  
19 monitoring activities. These include: (a) surveillance and control techniques to manage aging  
20 effects caused by biofouling, corrosion, erosion, protective coating failures, and fouling in the  
21 OCCW system or structures and components (SCs) serviced by the OCCW system;  
22 (b) inspection of components for signs of corrosion, erosion, loss of coating or lining integrity,  
23 fouling, and biofouling; and (c) testing of the heat transfer capability of heat exchangers that  
24 remove heat from components important to safety.

25 For buried OCCW system piping, the aging effects on the external surfaces are managed by  
26 XI.M41, "Buried and Underground Piping and Tanks," but the internal surfaces are managed by  
27 this program. The aging management of closed-cycle cooling water (CCCW) systems is  
28 described in XI.M21A, "Closed Treated Water Systems," and is not included as part of this  
29 program. Service water system components or components in other raw water systems that are  
30 not included within the scope of GL 89-13 may be managed by XI.M38, "Inspection of Internal  
31 Surfaces in Miscellaneous Piping and Ducting Components." However, water systems for fire  
32 protection are managed by XI.M27, "Fire Water System." The loss of coating or lining integrity  
33 for components managed by this program may be managed by XI.M42, "Internal  
34 Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and Tanks."  
35 Otherwise, if the OCCW system program manages internal coatings or linings, the program  
36 includes comparable guidance as provided in XI.M42.

## 37 Evaluation and Technical Basis

38 1. **Scope of Program:** The program addresses piping, piping components, piping  
39 elements, and heat exchanger components exposed to raw water in the OCCW system.  
40 The program applies to components constructed of various materials including steel,  
41 stainless steel (SS), aluminum, copper alloys, titanium, nickel alloy, fiberglass, polymeric  
42 materials, and concrete. The program also applies to internal coatings or linings of  
43 OCCW system piping and components that are not being separately managed by a  
44 coatings monitoring program. This program references NRC GL 89-13; plant activities in  
45 response to NRC GL 89-13 may be credited for this program, as appropriate.

1 2. **Preventive Actions:** This program is primarily a condition monitoring program;  
2 however, some preventive actions may be effective. Implementation of NRC GL 89-13  
3 includes control techniques, such as chemical treatment whenever the potential for  
4 biofouling exists. Treatment with chemicals mitigates microbiologically-induced  
5 corrosion and buildup of macroscopic biofouling debris from biota such as blue mussels,  
6 oysters, or clams. Periodic flushing of infrequently used cooling loops removes  
7 accumulations of biofouling agents, corrosion products, debris, and silt. The use of  
8 degradation resistant materials and the application of internal coatings or lining may  
9 be included.

10 3. **Parameters Monitored or Inspected:** This program addresses loss of material, fouling,  
11 and in some materials, cracking. This program: (a) inspects surfaces of components  
12 exposed to raw water for presence of fouling; (b) monitors heat transfer performance of  
13 components affected by fouling in the OCCW system; and (c) monitors the condition of  
14 piping and components to ensure that loss of material, loss of coating or lining integrity,  
15 cracking, and flow blockage do not degrade the performance of the safety-related  
16 systems supplied by the OCCW system. For those portions of the OCCW system where  
17 flow monitoring is not performed, test results from the monitored portions of the system  
18 are used to calculate friction (or roughness) factors and are used to confirm that design  
19 flow rates will be achieved with the overall fouling identified in the system. If concrete  
20 piping is being managed, American Concrete Institute (ACI) 349.3R provides an  
21 acceptable basis for parameters monitored or inspected.

22 4. **Detection of Aging Effects:** Inspection scope, methods (e.g., visual or volumetric  
23 inspections, performance testing), and frequencies are in accordance with the  
24 applicant's docketed response to NRC GL 89-13. As noted in NRC GL 89-13, testing  
25 frequencies can be adjusted to provide assurance that equipment will perform the  
26 intended function between test intervals, but should not exceed 5 years. Visual  
27 inspections are used to identify fouling, and loss of coating or lining integrity and provide  
28 a qualitative assessment for loss of material due to various forms of corrosion and  
29 erosion. Examinations of polymeric materials should be consistent with the  
30 examinations described in aging management program (AMP) XI.M38. Volumetric  
31 examinations, such as ultrasonic testing (UT), eddy current testing, and radiography are  
32 used to quantify the extent of wall thinning or loss of material.

33 Inspections and tests are performed by personnel qualified in accordance with site  
34 procedures and programs to perform the specified task. Inspections within the scope of  
35 the American Society of Mechanical Engineers (ASME) Code should follow procedures  
36 consistent with the ASME Code. NonASME Code inspections should follow site  
37 procedures that include requirements for items such as lighting, distance offset, surface  
38 coverage, presence of protective coatings, and cleaning processes that ensure an  
39 adequate examination. For concrete components, the qualifications of personnel  
40 performing inspections and evaluations are specified in ACI 349.3R.

41 5. **Monitoring and Trending:** For heat exchangers that are tested for heat transfer  
42 capability, test results are trended to verify adequacy of testing frequencies. For heat  
43 exchangers that are inspected for degradation in lieu of testing, inspection results are  
44 trended to evaluate adequacy of inspection frequencies. If fouling is identified, the  
45 system is evaluated for the impact on the heat transfer capability of the system. Friction  
46 (or roughness) factors are trended to confirm design flow rates can be achieved in the  
47 portions of the OCCW system where flow monitoring is not performed. Evidence of

1 corrosion is evaluated for its potential impact on the integrity of the piping. For ongoing  
2 degradation due to specific aging mechanisms (e.g., microbiologically-induced  
3 corrosion), the program includes trending of wall thickness measurements at susceptible  
4 locations to adjust the monitoring frequency and the number of inspection locations.

- 5 6. **Acceptance Criteria:** Predicted wall thicknesses at the next scheduled inspection are  
6 greater than the components' minimum wall thickness requirements. As applicable,  
7 coatings or linings are intact with no indications of peeling, delaminating, blistering,  
8 cracking, flaking, or rusting. For heat exchangers, heat removal capability is within  
9 design values. For ongoing degradation mechanisms (e.g., microbiologically-induced  
10 corrosion), the program includes criteria for the extent or rate of degradation that will  
11 prompt more comprehensive corrective actions. If concrete piping is being managed,  
12 acceptance criteria are derived from ACI 349.3R, as applicable.

- 13 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
14 conditions adverse to quality or significant conditions adverse to quality under those  
15 specific portions of the quality assurance (QA) program that are used to meet  
16 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
17 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
18 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
19 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
20 related SCs within the scope of this program.

21 The program includes reevaluation, repair, or replacement of components that do not  
22 meet minimum wall thickness requirements. If fouling is identified, the overall effect for  
23 reduction of heat transfer or flow blockage is evaluated. Fouling deposits are removed  
24 to determine if loss of material has occurred and to prevent further degradation in the  
25 system. For ongoing degradation mechanisms (e.g., microbiologically-induced  
26 corrosion), the frequency and extent of wall thickness inspections are increased  
27 commensurate with the significance of the degradation.

- 28 8. **Confirmation Process:** The confirmation process is addressed through those specific  
29 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
30 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
31 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
32 confirmation process element of this AMP for both safety-related and nonsafety-related  
33 SCs within the scope of this program.

- 34 9. **Administrative Controls:** Administrative controls are addressed through the QA  
35 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
36 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
37 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
38 fulfill the administrative controls element of this AMP for both safety-related and  
39 nonsafety-related SCs within the scope of this program.

- 40 10. **Operating Experience:** Loss of material due to corrosion, including microbiologically-  
41 induced corrosion and erosion, has been identified [NRC Information Notice (IN) 85-30,  
42 IN 2007-06, licensee event reports (LER) 247/2001-006, LER 306/2004-001, LER  
43 483/2005-002, LER 331/2006-003, LER 255/2007-002, LER 454/2007-002,  
44 LER 254/2011-001, LER 255/2013-001, LER 286/2014-002]. Protective coatings have  
45 failed, leading to unanticipated corrosion (IN 85-24, IN 2007-06, LER 286/2002-001,

1 LER 286/2011-003). Reduction in heat transfer and flow blockage due to fouling has  
2 occurred in piping and in heat exchangers from protective coating failures, and  
3 accumulations of silt and sediment (IN 81-21, IN 86-96, IN 2004-07, IN 2006-17,  
4 IN 2007-28, IN 2008-11, LER 413/1999-010, LER 305/2000-007, LER 266/2002-003,  
5 LER 413/2003-004, LER 263/2007-004, LER 321/2010-002, LER 457/2011-001,  
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7 (SCC) has occurred in brass tubing (LER 305/2002-002), and pitting in SS has occurred  
8 (LER 247/2013-004).

9 The review of plant-specific operating experience during the development of this  
10 program is to be broad and sufficiently detailed to detect instances of aging effects that  
11 have repeatedly occurred. In some instances, recurring internal corrosion may warrant  
12 program enhancements. Standard Review Plan for Review of Subsequent License  
13 Renewal Applications for Nuclear Power Plants (SRP-SLR) Sections 3.2.2.2.8, 3.3.2.2.7,  
14 and 3.4.2.2.6, "Loss of Material Due to Recurring Internal Corrosion," include criteria to  
15 identify instances of recurring internal corrosion and recommendations for augmenting  
16 aging management activities.

17 The program is informed and enhanced when necessary through the systematic and  
18 ongoing review of both plant-specific and industry operating experience, as discussed in  
19 Appendix B of the GALL-SLR Report.

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# 1 XI.M21A CLOSED TREATED WATER SYSTEMS

## 2 Program Description

3 Nuclear power plants (NPPs) contain many closed, treated water systems. These systems  
4 undergo water treatment to control water chemistry and prevent corrosion (i.e., treated water  
5 systems). These systems are also recirculating systems in which the rate of recirculation is  
6 much higher than the rate of addition of makeup water (i.e., closed systems). The program  
7 includes (a) water treatment, including the use of corrosion inhibitors, to modify the chemical  
8 composition of the water such that the function of the equipment is maintained and such that the  
9 effects of corrosion are minimized; (b) chemical testing of the water to ensure that the water  
10 treatment program maintains the water chemistry within acceptable guidelines; and  
11 (c) inspections to determine the presence or extent of degradation. Depending on the industry  
12 standard selected for use in association with this aging management program (AMP) and/or  
13 plant operating experience, this program also may include corrosion monitoring (e.g., corrosion  
14 coupon testing) and microbiological testing.

15 The water used in systems covered by this AMP may be, but need not be, demineralized and  
16 receives chemical treatment, including corrosion inhibitors, unless the systems meet the  
17 industry guidance for pure water systems. Otherwise, untreated water systems are addressed  
18 using other AMPs, such as Inspection of Internal Surfaces in Miscellaneous Piping and Ducting  
19 Components (XI.M38). Examples of systems managed by this AMP include closed-cycle  
20 cooling water (CCCW) systems (as defined by the U.S. Nuclear Regulatory Commission (NRC)  
21 Generic Letter (GL) 89-13<sup>1</sup>); closed portions of heating, ventilation, and air conditioning (HVAC)  
22 systems; diesel generator cooling water; and auxiliary boiler systems. Examples of systems not  
23 addressed by this AMP include boiling water reactor (BWR) coolant, pressurized water reactor  
24 (PWR) primary and secondary water, and PWR/BWR condensate systems. Aging in these  
25 systems is managed by the water chemistry AMP (XI.M2) and the American Society of  
26 Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Inservice  
27 Inspection, Subsections IWB, IWC, and IWD AMP (XI.M1)<sup>2</sup>. Treated fire water systems, if  
28 present, are also not included in this AMP.

## 29 Evaluation and Technical Basis

- 30 1. **Scope of Program:** This program manages the aging effects of loss of material due to  
31 corrosion, cracking due to stress corrosion cracking (SCC), and reduction of heat  
32 transfer due to fouling of the internal surfaces of piping, piping components, piping  
33 elements and heat exchanger components fabricated from any material and exposed to  
34 treated water.
- 35 2. **Preventive Actions:** This program mitigates the aging effects of loss of material,  
36 cracking, and reduction of heat transfer through water treatment. The water treatment

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<sup>1</sup>NRC GL 89-13 defines a service water system as “the system or systems that transfer heat from safety-related structures, systems, or components to the ultimate heat sink.” NRC GL 89-13 further defines a closed-cycle system as a part of the service water system that is not subject to significant sources of contamination, one in which water chemistry is controlled and in which heat is not directly rejected to an ultimate heat sink.

<sup>2</sup>GALL-SLR Report Chapter 1, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for AMPs

1 program includes corrosion inhibitors and is designed to maintain the function of  
2 associated equipment and minimize the corrosivity of the water and the accumulation of  
3 corrosion products that can foul heat transfer surfaces.

- 4 3. **Parameters Monitored or Inspected:** This program monitors water chemistry  
5 parameters (preventive monitoring) and the condition of surfaces exposed to the water  
6 (condition monitoring). Depending on the industry standard selected for use in  
7 association with this AMP and/or plant operating experience, this program may also  
8 include corrosion monitoring (e.g., corrosion coupon testing) and microbiological testing.

9 Water chemistry parameters (such as the concentration of iron, copper, silica, oxygen,  
10 and hardness, alkalinity, specific conductivity, and pH) are monitored because  
11 maintenance of optimal water chemistry prevents loss of material and cracking due to  
12 corrosion and SCC. The specific water chemistry parameters monitored and the  
13 acceptable range of values for these parameters are in accordance with industry  
14 standard guidance documents produced by the Electric Power Research Institute  
15 (EPRI), the American Society of Heating Refrigeration and Air Conditioning Engineers,  
16 the Cooling Technology Institute, the American Boiler Manufacturer's Association,  
17 American Society for Testing and Materials (ASTM) standards, water chemistry  
18 guidelines recommended by the equipment manufacturer, Nalco Water Handbook, or  
19 the ASME. For CCCW systems, as defined in NRC GL 89-13, EPRI 1007820 is used.  
20 For other systems, the applicant selects an appropriate industry standard document. In  
21 all cases, the selected industry standard guidance document is used in its entirety for the  
22 water chemistry control or guidance.

23 The visual appearance of surfaces provides evidence of loss of material. Surface  
24 discontinuities revealed by surface or volumetric examination techniques provide  
25 evidence of cracking. The heat transfer capability of heat exchanger surfaces is  
26 evaluated by either visual inspections to determine surface cleanliness, or functional  
27 testing to verify that design heat removal rates are maintained.

- 28 4. **Detection of Aging Effects:** In this program, aging effects are detected through water  
29 testing and periodic inspections. Water testing ensures that the water treatment  
30 program is effective in maintaining acceptable water chemistry. Water testing is  
31 conducted in accordance with the selected industry standard. The frequency of water  
32 testing is in accordance with the selected industry standard, but in no case should the  
33 testing interval be greater than quarterly unless justified with a documented analysis.

34 Because the control of water chemistry may not be fully effective in mitigating the aging  
35 effects, inspections are conducted. Visual inspections of internal surfaces are  
36 conducted whenever the system boundary is opened. At a minimum, in each 10-year  
37 period during the subsequent period of extended operation, a representative sample of  
38 20 percent of the population (defined as components having the same material, water  
39 treatment program, and aging effect combination) or a maximum of 25 components per  
40 population at each unit is inspected using techniques capable of detecting loss of  
41 material, cracking, and fouling, as appropriate. Technical justification for an alternative  
42 sampling methodology is included in the program's documentation. For multi-unit sites  
43 where the sample size is not based on the percentage of the population, it is acceptable  
44 to reduce the total number of inspections at the site as follows. For two-unit sites,  
45 19 components are inspected per unit and for a three-unit site, 17 components are  
46 inspected per unit. In order to conduct 17 or 19 inspections at a unit in lieu of 25, the

1 subsequent license renewal application (SLRA) includes the basis for why the operating  
2 conditions at each unit are sufficiently similar (e.g., flowrate, chemistry, temperature,  
3 excursions) to provide representative inspection results. The basis should include  
4 consideration of potential differences such as the following:

- 5 • Have power uprates been performed and, if so, could more aging have occurred  
6 on one unit that has been in the uprate period for a longer time period?
- 7 • Are there any systems which have had an out-of-spec water chemistry condition  
8 for a longer period of time or out-of-spec conditions occur more frequently?

9 If degradation is identified in the initial sample, additional samples are inspected to  
10 determine the extent of the condition.

11 The ongoing opportunistic visual inspections are credited towards the representative  
12 samples for the loss of material and fouling; however, surface or volumetric  
13 examinations are used to detect cracking. The inspections focus on the components  
14 most susceptible to aging because of time in service and severity of operating  
15 conditions, including locations where local conditions may be significantly more severe  
16 than those in the bulk water (e.g., heat exchanger tube surfaces).

17 Inspections and tests are performed by personnel qualified in accordance with site  
18 procedures and programs to perform the specified task. Inspections within the scope of  
19 the ASME Code should follow procedures consistent with the ASME Code. For  
20 non-ASME Code inspections, the inspections should follow site procedures that include  
21 requirements for items such as lighting, distance offset, surface coverage, presence of  
22 protective coatings, and cleaning processes that ensure an adequate examination.

23 5. **Monitoring and Trending:** Water chemistry data are evaluated against the standards  
24 contained in the selected industry standard documents. These data are trended, so  
25 corrective actions are taken, based on trends in water chemistry, prior to loss of intended  
26 function. Inspection results also are trended with time so that the progression of any  
27 corrosion or cracking can be evaluated and predicted.

28 6. **Acceptance Criteria:** Water chemistry concentrations are maintained within the limits  
29 specified in the selected industry standard documents. Due to the water chemistry  
30 controls, no age-related degradation is expected. Therefore, any detectable loss of  
31 material, cracking, or fouling is evaluated in the corrective action program.

32 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
33 conditions adverse to quality or significant conditions adverse to quality under those  
34 specific portions of the QA program that are used to meet Criterion XVI, "Corrective  
35 Action," of 10 CFR Part 50, Appendix B. Appendix A of the Generic Aging Lessons  
36 Learned for Subsequent License Renewal (GALL-SLR) Report describes how an  
37 applicant may apply its 10 CFR Part 50, Appendix B, quality assurance (QA) program to  
38 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
39 related structures and components (SCs) within the scope of this program.

40 Water chemistry concentrations that are not in accordance with the selected industry  
41 standard document should be returned to an "in specification" condition in accordance  
42 with the referenced guidelines. Some industry standard documents have time guidelines

1 which govern how rapidly “out of specification” conditions should be corrected. If fouling  
2 is identified, the overall effects on reduction of heat transfer are evaluated. Fouling  
3 deposits are removed to determine if loss of material has occurred and to prevent further  
4 degradation in the system.

5 8. **Confirmation Process:** The confirmation process is addressed through those specific  
6 portions of the QA program that are used to meet Criterion XVI, “Corrective Action,” of  
7 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
8 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
9 confirmation process element of this AMP for both safety-related and nonsafety-related  
10 SCs within the scope of this program.

11 9. **Administrative Controls:** Administrative controls are addressed through the QA  
12 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
13 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
14 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
15 fulfill the administrative controls element of this AMP for both safety-related and  
16 nonsafety-related SCs within the scope of this program.

17 10. **Operating Experience:** Degradation of CCCW systems due to corrosion product  
18 buildup [licensee event reports (LER) 327/93-029] or through-wall cracks in supply lines  
19 (NRC LER 50-280/91-019-00) has been observed in operating plants. In addition, SCC  
20 of stainless steel (SS) reactor recirculation pump seal heat exchanger coils has been  
21 attributed to localized boiling of the closed cooling water, concentrating water impurities  
22 on the coil surfaces (LER 263/2014-001). Accordingly, operating experience  
23 demonstrates the need for this program.

24 The program is informed and enhanced when necessary through the systematic and  
25 ongoing review of both plant-specific and industry operating experience, as discussed in  
26 Appendix B of the GALL-SLR Report.

## 27 **References**

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<sup>3</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

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## 1 XI.M22 BORAFLEX MONITORING

### 2 Program Description

3 Many neutron-absorbing materials, such as Boraflex, Boral, Metamic, boron steel, and  
4 carborundum, are used in spent fuel pools. This aging management program (AMP) addresses  
5 aging management of spent fuel pools using Boraflex as the neutron-absorbing material.  
6 GALL-SLR Report AMP XI.M40, "Monitoring of Neutron-Absorbing Material Other Than  
7 Boraflex," addresses aging management of spent fuel pools using neutron-absorbing materials  
8 other than Boraflex, such as Boral, Metamic, boron steel, and carborundum. When a spent fuel  
9 pool criticality analysis credits Boraflex and materials other than Boraflex, the guidance in both  
10 AMPs XI.M22 and XI.M40 applies.

11 For Boraflex panels in spent fuel storage racks, gamma irradiation and long-term exposure to  
12 the wet fuel pool environment causes shrinkage resulting in gap formation, gradual degradation  
13 of the polymer matrix, and the release of silica to the spent fuel storage pool water. This results  
14 in the loss of boron carbide in the neutron absorber sheets. A monitoring program for the  
15 Boraflex panels in the spent fuel storage racks is implemented to assure that no unexpected  
16 degradation of the Boraflex material compromises the criticality analysis in support of the design  
17 of spent fuel storage racks. This AMP relies on periodic inspection, testing, monitoring, and  
18 analysis of the criticality design to assure that the required 5 percent subcriticality margin is  
19 maintained. Therefore, this AMP includes: (a) completing sampling and analysis for silica  
20 levels in the spent fuel pool water on a regular basis, such as monthly, quarterly, or annually  
21 (depending on Boraflex panel condition), and trending the results by using the Electric Power  
22 Research Institute (EPRI) RACKLIFE predictive code or its equivalent; and (b) performing  
23 neutron attenuation testing to determine gap formation in Boraflex panels or measuring  
24 boron-10 areal density by techniques such as the BADGER device.

### 25 Evaluation and Technical Basis

- 26 1. **Scope of Program:** This program manages the effect of reduction in neutron-absorbing  
27 capacity due to degradation in sheets of neutron-absorbing material made of Boraflex  
28 affixed to spent fuel racks.
- 29 2. **Preventive Actions:** This program is a performance monitoring program and does not  
30 include preventive actions.
- 31 3. **Parameters Monitored or Inspected:** The parameters monitored include physical  
32 conditions of the Boraflex panels, such as gap formation and decreased boron-10 areal  
33 density, and the concentration of the silica in the spent fuel pool. These are conditions  
34 directly related to degradation of the Boraflex material. When Boraflex is subjected to  
35 gamma radiation and long-term exposure to the spent fuel pool environment, the silicon  
36 polymer matrix becomes degraded and silica filler and boron carbide are released into  
37 the spent fuel pool water. As indicated in the U.S. Nuclear Regulatory Commission  
38 (NRC) Information Notice (IN) 95-38 and NRC Generic Letter (GL) 96-04, the loss of  
39 boron carbide (washout) from Boraflex is characterized by slow dissolution of silica from  
40 the surface of the Boraflex and a gradual thinning of the material. Because Boraflex  
41 contains about 25 percent silica, 25 percent polydimethyl siloxane polymer, and  
42 50 percent boron carbide, sampling and analysis for the presence of silica in the spent  
43 fuel pool provide an indication of depletion of boron carbide from Boraflex; however, the

1 degree to which Boraflex has degraded is ascertained through measurement of the  
2 boron-10 areal density.

- 3 4. **Detection of Aging Effects:** Aging effects on Boraflex panels are detected by  
4 monitoring silica levels in the spent fuel storage pool on a regular basis, such as  
5 monthly, quarterly, or annually (depending on Boraflex panel condition); by measuring  
6 boron-10 areal density on a frequency determined by the material condition of the  
7 Boraflex panels, with a minimum frequency of once every 5 years; and by applying  
8 predictive methods to the measured results. The amount of boron-10 carbide present in  
9 the Boraflex panels is determined through direct measurement of boron-10 areal density  
10 by periodic verification of boron-10 loss through areal density measurement techniques,  
11 such as the BADGER device. Frequent Boraflex testing is sufficient to ensure that  
12 Boraflex panel degradation does not compromise criticality analysis for the spent fuel  
13 pool storage racks. Additionally, changes in the level of silica present in the spent fuel  
14 pool water provide an indication of changes in the rate of degradation of Boraflex panels.

- 15 5. **Monitoring and Trending:** The periodic inspection measurements and analysis are  
16 compared to values of previous measurements and analysis providing a continuing level  
17 of data for trend analysis. Sampling and analysis for silica levels in the spent fuel pool  
18 water is performed on a regular basis, such as monthly, quarterly, or annually  
19 (depending on Boraflex panel condition), and results are trended using the EPRI  
20 RACKLIFE predictive code or its equivalent. Silica concentration is monitored against  
21 time to trend degradation. Rapid increases of silica concentration may indicate  
22 accelerated Boraflex degradation. The frequency to perform boron-10 areal density  
23 testing will be determined by the material condition of the Boraflex panels, with an  
24 interval not to exceed 5 years.

- 25 6. **Acceptance Criteria:** The 5 percent subcriticality margin of the spent fuel racks is  
26 maintained for the period of extended operation.

- 27 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
28 conditions adverse to quality or significant conditions adverse to quality under those  
29 specific portions of the quality assurance (QA) program that are used to meet  
30 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
31 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
32 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
33 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
34 related structures and components (SCs) within the scope of this program.

35 Corrective actions are initiated if the test results find that the 5 percent subcriticality  
36 margin cannot be maintained because of the current or projected future degradation.  
37 Corrective actions consist of providing additional neutron-absorbing capacity by Boral<sup>®</sup>  
38 or boron steel inserts or other options which are available to maintain a subcriticality  
39 margin of 5 percent.

- 40 8. **Confirmation Process:** The confirmation process is addressed through those specific  
41 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
42 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
43 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
44 confirmation process element of this AMP for both safety-related and nonsafety-related  
45 SCs within the scope of this program.

- 1 9. **Administrative Controls:** Administrative controls are addressed through the QA  
2 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
3 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
4 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
5 fulfill the administrative controls element of this AMP for both safety-related and  
6 nonsafety-related SCs within the scope of this program.
- 7 10. **Operating Experience:** NRC IN 87-43 addresses the problems of development of tears  
8 and gaps (average 1-2 inches, with the largest 4 inches) in Boraflex sheets due to  
9 gamma radiation-induced shrinkage of the material. NRC IN 93-70, NRC IN 95-38, and  
10 NRC GL 96-04 address several cases of significant degradation of Boraflex test coupons  
11 due to accelerated dissolution of Boraflex caused by pool water flow through panel  
12 enclosures and high accumulated gamma dose. In such cases, the Boraflex may be  
13 replaced by boron steel inserts or by a completely new rack system using Boral<sup>®</sup>.  
14 Experience with boron steel is limited; however, the application of Boral<sup>®</sup> for use in the  
15 spent fuel storage racks predates the manufacturing and use of Boraflex. The  
16 experience with Boraflex panels indicates that coupon surveillance programs are not  
17 reliable. Therefore, during the period of extended operation, the measurement of  
18 boron-10 areal density correlated, through a predictive code, with silica levels in the pool  
19 water, is verified. These monitoring programs provide assurance that degradation of  
20 Boraflex sheets is monitored so that appropriate actions can be taken in a timely manner  
21 if significant loss of neutron-absorbing capability is occurring. These monitoring  
22 programs provide reasonable assurance that the Boraflex sheets maintain their integrity  
23 and are effective in performing their intended function.
- 24 The program is informed and enhanced when necessary through the systematic and  
25 ongoing review of both plant-specific and industry operating experience, as discussed in  
26 Appendix B of the GALL-SLR Report.

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1 **XI.M23 INSPECTION OF OVERHEAD HEAVY LOAD AND LIGHT LOAD**  
2 **(RELATED TO REFUELING) HANDLING SYSTEMS**

3 **Program Description**

4 The Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling  
5 Systems program evaluates the effectiveness of maintenance monitoring activities for cranes  
6 and hoists that are within the scope of license renewal. This program primarily addresses the  
7 structural components that make up the bridge and trolley. Many crane systems and  
8 components are not within the scope of this program because they perform an intended function  
9 with moving parts or with a change in configuration, or they are subject to replacement based on  
10 qualified life.

11 The program includes periodic visual inspections to detect loss of material due to general  
12 corrosion on bridge components, rails, and trolley structural components; loss of material due to  
13 wear on rails; cracking due to stress corrosion cracking (SCC) of high strength bolts, and loss of  
14 preload on bolted connections. NUREG-0612, "Control of Heavy Loads at Nuclear Power  
15 Plants," provides specific guidance on the control of overhead heavy load cranes. The aging  
16 management activities specified in this program utilize the guidance provided in American  
17 Society of Mechanical Engineers (ASME) Safety Standard B30.2, "Overhead and Gantry  
18 Cranes (Top Running Bridge, Single or Multiple Girder, Top Running Trolley Hoist)" or other  
19 appropriate standards in the ASME B30 series.

20 **Evaluation and Technical Basis**

21 1. **Scope of Program:** The program manages (a) the effects of loss of material due to  
22 general corrosion on the bridge rails, bridge, and trolley structural components for those  
23 cranes that are within the scope of 10 CFR 54.4, (b) the effects of wear on the rails in  
24 the rail system, and (c) cracking due to SCC of high strength bolts. The program also  
25 manages the effects of loss of preload of bolted connections.

26 2. **Preventive Actions:** This program is a condition monitoring program. No preventive  
27 actions are identified.

28 3. **Parameters Monitored or Inspected:** Surface condition is monitored by visual  
29 inspection to ensure that loss of material is not occurring due to corrosion or wear.  
30 Bolted connections are monitored for loose bolts, missing or loose nuts, and other  
31 conditions indicative of loss of preload. High strength [actual measured yield strength  
32 greater than 150 kilopounds per square inch (ksi) or 1,034 megapascal (MPa)] bolts  
33 greater than 1 inch in diameter are monitored for SCC.

34 4. **Detection of Aging Effects:** Crane rails and structural components are visually  
35 inspected at a frequency in accordance ASME B30.2, "Overhead and Gantry Cranes  
36 (Top Running Bridge, Single or Multiple Girder, Top Running Trolley Hoist)," or other  
37 appropriate standard in the ASME B30 series. ASME B30.2 establishes inspection  
38 frequencies based on the severity of service, as defined by the number and magnitude  
39 of lifts. For systems that are infrequently in service, such as containment polar cranes,  
40 periodic inspections are performed once every refueling cycle just prior to use. Bolted  
41 connections are visually inspected for loose bolts or missing nuts at the same frequency  
42 as crane rails and structural components. Visual inspection of high strength  
43 (actual measured yield strength greater than or equal to 150 ksi or 1,034 MPa) structural

- 1 bolting greater than 1 in [25 mm] in diameter is supplemented with volumetric or surface  
2 examinations to detect cracking at an interval not to exceed 5 years, unless justified.
- 3 5. **Monitoring and Trending:** Visual inspection activities are performed by personnel  
4 qualified in accordance with controlled procedures and processes. Deficiencies are  
5 documented using applicant-approved processes and procedures, such that results can  
6 be trended; however, the program does not include formal trending.
- 7 6. **Acceptance Criteria:** Any visual indication of loss of material due to corrosion or wear  
8 and any visual sign of loss of bolting preload is evaluated according to ASME B30.2 or  
9 other applicable industry standard in the ASME B30 series. Volumetric or surface  
10 examinations confirm the absence of cracking in high strength bolts.
- 11 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
12 conditions adverse to quality or significant conditions adverse to quality under those  
13 specific portions of the quality assurance (QA) program that are used to meet  
14 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
15 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
16 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
17 fulfill the corrective actions element of this aging management program (AMP) for both  
18 safety-related and nonsafety-related structures and components (SCs) within the scope  
19 of this program.
- 20 Repairs are performed as specified in ASME B30.2 or other appropriate standard in the  
21 ASME B30 series.
- 22 8. **Confirmation Process:** The confirmation process is addressed through those specific  
23 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
24 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
25 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
26 confirmation process element of this AMP for both safety-related and nonsafety-related  
27 SCs within the scope of this program.
- 28 9. **Administrative Controls:** Administrative controls are addressed through the QA  
29 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
30 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
31 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
32 fulfill the administrative controls element of this AMP for both safety-related and  
33 nonsafety-related SCs within the scope of this program.
- 34 10. **Operating Experience:** There has been no history of corrosion-related degradation that  
35 threatened the ability of a crane to perform its intended function. Likewise, because  
36 cranes have not been operated beyond their design lifetime, there have been no  
37 significant fatigue-related structural failures. Operating experience indicates that loss of  
38 bolt preload has occurred, but not to the extent that it has threatened the ability of a  
39 crane structure to perform its intended function.
- 40 The program is informed and enhanced when necessary through the systematic and  
41 ongoing review of both plant-specific and industry operating experience, as discussed in  
42 Appendix B of the GALL-SLR Report.

1 **References**

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# 1 XI.M24 COMPRESSED AIR MONITORING

## 2 Program Description

3 The purpose of the compressed air monitoring program is to provide reasonable assurance of  
4 the integrity of the compressed air system. The program consists of monitoring moisture  
5 content, corrosion, and performance of the compressed air system. This includes (a) preventive  
6 monitoring of water (moisture) and other potential contaminants to keep within the specified  
7 limits; and (b) inspection of components for indications of loss of material due to corrosion.

8 The compressed air monitoring aging management program (AMP) is based on results of the  
9 plant owner's response to the U.S. Nuclear Regulatory Commission (NRC) Generic  
10 Letter (GL) 88-14 (as applicable to license renewal) and reported in previous NRC Information  
11 Notice (IN) 81-38; IN 87-28; IN 87-28, Supplement 1; and by the Institute of Nuclear Power  
12 Operations (INPO) Significant Operating Experience Report (SOER) 88-01. NRC GL 88-14,  
13 issued after several years of study of problems and failures of instrument air systems,  
14 recommends that each holder of an operating license perform an extensive design and  
15 operations review and verification of its instrument air system. NRC GL 88-14 also  
16 recommends that the licensees describe their program for maintaining proper instrument air  
17 quality. This AMP does not include all aspects of NRC GL 88-14 because many of the issues in  
18 the GL are not relevant to license renewal.

19 This AMP does not change the applicant's docketed response to NRC GL 88-14 for the rest of  
20 its operations. The program utilizes the aging management aspects of the applicant's response  
21 to NRC GL 88-14 for license renewal with regard to preventative measures, inspections of  
22 components, and testing to ensure that the compressed air system will be able to perform its  
23 intended function for the period of extended operation. The AMP also incorporates the air  
24 quality provisions provided in the guidance of the Electric Power Research Institute (EPRI)  
25 TR 108147. The American Society of Mechanical Engineers (ASME) operations and  
26 maintenance standards and guides (ASME OM-2012, Division 2, Part 28) provides additional  
27 guidance for maintenance of the instrument air system by offering recommended test methods,  
28 test intervals, parameters to be measured and evaluated, acceptance criteria, corrective  
29 actions, and records requirements.

## 30 Evaluation and Technical Basis

- 31 1. **Scope of Program:** The program manages the aging effects of loss of material due to  
32 corrosion in compressed air systems.
- 33 2. **Preventive Actions:** For the purposes of aging management, moisture and other  
34 corrosive contaminants in the system's air are maintained below specified limits to  
35 ensure that the system and components maintain their intended functions. These limits  
36 are prepared from consideration of the manufacturer's recommendations for individual  
37 components and guidelines based on ASME OM-2012, Division 2, Part 28;  
38 ANSI/ISA-7.0.01-1996; and EPRI TR-108147.
- 39 3. **Parameters Monitored or Inspected:** Periodic air samples are taken and analyzed for  
40 moisture content, lubricant content, particulate matter and other corrosive contaminants  
41 and hazardous gases. Periodic and opportunistic inspections of accessible internal  
42 surfaces are performed for signs of corrosion and abnormal corrosion products that  
43 might indicate a loss of material within the system.

1 4. **Detection of Aging Effects:** The program periodically samples and tests the air in the  
2 compressed system in accordance with industry standards (i.e., ANSI/ISA-7.0.01-1996).  
3 Compressed air systems have in-line dew point instrumentation that either checks  
4 continuously using an automatic alarm system or is checked at least daily to ensure that  
5 moisture content is within the recommended range. Additionally, periodic visual  
6 inspections of critical component internal surfaces (compressors, dryers, after-coolers,  
7 and filters) are performed for signs of loss of material due to corrosion. Guidance for  
8 inspection frequency and inspection methods of these components is provided in  
9 standards or documents such as ASME OM-2012, Division 2, Part 28.

10 Inspections and tests are performed by personnel qualified in accordance with site  
11 procedures and programs to perform the specified task.

12 5. **Monitoring and Trending:** If daily readings of system dew points are taken, they are  
13 recorded and trended. Air quality analysis results are reviewed to determine if alert  
14 levels or limits have been reached or exceeded. This review also checks for unusual  
15 trends. ASME OM-2012, Division 2, Part 28, provides guidance for monitoring and  
16 trending data. Visual inspection results are compared to previous results to ascertain if  
17 adverse long-term trends exist. The effects of corrosion are monitored by visual  
18 inspection. Test data are analyzed and compared to data from previous tests to provide  
19 for the timely detection of aging effects on passive components.

20 6. **Acceptance Criteria:** Acceptance criteria for air quality moisture limits are established  
21 based on accepted industry standards, such as ANSI/ISA-7.0.01-1996. Internal  
22 surfaces should not show signs of corrosion (general, pitting, and crevice) that could  
23 indicate the potential loss of function of the component. Suppliers' certifications can be  
24 used to demonstrate that bottled air meets acceptable quality standards.

25 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
26 conditions adverse to quality or significant conditions adverse to quality under those  
27 specific portions of the quality assurance (QA) program that are used to meet  
28 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
29 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
30 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
31 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
32 related structures and components (SCs) within the scope of this program.

33 Corrective actions are taken if any parameters, such as moisture content in the system  
34 air, are out of acceptable ranges, or if corrosion is identified on internal surfaces.

35 8. **Confirmation Process:** The confirmation process is addressed through those specific  
36 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
37 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
38 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
39 confirmation process element of this AMP for both safety-related and nonsafety-related  
40 SCs within the scope of this program.

41 9. **Administrative Controls:** Administrative controls are addressed through the QA  
42 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
43 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
44 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to

1 fulfill the administrative controls element of this AMP for both safety-related and  
2 nonsafety-related SCs within the scope of this program.

- 3 10. **Operating Experience:** Potentially significant safety-related problems pertaining to air  
4 systems have been documented in NRC IN 81-38; IN 87-28; IN 87-28, Supplement 1;  
5 and licensee event report (LER) 50-237/94-005-3. Some of the systems that have been  
6 significantly degraded or that have failed due to the problems in the air system include  
7 the decay heat removal, auxiliary feedwater (AFW), main steam isolation, containment  
8 isolation, and fuel pool seal systems. In 2008, one plant incurred an unplanned reactor  
9 trip from a failure of a mechanical joint in the instrument air system (NRC IN 2008-06).  
10 Nevertheless, as a result of NRC GL 88-14 and in consideration of INPO SOER 88-01  
11 and EPRI TR-108147, performance of air systems has improved significantly.

12 The program is informed and enhanced when necessary through the systematic and  
13 ongoing review of both plant-specific and industry operating experience, as discussed in  
14 Appendix B of the GALL-SLR Report.

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5 U.S. Nuclear Regulatory Commission. December 17, 1981.

1 **XI.M25 BOILING WATER REACTOR (BWR) REACTOR WATER**  
2 **CLEANUP SYSTEM**

3 **Program Description**

4 This program is a condition monitoring program that provides inspections to manage the aging  
5 effects of cracking due to stress corrosion cracking (SCC) or intergranular stress corrosion  
6 cracking (IGSCC) on the intended function of certain austenitic stainless steel (SS) piping in the  
7 reactor water cleanup (RWCU) system of boiling water reactors (BWRs). Based on the  
8 U.S. Nuclear Regulatory Commission (NRC) criteria related to inspection guidelines for RWCU  
9 piping welds outboard of the second isolation valve, the program includes the measures  
10 delineated in NUREG-0313, Revision 2, and NRC Generic Letter (GL) 88-01 and its  
11 Supplement 1.

12 NRC GL 88-01 applies to all BWR piping made of austenitic SS that is 4 inches or larger in  
13 nominal diameter and contains reactor coolant at a temperature above 93 °C [200 °F] during  
14 power operation, regardless of the American Society of Mechanical Engineers (ASME) Code  
15 classification. NRC GL 88-01 requests, in part, that affected licensees implement an inservice  
16 inspection (ISI) program conforming to staff positions for austenitic SS piping covered under the  
17 scope of the letter. In response to NRC GL 88-01, affected licensees undertook ISI in  
18 accordance with the scope and schedules described in the letter and included affected portions  
19 of RWCU piping outboard of the second isolation valves within their ISI programs.

20 The NRC issued GL 88-01, Supplement 1, to provide acceptable alternatives to the staff  
21 positions delineated in NRC GL 88-01. In NRC GL 88-01, Supplement 1, the staff noted, in  
22 part, that the position stated in NRC GL 88-01 on inspection sample size of RWCU system  
23 welds outboard of the second isolation valves had created an unnecessary hardship for affected  
24 licensees because of the very high radiation levels associated with this portion of RWCU piping.  
25 The staff also noted that affected licensees had requested that they be exempted from NRC  
26 GL 88-01 with regard to inspection of this piping of the RWCU system. Although NRC  
27 GL 88-01, Supplement 1, does not provide explicit generic guidance with regard to staff criteria  
28 for reduction or elimination of RWCU weld inspections, it does suggest that the staff would be  
29 receptive to modifications to a licensee's original docketed NRC GL 88-01 response for RWCU  
30 weld inspections, provided that all issues of reactor safety were adequately addressed. The  
31 staff has subsequently allowed individual licensees to modify their docketed responses to  
32 GL-88-01 to reduce or eliminate their ISI of RWCU welds in the piping outboard of the second  
33 isolation valves. This program only applies in cases where the NRC has not previously  
34 approved the complete elimination of the augmented GL 88 01 inspections for RWCU system  
35 piping outboard the second containment isolation valves.

36 **Evaluation and Technical Basis**

37 1. **Scope of Program:** This program provides ISI to manage the aging effects of cracking  
38 due to SCC or IGSCC in austenitic SS piping outboard of the second containment  
39 isolation valves in the RWCU system.

40 The components included in this program are the welds in piping that have a nominal  
41 diameter of 4 inches or larger and that contain reactor coolant at a temperature above  
42 93 °C [200 °F] during power operation, regardless of ASME Code classification.

- 1 2. **Preventive Actions:** The comprehensive program outlined in NUREG–0313 and  
2 NRC GL 88-01 addresses improvements in all three elements that, in combination,  
3 cause SCC or IGSCC. These elements are a susceptible (sensitized) material,  
4 a significant tensile stress, and an aggressive environment. The program delineated in  
5 NUREG–0313 and NRC GL 88-01 includes recommendations regarding selection of  
6 materials that are resistant to sensitization, use of special processes that reduce residual  
7 tensile stresses, and monitoring and maintenance of coolant chemistry. The resistant  
8 materials are used for new and replacement components and include low-carbon grades  
9 of austenitic SS and weld metal, with a maximum carbon of 0.035 wt.% and a minimum  
10 ferrite of 7.5 percent in weld metal and CASS. Special processes are used for existing  
11 as well as new and replacement components. These processes include solution heat  
12 treatment, heat sink welding, induction heating, and mechanical stress improvement.  
13 Reactor coolant water chemistry is monitored and maintained in accordance with  
14 activities that meet the guidelines in the Generic Aging Lessons Learned for Subsequent  
15 License Renewal (GALL-SLR) Report AMP XI.M2, “Water Chemistry.”
- 16 3. **Parameters Monitored or Inspected:** The aging management program (AMP)  
17 monitors SCC or IGSCC of austenitic SS piping by detecting and sizing cracks in  
18 accordance with the guidelines of NUREG–0313, NRC GL 88-01, and NRC GL 88-01,  
19 Supplement 1.
- 20 4. **Detection of Aging Effects:** The extent, method, and schedule of the inspections  
21 delineated in the NRC inspection criteria for RWCU piping and NRC GL 88-01 are  
22 designed to maintain structural integrity and to detect aging effects before the loss of  
23 intended function of austenitic SS piping and fittings. Guidelines for the inspection  
24 schedule, methods, personnel, and sample expansion are based on NRC GL 88-01 and  
25 GL 88-01, Supplement 1, and any applicable alternatives to these inspections that were  
26 subsequently approved by the NRC. These alternative inspections are implemented in  
27 accordance with the current licensing basis for the plant. Typically, if all of the GL 89-10  
28 actions had not been satisfactorily completed, then one alternative inspection would  
29 include 10 percent of the welds every refueling outage. Another alternative inspection  
30 would typically include at least 2 percent of the welds or 2 welds every refueling outage,  
31 whichever sample is larger, if: (a) all of the GL 89-10 actions had been satisfactorily  
32 completed, (b) no IGSCC had been detected in RWCU piping welds inboard of the  
33 second containment isolation valves, and (c) no IGSCC had been detected in RWCU  
34 piping welds outboard of the second containment isolation valves after a minimum of  
35 10 percent of the susceptible welds were inspected. For example, IGSCC was detected  
36 at Peach Bottom on certain welds inboard of primary containment isolation valves.  
37 Thus, the weld inspection sample size was reduced from 10 percent of the susceptible  
38 welds to 2 percent of the susceptible welds, as discussed in the letter from  
39 Joseph W. Shea, NRC, to George A. Hunger, Jr., PECO Energy Company, RWCU  
40 System Weld Inspections at Peach Bottom Atomic Power Station, Units 2 and 3.
- 41 5. **Monitoring and Trending:** The extent and schedule for inspection in accordance with  
42 the recommendations of NRC GL 88-01 provide for the timely detection of cracks.  
43 Based on inspection results, NRC GL 88-01 provides guidelines for additional samples  
44 of welds to be inspected when one or more cracked welds are found in a weld category.
- 45 6. **Acceptance Criteria:** NRC GL 88-01 recommends that any indication detected be  
46 evaluated in accordance with the requirements of ASME Code, Section XI,  
47 Subsection IWB-3640.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
6 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
7 safety-related and nonsafety-related structures and components (SCs) within the scope  
8 of this program.

9 The guidelines in NRC GL 88-01 are followed for replacements, stress improvement,  
10 and weld overlay repairs.

11 8. **Confirmation Process:** The confirmation process is addressed through those specific  
12 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
13 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
14 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
15 confirmation process element of this AMP for both safety-related and nonsafety-related  
16 SCs within the scope of this program.

17 9. **Administrative Controls:** Administrative controls are addressed through the QA  
18 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
19 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
20 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
21 fulfill the administrative controls element of this AMP for both safety-related and  
22 nonsafety-related SCs within the scope of this program.

23 10. **Operating Experience:** IGSCC has occurred in small- and large-diameter BWR piping  
24 made of austenitic SS. The comprehensive program outlined in NRC GL 88-01 and  
25 NUREG-0313 addresses improvements in all elements that cause SCC or IGSCC  
26 (e.g., susceptible material, significant tensile stress, and an aggressive environment)  
27 and is effective in managing IGSCC in austenitic SS piping in the RWCU system.

28 The program is informed and enhanced when necessary through the systematic and  
29 ongoing review of both plant-specific and industry operating experience, as discussed in  
30 Appendix B of the GALL-SLR Report.

## 31 **References**

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3 Mechanical Engineers. 2013.<sup>1</sup>

4 Letter from Robert M. Pulsifer, U.S. Nuclear Regulatory Commission, to Michael A Balduzzi,  
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23 U.S. Nuclear Regulatory Commission. January 31, 1988.

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<sup>1</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

1 **XI.M26 FIRE PROTECTION**

2 **Program Description**

3 The Fire Protection aging management program (AMP) includes a fire barrier inspection  
4 program. The fire barrier inspection program requires periodic visual inspection of fire barrier  
5 penetration seals; fire barrier walls, ceilings, and floors; fire damper housings; and periodic  
6 visual inspection and functional tests of fire-rated doors to ensure that their operability is  
7 maintained. The AMP also includes periodic inspection and testing of the halon/carbon dioxide  
8 (CO<sub>2</sub>) fire suppression system. Additionally, this AMP is complemented by GALL-SLR Report  
9 AMP XI.S6 "Structures Monitoring" which consists of periodic visual inspections by personnel  
10 qualified to monitor structures and components (SCs) for applicable aging effects.

11 In accordance with 10 CFR 50.48(a), each operating nuclear power plant (NPP) licensee must  
12 have a fire protection plan that satisfies GDC 3, "Fire protection," of Appendix A, "General  
13 Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of  
14 Production and Utilization Facilities."

15 Licensees of plants that were licensed to operate before January 1, 1979, must meet  
16 the requirements of Appendix R, "Fire Protection Program for Nuclear Power Facilities  
17 Operating Prior to January 1, 1979," to 10 CFR Part 50, except to the extent provided for in  
18 10 CFR 50.48(b). Licensees of plants licensed to operate after January 1, 1979, must meet the  
19 plant-specific fire protection licensing basis. Regulatory Guide (RG) 1.189 "Fire Protection for  
20 Nuclear Power Plants," provides guidance for compliance with 10 CFR 50.48(b) and plant-  
21 specific fire protection licensing basis.

22 As an alternative to 10 CFR 50.48(b) or to plant-specific fire protection licensing basis, licensees  
23 may also adopt and maintain a fire protection program that meets 10 CFR 50.48(c), "National  
24 Fire Protection Association Standard NFPA 805" that incorporates by reference National Fire  
25 Protection Association (NFPA) 805, "Performance-Based Standard for Fire Protection for Light  
26 Water Reactor Electric Generating Plants, 2001 Edition" with certain exceptions. RG 1.205,  
27 Rick-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power  
28 Plants," provides guidance for compliance with 10 CFR 50.48(c).

29 The deterministic means for meeting these requirements come from 10 CFR Part 50,  
30 Appendix R, and 10 CFR 50.48 or from plant-specific requirements incorporated into the  
31 operating license of plants licensed after that date. The U.S. Nuclear Regulatory Commission  
32 (NRC) deterministic fire protection requirements are documented in 10 CFR Part 50,  
33 Appendix R and 10 CFR 50.48.

34 1. **Scope of Program:** This program manages the effects of loss of material and cracking,  
35 increased hardness, shrinkage and loss of strength on the intended function of the  
36 penetration seals; fire barrier walls, ceilings, and floors; fire damper housings; and other  
37 fire resistance materials (e.g., flamastic, 3M fire wrapping, spray-on fire proofing  
38 material, intumescent coating, etc.) that serve a fire barrier function; and all fire-rated  
39 doors (automatic or manual) that perform a fire barrier function. It also manages the  
40 aging effects on the intended function of the halon/CO<sub>2</sub> fire suppression system.

41 2. **Preventive Actions:** This is a condition monitoring program. However, the fire hazard  
42 analysis assesses the fire potential and fire hazard in all plant areas. It also specifies  
43 measures for fire prevention, fire detection, fire suppression, and fire containment and

- 1 alternative shutdown capability for each fire area containing structures, systems, and  
2 components important to safety.
- 3 3. **Parameters Monitored or Inspected:** Visual inspection of penetration seals examines  
4 the surface condition of the seals for any sign of degradation. Visual inspection of the  
5 surface condition of the fire barrier walls, ceilings, and floors and other fire barrier  
6 materials detects any sign of degradation. Fire damper housings are inspected for signs  
7 of corrosion and cracking. Fire-rated doors are visually inspected to detect any  
8 degradation of door surfaces.
- 9 The periodic visual inspections of the surface condition for the halon/CO<sub>2</sub> fire  
10 suppression system are performed.
- 11 4. **Detection of Aging Effects:** Visual inspection of penetration seals detects cracking,  
12 seal separation from walls and components, and rupture and puncture of seals. Visual  
13 inspection by fire protection qualified personnel of not less than 10 percent of each type  
14 of seal in walkdowns is performed at a frequency in accordance with an NRC-approved  
15 fire protection program (e.g., Technical Requirements Manual, Appendix R program) or  
16 at least once every refueling outage. Visual inspection by fire protection qualified  
17 personnel of the fire barrier walls, ceilings, floors, and doors; fire damper housings; and  
18 other fire barrier materials performed in walkdowns at a frequency in accordance with an  
19 NRC-approved fire protection program ensure timely detection of cracking, spalling, and  
20 loss of material. Visual inspection by fire protection qualified personnel detects any sign  
21 of degradation of the fire doors, such as wear and missing parts. Periodic visual  
22 inspection and function tests detect degradation of the fire doors before there is a loss of  
23 intended function.
- 24 Visual inspections of the halon/CO<sub>2</sub> fire suppression system are performed to detect any  
25 sign of corrosion before the loss of the component intended function.
- 26 5. **Monitoring and Trending:** The results of inspections of the aging effects of cracking,  
27 spalling, and loss of material on fire barrier penetration seals, fire barriers, fire dampers,  
28 and fire doors are trended to provide for timely detection of aging effects so that the  
29 appropriate corrective actions can be taken.
- 30 6. **Acceptance Criteria:** Inspection results are acceptable if there are no signs of  
31 degradation that could result in the loss of the fire protection capability due to loss of  
32 material. The acceptance criteria include (a) no visual indications (outside those allowed  
33 by approved penetration seal configurations) of cracking, separation of seals from walls  
34 and components, separation of layers of material, or ruptures or punctures of seals;  
35 (b) no significant indications cracking, spalling, and loss of material of fire barrier walls,  
36 ceilings, and floors and in other fire barrier materials; (c) no visual indications of missing  
37 parts, holes, and wear; (d) no visual indications of cracks or corrosion of fire damper  
38 housings; and (e) no deficiencies in the functional tests of fire doors. Also, inspection  
39 results for the halon/CO<sub>2</sub> fire suppression system are acceptable if there are no  
40 indications of excessive loss of material.
- 41 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
42 conditions adverse to quality or significant conditions adverse to quality under those  
43 specific portions of the quality assurance (QA) program that are used to meet  
44 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the

1 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
2 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
3 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
4 related SCs within the scope of this program.

5 For fire protection SCs identified that are subject to an aging management review for  
6 license renewal, the applicant's 10 CFR Part 50, Appendix B, program is used for  
7 corrective actions, confirmation process, and administrative controls for aging  
8 management during the subsequent period of extended operation.

9 During the inspection of penetration seals, if any sign of degradation is detected within  
10 that sample, the scope of the inspection is expanded to include additional seals in  
11 accordance with the plant's approved fire protection program.

12 8. **Confirmation Process:** The confirmation process is addressed through those specific  
13 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
14 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
15 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
16 confirmation process element of this AMP for both safety-related and nonsafety-related  
17 SCs within the scope of this program.

18 9. **Administrative Controls:** Administrative controls are addressed through the QA  
19 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
20 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
21 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
22 fulfill the administrative controls element of this AMP for both safety-related and  
23 nonsafety-related SCs within the scope of this program.

24 10. **Operating Experience:** Silicone foam fire barrier penetration seals have experienced  
25 splits, shrinkage, voids, lack of fill, and other failure modes [NRC Information Notice  
26 (IN) 88-56, IN 94-28, and IN 97-70]. Degradation of electrical raceway fire barrier such  
27 as small holes, cracking, and unfilled seals are found on routine walkdown (NRC IN 91-  
28 47 and NRC Generic Letter 92-08). Fire doors have experienced wear of the hinges and  
29 handles.

30 The program is informed and enhanced when necessary through the systematic and  
31 ongoing review of both plant-specific and industry operating experience, as discussed in  
32 Appendix B of the GALL-SLR Report.

### 33 **References**

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- 1 NFPA. NFPA 805, *Performance-Based Standard for Fire Protection for Light Water Reactor*  
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# 1 XI.M27 FIRE WATER SYSTEM

## 2 Program Description

3 This aging management program (AMP) applies to water-based fire protection system  
4 components, including sprinklers, nozzles, fittings, valve bodies, fire pump casings, hydrants,  
5 hose stations, standpipes, water storage tanks, and aboveground, buried, and underground  
6 piping and components that are tested in accordance with the applicable National Fire  
7 Protection Association (NFPA) codes and standards. Full-flow testing and visual inspections  
8 are conducted to ensure that loss of material due to general, pitting, and crevice corrosion,  
9 microbiologically-induced corrosion or fouling, and flow blockage due to fouling is adequately  
10 managed. In addition to NFPA codes and standards, portions of the water-based fire protection  
11 system that are: (a) normally dry but periodically are subject to flow (e.g., dry-pipe or preaction  
12 sprinkler system piping and valves) and (b) that cannot be drained or allow water to collect, are  
13 subjected to augmented testing or inspections. Also, portions of the system (e.g., fire service  
14 main, standpipe) are normally maintained at required operating pressure and monitored such  
15 that loss of system pressure is immediately detected and corrective actions are initiated.

16 Either sprinklers are replaced before reaching 50 years inservice or a representative sample of  
17 sprinklers from one or more sample areas is tested by using the guidance of the 2011 Edition of  
18 NFPA 25, "Inspection, Testing and Maintenance of Water-Based Fire Protection Systems" to  
19 ensure that signs of degradation, such as corrosion, are detected in a timely manner. Generic  
20 Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report AMP XI.M41,  
21 "Buried and Underground Piping and Tanks," is used to monitor the external surfaces of buried  
22 and underground water-based fire protection system piping and tanks.

## 23 Evaluation and Technical Basis

- 24 1. **Scope of Program:** Components within the scope of water-based fire protection  
25 systems include items such as sprinklers, nozzles, fittings, valve bodies, fire pump  
26 casings, hydrants, hose stations, fire water storage tanks, fire service mains, and  
27 standpipes. The internal surfaces of water-based fire protection system piping that is  
28 normally drained, such as dry-pipe sprinkler system piping, are included within the scope  
29 of the AMP. Fire hose stations and standpipes are considered piping in the AMP. Fire  
30 hoses and gaskets can be excluded from the scope of license renewal if the standards  
31 that are relied upon to prescribe replacement of the hose and gaskets are identified in  
32 the scoping methodology description.
- 33 2. **Preventive Actions:** Flushes (e.g., NFPA 25 Section 7.3.2.1) mitigate or prevent  
34 fouling, which can cause flow blockage or loss of material, by clearing corrosion  
35 products and sediment.
- 36 3. **Parameters Monitored or Inspected:** Loss of material could reduce wall thickness of  
37 the fire protection piping system components and result in system failure. Flow blockage  
38 due to fouling from the buildup of corrosion products or sediment in the system could  
39 occur. Therefore, the parameters monitored are the system's ability to maintain required  
40 pressure, flow rates, and the system's internal corrosion conditions. Periodic flow tests,  
41 flushes, and internal and external visual inspections are performed to ensure that the  
42 system maintains its intended function. Testing of sprinklers ensures that degradation is  
43 detected in a timely manner. When visual inspections are used to detect loss of  
44 material, the inspection technique is capable of detecting surface irregularities that could

1 indicate an unexpected level of degradation due to corrosion and corrosion product  
2 deposition. Where such irregularities are detected, follow-up volumetric wall thickness  
3 examinations are performed. Volumetric wall thickness inspections are conducted on  
4 portions of water-based fire protection system components that are periodically  
5 subjected to flow but are normally dry.

6 4. **Detection of Aging Effects:** Water-based fire protection system components are  
7 subject to flow testing (except for fire water storage tanks), other testing, and visual  
8 inspections. Testing and visual inspections are performed in accordance with  
9 Table XI.M27-1, "Fire Water System Inspection and Testing Recommendations."

10 a. Flow tests confirm the system is functional by verifying the capability of the  
11 system to deliver water to fire suppression systems at required pressures and  
12 flow rates.

13 b. Visual inspections are capable of evaluating: (a) the condition of the external  
14 surfaces of components, (b) the conditions of the internal surfaces of  
15 components that could indicate wall loss, and (c) the inner diameter of the piping  
16 as it applies to the design flow of the fire protection system (i.e., to verify that  
17 corrosion product buildup has not resulted in flow blockage due to fouling).  
18 Internal visual inspections used to detect loss of material are capable of detecting  
19 surface irregularities that could be indicative of an unexpected level of  
20 degradation due to corrosion and corrosion product deposition. Where such  
21 irregularities are detected, follow-up volumetric examinations are performed.  
22 When fouling is identified, deposits are removed to determine if loss of material  
23 has occurred and to prevent further degradation in the system.

24 c. Visual inspection of yard fire hydrants ensures timely detection of signs of  
25 degradation, such as corrosion. Fire hydrant hose hydrostatic tests, gasket  
26 inspections, and fire hydrant flow tests ensure that fire hydrants can perform their  
27 intended function and provide opportunities to detect degradation before a loss of  
28 intended function can occur.

29 Portions of water-based fire protection system components that have been wetted but  
30 are normally dry, such as dry-pipe or preaction sprinkler system piping and valves, are  
31 subjected to augmented testing and inspections beyond those of Table XI.M27-1. The  
32 augmented tests and inspections are conducted on piping segments that cannot be  
33 drained or piping segments that allow water to collect:

- 34 • In each 5-year interval, beginning 5 years prior to the subsequent period of  
35 extended operation, either conduct a flow test or flush sufficient to detect  
36 potential flow blockage, or conduct a visual inspection of 100 percent of the  
37 internal surface of piping segments that cannot be drained or piping segments  
38 that allow water to collect.
- 39 • In each 5-year interval of the subsequent period of extended operation,  
40 20 percent of the length of piping segments that cannot be drained or piping  
41 segments that allow water to collect is subject to volumetric wall thickness  
42 inspections. Measurement points are obtained to the extent that each potential  
43 degraded condition can be identified (e.g., general corrosion, microbiologically-

1 induced corrosion). The 20 percent of piping that is inspected in each 5-year  
2 interval is in different locations than previously inspected piping.

3 If the results of a 100-percent internal visual inspection are acceptable, and the  
4 segment is not subsequently wetted, no further augmented tests or inspections  
5 are necessary.

6 For portions of the normally dry piping that are configured to drain (e.g., pipe  
7 slopes towards a drain point) the tests and inspections of Table XI.M27-1 do not need to  
8 be augmented.

9 The inspections and tests of all water based fire protection components occur at the  
10 intervals specified in the 2011 Edition of NFPA 25.

11 If the environmental (e.g., type of water, flowrate, temperature) and material that exist on  
12 the interior surface of the underground and buried fire protection piping are similar to the  
13 conditions that exist within the above grade fire protection piping, the results of the  
14 inspections of the above grade fire protection piping can be extrapolated to evaluate the  
15 condition of buried and underground fire protection piping for the purpose of identifying  
16 inside diameter loss of material. If not, additional inspection activities are needed to  
17 ensure that the intended function of buried and underground fire protection piping is  
18 maintained consistent with the current licensing basis (CLB) for the subsequent period of  
19 extended operation.

20 The water-based fire protection systems are normally maintained at required operating  
21 pressure and monitored in such a way that loss of system pressure is immediately  
22 detected and corrected when acceptance criteria are exceeded. Continuous system  
23 pressure monitoring or equivalent methods (e.g., number of jockey fire pump starts or  
24 run time) are conducted.

25 Inspections and tests are performed by personnel qualified in accordance with site  
26 procedures and programs to perform the specified task. Noncode inspections and tests  
27 follow site procedures that include inspection parameters for items such as lighting,  
28 distance offset, presence of protective coatings, and cleaning processes that ensure an  
29 adequate examination.

30 Aging effects associated with fire water system components having only CLB intended  
31 functions of leakage boundary (spatial) or structural integrity (attached) as defined in  
32 Standard Review Plan for Subsequent License Renewal (SRP-SLR) Table 2.1-4(b) may  
33 be managed by GALL-SLR Report AMP XI.M36, "External Surfaces Monitoring of  
34 Mechanical Components," and GALL-SLR Report AMP XI.M38, "Inspection of Internal  
35 Surfaces in Miscellaneous Piping and Ducting Components." Flow blockage due to  
36 fouling need not be managed for these components.

<b>Table XI.M27-1. Fire Water System Inspection and Testing Recommendations<sup>1, 2, 5</sup></b>	
<b>Description</b>	<b>NFPA 25 Section</b>
<b>Sprinkler Systems</b>	
Sprinkler inspections <sup>5</sup>	5.2.1.1
Sprinkler testing <sup>7</sup>	5.3.1
<b>Standpipe and Hose Systems</b>	
Flow tests	6.3.1
<b>Private Fire Service Mains</b>	
Underground and exposed piping flow tests	7.3.1
Hydrants	7.3.2
<b>Fire Pumps</b>	
Suction screens	8.3.3.7
<b>Water Storage Tanks</b>	
Exterior inspections	9.2.5.5
Interior inspections	9.2.6 <sup>4</sup> , 9.2.7
<b>Valves and System-Wide Testing</b>	
Main drain test	13.2.5
Deluge valves <sup>8</sup>	13.4.3.2.2 through 13.4.3.2.5
<b>Water Spray Fixed Systems</b>	
Strainers (after each system actuation)	10.2.1.6, 10.2.1.7, 10.2.7
Operation test (refueling outage interval)	10.3.4.3
<b>Foam Water Sprinkler Systems</b>	
Strainers (refueling outage interval and after each system actuation)	11.2.7.1
Operational Test Discharge Patterns (annually) <sup>6</sup>	11.3.2.6
Storage tanks (internal–10 years)	Visual inspection for internal corrosion
<b>Obstruction Investigation</b>	
Obstruction, internal inspection of piping <sup>3</sup>	14.2 and 14.3
<p>1. All terms and references are to the 2011 Edition of NFPA 25. The staff cites the 2011 Edition of NFPA 25 for the description of the scope and periodicity of specific inspections and tests. This table specifies those inspections and tests that are related to age-managing applicable aging effects associated with loss of material and flow blockage for passive long-lived in-scope components in the fire water system. Inspections and tests not related to the above continue to be conducted in accordance with the plant's CLB. If the CLB specifies more frequent inspections than required by NFPA 25 or this table, the plant's CLB continues to be met.</p> <p>2. A reference to a section includes all subbullets unless otherwise noted. Section 5.2.1.1 includes Sections 5.2.1.1.1 through 5.2.1.1.7.</p> <p>3. The alternative nondestructive examination methods permitted by Sections 14.2.1.1 and 14.3.2.3 are limited to those that can ensure that flow blockage will not occur.</p> <p>4. In regard to Sections 9.2.6.4 and 9.2.7: When degraded coatings are detected, the acceptance criteria and corrective action recommendations in GALL-SLR Report AMP XI.M42 are followed in lieu of Section 9.2.7 (1), (2), and (4). When interior pitting or general corrosion (beyond minor surface rust) is detected, tank wall thickness measurements are conducted as stated in Section 9.2.7 (3) in the vicinity of the loss of material. Vacuum box testing as stated in Section 9.2.7 (6) is conducted when pitting, cracks, or loss of material is detected in the immediate vicinity of welds. Bottom-thickness measurements are taken on each tank in the 10-year period before a subsequent period of extended operation unless condition-based bottom thickness measurements have been obtained as described in Section 9.2.7 (5) in the same time period.</p> <p>5. Items in areas that are inaccessible because of safety considerations such as those raised by continuous process operations, radiological dose, or energized electrical equipment are inspected during each scheduled shutdown but not more often than every refueling outage interval.</p> <p>6. Where the nature of the protected property is such that foam cannot be discharged, the nozzles or open sprinklers are inspected for correct orientation and the system tested with air to ensure that the nozzles are not obstructed.</p> <p>7. For wet pipe sprinkler systems, the subsequent license renewal application either:</p> <ul style="list-style-type: none"> <li>• Provides a plant-specific evaluation demonstrating that the water is not corrosive to the sprinklers (e.g., corrosion-resistant sprinklers); or</li> <li>• Proposes a one-time test of sprinklers that have been exposed to water including the sample size, sample selection criteria, and minimum time in service of tested sprinklers; or</li> <li>• Proposes to test the sprinklers in accordance with NFPA 25 Section 5.3.1.1.2.</li> </ul> <p>8. If past testing results demonstrate that sufficient nozzles are not obstructed such that full design flow could be achieved, the test frequency does not exceed 3 years. Otherwise, tests are conducted annually except protected components that are inaccessible because of safety considerations such as those raised by continuous process operations, radiological dose, or energized electrical equipment are tested during each scheduled shutdown but not more often than every refueling outage interval.</p>	

1 5. **Monitoring and Trending:** Visual inspection results are monitored and evaluated.  
2 System discharge pressure or equivalent methods (e.g., number of jockey fire pump  
3 starts or run time) are monitored continuously and evaluated. Results of flow testing  
4 (e.g., buried and underground piping, fire mains, and sprinkler), flushes, and wall  
5 thickness measurements are monitored and trended. Degradation identified by flow  
6 testing, flushes, and inspections is evaluated. Rates of degradation are trended in order  
7 to confirm that the timing of the next inspection will occur before a loss of intended  
8 function of an in-scope component.

9 6. **Acceptance Criteria:** The acceptance criteria are: (a) the water-based fire protection  
10 system is able to maintain required pressure and flow rates, (b) minimum design wall  
11 thickness is maintained, and (c) no fouling exists in the sprinkler systems that could  
12 cause corrosion or flow blockage in the sprinklers.

13 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
14 conditions adverse to quality or significant conditions adverse to quality under those  
15 specific portions of the quality assurance (QA) program that are used to meet  
16 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
17 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
18 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
19 safety-related and nonsafety-related structures and components (SCs) within the scope  
20 of this program.

21 If the presence of sufficient foreign organic or inorganic material to obstruct pipe or  
22 sprinklers is detected during pipe inspections, the material is removed and its source is  
23 determined and corrected.

24 8. **Confirmation Process:** The confirmation process is addressed through those specific  
25 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
26 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
27 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
28 confirmation process element of this AMP for both safety-related and nonsafety-related  
29 SCs within the scope of this program.

30 9. **Administrative Controls:** Administrative controls are addressed through the QA  
31 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
32 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
33 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
34 fulfill the administrative controls element of this AMP for both safety-related and  
35 nonsafety-related SCs within the scope of this program.

36 10. **Operating Experience:** Operating experience (OE) shows that water-based fire  
37 protection systems are subject to loss of material due to corrosion, microbiologically-  
38 induced corrosion, or fouling; and flow blockages due to fouling. Loss of material has  
39 resulted in sprinkler system flow blockages, failed flow tests, and piping leaks.  
40 Inspections and testing performed in accordance with NFPA standards coupled with  
41 visual inspections are capable of detecting degradation prior to loss of intended function.  
42 The following operating experience may be of significance to an applicant's program:

43 a. In October 2004, a fire main failed its periodic flow test due to a low cleanliness  
44 factor. The low cleanliness factor was attributed to fouling because of an

1 accumulation of corrosion products on the interior of the pipe wall and  
2 tuberculation. Subsequent chemical cleaning to remove the corrosion products  
3 from the pipe wall revealed several leaks. Corrosion products removed during  
4 the chemical cleaning were observed to settle out in normally stagnant sections  
5 of the water-based fire protection system, resulting in flow blockages in small  
6 diameter piping and valve leak-by.

7 b. In October 2010, a portion of a preaction spray system failed its functional flow  
8 test because of flow blockages. Two branch lines were found to have significant  
9 blockages. The blockage in one branch line was determined to be a buildup of  
10 corrosion products. A rag was found in the other branch line.

11 c. In August 2011, an intake fire protection preaction sprinkler system was unable  
12 to pass flow during functional testing. Subsequent visual inspections identified  
13 flow blockages in the inspector's test valve, the piping leading to the inspector's  
14 test valves, and three vertical risers. The flow blockages were determined to be  
15 a buildup of corrosion products.

16 The review of plant specific OE during the development of this program is to be broad  
17 and detailed enough to detect instances of aging effects that have occurred repeatedly.  
18 In some instances, repeatedly occurring aging effects (i.e., recurring internal corrosion)  
19 might result in augmented aging management activities. Further evaluation aging  
20 management review line items in SRP-SLR Sections 3.2.2.2.8, 3.3.2.2.7, and 3.4.2.2.6,  
21 "Loss of Material due to Recurring Internal Corrosion," include criteria to determine  
22 whether recurring internal corrosion is occurring and recommendations related to  
23 augmenting aging management activities.

24 The program is informed and enhanced when necessary through the systematic and  
25 ongoing review of both plant-specific and industry OE, as discussed in Appendix B of the  
26 GALL-SLR Report.

## 27 **References**

28 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
29 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

30 NFPA. NFPA 25, *Inspection, Testing, and Maintenance of Water-Based Fire Protection*  
31 *Systems*. National Fire Protection Association. 2011.

32 NRC. NRC Information Notice 2013-06, "Corrosion in Fire Protection Piping Due to Air and  
33 Water Interaction." ADAMS Accession No. ML13031A618. Washington, DC: U.S. Nuclear  
34 Regulatory Commission. March 25, 2013.

1 **XI.M29 ABOVEGROUND METALLIC TANKS**

2 **Program Description**

3 The Aboveground Metallic Tanks aging management program (AMP) manages the effects of  
4 loss of material and cracking on the outside and inside surfaces of aboveground tanks  
5 constructed on concrete or soil. All outdoor tanks (except fire water storage tanks) and certain  
6 indoor tanks are included. If the tank exterior is fully visible, the tank's outside surfaces may be  
7 inspected under the program for inspection of external surfaces [Generic Aging Lessons  
8 Learned for Subsequent License Renewal (GALL-SLR) Report AMP XI.M36] for visual  
9 inspections of external surfaces recommended in this AMP; surface examinations are  
10 conducted in accordance with the recommendations of this AMP. This program credits the  
11 standard industry practice of coating or painting the external surfaces of steel tanks as a  
12 preventive measure to mitigate corrosion. The program relies on periodic inspections to monitor  
13 degradation of the protective paint or coating. Tank inside surfaces are inspected by visual or  
14 surface examinations as required to detect applicable aging effects.

15 For storage tanks supported on earthen or concrete foundations, corrosion could occur at  
16 inaccessible locations, such as the tank bottom. Accordingly, verification of the effectiveness of  
17 the program is performed to ensure that significant degradation in inaccessible locations is not  
18 occurring and that the component's intended function is maintained during the subsequent  
19 period of extended operation. For reasons set forth below, an acceptable verification program  
20 consists of thickness measurements of the tank bottom.

21 **Evaluation and Technical Basis**

22 1. **Scope of Program:** Tanks within the scope of this program include all outdoor tanks  
23 except the fire water storage tank, constructed on soil or concrete. Indoor large volume  
24 storage tanks (i.e., those with a capacity greater than 100,000 gallons) designed to  
25 internal pressures approximating atmospheric pressure and exposed internally to water  
26 are also included. If the tank exterior is fully visible, tank outside surfaces may be  
27 inspected under the program for inspection of external surfaces (GALL-SLR Report AMP  
28 XI.M36). Aging effects for fire water storage tanks are managed using GALL-SLR  
29 Report AMP XI.M27. Visual inspections are conducted on tank insulation and jacketing  
30 when these are installed.

31 This program may be used to manage the aging effects for coatings/linings that are  
32 applied to the internal surfaces of components included in the scope of this program as  
33 long as the following are met:

- 34 • The recommendations of Generic Aging Lessons Learned (GALL) Report AMP  
35 XI.M42 are incorporated into this AMP.
- 36 • Exceptions or enhancements associated with the recommendations in  
37 GALL Report AMP XI.M42 are included in this AMP.
- 38 • The Final Safety Analysis Report (FSAR) supplement for GALL Report  
39 AMP XI.M42, as shown in SRP-SLR Table 3.0-1, "FSAR Supplement for Aging  
40 Management of Applicable Systems," is included in the application with a  
41 reference to this AMP.

1 2. **Preventive Actions:** In accordance with industry practice, steel tanks may be coated  
2 with protective paint or coating to mitigate corrosion by protecting the external surface of  
3 the tank from environmental exposure. For outdoor tanks, sealant or caulking is applied  
4 at the interface between the tank external surface and concrete or earthen surface  
5 (e.g., foundation, tank interface joint in a partially encased tank) to mitigate corrosion of  
6 the tank by minimizing the amount of water and moisture penetrating the interface.  
7 Certain tank configurations may minimize the amount of water and moisture penetrating  
8 these interfaces by design, (e.g., foundation is sloped in a manner that prevents water  
9 from accumulating).

10 3. **Parameters Monitored or Inspected:** The program consists of periodic inspections of  
11 metallic tanks (with or without coatings) to manage the effects of corrosion and cracking  
12 on the intended function of these tanks. Inspections cover all surfaces of the tank  
13 (i.e., outside uninsulated surfaces, outside insulated surfaces, bottom, interior surfaces).  
14 The AMP uses periodic plant inspections to monitor degradation of coatings, sealants,  
15 and caulking because it is a condition directly related to the potential loss of material.  
16 Thickness measurements of the bottoms of the tanks are made periodically for the tanks  
17 monitored by this program as an additional way to ensure that loss of material is not  
18 occurring at locations inaccessible for inspection. Periodic internal visual inspections  
19 and surface examinations, as required to detect applicable aging effects, are performed  
20 to detect degradation that could be occurring on the inside of the tank. Where the  
21 exterior surface is insulated for outdoor tanks and indoor tanks operated below the dew  
22 point, a representative sample of the insulation is periodically removed or inspected to  
23 detect the potential for loss of material or cracking underneath the insulation, unless it is  
24 demonstrated that the aging effect (i.e., SCC, loss of material) is not applicable, see  
25 Table XI.M29-1, "Tank Inspection Recommendations."

26 4. **Detection of Aging Effects:** Tank inspections are conducted in accordance with  
27 Table XI.M29-1 and the associated table notes. Degradation of an exterior metallic  
28 surface can occur in the presence of moisture; therefore, an inspection of the coating is  
29 performed to ensure that the surface is protected from moisture. Periodic visual  
30 inspections at each outage are conducted to confirm that the paint, coating, sealant, and  
31 caulking are intact. The visual inspections of sealant and caulking are supplemented  
32 with physical manipulation to detect degradation. If the exterior surface is not coated,  
33 visual inspections of the tank's surface are conducted within sufficient proximity  
34 (e.g., distance, angle of observation) to detect loss of material. If the tank is insulated,  
35 the inspections include locations where potential leakage past the insulation could be  
36 accumulating.

37 When necessary to detect cracking in materials susceptible to cracking such as  
38 stainless steel (SS), and aluminum, the program includes surface examinations. When  
39 surface examinations are required to detect an aging effect, the program states how  
40 many surface examinations will be conducted, the area covered by each examination,  
41 and how examination sites will be selected.

**Table XI.M29-1. Tank Inspection Recommendations<sup>1,2</sup>**

<b>Inspections to Identify Degradation of Inside Surfaces of Tank Shell, Roof<sup>4</sup>, and Bottom<sup>5,6</sup></b>				
<b>Material</b>	<b>Environment</b>	<b>Aging Effect Required Aging Management (AERM)</b>	<b>Inspection Technique<sup>3</sup></b>	<b>Inspection Frequency</b>
Steel	Raw water	Loss of material	Visual from inside surface (IS) or	Each 10-year period starting 10 years before the subsequent period of extended operation
	Waste water		Volumetric from outside surface (OS) <sup>7</sup>	
Stainless steel <sup>8, 14</sup>	Treated water	Loss of material	Visual from IS or Volumetric from OS <sup>7</sup>	One-time inspection conducted in accordance with GALL-SLR Report AMP XI.M32 <sup>8</sup>
	Treated water	Loss of Material	Visual from IS or Volumetric from OS <sup>7</sup>	One-time inspection conducted in accordance with GALL-SLR Report AMP XI.M32 <sup>8</sup> or periodic inspections see SRP-SLR Sections 3.2.2.2.12, 3.3.2.2.12, or 3.4.2.2.9.
Aluminum	Treated water	Loss of Material	Visual from IS or Volumetric from OS <sup>7</sup>	One-time inspection conducted in accordance with GALL-SLR Report AMP XI.M32 <sup>8</sup>
<b>Inspections to Identify Degradation of External Surfaces<sup>9</sup> of Tank Shell, Roof, and Bottom</b>				
<b>Material</b>	<b>Environment</b>	<b>AERM</b>	<b>Inspection Technique<sup>3</sup></b>	<b>Inspection Frequency</b>
Steel	Air – indoor uncontrolled	Loss of material	Visual from OS	Each refueling outage interval
	Air – outdoor			
Stainless steel <sup>14</sup>	Soil or concrete	Loss of material	Volumetric from IS <sup>12</sup>	Each 10-year period starting 10 years before the subsequent period of extended operation <sup>13</sup>
	Any indoor air environment	Cracking	Surface <sup>10, 11</sup>	Each 10-year period starting 10 years before the subsequent period of extended operation or demonstrate that SCC is not an applicable aging effect, see SRP-SLR Sections 3.2.2.2.5, 3.3.2.2.3, or 3.4.2.2.2.
Stainless steel <sup>14</sup>	Air-outdoor	Loss of material	Visual from OS	Each refueling outage interval or demonstrate that loss of material is not an applicable aging effect, see SRP-SLR Sections 3.2.2.2.2, 3.3.2.2.4, or 3.4.2.2.3.
		Cracking	Surface <sup>10, 11</sup>	Each 10-year period starting 10 years before the subsequent period of extended operation or demonstrate that SCC is not an applicable aging effect,

**Table XI.M29-1. Tank Inspection Recommendations<sup>1,2</sup>**

						see SRP-SLR Sections 3.2.2.2.5, 3.3.2.2.3, or 3.4.2.2.2.
	Soil or concrete	Loss of material	Volumetric from IS <sup>12</sup>			Each 10-year period starting 10 years before the subsequent period of extended operation <sup>13</sup>
	Any indoor air environment	Cracking	Surface <sup>10, 11</sup>			Each 10-year period starting 10 years before the subsequent period of extended operation or demonstrate that SCC is not an applicable aging effect, see SRP-SLR Sections 3.2.2.2.10, 3.3.2.2.10, or 3.4.2.2.7.
Aluminum	Any air environment	Loss of material	Visual from OS			One-time inspection conducted in accordance with AMP XI.M32 or demonstrate that loss of material is not an applicable aging effect, see SRP-SLR Sections 3.2.2.2.13, 3.3.2.2.13, or 3.4.2.2.10.
		Loss of material	Visual from OS			Each refueling outage interval
	Air-outdoor	Cracking <sup>14</sup>	Surface <sup>10, 11</sup>			Each 10-year period starting 10 years before the subsequent period of extended operation or demonstrate that SCC is not an applicable aging effect, see SRP-SLR Sections 3.2.2.2.10, 3.3.2.2.10, or 3.4.2.2.7.
	Soil or concrete	Loss of Material	Volumetric from IS <sup>12</sup>			Each 10-year period starting 10 years before the subsequent period of extended operation <sup>13</sup>
<p>1. GALL-SLR Report AMP XI.M30, "Fuel Oil Chemistry," is used to manage loss of material on the internal surfaces of fuel oil storage tanks. However, for outdoor fuel oil storage tanks, inspections to identify aging of the external surfaces of tank bottoms and tank shells exposed to soil or concrete are conducted in accordance with GALL-SLR Report AMP XI.M29. GALL-SLR Report AMP XI.M41 is used to manage loss of material and cracking for the external surfaces of buried tanks.</p> <p>2. When one-time internal inspections in accordance with these footnotes are used in lieu of periodic inspections, the one-time inspection must occur within the 5-year period before the start of the subsequent period of extended operation.</p> <p>3. Alternative inspection methods may be used to inspect both surfaces (i.e., internal, external) or the opposite surface (e.g., inspecting the internal surfaces for loss of material from the external surface, inspecting for corrosion under external insulation from the internal surfaces of the tank) as long as the method has been demonstrated to be effective at detecting the AERM and a sufficient amount of the surface is inspected to ensure that localized aging effects are detected. For example, in some cases, subject to being demonstrated effective by the applicant, the low frequency electromagnetic technique (LFET) can be used to scan an entire surface of a tank. If followup ultrasonic examinations are conducted in any areas where the wall thickness is below nominal, an LFET inspection can effectively detect loss of material in the tank shell, roof, or bottom.</p> <p>4. Nonwetted surfaces on the inside of a tank (e.g., roof, surfaces above the normal waterline) are inspected in the same manner as the wetted surfaces based on the material, environment, and AERM.</p> <p>5. Visual inspections to identify degradation of the inside surfaces of tank shell, roof, and bottom cover all the inside surfaces. Where this is not possible because of the tank's configuration (e.g., tanks with floating covers or bladders), the SLRA includes a justification for how aging effects will be detected before the loss of the tank's intended function.</p> <p>6. For tank configurations in which deleterious materials could accumulate on the tank bottom (e.g., sediment, silt), the internal inspections of the tank's bottom include inspections of the side wall of the tank up to the top of the sludge-affected region.</p>						

**Table XI.M29-1. Tank Inspection Recommendations<sup>1,2</sup>**

<p>7. At least 25 percent of the tank's internal surface is to be inspected using a method capable of precisely determining wall thickness. The inspection method is capable of detecting both general and pitting corrosion and be demonstrated effective by the applicant.</p> <p>8. At least one tank for each material and environment combination is inspected at each site. The tank inspection can be credited towards the sample population for GALL-SLR Report AMP XI.M32.</p> <p>9. For insulated tanks, the external inspections of tank surfaces that are insulated are conducted in accordance with the sampling recommendations in this AMP. If the initial inspections meet the criteria described in the preceding "Alternatives to Removing Insulation" portion of this AMP, subsequent inspections may consist of external visual inspections of the jacketing in lieu of surface examinations. Tanks with tightly adhering insulation may use the "Alternatives to Removing Insulation" portion of this AMP for initial and all follow-on inspections.</p> <p>10. A one-time inspection conducted in accordance with GALL-SLR Report AMP XI.M32 may be conducted in lieu of periodic inspections if an evaluation conducted before the subsequent period of extended operation and during each 10-year period during the subsequent period of extended operation demonstrates the absence of environmental impacts in the vicinity of the plant due to: (a) the plant being located within approximately 5 miles of a saltwater coastline, or within 1/2 mile of a highway that is treated with salt in the wintertime, or in areas in which the soil contains more than trace amounts of chlorides; (b) cooling towers where the water is treated with chlorine or chlorine compounds; and (c) chloride contamination from other agricultural or industrial sources. The evaluation includes soil sampling in the vicinity of the tank (because soil results indicate atmospheric fallout accumulating in the soil and potentially affecting tank surfaces) and sampling of residue on the top and sides of the tank to ensure that chlorides or other deleterious compounds are not present at sufficient levels to cause pitting corrosion, crevice corrosion, or cracking.</p> <p>11. A minimum of either 25 sections of the tank's surface (e.g., 1-square-foot sections for tank surfaces, 1-linear-foot sections of weld length) or 20 percent of the tank's surface are examined. The sample inspection points are distributed in such a way that inspections occur in those areas most susceptible to degradation (e.g., areas where contaminants could collect, inlet and outlet nozzles, welds).</p> <p>12. When volumetric examinations of the tank bottom cannot be conducted because the tank is coated, an exception is stated, and the accompanying justification for not conducting inspections includes the considerations in footnote 13, below, or propose an alternative examination methodology.</p> <p>13. A one-time inspection conducted in accordance with GALL-SLR Report AMP XI.M32 may be conducted in lieu of periodic inspections if an evaluation conducted before the subsequent period of extended operation and during each 10-year period during the subsequent period of extended operation demonstrates that the soil under the tank is not corrosive using actual soil samples that are analyzed for each individual parameter (e.g., resistivity, pH, redox potential, sulfides, moisture) and overall soil corrosivity. The evaluation includes soil sampling from underneath the tank. Alternatively, a one-time inspection conducted in accordance with GALL-SLR Report AMP XI.M32 may be conducted in lieu of periodic inspections if the bottom of the tank has been cathodically protected in such a way that the availability and effectiveness criteria of GALL-SLR Report AMP XI.M41, "Buried and Underground Piping and Tanks," Table XI.M41-3, "Inspections of Buried Tanks for all Inspection Periods," have been met beginning 5 years prior to the subsequent period of extended operation, and the criteria continue to be met throughout the subsequent period of extended operation.</p> <p>14. If the tank contents are greater than 60 °C [140 °F] , or the tank's surface could be greater than 60 °C [140 °F] due to exposure to the environment (e.g., direct sunlight on the surfaces of the tank), stress corrosion cracking is an applicable aging effect and surface examinations are conducted to detect potential cracking. Reference footnote 11 for the extent of inspections.</p>
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1 If the exterior surface of an outdoor tank or indoor tank exposed to condensation  
2 (because the in-scope component being operated below the dew point) is insulated,  
3 sufficient insulation is removed to determine the condition of the exterior surface of the  
4 tank, unless it is demonstrated that the aging effect (i.e., SCC, loss of material) is not  
5 applicable, see Table XI.M29-1, "Tank Inspection Recommendations." At a minimum,  
6 during each 10 year period of the subsequent period of extended operation, a minimum  
7 of either 25 1 square foot sections or 20 percent of the surface area of insulation is  
8 removed to permit inspection of the exterior surface of the tank. Aging effects  
9 associated with corrosion under insulation for outdoor tanks may be managed by  
10 GALL-SLR Report AMP XI.M36, "External Surfaces Monitoring of Mechanical  
11 Components."

12 The sample inspection points are distributed in such a way that inspections occur on the  
13 tank dome (if it is flat), near the bottom, at points where structural supports, pipe, or  
14 instrument nozzles penetrate the insulation and where water could collect such as on top  
15 of stiffening rings. In addition, inspection locations are based on the likelihood of  
16 corrosion under insulation occurring (e.g., given how often a potential inspection location  
17 is subject to alternate wetting and drying in environments where trace contaminants  
18 could be present, how long a system at a potential inspection location operates below  
19 the dew point).

20 Alternatives to Removing Insulation:

21 a. Subsequent inspections may consist of examination of the exterior surface of the  
22 insulation for indications of damage to the jacketing or protective outer layer of  
23 the insulation when the results of the initial inspection meet the following criteria:

24 i. No loss of material due to general, pitting or crevice corrosion, beyond  
25 that which could have been present during initial construction is  
26 observed, and

27 ii. No evidence of stress corrosion cracking (SCC) is observed.

28 If the external visual inspections of the insulation reveal damage to the exterior surface  
29 of the insulation or jacketing, or there is evidence of water intrusion through the  
30 insulation (e.g., water seepage through insulation seams/joints), periodic inspections  
31 under the insulation continue as conducted for the initial inspection.

32 b. Removal of tightly adhering insulation that is impermeable to moisture is  
33 not required unless there is evidence of damage to the moisture barrier.  
34 If the moisture barrier is intact, the likelihood of corrosion under insulation  
35 (CUI) is low for tightly adhering insulation. Tightly adhering insulation is  
36 considered to be a separate population from the remainder of insulation  
37 installed on in scope components. The entire population of in scope  
38 piping that has tightly adhering insulation is visually inspected for damage  
39 to the moisture barrier with the same frequency as for other types of  
40 insulation inspections. These inspections are not credited towards the  
41 inspection quantities for other types of insulation.

42 Potential corrosion of tank bottoms is determined from ultrasonic testing (UT) thickness  
43 measurements of the tank bottoms that are taken whenever the tank is drained or at

1 intervals not less than those recommended in Table XI.M29-1. Measurements are taken  
2 to ensure that significant degradation is not occurring and that the component's intended  
3 function is maintained during the period of extended operation.

4 When inspections are conducted on a sampling basis, subsequent inspections are  
5 conducted in different locations unless the program states the basis for why repeated  
6 inspections will be conducted in the same location.

7 Inspections and tests are performed by personnel qualified in accordance with site  
8 procedures and programs to perform the specified task. Inspections and tests within the  
9 scope of the American Society of Mechanical Engineers (ASME) Code follow  
10 procedures consistent with the ASME code. Noncode inspections and tests follow site  
11 procedures that include inspection parameters for items such as lighting, distance offset,  
12 surface coverage, presence of protective coatings, and cleaning processes that ensure  
13 an adequate examination.

14 5. **Monitoring and Trending:** The effects of corrosion of the tank surfaces are detectable  
15 by visual and surface (for cracking) examination techniques. Based on operating  
16 experience, periodic inspections provide for timely detection of aging effects. The  
17 effects of corrosion on the inaccessible external surfaces are detectable by UT thickness  
18 measurements of the tank bottom and are monitored and trended if significant material  
19 loss is detected and successive measurements are available.

20 6. **Acceptance Criteria:** Any degradation of paints or coatings (cracking, flaking, or  
21 peeling), or evidence of corrosion is reported and requires further evaluation to  
22 determine whether repair or replacement of the paints or coatings should be conducted.  
23 Non-pliable, cracked, or missing sealant and caulking is unacceptable. When degraded  
24 sealant or caulking is detected, an evaluation is conducted to determine the need to  
25 conduct follow up examination of the tank's surfaces. Indications of cracking are  
26 analyzed in accordance with the applicable design requirements for the tank. UT  
27 thickness measurements of the tank bottom are evaluated against the design thickness  
28 and corrosion allowance.

29 7. **Corrective Actions:** The site corrective actions program, quality assurance procedures,  
30 site review and approval process, and administrative controls are implemented in  
31 accordance with 10 CFR Part 50, Appendix B. As discussed in the Appendix for GALL,  
32 the staff finds the requirements of 10 CFR Part 50, Appendix B, acceptable to address  
33 the corrective actions, confirmation process, and administrative controls. Flaws in the  
34 caulking or sealant are repaired and followup examination of the tank's surfaces is  
35 conducted if deemed appropriate.

36 Any loss of material; cracking; degradation of paints or coatings (e.g., cracking, flaking,  
37 or peeling); or drying, cracking, or missing sealant and caulking is evaluated to  
38 determine whether the degradation could impact the tank's intended function prior to the  
39 next scheduled inspection.

40 8. **Confirmation Process:** The confirmation process is addressed through those specific  
41 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
42 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
43 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the

1 confirmation process element of this AMP for both safety-related and nonsafety-related  
2 SCs within the scope of this program.

3 9. **Administrative Controls:** Administrative controls are addressed through the QA  
4 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
5 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
6 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
7 fulfill the administrative controls element of this AMP for both safety-related and  
8 nonsafety-related SCs within the scope of this program.

9 10. **Operating Experience:** A review of operating experience (OE) reveals that there have  
10 been instances involving defects variously described as wall thinning, pinhole leaks,  
11 cracks, and through wall flaws in tanks. In addition, internal blistering, delamination of  
12 coatings, rust stains, and holidays have been found on the bottom of tanks.

13 The review of plant-specific OE during the development of this program is to be broad  
14 and detailed enough to detect instances of aging effects that have occurred repeatedly.  
15 In some instances, repeatedly occurring aging effects (i.e., recurring internal corrosion)  
16 might result in augmented aging management activities. Further evaluation aging  
17 management review line items in Standard Review Plan-Subsequent License Renewal  
18 (SRP-SLR) 3.2.2.2.8, 3.3.2.2.7, and 3.4.2.2.6, "Loss of Material Due to Recurring  
19 Internal Corrosion," include criteria to determine whether recurring internal corrosion is  
20 occurring and recommendations related to augmenting aging management activities.

21 The program is informed and enhanced when necessary through the systematic and  
22 ongoing review of both plant-specific and industry OE, as discussed in Appendix B of the  
23 GALL-SLR Report.

## 24 **References**

25 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
26 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

27 NRC. NRC Information Notice 2013-18, "Refueling Water Storage Tank Degradation."  
28 ML13128A118. Washington, DC: U.S. Nuclear Regulatory Commission. September 13, 2013.

# 1 XI.M30 FUEL OIL CHEMISTRY

## 2 Program Description

3 The program includes (a) surveillance and maintenance procedures to mitigate corrosion and  
4 (b) measures to verify the effectiveness of the mitigative actions and confirm the insignificance  
5 of an aging effect. Fuel oil quality is maintained by monitoring and controlling fuel oil  
6 contamination in accordance with the plant's technical specifications (TSs). Guidelines of the  
7 American Society for Testing and Materials (ASTM) Standards, such as ASTM D 0975-04,  
8 D 1796-97, D 2276-00, D 2709-96, D 6217-98, and D 4057-95, also may be used. Exposure to  
9 fuel oil contaminants, such as water and microbiological organisms, is minimized by periodic  
10 draining or cleaning of tanks and by verifying the quality of new oil before its introduction into the  
11 storage tanks. However, corrosion may occur at locations in which contaminants may  
12 accumulate, such as tank bottoms. Accordingly, the effectiveness of the program is verified to  
13 ensure that significant degradation is not occurring and that the component's intended function  
14 is maintained during the subsequent period of extended operation. Thickness measurement of  
15 the tank bottom is an acceptable verification program.

16 The fuel oil chemistry program is generally effective in removing impurities from areas that  
17 experience flow. The GALL-SLR Report identifies those circumstances in which the fuel oil  
18 chemistry program is to be augmented to manage the effects of aging for subsequent license  
19 renewal (SLR). For example, the fuel oil chemistry program may not be effective in stagnant  
20 areas. Accordingly, in certain cases as identified in this GALL-SLR Report, verification of the  
21 effectiveness of the fuel oil chemistry program is undertaken to ensure that significant  
22 degradation is not occurring and that the component's intended function is maintained during  
23 the subsequent period of extended operation. As discussed in this GALL-SLR Report for these  
24 specific cases, an acceptable verification program is a one-time inspection of selected  
25 components at susceptible locations in the system.

## 26 Evaluation and Technical Basis

- 27 1. **Scope of Program:** Components within the scope of the program are the diesel fuel oil  
28 storage tanks, piping, and other metal components subject to aging management review  
29 that are exposed to an environment of diesel fuel oil. The program is focused on  
30 managing loss of material due to general, pitting, and crevice corrosion,  
31 microbiologically-induced corrosion, and fouling that leads to corrosion of the diesel fuel  
32 tank internal surfaces.
- 33 2. **Preventive Actions:** The program reduces the potential for (a) exposure of the storage  
34 tanks' internal surface to fuel oil contaminated with water and microbiological organisms,  
35 reducing the potential for age-related degradation in other components exposed to  
36 diesel fuel oil; and (b) transport of corrosion products, sludge, or particulates to  
37 components serviced by the fuel oil storage tanks. Biocides or corrosion inhibitors may  
38 be added as a preventive measure. Periodic cleaning of a tank allows removal of  
39 sediments, and periodic draining of water collected at the bottom of a tank minimizes the  
40 amount of water and the length of contact time. Accordingly, these measures are  
41 effective in mitigating corrosion inside diesel fuel oil tanks. Coatings, if used, prevent or  
42 mitigate corrosion by protecting the internal surfaces of the tank from contact with water  
43 and microbiological organisms.

1 3. **Parameters Monitored or Inspected:** The program is focused on managing loss of  
2 material due to general, pitting, and crevice corrosion, microbiologically-induced  
3 corrosion, and fouling that leads to corrosion of the diesel fuel tank internal surfaces.  
4 The aging management program (AMP) monitors fuel oil quality through receipt testing  
5 and periodic sampling of stored fuel oil. Parameters monitored include water and  
6 sediment content, total particulate concentration, and the levels of microbiological  
7 organisms in the fuel oil. Water and microbiological organisms in the fuel oil storage  
8 tank increase the potential for corrosion. Sediment and total particulate content may be  
9 indicative of water intrusion or corrosion. Periodic visual inspections of tank internal  
10 surfaces and thickness measurements of the bottoms of the tanks are conducted as an  
11 additional measure to ensure that loss of material is not occurring.

12 4. **Detection of Aging Effects:** Loss of material due to corrosion of the diesel fuel oil tank  
13 or other components exposed to diesel fuel oil cannot occur without exposure of the  
14 tank's internal surfaces to contaminants in the fuel oil, such as water and microbiological  
15 organisms. Periodic multilevel sampling provides assurance that fuel oil contaminants  
16 are below unacceptable levels. If tank design features do not allow for multilevel  
17 sampling, a sampling methodology that includes a representative sample from the  
18 lowest point in the tank may be used.

19 At least once during the 10-year period prior to the subsequent period of extended  
20 operation, each diesel fuel tank is drained and cleaned, the internal surfaces are visually  
21 inspected (if physically possible) and volumetrically-inspected if evidence of degradation  
22 is observed during visual inspection, or if visual inspection is not possible. During the  
23 subsequent period of extended operation, at least once every 10 years, each diesel fuel  
24 tank is drained and cleaned, the internal surfaces are visually inspected (if physically  
25 possible), and, if evidence of degradation is observed during inspections, or if visual  
26 inspection is not possible, these diesel fuel tanks are volumetrically inspected.

27 Prior to the subsequent period of extended operation, a one-time inspection  
28 (i.e., GALL-SLR Report AMP XI.M32) of selected components exposed to diesel fuel oil  
29 is performed to verify the effectiveness of the Fuel Oil Chemistry program.

30 5. **Monitoring and Trending:** Water, biological activity, and particulate contamination  
31 concentrations are monitored and trended in accordance with the plant's technical  
32 specifications or at least quarterly. In addition, the inspection results are trended and the  
33 inspection periodicity is shortened when available evidence, including trending, indicates  
34 the acceptance criteria may be exceeded before the next scheduled inspection.

35 6. **Acceptance Criteria:** Acceptance criteria for fuel oil quality parameters are as invoked  
36 or referenced in a plant's TSs. Additional acceptance criteria may be implemented using  
37 guidance from industry standards and equipment manufacturer or fuel oil supplier  
38 recommendations. ASTM D 0975-04 or other appropriate standards may be used to  
39 develop fuel oil quality acceptance criteria. Suspended water concentrations are in  
40 accordance with the applicable fuel oil quality specifications. Corrective actions are  
41 taken if microbiological activity is detected. Any degradation of the tank internal surfaces  
42 is reported and is evaluated using the corrective action program. Thickness  
43 measurements of the tank bottom are evaluated against the design thickness and  
44 corrosion allowance.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
6 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
7 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
8 related structures and components (SCs) within the scope of this program.

9 Corrective actions are taken to prevent recurrence when the specified limits for fuel oil  
10 standards are exceeded or when water is drained during periodic surveillance. If  
11 accumulated water is found in a fuel oil storage tank, it is immediately removed. In  
12 addition, when the presence of biological activity is confirmed, or if there is evidence of  
13 corrosion, a biocide is added to fuel oil.

14 8. **Confirmation Process:** The confirmation process is addressed through those specific  
15 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
16 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
17 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
18 confirmation process element of this AMP for both safety-related and nonsafety-related  
19 SCs within the scope of this program.

20 9. **Administrative Controls:** Administrative controls are addressed through the QA  
21 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
22 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
23 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
24 fulfill the administrative controls element of this AMP for both safety-related and  
25 nonsafety-related SCs within the scope of this program.

26 10. **Operating Experience:** The operating experience at some plants has included  
27 identification of water in the fuel, particulate contamination, and biological fouling. In  
28 addition, when a diesel fuel oil storage tank at one plant was cleaned and visually  
29 inspected, the inside of the tank was found to have unacceptable pitting corrosion  
30 (>50 percent of the wall thickness), which was repaired in accordance with American  
31 Petroleum Institute (API) 653 standard by welding patch plates over the affected area.

32 The program is informed and enhanced when necessary through the systematic and  
33 ongoing review of both plant-specific and industry operating experience, as discussed in  
34 Appendix B of the GALL-SLR Report.

## 35 **References**

36 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
37 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

38 API. API 653, "Tank Inspection, Repair, Alteration, and Reconstruction." Washington, DC:  
39 American Petroleum Institute. April 2009.

40 ASTM. ASTM D 0975-04, "Standard Specification for Diesel Fuel Oils." West Conshohocken,  
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- 1 \_\_\_\_\_. ASTM D 4057-95, "Standard Practice for Manual Sampling of Petroleum and Petroleum  
2 Products." West Conshohocken, Pennsylvania: American Society for Testing Materials. 2000.
- 3 \_\_\_\_\_. ASTM D 2276-00, "Standard Test Method for Particulate Contaminant in Aviation Fuel  
4 by Line Sampling." West Conshohocken, Pennsylvania: American Society for Testing Materials.  
5 2000.
- 6 \_\_\_\_\_. ASTM D 6217-98, "Standard Test Method for Particulate Contamination in Middle  
7 Distillate Fuels by Laboratory Filtration." West Conshohocken, Pennsylvania: American Society  
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- 9 \_\_\_\_\_. ASTM D 1796-97, "Standard Test Method for Water and Sediment in Fuel Oils by the  
10 Centrifuge Method." West Conshohocken, Pennsylvania: American Society for Testing  
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- 12 \_\_\_\_\_. ASTM D 2709-96, "Standard Test Method for Water and Sediment in Middle Distillate  
13 Fuels by Centrifuge." West Conshohocken, Pennsylvania: American Society for Testing  
14 Materials. 1996.
- 15 NRC. "Safety Evaluation Report Related to the License Renewal of Three Mile Island Nuclear  
16 Unit 1, Section 3.0.3.2.12, Fuel Oil Chemistry—Operating Experience." ML091660470.  
17 Washington, DC: U.S. Nuclear Regulatory Commission. June 30, 2009.
- 18 \_\_\_\_\_. NRC Regulatory Guide 1.137, "Fuel-Oil Systems for Standby Diesel Generators."  
19 Revision 1. ML003740180. Washington, DC: U.S. Nuclear Regulatory Commission,  
20 October 31, 1979.

# 1 XI.M31 REACTOR VESSEL MATERIAL SURVEILLANCE

## 2 Program Description

3 Appendix H of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix H  
4 requires implementation of a reactor vessel material surveillance program to monitor the  
5 changes in fracture toughness to the ferritic reactor vessel beltline materials which are projected  
6 to receive a peak neutron fluence at the end of the design life of the vessel exceeding  
7  $10^{17}$  n/cm<sup>2</sup> [E >1MeV]. The surveillance capsules must be located near the inside vessel wall in  
8 the beltline region so that the material specimens duplicate, to the greatest degree possible, the  
9 neutron spectrum, temperature history, and maximum neutron fluence experienced at the  
10 reactor vessel's inner surface. Because of the resulting lead factors, surveillance capsules  
11 receive equivalent neutron fluence exposures earlier than the inner surface of the reactor  
12 vessel. This allows surveillance capsules to be withdrawn prior to the inner surface receiving an  
13 equivalent neutron fluence and therefore test results may bound the corresponding operating  
14 period in the capsule withdrawal schedule.

15 The surveillance program must comply with ASTM International (formerly American Society for  
16 Testing and Materials) Standard Practice E 185-82, as incorporated by reference in  
17 10 CFR Part 50, Appendix H. Because the withdrawal schedule in Table 1 of ASTM E 185-82 is  
18 based on plant operation during the original 40-year license term, standby capsules may need  
19 to be incorporated into the Appendix H program to ensure appropriate monitoring during the  
20 subsequent period of extended operation. Surveillance capsules are designed and located to  
21 permit insertion of replacement capsules. If standby capsules will be incorporated into the  
22 Appendix H program for the subsequent period of extended operation and have been removed  
23 from the reactor vessel, these should be reinserted so that appropriate lead factors are  
24 maintained and test results will bound the corresponding operating period. This program  
25 includes removal and testing of at least one capsule during the subsequent period of extended  
26 operation, with a neutron fluence of the capsule between one and one and one quarter (1.25)  
27 times the projected peak vessel neutron fluence at the end of the subsequent period of  
28 extended operation.

29 As an alternative to a plant-specific surveillance program complying with ASTM E 185-82, an  
30 integrated surveillance program (ISP) may be considered for a set of reactors that have similar  
31 design and operating features, in accordance with 10 CFR Part 50, Appendix H, Paragraph III.C.  
32 The plant-specific implementation of the ISP is consistent with the latest version of the ISP plan  
33 that has received approval by the U.S. Nuclear Regulatory Commission (NRC) for the  
34 subsequent period of extended operation.

35 The objective of this Reactor Vessel Material Surveillance program is to provide sufficient  
36 material data and dosimetry to (a) monitor irradiation embrittlement to neutron fluence greater  
37 than the projected fluence at the end of the subsequent period of extended operation, and  
38 (b) provide adequate dosimetry monitoring during the operational period. If surveillance  
39 capsules are not withdrawn during the subsequent period of extended operation, provisions are  
40 made to perform dosimetry monitoring.

41 The program is a condition monitoring program that measures the increase in Charpy V-notch  
42 30 foot-pound (ft-lb) transition temperature and the drop in the upper shelf energy (USE) as a  
43 function of neutron fluence and irradiation temperature. The data from this surveillance program  
44 are used to monitor neutron irradiation embrittlement of the reactor vessel, and are inputs to the  
45 neutron embrittlement time-limited aging analysis (TLAAs) described in Section 4.2 of the

1 Standard Review Plan for Subsequent License Renewal (SRP-SLR). The Reactor Vessel  
2 Material Surveillance program is also used in conjunction with AMP X.M2, "Neutron Fluence  
3 Monitoring," which monitors neutron fluence for reactor vessel (RV) components and reactor  
4 vessel internal (RVI) components.

5 In accordance with 10 CFR Part 50, Appendix H, all surveillance capsules, including those  
6 previously removed from the reactor vessel, must meet the test procedures and reporting  
7 requirements of ASTM E 185-82, to the extent practicable, for the configuration of the  
8 specimens in the capsule. Any changes to the capsule withdrawal schedule, including the  
9 conversion of standby capsules into the Appendix H program and extension of the surveillance  
10 program for the subsequent period of extended operation, must be approved by the NRC prior  
11 to implementation, in accordance with 10 CFR Part 50, Appendix H, Paragraph III.B.3.  
12 Standby capsules placed in storage (e.g., removed from the reactor vessel) are maintained for  
13 possible future insertion.

## 14 **Evaluation and Technical Basis**

15 The Reactor Vessel Material Surveillance program is plant-specific and depends on the  
16 composition and availability of the limiting materials, the availability of surveillance capsules,  
17 and the projected neutron fluence at the end of the subsequent period of extended operation. In  
18 accordance with 10 CFR Part 50, Appendix H, an applicant submits its proposed withdrawal  
19 schedule for NRC approval prior to implementation.

20 1. **Scope of Program:** The program addresses neutron embrittlement of all reactor vessel  
21 beltline materials as defined by 10 CFR Part 50, Appendix G as the region of the reactor  
22 vessel that directly surrounds the effective height of the active core and the adjacent  
23 regions of the reactor vessel that are predicted to experience sufficient neutron damage  
24 to be considered in the selection of the limiting material with regard to radiation damage.  
25 Materials with a projected neutron fluence greater than  $10^{17}$  n/cm<sup>2</sup> (E >1MeV) at the end  
26 of the license are considered to experience sufficient neutron damage to be included in  
27 the beltline. Materials originally monitored within the licensee's existing 10 CFR Part 50,  
28 Appendix H, materials surveillance program will continue to serve as the basis for the  
29 reactor vessel surveillance aging management program (AMP) unless safety  
30 considerations for the term of the subsequent period of extended operation would  
31 require the monitoring of additional or alternative materials.

32 For integrated surveillance programs (ISPs), the plant-specific implementation of the ISP  
33 in this Reactor Vessel Material Surveillance program is maintained consistent with the  
34 latest version of the ISP plan that has received approval by the NRC for the subsequent  
35 period of extended operation.

36 2. **Preventive Actions:** This program is a surveillance program; no preventive actions  
37 are identified.

38 3. **Parameters Monitored or Inspected:** The program monitors reduction of fracture  
39 toughness of reactor vessel beltline materials due to neutron irradiation embrittlement,  
40 through the periodic testing of material specimens at different intervals that have been  
41 irradiated in the surveillance capsules that are a part of the program. The program also  
42 monitors long term operating conditions of the reactor vessel (i.e., vessel beltline  
43 operating temperature and neutron fluence) that could affect neutron irradiation  
44 embrittlement of the reactor vessel.

1 The program uses two parameters to monitor the effects of neutron irradiation: (a) the  
2 increase in the Charpy V-notch 30 ft-lb transition temperature and (b) the drop in the  
3 Charpy V-notch USE. The program uses neutron dosimeters to benchmark neutron  
4 fluence calculations. Low melting point elements or low melting point eutectic alloys  
5 may be used as a check on peak specimen irradiation temperature. Results from these  
6 temperature monitors are used to ensure that the exposure temperature of the  
7 surveillance capsule is consistent with the reactor vessel beltline operating temperature.  
8 The Charpy V-notch specimens, neutron dosimeters, and temperature monitors are  
9 placed in capsules that are located within the reactor vessel; the capsules are withdrawn  
10 periodically to monitor the reduction in fracture toughness due to neutron irradiation.

11 This program includes removal and testing of at least one capsule during the  
12 subsequent period of extended operation, with a neutron fluence of the capsule between  
13 one and one and one quarter (1.25) times the projected peak vessel neutron fluence  
14 subsequent period of extended operation. Test results are required to be reported  
15 consistent with the requirements of 10 CFR Part 50, Appendix H.

16 Because the degree of neutron irradiation embrittlement is a function of the neutron  
17 fluence, calculations of the capsule fluence and the reactor vessel wall fluence are  
18 important parts of the program. The methods used to determine both capsule and  
19 reactor vessel wall fluence values are consistent with Regulatory Guide (RG) 1.190,  
20 "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron  
21 Fluence," as described in AMP X.M2, "Neutron Fluence Monitoring."

22 This program uses separate dosimeter capsules or ex-vessel dosimeters to monitor  
23 neutron fluence independent of the specimen capsules if there are no capsules installed  
24 in the reactor vessel.

25 4. **Detection of Aging Effects:** Reactor vessel materials are monitored by a surveillance  
26 program in which surveillance capsules are withdrawn from the reactor vessel and  
27 tested in accordance with the requirements of 10 CFR Part 50, Appendix H. The ASTM  
28 standards referenced in Appendix H describe the methods used to monitor irradiation  
29 embrittlement (as described in Element 3, above), selection of materials, and the  
30 withdrawal schedule for capsules. Because the withdrawal schedule in Table 1 of  
31 ASTM E185-82 is based on plant operation during the original 40-year license term,  
32 standby capsules may need to be converted to testing program capsules within a  
33 withdrawal schedule that covers the subsequent period of extended operation.

34 Alternatively, an ISP for the subsequent period of extended operation may be  
35 considered for a set of reactors that have similar design and operating features in  
36 accordance with 10 CFR Part 50, Appendix H, Paragraph III.C. For an ISP, in some  
37 cases the plant Reactor Vessel Material Surveillance Program may result in no  
38 surveillance capsules being irradiated in the plant's reactor vessel, with the plant relying  
39 on data from testing of the ISP capsules from the host plants of the capsules. Additional  
40 surveillance capsules may also be needed for the subsequent period of extended  
41 operation for an ISP. For ISPs, the plant-specific implementation of the ISP in the  
42 Reactor Vessel Material Surveillance program is maintained consistent with the latest  
43 version of the ISP plan that has received approval by the NRC for the subsequent period  
44 of extended operation.

1 If all surveillance capsules have been removed and tested, a plant may seek  
2 membership in an ISP. In addition, the plant institutes a supplemental neutron  
3 monitoring program, to meet the requirement of 10 CFR Part 50, Appendix H, III.C.1.b,  
4 that each reactor in an ISP has an adequate dosimetry program. Alternatively, this  
5 program can propose implementation of in-vessel irradiation of capsule (s) with  
6 reconstituted specimens from previously tested capsules and appropriate and neutron  
7 monitoring.

8 If no invessel surveillance capsules are available, an alternative neutron monitoring  
9 program uses alternative dosimetry, either from invessel dosimetry capsules or  
10 ex-vessel capsules, to monitor neutron fluence during the subsequent period of  
11 extended operation. The methods used in this alternative neutron monitoring program  
12 are consistent with RG 1.190, including appropriate benchmarking, as described in  
13 AMP X.M2, "Neutron Fluence Monitoring."

14 If all surveillance capsules have been removed and tested, operating restrictions are  
15 established to ensure that the plant is operated under conditions that are consistent with  
16 and bounded by those to which the surveillance capsules were exposed. The exposure  
17 conditions of the reactor vessel are monitored to ensure that they are consistent with the  
18 operating restrictions. If the reactor vessel exposure conditions (neutron flux, spectrum,  
19 irradiation temperature, etc.) are altered, then the basis for the projection of neutron  
20 fluence to the end of the subsequent period of extended operation is reviewed and, if  
21 deemed appropriate, modifications are made to the Reactor Vessel Material Surveillance  
22 program. Any changes to the Reactor Vessel Material Surveillance program must be  
23 submitted for NRC review and approval in accordance with 10 CFR Part 50, Appendix H  
24 prior to implementation.

- 25 5. **Monitoring and Trending:** The program provides data on neutron embrittlement of the  
26 reactor vessel materials and neutron fluence data. These data are to evaluate the  
27 TLAAAs on neutron irradiation embrittlement [e.g., USE, pressurized thermal shock (PTS)  
28 and pressure-temperature limits evaluations, etc.] as needed to demonstrate compliance  
29 with the requirements of 10 CFR Part 50, Appendix G, and 10 CFR 50.61 or  
30 10 CFR 50.61a for the licensed operating period of the plant. The applicable TLAAAs are  
31 described in subsequent license renewal applications (SLRA) Section 4.2 (see SRP-SLR  
32 Section 4.2).

33 The plant-specific surveillance program or ISP has at least one capsule that will attain  
34 projected neutron fluence equal to or exceeding the peak reactor vessel wall neutron  
35 fluence at the end of the subsequent period of extended operation. The program  
36 withdraws and tests the capsule(s) at an outage in which the capsule receives a neutron  
37 fluence of between one and one and one quarter (1.25) times the peak reactor vessel  
38 wall neutron fluence projected at the end of the subsequent period of extended  
39 operation. Test results from this capsule are reported in accordance with  
40 10 CFR Part 50, Appendix H. If an existing standby capsule that has been previously  
41 withdrawn from the reactor vessel is used for testing and the capsule does not require  
42 additional irradiation, then that (formerly standby) capsule is incorporated into the  
43 surveillance capsule withdrawal schedule of the Reactor Vessel Material Surveillance  
44 program upon receipt of the subsequently renewed license, and reporting of the test  
45 results is governed by 10 CFR Part 50, Appendix H.

1 The surveillance program retains additional capsules within the reactor vessel to support  
2 additional testing if, for example, the data from the required surveillance capsule turn out  
3 to be invalid, or to provide contingencies for future use. If the projected neutron fluence  
4 for these additional capsules is expected to be excessive when left in the reactor vessel,  
5 the program may propose to withdraw and place one or more untested capsules in  
6 storage for future reinsertion and/or testing.

7 If a plant has ample capsules remaining for future use, all pulled and tested samples  
8 placed in storage with reactor vessel neutron fluence less than 50 percent of the  
9 projected neutron fluence at the end of the subsequent period of extended operation,  
10 may be discarded. All pulled and tested samples with a neutron fluence greater than  
11 50 percent of the projected reactor vessel neutron fluence at the end of the subsequent  
12 period of extended operation and all untested capsules are placed in storage (these  
13 specimens and capsules saved for future reconstitution and reinsertion use) unless  
14 the applicant has gained NRC approval to discard the pulled and tested samples  
15 or capsules.

16 If an applicant does not have ample capsules remaining for future use, all pulled and  
17 tested capsules are placed in storage. These specimens are saved for future  
18 reconstitution, in case irradiation embrittlement monitoring by the surveillance program  
19 is reestablished.

20 Tested surveillance specimens may be removed from storage and used in research  
21 activities (e.g., microstructural examination, mechanical testing, and/or additional  
22 irradiation) without NRC approval if the licensee determines that a sufficient number of  
23 specimens will remain.

24 Evaluations of the neutron embrittlement of the reactor vessel materials are based on  
25 the specific results of the surveillance program or from correlations that utilize the  
26 material chemistry and the vessel neutron fluence. These evaluation are in accordance  
27 with NRC RG 1.99, Rev. 2, "Radiation Embrittlement of Reactor Vessel Materials," or the  
28 PTS rules (10 CFR 50.61 or 10 CFR 50.61a), as appropriate, and as governed by  
29 those documents.

30 If the program determines embrittlement using surveillance data, then the applicable  
31 bounds of the data, such as cold leg operating temperature and neutron fluence, are  
32 used to establish operating restrictions for the plant. If the plant uses an embrittlement  
33 trend curve to determine embrittlement (such as those of RG 1.99, Rev. 2,  
34 10 CFR 50.61, and 10 CFR 50.61a), the program ensures that the operating conditions  
35 for the reactor vessel beltline are within the applicability limits of the embrittlement trend  
36 curve with respect to parameters such as irradiation temperature, neutron fluence, and  
37 flux, or provides technical justification for exceeding these applicability limits.

- 38 6. **Acceptance Criteria:** Although there are no specific acceptance criteria that apply  
39 to the surveillance data themselves, the program provides compliance with  
40 10 CFR Part 50, Appendix H, and the reactor vessel embrittlement projections are used  
41 to demonstrate compliance with the requirements of 10 CFR Part 50, Appendix G,  
42 and 10 CFR 50.61 or 10 CFR 50.61a, and acceptability of other plant-specific analyses,  
43 throughout the subsequent period of extended operation.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
6 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
7 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
8 related structures and components (SCs) within the scope of this program.

9 Since the data from this program are used for reactor vessel embrittlement projections to  
10 comply with regulations (e.g., 10 CFR Part 50, Appendix G, requirements, and  
11 10 CFR 50.61 or 10 CFR 50.61a limits) through the subsequent period of extended  
12 operation, corrective actions would be necessary if these requirements are not satisfied,  
13 or if this program fails to comply with Appendix H of 10 CFR Part 50. If plant operating  
14 characteristics exceed the operating restrictions identified previously, such as a lower  
15 reactor vessel operating temperature or a higher fluence, this program provides that the  
16 impact of actual plant operation characteristics on the extent of reactor vessel  
17 embrittlement is evaluated, and the NRC is notified.

18 8. **Confirmation Process:** The confirmation process is addressed through those specific  
19 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
20 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
21 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
22 confirmation process element of this AMP for both safety-related and nonsafety-related  
23 SCs within the scope of this program.

24 9. **Administrative Controls:** Administrative controls are addressed through the QA  
25 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
26 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
27 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
28 fulfill the administrative controls element of this AMP for both safety-related and  
29 nonsafety-related SCs within the scope of this program.

30 10. **Operating Experience:** The existing reactor vessel material surveillance program  
31 provides sufficient material data and dosimetry to (a) monitor irradiation embrittlement at  
32 the end of the subsequent period of extended operation and (b) determine the need for  
33 operating restrictions on the inlet temperature, neutron fluence, and neutron flux.

34 This program is informed and enhanced when necessary through the systematic and  
35 ongoing review of both plant-specific and industry operating experience, as discussed in  
36 Appendix B of the GALL-SLR Report.

## 37 **References**

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1 10 CFR Part 50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements."  
2 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

3 10 CFR 50.61, "Fracture Toughness Requirements for Protection Against Pressurized Thermal  
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5 10 CFR 50.61a, "Alternate Fracture Toughness Requirements for Protection Against  
6 Pressurized Thermal Shock Events." Washington, DC: U.S. Nuclear Regulatory Commission.  
7 January 2010.

8 ASTM. ASTM E 185-82, "Standard Practice for Conducting Surveillance Tests of Light-Water  
9 Cooled Nuclear Power Reactor Vessels." Philadelphia, Pennsylvania: American Society for  
10 Testing Materials, (Versions of ASTM E 185 to be used for the various aspects of the reactor  
11 vessel surveillance program are as specified in 10 CFR Part 50, Appendix H). 1982.

12 Eason, E.D., G.R. Odette, R.K. Nanstad, and T. Yamamoto. "A Physically Based Correlation of  
13 Irradiation-Induced Transition Temperature Shifts for RPV Steels." ORNL/TM-2006/530.  
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15 NRC. NRC Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining  
16 Pressure Vessel Neutron Fluence." ML010890301. Washington, DC: U.S. Nuclear Regulatory  
17 Commission. March 31, 2001.

18 \_\_\_\_\_. NRC Regulatory Guide 1.99, "Radiation Embrittlement of Reactor Vessel Materials."  
19 Rev. 2. ML003740284. Washington, DC: U.S. Nuclear Regulatory Commission.  
20 May 31, 1988.



# 1 **XI.M32 ONE-TIME INSPECTION**

## 2 **Program Description**

3 A one-time inspection of selected components is conducted just prior to the beginning of a  
4 subsequent period of extended operation (e.g., prior to the second period of extended  
5 operation) in order to verify the system-wide effectiveness of an aging management program  
6 (AMP) that is designed to prevent or minimize aging to the extent that it will not cause the loss  
7 of intended function during the subsequent period of extended operation. For example,  
8 effective control of water chemistry under the XI.M2, "Water Chemistry," program can prevent  
9 some aging effects and minimize others. However, there may be locations that are isolated  
10 from the flow stream for extended periods and are susceptible to the gradual accumulation or  
11 concentration of agents that promote certain aging effects. This program provides inspections  
12 that verify that unacceptable degradation is not occurring. It also may trigger additional actions  
13 that ensure the intended functions of affected components are maintained during subsequent  
14 period of extended operation.

15 This program can also be used to verify the lack of significance of an aging effect. Situations in  
16 which additional confirmation is appropriate include: (a) an aging effect is not expected to  
17 occur, but the data are insufficient to rule it out with reasonable confidence; or (b) an aging  
18 effect is expected to progress very slowly in the specified environment, but the local  
19 environment may be more adverse than generally expected. For these cases, confirmation  
20 demonstrates that either the aging effect is not occurring or that the aging effect is occurring  
21 very slowly and does not affect the component's or structure's intended function during the  
22 subsequent period of extended operation based on prior operating experience data.

23 In addition, for steel components exposed to water environments that do not include corrosion  
24 inhibitors as a preventive action (i.e., treated water, reactor coolant, raw water, or waste water),  
25 this program verifies that long-term loss of material due to general corrosion will not cause a  
26 loss of intended function [e.g., pressure boundary, leakage boundary (spatial), structural  
27 integrity (attached)].

28 This program does not address Class 1 piping less than 4 inches nominal pipe size. That piping  
29 is addressed in GALL-SLR Report AMP XI.M35, "ASME Code Class 1 Small-Bore Piping."

30 The elements of the program include: (a) determination of the sample size of components to be  
31 inspected based on an assessment of materials of fabrication, environments, plausible aging  
32 effects, and operating experience; (b) identification of the inspection locations in the system or  
33 component based on the potential for the aging effect to occur; (c) determination of the  
34 examination technique, including acceptance criteria that would be effective in managing the  
35 aging effect for which the component is examined; and (d) evaluation of the need for follow-up  
36 examinations to monitor the progression of aging if age-related degradation is found that could  
37 jeopardize an intended function before the end of the subsequent period of extended operation.

38 The program may include a review of routine maintenance, repair, or inspection records to  
39 confirm that selected components have been inspected for aging degradation within the  
40 recommended time period for the inspections related to the subsequent period of extended  
41 operation, and that significant aging degradation has not occurred. A one-time inspection  
42 program is acceptable to verify the effectiveness of GALL-SLR Report AMP XI.M2, "Water  
43 Chemistry," GALL-SLR Report AMP XI.M30, "Fuel Oil Chemistry," and GALL-SLR Report AMP  
44 XI.M39, "Lubricating Oil Analysis," where the environment in the subsequent period of extended

1 operation is expected to be equivalent to that in the prior operating period and for which no  
2 aging effects have been observed. However, the one-time inspection for environments that do  
3 not fall in the above category, or of any other action or program created to verify the  
4 effectiveness of an AMP and confirm the absence of an aging effect, is to be reviewed by the  
5 staff on a plant-specific basis.

6 This program cannot be used for structures or components with known age-related degradation  
7 mechanisms or when the environment in the subsequent period of extended operation is not  
8 expected to be equivalent to that in the prior operating period. Periodic inspections are  
9 proposed in these cases.

## 10 **Evaluation and Technical Basis**

11 1. **Scope of Program:** The scope of this program includes systems and components that  
12 are subject to aging management using GALL-SLR Report AMPs XI.M2, "Water  
13 Chemistry;" XI.M30, "Fuel Oil Chemistry;" and XI.M39, "Lubricating Oil Analysis;" and for  
14 which no aging effects have been observed or for which the aging effect is occurring  
15 very slowly and will not affect the component's or structure's intended function during the  
16 subsequent period of extended operation based on prior operating experience data. The  
17 scope of this program also may include other components and materials where the  
18 environment in the period of extended operation is expected to be equivalent to that in  
19 the prior operating period and for which no aging effects have been observed. The  
20 scope of this program includes managing long-term loss of material due to general  
21 corrosion for steel components. Long-term loss of material due to general corrosion for  
22 steel components need not be managed if two conditions are met: (i) the environment  
23 for the steel components includes corrosion inhibitors as a preventive action; and  
24 (ii) periodic wall thickness measurements on a representative sample of each  
25 environment have been conducted every 5 years up to at least the 50<sup>th</sup> year of  
26 operation. Environments such as treated water, reactor coolant, raw water, and waste  
27 water do not typically include corrosion inhibitors.

28 The program cannot be used for structures or components:

- 29 • Subjected to known age-related degradation mechanisms as determined based  
30 on a review of plant-specific and industry operating experience for the prior  
31 operating period,
- 32 • When the environment in the subsequent period of extended operation is not  
33 expected to be equivalent to that in the prior operating period, or
- 34 • When aging effects that do not meet acceptance criteria are identified during the  
35 one-time inspection conducted in the prior operating period or during the review  
36 of plant-specific or industry operating experience.

37 Periodic inspections are proposed in these cases.

38 2. **Preventive Actions:** One-time inspection is a condition monitoring program. It does  
39 not include methods to mitigate or prevent age-related degradation.

40 3. **Parameters Monitored or Inspected:** The program monitors parameters directly  
41 related to the age-related degradation of a component. Examples of parameters

1 monitored and the related aging effect are provided in the table in Element 4, below.  
2 Inspection is performed using a variety of nondestructive examination (NDE) methods,  
3 including visual, volumetric, and surface techniques.

- 4 4. **Detection of Aging Effects:** Elements of the program include (a) determination of the  
5 sample size of components to be inspected based on an assessment of materials of  
6 fabrication, environment, plausible aging effects, and operating experience;  
7 (b) identification of the inspection locations in the system or component based on the  
8 potential for the aging effect to occur; and (c) determination of the examination  
9 technique, including acceptance criteria that would be effective in managing the aging  
10 effect for which the component is examined.

11 The inspection includes a representative sample of each population (defined as  
12 components having the same material, environment, and aging effect combination) and,  
13 where practical, focuses on the bounding or lead components most susceptible to aging  
14 due to time in service, and severity of operating conditions. A representative sample  
15 size is 20 percent of the population or a maximum of 25 components at each unit.  
16 Otherwise, a technical justification of the methodology and sample size used for  
17 selecting components for one-time inspection is included as part of the  
18 program's documentation.

19 The program relies on established NDE techniques, including visual, ultrasonic, and  
20 surface techniques. Inspections and tests are performed by personnel qualified in  
21 accordance with site procedures and programs to perform the type of examination  
22 specified. Inspections and tests within the scope of the ASME Code<sup>1</sup> follow procedures  
23 consistent with the ASME Code. Non-ASME Code inspections follow site procedures  
24 that include inspection parameters for items such as lighting, distance offset, surface  
25 coverage, presence of protective coatings, and cleaning processes that ensure an  
26 adequate examination. In addition, a description of enhanced visual examination  
27 (EVT)-1 is found in Boiling Water Reactor Vessel and Internals Project (BWRVIP)-03  
28 and Materials Reliability Program (MRP)-228.

29 The inspection and test techniques have a demonstrated history of effectiveness in  
30 detecting the aging effect of concern. Typically, the one-time inspections are performed  
31 as indicated in the following table.

32 When using this AMP to conduct one-time inspections of aluminum piping, piping  
33 components and tanks exposed to air, aluminum structures and components (SCs) are  
34 grouped by material type. The high strength heat treatable aluminum alloys (i.e., 2xxx  
35 and 7xxx series) may be treated as a separate population when performing inspections  
36 and interpreting results due to their relatively lower corrosion resistance. The relative  
37 susceptibility of moderate and lower strength alloys varies based on composition  
38 (primarily weight percent Cu, Mg, and Fe) and temper designation. Grouping of air  
39 environments consistent with the Detection of Aging Effects program element of  
40 GALL-SLR Report AMP XI.M38 is acceptable.

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<sup>1</sup> Refer to the GALL-SLR Report, Chapter I, for acceptable editions and addenda of the ASME Code, Section XI.

<b>Aging Effect</b>	<b>Aging Mechanism</b>	<b>Parameter(s) Monitored</b>	<b>Inspection Method<sup>2</sup></b>
Loss of Material	Crevice Corrosion	Surface Condition or Wall Thickness	Visual (e.g., VT-1) or Volumetric (e.g., UT)
Loss of Material	General Corrosion	Surface Condition or Wall Thickness	Visual (e.g., VT-3) or Volumetric (e.g., UT)
Loss of Material	Microbiologically-induced Corrosion	Surface Condition or Wall Thickness	Visual (e.g., VT-3) or Volumetric (e.g., UT)
Loss of Material	Pitting Corrosion	Surface Condition or Wall Thickness	Visual (e.g., VT-1) or Volumetric (e.g., UT)
Loss of Material	Erosion	Surface Condition or Wall Thickness	Visual (e.g., VT-3) or Volumetric (e.g., UT)
Long-term Loss of Material	General corrosion	Wall Thickness	Volumetric (e.g., UT)
Reduction of Heat Transfer	Fouling	Tube Fouling	Visual (e.g., VT-3)
Cracking	SCC or Cyclic Loading	Surface Condition or Cracks	Enhanced Visual (e.g., EVT-1) or Surface Examination (magnetic particle, liquid penetrant) or Volumetric (radiographic testing or UT)

<sup>1</sup>The examples provided in the table may not be appropriate for all relevant situations. If the applicant chooses to use an alternative to the recommendations in this table, a technical justification is provided as an exception to this AMP. This exception lists the aging management review line item component, examination technique, acceptance criteria, evaluation standard, and a description of the justification.

<sup>2</sup>Visual inspection may be used only when the inspection methodology examines the surface potentially experiencing the aging effect.

- 1 With respect to inspection timing, the sample of components inspected before the end of  
2 the current operating term needs to be sufficient to provide reasonable assurance that  
3 the aging effect will not compromise any intended function during the subsequent period  
4 of extended operation. Specifically, inspections need to be completed early enough to  
5 ensure that the aging effects that may affect intended functions early in the subsequent  
6 period of extended operation are appropriately managed. Conversely, inspections need  
7 to be timed to allow the inspected components to attain sufficient age to ensure that the  
8 aging effects with long incubation periods (i.e., those that may affect intended functions  
9 near the end of the subsequent period of extended operation) are identified. Within  
10 these constraints, the applicant schedules the inspection no earlier than 10 years prior to  
11 the subsequent period of extended operation.
- 12 5. **Monitoring and Trending:** Inspection results for each material, environment, and aging  
13 effect are compared to those obtained during previous inspections when available.
- 14 6. **Acceptance Criteria:** The acceptance criterion for this program considers both the  
15 results of each individual inspection and the compiled results of the inspections for each  
16 material, environment and aging effect combinations.
- 17 • For individual inspections, any indication or relevant conditions of degradation  
18 detected are evaluated. Acceptance criteria may be based on applicable ASME  
19 or other appropriate standards, design basis information, or vendor-specified  
20 requirements and recommendations. For example, ultrasonic thickness  
21 measurements are compared to predetermined limits.

- For the compiled results of the inspections of each material, environment, and aging effect combination, the results must demonstrate that: (a) aging effects have not occurred; or (b) the progression of an aging effect is such that based on a projection of the observed degradation, all components in the material, environment, and aging effect combination will meet acceptance criteria at the end of the subsequent period of extended operation.

7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as conditions adverse to quality or significant conditions adverse to quality under those specific portions of the quality assurance (QA) program that are used to meet Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the corrective actions element of this AMP for both safety-related and nonsafety-related SCs within the scope of this program.

Additional inspections are conducted if one of the baseline inspections does not meet acceptance criteria. The number of increased inspections is determined in accordance with the site's corrective action process; however, there are no fewer than 5 additional inspections for each baseline inspection that did not meet acceptance criteria. At multi-unit sites, the additional inspections include inspections at all of the units with the same material, environment, and aging effect combination. Where there are multiple instances of inspections not meeting acceptance criteria, a periodic inspection program is developed for the specific combination(s) of material, environment, and aging effect.

Where the compiled results of the inspections of a material, environment, and aging effect combination does not meet the above acceptance criteria, a periodic inspection program is developed for the specific material, environment, and aging effect combination. The periodic inspection program is implemented at any of the units on site with same combination(s) of material, environment, and aging effect.

8. **Confirmation Process:** The confirmation process is addressed through those specific portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the confirmation process element of this AMP for both safety-related and nonsafety-related SCs within the scope of this program.

9. **Administrative Controls:** Administrative controls are addressed through the QA program that is used to meet the requirements of 10 CFR Part 50, Appendix B, associated with managing the effects of aging. Appendix A of the GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the administrative controls element of this AMP for both safety-related and nonsafety-related SCs within the scope of this program.

10. **Operating Experience:** The elements that comprise inspections associated with this program (the scope of the inspections and inspection techniques) are consistent with industry practice. An applicant's operating experience with detection of aging effects should be adequate to demonstrate that the program is capable of detecting the presence or noting the absence of aging effects in the components, materials, and

1 environments where one-time inspection is used to confirm system-wide effectiveness of  
2 another preventive or mitigative AMP.

3 The program is informed and enhanced when necessary through the systematic and  
4 ongoing review of both plant-specific and industry operating experience, as discussed in  
5 Appendix B of the GALL-SLR Report.

## 6 **References**

7 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
8 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

9 10 CFR 50.55a, "Codes and Standards. Washington, DC: U.S. Nuclear Regulatory  
10 Commission. 2015.

11 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."  
12 The ASME Boiler and Pressure Vessel Code. New York, New York: The American Society of  
13 Mechanical Engineers. 2013.<sup>2</sup>

14 EPRI. MRP-228, "Materials Reliability Program: Inspection Standard for PWR Internals."  
15 Palo Alto, California: Electric Power Research Institute. 2009.

16 \_\_\_\_\_. BWRVIP-03 (EPRI 105696-R6), "BWR Vessel and Internals Project: Reactor Pressure  
17 Vessel and Internals Examination Guidelines." ML040440261. Palo Alto, California: Electric  
18 Power Research Institute. January 2004.

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<sup>2</sup>GALL-SLR Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this aging management program.

# 1 XI.M33 SELECTIVE LEACHING

## 2 Program Description

3 The program for selective leaching of materials ensures the integrity of the components made of  
4 gray cast iron and copper alloys (except for inhibited brass) that contain greater than 15 percent  
5 zinc (> 15 percent Zn) or 8 percent aluminum (>8 percent Al) exposed to a raw water,  
6 closed-cycle cooling water (CCCW), treated water, waste water, soil, or ground water  
7 environment. Depending on the environment, the aging management program (AMP) includes  
8 one-time, or opportunistic or periodic visual inspections of selected components that are  
9 susceptible to selective leaching, coupled with mechanical examination techniques  
10 (e.g., chipping, scraping). Destructive examinations of components to determine the presence  
11 of and depth of dealloying through wall thickness are also conducted. These techniques can  
12 determine whether loss of material due to selective leaching is occurring and whether selective  
13 leaching will affect the ability of the components to perform their intended function for the  
14 subsequent period of extended operation.

15 The selective leaching process involves the preferential removal of one of the alloying  
16 components from the material. Dezincification (loss of zinc from brass) and graphitization  
17 (removal of iron from cast iron) are examples of such a process. Susceptible materials exposed  
18 to high operating temperatures, stagnant-flow conditions, and a corrosive environment  
19 (e.g., acidic solutions for brasses with high zinc content and dissolved oxygen) are conducive to  
20 selective leaching.

## 21 Evaluation and Technical Basis

22 1. **Scope of Program:** Components include piping, valve bodies and bonnets, pump  
23 casings, and heat exchanger components that are susceptible to selective leaching.  
24 The materials of construction for these components may include gray cast iron and  
25 uninhibited brass containing greater than 15 percent zinc or greater than 8 percent  
26 aluminum. These components may be exposed to raw water, CCCW, treated water,  
27 waste water, soil, or ground water.

28 Dependent on plant-specific operating experience and implementation of preventive  
29 actions, certain components may be excluded from the scope of this program in each  
30 10-year inspection interval as follows:

- 31 • The internal surfaces of internally-coated components for which loss of coating  
32 integrity is managed by GALL-SLR Report AMP XI.M42, "Internal  
33 Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, and  
34 Tanks"
- 35 • The external surfaces of buried components that are externally-coated in  
36 accordance with Table XI.M41-1, of GALL-SLR Report AMP XI.M41, "Buried and  
37 Underground Piping and Tanks," and where direct visual examinations of buried  
38 piping in the scope of license renewal have not revealed any coating damage
- 39 • The external surfaces of buried gray cast iron components that have been  
40 cathodically protected since installation and meet the criteria for Preventive  
41 Actions Category C in Generic Aging Lessons Learned for Subsequent License

1 Renewal (GALL-SLR) Report AMP XI.M41 Table XI.M41-2, "Inspections of  
2 Buried Pipe"

- 3 • The external surfaces of buried copper alloy components that meet the above  
4 cathodic protection recommendations, if technical justification is submitted with  
5 the subsequent license renewal application (SLRA) that demonstrates the  
6 effectiveness of cathodic protection in the prevention of selective leaching for  
7 those alloys.

8 2. **Preventive Actions:** Although the program does not provide guidance on preventive  
9 actions, water chemistry control consistent with GALL-SLR Report AMP XI.M2, "Water  
10 Chemistry," or GALL-SLR Report AMP XI.M21A, "Closed Treated Water Systems," to  
11 control pH and concentration of corrosive contaminants, and treatment to minimize  
12 dissolved oxygen can be effective in minimizing selective leaching.

13 3. **Parameters Monitored or Inspected:** This program monitors visual appearance  
14 (e.g., color, porosity, abnormal surface conditions), surface conditions through  
15 mechanical examination techniques (e.g., chipping, scraping), and the presence of and  
16 depth of dealloying through wall thickness through destructive examinations

17 4. **Detection of Aging Effects:** Inspections and examinations consist of the following:

- 18 • Visual inspections of all accessible surfaces. In certain copper-based alloys  
19 selective leaching can be detected by visual inspection through a change in color  
20 from a normal yellow color to a reddish copper color or green copper oxide.  
21 Graphitized cast iron cannot be reliably identified through visual examination, as  
22 the appearance of the graphite surface layer created by selective leaching does  
23 not always differ appreciably from uncorroded cast iron.
- 24 • Mechanical examination techniques, such as chipping and scraping, augment  
25 visual inspections for gray cast iron components.
- 26 • Destructive examinations are used to determine the presence of and depth of  
27 dealloying through wall thickness of components.

28 One-time and periodic inspections are conducted of a representative sample of each  
29 population. A population is defined as the same material and environment combination.  
30 Opportunistic inspections are conducted whenever components are opened, or buried or  
31 submerged surfaces are exposed.

32 One-time inspections are only conducted for components exposed to CCCW or treated  
33 water when no plant-specific operating experience of selective leaching exists in these  
34 environments. In the 10-year period prior to a subsequent period of extended operation,  
35 a sample of 3 percent of the population or a maximum of 10 components per population  
36 at each unit are visually and mechanically (for gray cast iron components) inspected.  
37 Inspections, where possible, focus on the bounding or lead components most  
38 susceptible to aging based on time-in-service and severity of operating conditions for  
39 each population.

40 Opportunistic and periodic inspections are conducted for components exposed to raw  
41 water, waste water, soil, or ground water and for components in CCCW or treated water

1 where plant-specific operating experience includes selective leaching in these  
2 environments. Opportunistic inspections are conducted whenever components are  
3 opened, or buried or submerged surfaces are exposed. Periodic inspections are  
4 conducted in the 10-year period prior to a subsequent period of extended operation and  
5 in each 10-year period during a period of extended operation. In these periodic  
6 inspections, a sample of 3 percent of the population or a maximum of 10 components  
7 per population are visually and mechanically (for gray cast iron components) inspected  
8 at each unit. When inspections are conducted on piping, a 1-foot axial length section is  
9 considered as one inspection. In addition, two destructive examinations are performed  
10 in each material and environment population in each 10-year period at each unit.  
11 Otherwise, a technical justification of the methodology and sample size used for  
12 selecting components for inspection is included as part of the program's documentation.  
13 The number of visual and mechanical inspections may be reduced by two for each  
14 component that is destructively examined beyond the minimum number of destructive  
15 examinations recommended in each 10-year interval. Inspections, where possible,  
16 focus on the bounding or lead components most susceptible to aging based on  
17 time-in-service and severity of operating conditions for each population. Opportunistic  
18 inspections may be credited as periodic inspections as long as the inspection locations  
19 selection criteria are met.

20 For multi-unit sites where the sample size is not based on the percentage of the  
21 population and the inspections are conducted periodically (not one-time inspections), it is  
22 acceptable to reduce the total number of inspections at the site as follows. For two unit  
23 sites, eight visual and mechanical inspections and two destructive examinations are  
24 conducted at each unit. For three unit sites, seven visual and mechanical and one  
25 destructive examination are conducted at each unit. In order to conduct the reduced  
26 number of inspections, the applicant states in the SLRA the basis for why the operating  
27 conditions at each unit are similar enough (e.g., flowrate, chemistry, temperature,  
28 excursions) to provide representative inspection results. The basis should include  
29 consideration of potential differences such as the following:

- 30 • Have power uprates been performed and if so, could more aging have occurred  
31 on one unit that has been in the uprate period for a longer time period?
- 32 • Are there any systems which have had an out-of-spec water chemistry condition  
33 for a longer period of time or out-of-spec conditions occurred more frequently?
- 34 • For raw water systems, is the water source from different sources where one or  
35 the other is more susceptible to microbiologically-induced corrosion or other  
36 aging effects?

37 For similar environments (i.e., soil and groundwater, or raw water and waste water), the  
38 populations may be combined as long as an evaluation is conducted to determine the  
39 more severe environment and the inspections and examinations are conducted on  
40 components in the most severe environment, with one inspection being conducted in the  
41 less severe environment.

42 Dependent on plant-specific operating experience and implementation of preventive  
43 actions, the number of inspections for certain components exposed to soil or  
44 groundwater may be adjusted as follows. When minor through-wall coating damage has  
45 been identified in plant-specific operating experience, but the components are coated in

1 accordance with Table XI.M41-1 of GALL-SLR Report AMP XI.M41, the inspection  
2 sample size may be reduced by 50 percent of that recommended in the “detection of  
3 aging effects” program element of this AMP if the following conditions are met:

- 4 • There were no more than two instances of coating damage identified in each  
5 10-year period of the prior operating period
- 6 • An analysis demonstrates that, if the pipe surface area affected by the coating  
7 damage is assumed to have been a through-wall hole, the pipe could be shown  
8 to meet unreinforced opening criteria of the applicable piping code

9 Inspections follow site procedures that include inspection parameters such as lighting,  
10 distance offset, surface coverage, presence of protective coatings, and cleaning  
11 processes that ensure an adequate examination.

12 5. **Monitoring and Trending:** Trending of destructive examination results to indicate the  
13 progression of dealloying is performed. The extent of degradation (e.g., dealloyed  
14 wall thickness, percent dealloying) is projected until the next inspection period or end  
15 of the period of extended operation to confirm the component’s intended functions will  
16 be maintained.

17 6. **Acceptance Criteria:** The acceptance criteria are: (a) for copper-based alloys, no  
18 noticeable change in color from the normal yellow color to the reddish copper color or  
19 green copper oxide; (b) for gray cast iron, the absence of a surface layer that can be  
20 easily removed by chipping or scraping or identified in the destructive examinations; and  
21 (c) components meet system design requirements such as minimum wall thickness,  
22 extended to the end of the subsequent period of extended operation.

23 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
24 conditions adverse to quality or significant conditions adverse to quality under those  
25 specific portions of the quality assurance (QA) program that are used to meet  
26 Criterion XVI, “Corrective Action,” of 10 CFR Part 50, Appendix B. Appendix A of the  
27 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
28 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
29 safety-related and nonsafety-related structures and component (SCs) within the scope of  
30 this program.

31 When the acceptance criteria are not met such that it is determined that the affected  
32 component should be replaced prior to the end of the subsequent period of extended  
33 operation, additional inspections are performed. The number of additional inspections is  
34 equal to the number of failed inspections for each material and environment population  
35 with a minimum of five additional visual and mechanical inspections when visual and  
36 mechanical inspections(s) did not meet acceptance criteria and a minimum of one  
37 additional destructive examination when destruction examination(s) did not meet  
38 acceptance criteria. If any of the additional inspections do not meet the acceptance  
39 criteria, the number of additional inspections continues as described above until in the  
40 last set of inspections all of the components meet the acceptance criteria.

41 The program includes a process to evaluate difficult-to-access surfaces (e.g., heat  
42 exchanger shell interiors, exterior of heat exchanger tubes) if unacceptable inspection  
43 findings occur within the same material and environment population.

- 1 8. **Confirmation Process:** The confirmation process is addressed through those specific  
2 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
3 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
4 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
5 confirmation process element of this AMP for both safety-related and nonsafety-related  
6 SCs within the scope of this program.
- 7 9. **Administrative Controls:** Administrative controls are addressed through the QA  
8 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
9 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
10 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
11 fulfill the administrative controls element of this AMP for both safety-related and  
12 nonsafety-related SCs within the scope of this program.
- 13 10. **Operating Experience:** Operating experience shows that selective leaching has been  
14 detected in components constructed from cast iron, brass, bronze, and aluminum  
15 bronze. The following operating experience may be of significance to an  
16 applicant's program:
- 17 a. In March 2013, a licensee submitted an American Society of Mechanical  
18 Engineers (ASME) Code Section XI relief request because it had detected  
19 weeping through aluminum bronze (susceptible to dealloying) valve bodies  
20 exposed to sea water. The degraded area was characterized by corrosion debris  
21 or wetness that returned following cleaning and drying of the surface.  
22 (ADAMS Accession Numbers ML13091A038 and ML14182A634).
- 23 b. During a one-time inspection for selective leaching, a licensee identified  
24 degradation in four gray cast iron valve bodies in the service water system  
25 exposed to raw water. The mechanical test used by the licensee to identify the  
26 graphitization was tapping and scraping of the surface. The licensee sand  
27 blasted two of the valve bodies and, after all of the graphite was removed, the  
28 licensee determined that the leaching progressed to a depth of approximately  
29 3/32 inch. Based on the estimated corrosion rate, the licensee determined that  
30 the valve bodies had adequate wall thickness for at least 20 years of additional  
31 service. (ADAMS Accession Number ML14017A289).
- 32 c. Based on visual inspections conducted as part of implementing a one-time  
33 inspection for selective leaching, a licensee identified selective leaching in a gray  
34 cast iron drain plug of an auxiliary feedwater (AFW) pump outboard bearing  
35 cooler. Possible selective leaching was also found on multistatic valves on the  
36 underside of the clapper. As a result, the licensee incorporated quarterly  
37 inspections of the components in its preventive surveillance and periodic  
38 maintenance program. (ADAMS Accession Number ML13122A009).
- 39 d. In September 2008, a licensee identified the dealloying of an aluminum bronze  
40 strainer drum exposed to brackish water. This was identified after an unexpected  
41 material failure occurred, during a planned maintenance evolution at an offsite  
42 repair facility. The maintenance evolution involved rigging the strainer drum into  
43 position for a machining operation. During the rigging, the strainer drum material  
44 failed at the rigging attachment point to the strainer. This failure of the strainer  
45 drum exposed the inner portion of the drum material where dealloying of the

- 1 drum was visually observed during an inspection. (ADAMS Accession  
2 Number ML092400531).
- 3 e. A licensee has reported occurrences of selective leaching of aluminum bronze  
4 components for an extensive number of years. The licensee is evaluating  
5 changes to its current approach to managing selective leaching in order to  
6 address the aging effect during the period of extended operation (e.g., enhanced  
7 testing, metallurgical analyses of degraded components to trend material  
8 properties). (ADAMS Accession Number ML13045A356).
- 9 f. U.S. Nuclear Regulatory Commission (NRC) Information Notice (IN) 84-71,  
10 Graphitic Corrosion of Cast Iron in Salt Water, September 06, 1984.
- 11 g. NRC IN 94-59, Accelerated Dealloying of Cast Aluminum-Bronze Valves Caused  
12 by Microbiologically Induced Corrosion, August 17, 1994.

13 The program is informed and enhanced when necessary through the systematic and  
14 ongoing review of both plant-specific and industry operating experience, as discussed in  
15 Appendix B of the GALL-SLR Report.

## 16 **References**

- 17 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
18 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 19 EPRI. EPRI TR-107514, "Age Related Degradation Inspection Method and Demonstration."  
20 Electric Power Research Institute. April 1998.
- 21 Fontana, M.G. *Corrosion Engineering*. McGraw Hill. p 86-90. 1986.

# 1 XI.M35 ASME CODE CLASS 1 SMALL-BORE PIPING

## 2 Program Description

3 This program is a condition monitoring program for detecting cracking in small-bore, American  
4 Society of Mechanical Engineers (ASME) Code Class 1 piping. The program augments the  
5 inservice inspections (ISI) specified by ASME Code, Section XI, for certain ASME Code Class 1  
6 piping that is less than 4 inches nominal pipe size (NPS) and greater than or equal to  
7 1 inch NPS.

8 Industry operating experience demonstrates that welds in ASME Code Class 1 small-bore  
9 piping are susceptible to stress corrosion cracking (SCC) and cracking due to thermal or  
10 vibratory fatigue loading. Such cracking is frequently initiated from the inside diameter of the  
11 piping; therefore, volumetric examinations are needed to detect cracks. However, ASME Code,  
12 Section XI, generally does not call for volumetric examinations of this class and size of piping.  
13 Specifically, ASME Code, Section XI, Subsubarticle IWB-1220, exempts all components that are  
14 less than or equal to 1 inch NPS from volumetric examinations. In addition, with the exception  
15 of certain pressurized water reactor (PWR) high pressure safety injection system piping  
16 components, ASME Code, Section XI, Table IWB-2500-1, calls for surface examinations and  
17 visual inspections during system leakage tests of piping components that are less than  
18 4 inches NPS.

19 This program supplements the ASME Code, Section XI, examinations with volumetric  
20 examinations, or alternatively, destructive examinations, to detect cracks that may originate  
21 from the inside diameter of butt welds, socket welds, and their base metal materials. The  
22 examination schedule and extent is based on plant-specific operating experience and whether  
23 actions have been implemented that would successfully mitigate the causes of any past  
24 cracking. The program relies on a sample size as specified in Table XI.M35-1 as means to  
25 determine whether cracking is occurring in the total population of ASME Code Class 1  
26 small-bore piping in the plant.

## 27 Evaluation and Technical Basis

28 1. **Scope of Program:** This program manages the effects of SCC and cracking due to  
29 thermal or vibratory fatigue loading for certain ASME Code Class 1 small-bore piping.  
30 For the purposes of this program, small-bore piping includes piping that is less than  
31 4 inches NPS and greater than or equal to 1 inch NPS. PWR high pressure safety  
32 injection system piping components that are subject to volumetric examinations in  
33 accordance with ASME Code, Section XI, Table IWB-2500-1, Item No. B9.22, are not  
34 within the scope of this program.

35 2. **Preventive Actions:** This is a condition monitoring program only; therefore, it has no  
36 preventive actions.

37 3. **Parameters Monitored or Inspected:** Cracking is detected through either destructive  
38 or nondestructive examinations of piping welds and base metal materials. The volume  
39 of these materials is examined to detect flaws or other discontinuities that may indicate  
40 the presence of cracks.

41 4. **Detection of Aging Effects:** A sample of ASME Code Class 1 small-bore piping welds  
42 is examined in accordance with the categories specified in Table XI.M35-1. The initial

1 schedule of examinations, either one-time for Categories A and B or periodic for  
2 Category C, is based on plant-specific operating experience and whether actions that  
3 would successfully mitigate the causes of any past cracking have been implemented.  
4 Periodic examinations are implemented as per Category C if the one-time examinations  
5 detect any unacceptable flaws or relevant conditions. The scope of the examinations  
6 includes both full penetration (butt) welds and partial penetration (socket) welds.

7 The welds to be examined are selected from those locations that are determined to be  
8 the most risk significant and most susceptible to SCC and cracking due to thermal or  
9 vibratory fatigue loading. Other factors, such as plant-specific and industry operating  
10 experience, accessibility, and personnel exposure, can also be considered to select the  
11 most appropriate locations for the examinations. The guidelines from Electric Power  
12 Research Institute (EPRI) Technical Report 1011955, "Materials Reliability Program:  
13 Management of Thermal Fatigue in Normally Stagnant Non-Isolable Reactor Coolant  
14 System Branch Lines (MRP-146)," and Technical Report 1018330, "Materials Reliability  
15 Program: Management of Thermal Fatigue in Normally Stagnant Non-Isolable Reactor  
16 Coolant System Branch Lines—Supplemental Guidance (MRP-146S)," may be used to  
17 determine the locations that are most susceptible to thermal fatigue.

- 18 5. **Monitoring and Trending:** For plants that fall within Categories A and B, a one-time  
19 examination provides confirmation that cracking is not occurring or that it is occurring so  
20 slowly that it will not affect the component's intended function during the subsequent  
21 period of extended operation. Periodic examinations provide for the timely detection of  
22 cracks for those plants that fall within Category C. If a component containing flaws or  
23 relevant conditions is accepted for continued service by analytical evaluation, then it is  
24 subsequently reexamined to meet the intent of ASME Code, Section XI,  
25 Subsubarticle IWB-2420.

- 26 6. **Acceptance Criteria:** Examination results are evaluated in accordance ASME Code,  
27 Section XI, Paragraph IWB-3132.

- 28 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
29 conditions adverse to quality or significant conditions adverse to quality under those  
30 specific portions of the quality assurance (QA) program that are used to meet  
31 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
32 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
33 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
34 fulfill the corrective actions element of this aging management program (AMP) for both  
35 safety-related and nonsafety-related structures and components (SCs) within the scope  
36 of this program.

37 The corrective actions are to include examinations of additional ASME Code Class 1  
38 small-bore piping welds to meet the intent of ASME Code, Section XI,  
39 Subsubarticle IWB-2430. In addition, for those plants that fell within Categories A and B,  
40 periodic examinations are then implemented in accordance with the schedule specified  
41 in Category C.

- 42 8. **Confirmation Process:** The confirmation process is addressed through those specific  
43 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
44 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
45 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the

1 confirmation process element of this AMP for both safety-related and nonsafety-related  
2 SCs within the scope of this program.

3 9. **Administrative Controls:** Administrative controls are addressed through the QA  
4 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
5 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
6 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
7 fulfill the administrative controls element of this AMP for both safety-related and  
8 nonsafety-related SCs within the scope of this program.

9 10. **Operating Experience:** Through-wall cracking in ASME Code Class 1 small-bore  
10 piping has occurred at a number of plants. Causes include SCC and thermal and  
11 vibratory fatigue loading as described in the U.S. Nuclear Regulatory Commission (NRC)  
12 Information Notice (IN) 97-46, "Unisolable Crack in High-Pressure Injection Piping." This  
13 program augments the ASME Code, Section XI, inspections to provide assurance that  
14 cracks will be detected before there is a loss of intended function. Licensee Event  
15 Reports (LERs) 50-259/2008-002 and LER 50-317/2012-002 provide a sample of  
16 relevant operating experience.

17 The program is informed and enhanced when necessary through the systematic and ongoing  
18 review of both plant-specific and industry operating experience, as discussed in Appendix B of  
19 the GALL-SLR Report.

## 20 **References**

21 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
22 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

23 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
24 Commission. 2015.

25 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."  
26 The ASME Boiler and Pressure Vessel Code. New York, New York: The American Society of  
27 Mechanical Engineers. 2013.<sup>1</sup>

28 EPRI. EPRI Technical Report 1018330, "Materials Reliability Program: Management of  
29 Thermal Fatigue in Normally Stagnant Non-Isolable Reactor Coolant System Branch Lines –  
30 Supplemental Guidance (MRP-146S)." Palo Alto, California: Electric Power Research Institute.  
31 December 2008.

32 \_\_\_\_\_. EPRI Technical Report 1011955, "Materials Reliability Program: Management of  
33 Thermal Fatigue in Normally Stagnant Non-Isolable Reactor Coolant System Branch Lines  
34 (MRP-146)." Palo Alto, California: Electric Power Research Institute. June 2005.

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<sup>1</sup>GALL-SLR Report Chapter I, Table 1, identifies the ASME Code, Section XI editions and addenda that are acceptable to use for this AMP.

- 1 NRC. LER 50-317/2012-002, "Reactor Coolant Pressure Boundary Leakage Due to Tubing
- 2 High Cyclic Fatigue." Washington, DC: U.S. Nuclear Regulatory Commission.
- 3 September 2012.
  
- 4 \_\_\_\_\_. LER 50-259/2008-002 and LER 50-259/2008-002-01, "ASME Code Class 1 Pressure
- 5 Boundary Leak on an Instrument Line Connected to the Reactor Vessel." Washington, DC:
- 6 U.S. Nuclear Regulatory Commission. March 2009.
  
- 7 \_\_\_\_\_. NRC Information Notice 97-46, "Unisolable Crack in High-Pressure Injection Piping."
- 8 Washington, DC: U.S. Nuclear Regulatory Commission. July 1997.

**Table XI.M35-1 Examinations**

Category	Plant Operating Experience	Mitigation	Examination Schedule	Sample Size	Examination Method
A	No age-related cracking <sup>(1)(2)</sup>	Not applicable	One-time: completed within 6 years prior to the start of the subsequent period of extended operation	Full penetration (butt) welds: 3% of total population per unit, up to 10 <sup>(4)</sup> Partial penetration (socket) welds: 3% of total population per unit, up to 10 <sup>(4)</sup>	Volumetric or destructive <sup>(5)(6)</sup>
B	Age-related cracking <sup>(2)</sup>	Yes <sup>(3)</sup>	One-time: completed within 6 years prior to the start of the subsequent period of extended operation	Full penetration (butt) welds: 10% of total population per unit, up to 25 <sup>(4)</sup> Partial penetration (socket) welds: 10% of total population per unit, up to 25 <sup>(4)</sup>	Volumetric or destructive <sup>(5)(6)</sup>
C	Age-related cracking <sup>(2)</sup>	No	Periodic: first examination completed within the 6 years prior to the start of the subsequent period of extended operation with subsequent examinations every 10 years thereafter	Full penetration (butt) welds: 10% of total population per unit, up to 25 <sup>(4)</sup> Partial penetration (socket) welds: 10% of total population per unit, up to 25 <sup>(4)</sup>	Volumetric or destructive <sup>(5)(6)</sup>

**NOTES:**

- (1) Must have no history of age-related cracking.
- (2) Age-related cracking includes piping leaks or other flaws where fatigue or stress corrosion cracking are contributing factors.
- (3) Actions must have been taken to mitigate the cause of the cracking. These actions, such as design changes, would generally go beyond typical repair or replacement activities.
- (4) The welds to be examined are selected from locations that are determined to be the most risk significant and most susceptible to cracking.
- (5) Volumetric examinations must employ techniques that have been demonstrated to be capable of detecting flaws and discontinuities in the examination volume of interest.
- (6) Each partial penetration (socket) weld subject to destructive examination may be credited twice towards the total number of examinations.



1 **XI.M36 EXTERNAL SURFACES MONITORING OF**  
2 **MECHANICAL COMPONENTS**

3 **Program Description**

4 The External Surfaces Monitoring of Mechanical Components program is based on system  
5 inspections and walkdowns. This program consists of periodic visual inspections of metallic and  
6 polymeric components, such as piping, piping components, ducting, heat exchanger  
7 components, and seals. The program manages aging effects through visual inspection of  
8 external surfaces for evidence of loss of material, cracking, fouling, changes in material  
9 properties, reduced thermal insulation resistance, and reduction of heat transfer due to fouling.  
10 When appropriate for the component and material, physical manipulation may be used to  
11 augment visual inspection to confirm the absence of elastomer hardening and loss of strength.  
12 This program may also be used to manage cracking due to stress corrosion cracking (SCC) in  
13 aluminum and stainless steel (SS) components exposed to aqueous solutions and air  
14 environments containing halides.

15 Reduced thermal insulation resistance due to moisture intrusion, associated with insulation that  
16 is jacketed, is managed by visual inspection of the condition of the jacketing when the insulation  
17 has an intended function to reduce heat transfer from the insulated components. Outdoor  
18 insulated components, and indoor components exposed to condensation, have portions of the  
19 insulation inspected or removed to determine whether the exterior surface of the component is  
20 degrading or has the potential to degrade. Loss of material due to boric acid corrosion is  
21 managed by the Boric Acid Corrosion program [Generic Aging Lessons Learned for Subsequent  
22 License Renewal (GALL-SLR) Report aging management program (AMP) XI.M10].

23 **Evaluation and Technical Basis**

24 1. **Scope of Program:** This program visually inspects the external surfaces of mechanical  
25 components for loss of material, hardening and loss of strength due to elastomer  
26 degradation, and reduction of heat transfer due to fouling and monitors the external  
27 surfaces of metallic components for leakage due to cracking. Visual inspections are  
28 conducted on insulation jacketing to ensure that the function of the thermal insulation is  
29 not impaired by moisture intrusion. Visual inspections are also conducted on outdoor  
30 insulated components, and indoor insulated components exposed to condensation  
31 (because the in-scope component is operated below the dew point) to determine  
32 whether the exterior surface of the component is degrading or has the potential to  
33 degrade. Cracking of SS and aluminum components exposed to aqueous solutions and  
34 air environments containing halides may also be managed by this program. Visual  
35 inspections or surface examinations are used to manage cracking. This program also  
36 visually inspects and monitors the external surfaces of elastomeric and polymeric  
37 components for changes in material properties (such as hardening and loss of strength),  
38 cracking, and loss of material due to wear. The program also inspects heat exchanger  
39 surfaces exposed to air for evidence of reduction of heat transfer due to fouling.  
40 Cementitious components are inspected for changes in material properties, cracking,  
41 and loss of material.

42 The program also may be credited with managing loss of material from internal surfaces  
43 of metallic components and with loss of material, cracking, and change in material  
44 properties from the internal surfaces of polymers, for cases in which material and

1 environment combinations are the same for internal and external surfaces such that  
2 external surface condition is representative of internal surface condition. When credited,  
3 the program describes the component's internal environment and the credited similar  
4 external component environment inspected.

5 Underground piping and tanks that are below grade but are contained within a tunnel or  
6 vault such that they are in contact with air and are located where access for inspection is  
7 restricted, are managed by GALL-SLR Report AMP XI.M41, "Buried and Underground  
8 Piping and Tanks." Below grade components that are accessible during normal  
9 operations or refueling outages for which access is not restricted are managed by  
10 this program.

11 2. **Preventive Actions:** Depending on the material, components may be coated to  
12 mitigate corrosion by protecting the external surface of the component from  
13 environmental exposure. Inspections to verify the integrity of the insulation jacketing can  
14 limit or prevent water in-leakage in the insulation.

15 3. **Parameters Monitored or Inspected:** This program uses periodic plant system  
16 inspections and walkdowns to monitor for material degradation, accumulation of debris,  
17 and leakage. This program inspects components such as piping, piping components,  
18 ducting, seals, insulation jacketing, and air-side heat exchangers. For metallic  
19 components, coatings deterioration is an indicator of possible underlying degradation.  
20 Cementitious components are visually inspected for indications of changes in material  
21 properties, loss of material, and cracking.

22 Periodic surface examinations are conducted if this program is being used to manage  
23 cracking in SS or aluminum components. Visual inspections for leakage or surface  
24 cracks are an acceptable alternative to conducting surface examinations to detect  
25 cracking if it has been demonstrated that cracks will be detected prior to challenging the  
26 structural integrity or intended function of the component.

27 Examples of inspection parameters for metallic components include:

- 28 • Surface discontinuities and imperfections (loss of material)
- 29 • Loss of wall thickness (loss of material)
- 30 • Flaking or oxide-coated surfaces (loss of material)
- 31 • Corrosion stains on thermal insulation (loss of material)
- 32 • Protective coating degradation (cracking, flaking, and blistering)
- 33 • Surface examinations for the detection of cracks on the external surfaces of SS  
34 and aluminum components exposed to air and aqueous solutions  
35 containing halides
- 36 • Leakage for detection of cracks on SS and aluminum components exposed to-air  
37 and aqueous-containing halides (cracking)
- 38 • Accumulation of debris that could impede heat transfer

39 The aging effects for elastomeric and flexible polymeric components are monitored  
40 through a combination of visual inspection and manual or physical manipulation of the  
41 material. Manual or physical manipulation of the material includes touching, pressing

1 on, flexing, bending, or otherwise manually interacting with the material. The purpose of  
2 the manual manipulation is to reveal changes in material properties, such as hardness,  
3 and to make the visual examination process more effective in identifying aging effects  
4 such as cracking.

5 Examples of inspection parameters for elastomers and polymers include:

- 6 • Surface cracking, crazing, scuffing, and dimensional change (e.g., “ballooning”  
7 and “necking”)
- 8 • Loss of thickness
- 9 • Discoloration
- 10 • Exposure of internal reinforcement for reinforced elastomers
- 11 • Hardening as evidenced by a loss of suppleness during manipulation where the  
12 component and material are appropriate to manipulation

- 13 4. **Detection of Aging Effects:** This program manages the aging effects of loss of  
14 material, cracking, changes in material properties using visual inspection, reduced  
15 thermal insulation resistance, and reduction of heat transfer due fouling. For coated  
16 surfaces, confirmation of the integrity of the coating is an effective method for managing  
17 the effects of corrosion on the metallic surface.

18 Inspections are performed by personnel qualified in accordance with site procedures and  
19 programs to perform the specified task. When required by the American Society of  
20 Mechanical Engineers (ASME) Code, inspections are conducted in accordance with the  
21 applicable code requirements. Non-ASME Code inspections and tests follow site  
22 procedures that include inspection parameters for items such as lighting, distance offset,  
23 surface coverage, and presence of protective coatings that ensure an adequate  
24 examination. The inspections are capable of detecting age-related degradation and are  
25 performed at a frequency not to exceed one refueling cycle. This frequency  
26 accommodates inspections of components that may be in locations normally accessible  
27 only during outages (e.g., high dose areas). Surfaces that are not readily visible during  
28 plant operations and refueling outages are inspected when they are made accessible  
29 and at such intervals that would ensure the components’ intended functions are  
30 maintained.

31 Periodic visual inspections or surface examinations are conducted on SS and aluminum  
32 to manage cracking. Periodic visual inspections are conducted where it has been  
33 demonstrated that leakage or surface cracks can be detected prior to a crack  
34 challenging the structural integrity or intended function of the component. If visual  
35 inspections have not been demonstrated to effectively detect cracks prior to challenging  
36 the structural integrity or intended function of the component then a representative  
37 sample of surface examinations is conducted every 10 years during the period of  
38 extended operation. A minimum of 20 percent of the population (components having the  
39 same material, environment, and aging effect combination) or maximum of  
40 25 components per population is inspected. The 20 percent minimum is surface area  
41 inspected unless the component is measured in linear feet, such as piping.

1 Alternatively, any combination of 1-foot length sections and components can be used to  
2 meet the recommended extent of 25 inspections.

3 In some instances, thermal insulation (e.g., calcium silicate) has been included in  
4 scope to reduce heat transfer from components to ensure that functions described in  
5 10 CFR 54.4(a) are successfully accomplished. When metallic jacketing has been used,  
6 it is acceptable to conduct external visual inspections of the jacketing to ensure that  
7 there is no damage to the jacketing that would permit in leakage of moisture as long as  
8 the jacketing has been installed in accordance with plant-specific procedures that  
9 include configuration features such as minimum overlap, location of seams, etc. If  
10 plant-specific procedures do not include these features, an alternative inspection  
11 methodology should be proposed.

12 Component surfaces that are insulated and exposed to condensation (because the  
13 in-scope component is operated below the dew point), and insulated outdoor  
14 components, (aging effects associated with corrosion under insulation for outdoor tanks  
15 may be managed by this AMP or GALL-SLR Report AMP XI.M29, "Aboveground  
16 Metallic Tanks") are periodically inspected every 10 years during the period of extended  
17 operation. For all outdoor components and any indoor components exposed to  
18 condensation (because the in-scope component is operated below the dew point),  
19 inspections are conducted of each material type (e.g., steel, SS, copper alloy, aluminum)  
20 and environment (e.g., air outdoor, moist air, air accompanied by leakage) where  
21 condensation or moisture on the surfaces of the component could occur routinely or  
22 seasonally. In some instances, significant moisture can accumulate under insulation  
23 during high humidity seasons, even in conditioned air. A minimum of 20 percent of the  
24 in-scope piping length, or 20 percent of the surface area for components whose  
25 configuration does not conform to a 1-foot axial length determination (e.g., valve,  
26 accumulator, tank) is inspected after the insulation is removed. Alternatively, any  
27 combination of a minimum of 25 1-foot axial length sections and components for each  
28 material type is inspected. Inspection locations should focus on the bounding or lead  
29 components most susceptible to aging because of time in service, severity of operating  
30 conditions (e.g., amount of time that condensate would be present on the external  
31 surfaces of the component), and lowest design margin. The following are alternatives to  
32 removing insulation after the initial inspection:

33 a. Subsequent inspections may consist of examination of the exterior surface of the  
34 insulation with sufficient acuity to detect indications of damage to the jacketing or  
35 protective outer layer (if the protective outer layer is waterproof) of the insulation  
36 when the results of the initial inspection meet the following criteria:

37 i. No loss of material due to general, pitting, or crevice corrosion beyond  
38 that which could have been present during initial construction is observed,  
39 and

40 ii. No evidence of SCC is observed.

41 If: (a) the external visual inspections of the insulation reveal damage to the exterior  
42 surface of the insulation or jacketing, (b) there is evidence of water intrusion  
43 through the insulation (e.g., water seepage through insulation seams/joints), or  
44 (c) the protective outer layer (where jacketing is not installed) is not waterproof,

1 periodic inspections under the insulation should continue as conducted for the  
2 initial inspection.

3 b. Removal of tightly adhering insulation that is impermeable to moisture is not  
4 required unless there is evidence of damage to the moisture barrier. If the  
5 moisture barrier is intact, the likelihood of corrosion under insulation (CUI) is low  
6 for tightly adhering insulation. Tightly adhering insulation is considered to be a  
7 separate population from the remainder of insulation installed on in-scope  
8 components. The entire population of in-scope piping that has tightly adhering  
9 insulation is visually inspected for damage to the moisture barrier with the same  
10 frequency as for other types of insulation inspections. These inspections are not  
11 credited towards the inspection quantities for other types of insulation.

12 Visual inspection will identify indirect indicators of elastomer and flexible polymer  
13 hardening and loss of strength, including the presence of surface cracking, crazing,  
14 discoloration, and, for elastomers with internal reinforcement, the exposure of reinforcing  
15 fibers, mesh, or underlying metal. Visual inspections cover 100 percent of accessible  
16 component surfaces. Visual inspection will identify direct indicators of loss of material  
17 due to wear to include dimension change, scuffing, and, for flexible polymeric materials  
18 with internal reinforcement, the exposure of reinforcing fibers, mesh, or underlying metal.  
19 Manual or physical manipulation can be used to augment visual inspection to confirm the  
20 absence of hardening and loss of strength for elastomers and flexible polymeric  
21 materials [e.g., heating, ventilation, and air conditioning (HVAC) flexible connectors]  
22 where appropriate. The sample size for manipulation is at least 10 percent of available  
23 surface area.

24 5. **Monitoring and Trending:** This program uses standardized monitoring and trending  
25 activities to track degradation. Deficiencies are documented using approved processes  
26 and procedures, such that results can be trended. However, the program does not  
27 include formal trending. Inspections are performed at frequencies identified in  
28 Element 4, Detection of Aging Effects.

29 6. **Acceptance Criteria:** For each component and aging effect combination, the  
30 acceptance criteria are defined to ensure that the need for corrective actions will be  
31 identified before loss of intended functions. Acceptance criteria are developed from  
32 plant-specific design standards and procedural requirements, current licensing basis  
33 (CLB), industry codes or standards (e.g., ASME Code Section III, ANSI/ASME B31.1),  
34 and engineering evaluation. Acceptance criteria, which permit degradation, are based  
35 on maintaining the intended function(s) under all CLB design loads. The evaluation  
36 projects the degree of observed degradation to the end of the subsequent period of  
37 extended operation or the next scheduled inspection, whichever is shorter. Where  
38 possible, acceptance criteria are quantitative (e.g., minimum wall thickness, percent  
39 shrinkage allowed in an elastomeric seal). Where qualitative acceptance criteria are  
40 used, the criteria are clear enough to reasonably ensure that a singular decision is  
41 derived based on the observed condition of the systems, structures, and components  
42 (SSCs). For example, cracks are absent in rigid polymers, the flexibility of an  
43 elastomeric sealant is sufficient to ensure that it will properly adhere to surfaces. Electric  
44 Power Research Institute (EPRI) technical reports, TR-1007933, "Aging Assessment  
45 Field Guide," and TR-1009743, "Aging Identification and Assessment Checklist," provide  
46 general guidance for evaluation of materials and criteria for their acceptance when  
47 performing visual/tactile inspections.

- 1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
6 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
7 safety-related and nonsafety-related structures and components (SCs) within the scope  
8 of this program.
- 9 8. **Confirmation Process:** The confirmation process is addressed through those specific  
10 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
11 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
12 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
13 confirmation process element of this AMP for both safety-related and nonsafety-related  
14 SCs within the scope of this program.
- 15 9. **Administrative Controls:** Administrative controls are addressed through the QA  
16 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
17 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
18 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
19 fulfill the administrative controls element of this AMP for both safety-related and  
20 nonsafety-related SCs within the scope of this program.
- 21 10. **Operating Experience:** External surface inspections through system inspections and  
22 walkdowns have been in effect at many utilities since the mid-1990s in support of the  
23 Maintenance Rule (10 CFR 50.65) and have proven effective in maintaining the  
24 material condition of plant systems. The elements that comprise these inspections  
25 (e.g., the scope of the inspections and inspection techniques) are consistent with  
26 industry practice.
- 27 The program is informed and enhanced when necessary through the systematic and  
28 ongoing review of both plant-specific and industry operating experience, as discussed in  
29 Appendix B of the GALL-SLR Report.

## 30 References

- 31 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
32 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 33 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear  
34 Power Plants." Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 35 10 CFR 54.4(a), "Scope." Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 36 EPRI. EPRI Technical Report 1009743, "Aging Identification and Assessment Checklist."  
37 Palo Alto, California: Electric Power Research Institute. August 2004.
- 38 \_\_\_\_\_. EPRI Technical Report 1007933, "Aging Assessment Field Guide." Palo Alto,  
39 California: Electric Power Research Institute. December 2003.

- 1 INPO. INPO Good Practice TS-413, *Use of System Engineers*. INPO 85-033. Institute of
- 2 Nuclear Power Operations. May 1988.



# 1 XI.M37 FLUX THIMBLE TUBE INSPECTION

## 2 Program Description

3 The Flux Thimble Tube Inspection is a condition monitoring program used to inspect for thinning  
4 of the flux thimble tube wall, which provides a path for the incore neutron flux monitoring system  
5 detectors and forms part of the reactor coolant system (RCS) pressure boundary. Flux thimble  
6 tubes are subject to loss of material at certain locations in the reactor vessel where flow-induced  
7 fretting causes wear at discontinuities in the path from the reactor vessel instrument nozzle to  
8 the fuel assembly instrument guide tube. A nondestructive examination methodology, such as  
9 eddy current testing (ECT) or other applicant-justified and the U.S. Nuclear Regulatory  
10 Commission (NRC)-accepted inspection method, is used to monitor for wear of the flux thimble  
11 tubes. This program implements the recommendations of NRC Inspection and Enforcement  
12 (IE) Bulletin 88-09, as described below.

## 13 Evaluation and Technical Basis

14 1. **Scope of Program:** The flux thimble tube inspection encompasses all of the flux  
15 thimble tubes that form part of the RCS pressure boundary. The instrument guide tubes  
16 are not in the scope of this program. Within scope are the licensee responses to  
17 IE Bulletin 88-09, as accepted by the staff in its closure letters on the bulletin, and any  
18 amendments to the licensee responses as approved by the staff.

19 2. **Preventive Actions:** The program consists of inspection and evaluation and provides  
20 no guidance on preventive actions.

21 3. **Parameters Monitored or Inspected:** Flux thimble tube wall thickness is monitored  
22 to detect loss of material from the flux thimble tubes during the period of  
23 extended operation.

24 4. **Detection of Aging Effects:** An inspection methodology (such as ECT) that has been  
25 demonstrated to be capable of adequately detecting wear of the flux thimble tubes is  
26 used to detect loss of material during the period of extended operation. Justification for  
27 methods other than ECT should be provided unless use of the alternative method has  
28 been previously accepted by the NRC.

29 Examination frequency is based upon actual plant-specific wear data and wear  
30 predictions that have been technically justified as providing conservative estimates of  
31 flux thimble tube wear. The interval between inspections is established such that no flux  
32 thimble tube is predicted to incur wear that exceeds the established acceptance criteria  
33 before the next inspection. The examination frequency may be adjusted based on  
34 plant-specific wear projections. Rebaselining of the examination frequency should be  
35 justified using plant-specific wear-rate data unless prior plant-specific NRC acceptance  
36 for the rebaselining is received outside the license renewal process. If design changes  
37 are made to use more wear-resistant thimble tube materials [e.g., chrome-plated  
38 stainless steel (SS)], sufficient inspections are conducted at an adequate inspection  
39 frequency, as described above, for the new materials.

40 5. **Monitoring and Trending:** Flux thimble tube wall thickness measurements are trended  
41 and wear rates are calculated based on plant-specific data. Wall thickness is projected  
42 using plant-specific data and a methodology that includes sufficient conservatism to

1 ensure that wall thickness acceptance criteria continue to be met during plant operation  
2 between scheduled inspections.

- 3 6. **Acceptance Criteria:** Appropriate acceptance criteria, such as percent through-wall  
4 wear, are established, and inspection results are evaluated and compared with the  
5 acceptance criteria. The acceptance criteria are technically justified to provide an  
6 adequate margin of safety to ensure that the integrity of the reactor coolant system  
7 pressure boundary is maintained. The acceptance criteria include allowances for factors  
8 such as instrument uncertainty, uncertainties in wear scar geometry, and other potential  
9 inaccuracies, as applicable, to the inspection methodology chosen for use in the  
10 program. Acceptance criteria different from those previously documented in the  
11 applicant's response to IE Bulletin 88-09 and amendments thereto, as accepted by the  
12 NRC, should be justified.

- 13 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
14 conditions adverse to quality or significant conditions adverse to quality under those  
15 specific portions of the quality assurance (QA) program that are used to meet  
16 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
17 Generic Aging Lessons Learned for Subsequent Licensing Renewal (GALL-SLR) Report  
18 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
19 fulfill the corrective actions element of this aging management program (AMP) for both  
20 safety-related and nonsafety-related structures and components (SCs) within the scope  
21 of this program.

22 Flux thimble tubes with wall thickness that do not meet the established acceptance  
23 criteria are isolated, capped, plugged, withdrawn, replaced, or otherwise removed from  
24 service in a manner that ensures the integrity of the reactor coolant system pressure  
25 boundary is maintained. Analyses may allow repositioning of flux thimble tubes that are  
26 approaching the acceptance criteria limit. Repositioning of a tube exposes a different  
27 portion of the tube to the discontinuity that is causing the wear.

28 Flux thimble tubes that cannot be inspected over the tube length, that are subject to  
29 wear due to restriction or other defects, and that cannot be shown by analysis to be  
30 satisfactory for continued service are removed from service to ensure the integrity of the  
31 reactor coolant system pressure boundary

- 32 8. **Confirmation Process:** The confirmation process is addressed through those specific  
33 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
34 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
35 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
36 confirmation process element of this AMP for both safety-related and nonsafety-related  
37 SCs within the scope of this program.

- 38 9. **Administrative Controls:** Administrative controls are addressed through the QA  
39 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
40 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
41 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
42 fulfill the administrative controls element of this AMP for both safety-related and  
43 nonsafety-related SCs within the scope of this program.

1 10. **Operating Experience:** In IE Bulletin 88-09 the NRC requested that licensees  
2 implement a flux thimble tube inspection program due to several instances of leaks and  
3 due to licensees identifying wear. Utilities established inspection programs in  
4 accordance with IE Bulletin 88-09, which have shown excellent results in identifying and  
5 managing wear of flux thimble tubes. However, leakage events due to accelerated wear  
6 have occurred (see NRC EN Report 42822, dated August 31, 2006).

7 As discussed in IE Bulletin 88-09, the amount of vibration the thimble tubes experience  
8 is determined by many plant-specific factors. Therefore, the only effective method for  
9 determining thimble tube integrity is through inspections, which are adjusted to account  
10 for plant-specific wear patterns and history.

11 The program is informed and enhanced when necessary through the systematic and  
12 ongoing review of both plant-specific and industry operating experience, as discussed in  
13 Appendix B of the GALL-SLR Report.

## 14 **References**

15 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
16 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

17 NRC. NRC Licensee Event Notification [EN] 42822, "Technical Specification Required  
18 Shutdown Due to Unidentified Reactor Coolant System Leak." Washington, DC: U.S. Nuclear  
19 Regulatory Commission. August 2006.

20 \_\_\_\_\_. NRC IE Bulletin 88-09, "Thimble Tube Thinning in Westinghouse Reactors."  
21 Washington, DC: U.S. Nuclear Regulatory Commission. July 1988.

22 \_\_\_\_\_. NRC Information Notice No. 87-44, "Thimble Tube Thinning in Westinghouse Reactors."  
23 Supplement 1. Washington, DC: U.S. Nuclear Regulatory Commission. March 1988.

24 \_\_\_\_\_. NRC Information Notice No. 87-44, "Thimble Tube Thinning in Westinghouse Reactors."  
25 Washington, DC: U.S. Nuclear Regulatory Commission. September 1987.



1 **XI.M38 INSPECTION OF INTERNAL SURFACES IN MISCELLANEOUS**  
2 **PIPING AND DUCTING COMPONENTS**

3 **Program Description**

4 The program consists of inspections of the internal surfaces of metallic piping, piping  
5 components, and piping elements, ducting, heat exchanger components, polymeric and  
6 elastomeric components, and other components exposed to uncontrolled indoor air, outdoor air,  
7 air with borated water leakage, condensation, moist air, diesel exhaust, fuel oil, lubricating oil,  
8 and any water system other than open-cycle cooling water system [age-managed by Generic  
9 Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report aging  
10 management program (AMP) XI.M20], closed treated water system, (age-managed by  
11 GALL-SLR Report AMP XI.M21A), and fire water system (age-managed by GALL-SLR Report  
12 AMP XI.M27). However, elastomers and flexible polymeric components exposed to raw water,  
13 closed-cycle cooling water, and fire water are managed by this program. In addition, fire water  
14 system components with only a leakage boundary (spatial) or structural integrity (attached)  
15 intended function are managed by this program.

16 These internal inspections are performed during the periodic system and component  
17 surveillances or during the performance of maintenance activities when the surfaces are made  
18 accessible for visual inspection. The program includes visual inspections to ensure that existing  
19 environmental conditions are not causing material degradation that could result in loss of a  
20 component's intended functions. For certain materials, such as flexible polymers, physical  
21 manipulation or pressurization to detect hardening or loss of strength is used to augment the  
22 visual examinations conducted under this program. This program may also be used to manage  
23 cracking due to stress corrosion cracking (SCC) in aluminum and stainless steel (SS)  
24 components exposed to aqueous solutions and air environments containing halides. If visual  
25 inspection of internal surfaces is not possible, then the applicant needs to provide a  
26 plant-specific program.

27 This program, as written, is not intended for use on components in which recurring internal  
28 corrosion is evident based on a search of plant-specific operating experience conducted during  
29 the subsequent license renewal application (SLRA) development. If operating experience  
30 indicates that there has been recurring internal corrosion, a plant-specific program will be  
31 necessary unless this program, or another new or existing program, includes augmented  
32 requirements to ensure that any recurring aging effects are adequately managed (e.g., Standard  
33 Review Plan-Subsequent License Renewal (SRP-SLR) Sections 3.2.2.2.8, 3.3.2.2.7, 3.4.2.2.6).  
34 Following failure due to recurring internal corrosion, this program may be used if the failed  
35 material is replaced by one that is more corrosion resistant in the environment of interest, or  
36 corrective actions have been taken to prevent recurrence of the recurring internal corrosion.

37 **Evaluation and Technical Basis**

38 1. **Scope of Program:** This program includes the internal surfaces of piping, piping  
39 components, piping elements, ducting, heat exchanger components, polymeric and  
40 elastomeric components, and other components. Inspections are performed when the  
41 internal surfaces are accessible during the performance of periodic surveillances or  
42 during maintenance activities or scheduled outages. This program is not intended for  
43 components where loss of intended function has occurred due to age-related  
44 degradation. Cracking of SS and aluminum components exposed to aqueous solutions

1 and air environments containing halides may also be managed by this program. Visual  
2 inspections or surface examinations are used to manage cracking.

3 For situations in which the material and environment combinations are similar for the  
4 internal and external surfaces such that the external surface condition is representative  
5 of the internal surface condition, external inspections of components may be credited for  
6 managing: (a) loss of material and cracking of internal surfaces of metallic components,  
7 and (b) loss of material, cracking, and change in material properties from the internal  
8 surfaces of polymeric components. When credited, the program describes the  
9 component's internal environment and the credited external component's environment  
10 inspected and provides the basis to justify that the external and internal surface  
11 condition and environment are sufficiently similar.

12 2. **Preventive Actions:** This program is a condition monitoring program to detect signs of  
13 degradation and does not provide guidance for prevention.

14 3. **Parameters Monitored or Inspected:** This program manages loss of material,  
15 cracking, reduction of heat transfer due to fouling, and changes in material properties.  
16 This program monitors surface conditions or wall thickness to identify loss of material  
17 due to corrosion mechanisms for metals and loss of material due to erosion and wear for  
18 elastomers and polymers. This program also monitors for changes in visual appearance  
19 for elastomers and polymers and suppleness to identify changes in materials properties  
20 of elastomers and flexible polymers.

21 Periodic surface examinations are conducted if this program is being used to manage  
22 cracking in SS or aluminum components. Visual inspections for leakage or surface  
23 cracks are an acceptable alternative to conducting surface examinations to detect  
24 cracking if it has been demonstrated that cracks will be detected prior to challenging the  
25 structural integrity or intended function of the component.

26 Indicators of loss of material for metallic components include the following:

- 27 • Surface discontinuities and imperfections
- 28 • Loss of wall thickness
- 29 • Flaking or oxide-coated surfaces
- 30 • Debris from the air environment accumulating on heat exchanger tube surfaces  
31 (reduction of heat transfer due to fouling)
- 32 • Surface examinations for the detection of cracks on the surfaces of SS and  
33 aluminum components exposed to air and aqueous solutions containing halides
- 34 • Leakage for detection of cracks on the surfaces of SS and aluminum  
35 components exposed to air and aqueous solutions containing halides

36

- 1 • Indicators of loss of material and changes in material properties of elastomeric  
2 and polymeric materials include the following:
- 3 • Surface cracking, crazing, scuffing, loss of sealing, and dimensional change  
4 (e.g., “ballooning” and “necking”)
- 5 • Loss of wall thickness
- 6 • Discoloration
- 7 • Exposure of internal reinforcement for reinforced elastomers
- 8 • Hardening as evidenced by a loss of suppleness during manipulation where the  
9 component and material are appropriate to manipulation

10 4. **Detection of Aging Effects:** Visual and mechanical (e.g., involving manipulation or  
11 pressurization of elastomers and flexible polymeric components) inspections conducted  
12 under this program are opportunistic in nature; they are conducted whenever piping,  
13 heat exchangers, or ducting are opened for any reason. At a minimum, in each 10-year  
14 period during the subsequent period of extended operation, a representative sample of  
15 20 percent of the population (defined as components having the same material,  
16 environment, and aging effect combination) or a maximum of 25 components per  
17 population is inspected at each unit. Otherwise, a technical justification of the  
18 methodology and sample size used for selecting components for inspection is included  
19 as part of the program’s documentation. For multi-unit sites where the sample size is  
20 not based on the percentage of the population, it is acceptable to reduce the total  
21 number of inspections at the site as follows. For two-unit sites, 19 components are  
22 inspected per unit and for a three-unit site, 17 components are inspected per unit. In  
23 order to conduct 17 or 19 inspections at a unit in lieu of 25, the applicant states in the  
24 SLRA the basis for why the operating conditions at each unit are similar enough  
25 (e.g., flowrate, chemistry, temperature, excursions) to provide representative inspection  
26 results. The basis should include consideration of potential differences such as  
27 the following:

- 28 • Have power uprates been performed and if so, could more aging have occurred  
29 on one unit that has been in the uprate period for a longer time period?
- 30 • Are there any systems which have had an out-of-spec water chemistry condition  
31 for a longer period of time or out-of-spec conditions occurred more frequently?
- 32 • For raw water systems, is the water source from different sources where one or  
33 the other is more susceptible to microbiologically-induced corrosion or other  
34 aging effects?
- 35 • For components exposed to diesel exhaust, have certain diesels more operating  
36 more frequently and thus exposed to more cool down transients such that more  
37 deleterious materials could accumulate?

38 Where practical, the inspection includes a representative sample of the system  
39 population and focuses on the bounding or lead components most susceptible to aging  
40 because of time in service and severity of operating conditions. This minimum sample

1 size does not override the opportunistic inspection basis of this aging management  
2 program (AMP). Opportunistic inspections continue even though in a given 10 year  
3 period, 20 percent or 25 components might have already been inspected. An inspection  
4 of a component in a more severe environment may be credited as an inspection for the  
5 specified environment and for the same material and aging effects in a less severe  
6 environment (e.g., a moist air environment is more severe than an indoor controlled air  
7 environment because the moisture in the former environment is more likely to result in  
8 loss of material than would be expected from the normally dry surfaces associated with  
9 the latter environment). Alternatively, similar environments (e.g., internal uncontrolled  
10 indoor, controlled indoor, dry air environments) can be combined into a larger population  
11 provided that the inspections occur on components located in the most  
12 severe environment.

13 Periodic visual inspections or surface examinations are conducted on SS and aluminum  
14 to manage cracking. Periodic visual inspections are conducted where it has been  
15 demonstrated that leakage or surface cracks can be detected prior to a crack  
16 challenging the structural integrity or intended function of the component. If visual  
17 inspections have not been demonstrated to effectively detect cracks prior to challenging  
18 the structural integrity or intended function of the component then a representative  
19 sample of surface examinations is conducted every 10 years during the period of  
20 extended operation. A minimum of 20 percent of the population (components having  
21 the same material, environment, and aging effect combination) or maximum of  
22 25 components per population is inspected. The 20 percent minimum is surface area  
23 inspected unless the component is measured in linear feet, such as piping.  
24 Alternatively, any combination of 1-foot length sections and components can be used to  
25 meet the recommended extent of 25 inspections.

26 To determine the condition of internal surfaces of buried and underground piping,  
27 inspections of the interior surfaces of accessible piping may be credited if the accessible  
28 and buried or underground component material, environment, and aging effects are  
29 similar. When inspections of the interior surfaces of accessible components with similar  
30 material, environment, and aging effects as the interior surfaces of buried or  
31 underground piping are not conducted, the sample population will be inspected using  
32 volumetric or internal visual inspections capable of detecting loss of material on the  
33 internal surfaces of the buried or underground piping.

34 Visual inspections include all accessible surfaces. Inspections and tests are performed  
35 by personnel qualified in accordance with site procedures and programs to perform the  
36 specified task. Unless otherwise required [e.g., by the American Society of Mechanical  
37 Engineers (ASME) code], inspections follow site procedures that include inspection  
38 parameters for items such as lighting, distance offset, surface coverage, presence of  
39 protective coatings, and cleaning processes that ensure an adequate examination. The  
40 inspection procedures must be capable of detecting the aging effect(s) under  
41 consideration. These inspections provide for the detection of aging effects before the  
42 loss of component function. Visual inspection of flexible polymeric components is  
43 performed whenever the component surface is accessible. Visual inspection can  
44 provide indirect indicators of the presence of surface cracking, crazing, and  
45 discoloration. For elastomers with internal reinforcement, visual inspection can detect  
46 the exposure of reinforcing fibers, mesh, or underlying metal. Visual and tactile  
47 inspections are performed when the internal surfaces become accessible during the  
48 performance of periodic surveillances or during maintenance activities or scheduled

1 outages. Visual inspection provides direct indicators of loss of material due to wear,  
2 including dimensional change, scuffing, and the exposure of reinforcing fibers, mesh, or  
3 underlying metal for flexible polymeric materials with internal reinforcement.

4 Manual or, physical manipulation or pressurization of flexible polymeric components is  
5 used to augment visual inspection, where appropriate, to assess loss of material or  
6 strength. The sample size for manipulation is at least 10 percent of accessible surface  
7 area, including visually identified suspect areas. For flexible polymeric materials,  
8 hardening, loss of strength, or loss of material due to wear is expected to be detectable  
9 before any loss of intended function.

10 5. **Monitoring and Trending:** This program uses standardized monitoring and trending  
11 activities to track degradation. Deficiencies are documented using approved processes  
12 and procedures such that results can be trended. However, the program does not  
13 include formal trending. Inspections are performed at frequencies identified in  
14 Element 4, Detection of Aging Effects.

15 6. **Acceptance Criteria:** For each component and aging effect combination, the  
16 acceptance criteria are defined to ensure that the need for corrective actions is identified  
17 before the loss of intended functions. Acceptance criteria are developed from  
18 plant-specific design standards and procedural requirements, current licensing basis  
19 (CLB), industry codes or standards (e.g., ASME Code Section III, ANSI/ASME B31.1),  
20 and engineering evaluation. Acceptance criteria, which permit degradation, are based  
21 on maintaining the intended function(s) under all CLB design loads. The evaluation  
22 projects the degree of observed degradation to the end of the subsequent period of  
23 extended operation or the next scheduled inspection, whichever is shorter. Where  
24 possible, acceptance criteria are quantitative (e.g., minimum wall thickness, percent  
25 shrinkage allowed in an elastomeric seal). Where qualitative acceptance criteria are  
26 used, the criteria is clear enough to reasonably ensure that a singular decision is derived  
27 based on the observed condition of the systems, structures, and components (SSC).  
28 For example, cracks are absent in rigid polymers, the flexibility of an elastomeric sealant  
29 is sufficient to ensure that it will properly adhere to surfaces.

30 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
31 conditions adverse to quality or significant conditions adverse to quality under those  
32 specific portions of the quality assurance (QA) program that are used to meet  
33 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
34 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
35 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
36 safety-related and nonsafety-related structures and components (SCs) within the scope  
37 of this program.

38 8. **Confirmation Process:** The confirmation process is addressed through those specific  
39 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
40 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
41 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
42 confirmation process element of this AMP for both safety-related and nonsafety-related  
43 SCs within the scope of this program.

44 9. **Administrative Controls:** Administrative controls are addressed through the QA  
45 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,

1 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
2 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
3 fulfill the administrative controls element of this AMP for both safety-related and  
4 nonsafety-related SCs within the scope of this program.

- 5 10. **Operating Experience:** Inspections of internal surfaces during the performance of  
6 periodic surveillance and maintenance activities have been in effect at many utilities in  
7 support of plant component reliability programs. These activities have proven effective  
8 in maintaining the material condition of plant SSCs. The elements that comprise these  
9 inspections (e.g., the scope of the inspections and inspection techniques) are consistent  
10 with industry practice and staff expectations. The applicant evaluates recent operating  
11 experience and provides objective evidence to support the conclusion that the effects of  
12 aging are adequately managed.

13 The review of plant-specific operating experience during the development of this  
14 program is to be broad and detailed enough to detect instances of aging effects that  
15 have occurred repeatedly. In some instances, repeatedly occurring aging effects  
16 (i.e., recurring internal corrosion) might result in augmented aging management  
17 activities. Further evaluation aging management review line items in SRP-SLR Sections  
18 3.2.2.2.8, 3.3.2.2.7, and 3.4.2.2.6, "Loss of Material due to Recurring Internal Corrosion,"  
19 include criteria to determine whether recurring internal corrosion is occurring and  
20 recommendations related to augmenting aging management activities.

21 The program is informed and enhanced when necessary through the systematic and  
22 ongoing review of both plant-specific and industry operating experience, as discussed in  
23 Appendix B of the GALL-SLR Report.

## 24 **References**

- 25 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
26 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 27 EPRI. EPRI Technical Report 1009743, "Aging Identification and Assessment Checklist."  
28 Palo Alto, California: Electric Power Research Institute. August 2004.
- 29 \_\_\_\_\_. EPRI Technical Report 1007933, "Aging Assessment Field Guide." Palo Alto,  
30 California: Electric Power Research Institute. December 2003.
- 31 INPO. INPO Good Practice TS-413, "Use of System Engineers." INPO 85-033. Institute of  
32 Nuclear Power Operations. May 1988.

# 1 XI.M39 LUBRICATING OIL ANALYSIS

## 2 Program Description

3 The purpose of the Lubricating Oil Analysis program is to ensure that the oil environment in the  
4 mechanical systems is maintained to the required quality to prevent or mitigate age-related  
5 degradation of components within the scope of this program. This program maintains oil  
6 systems contaminants (primarily water and particulates) within acceptable limits, thereby  
7 preserving an environment that is not conducive to loss of material or reduction of heat transfer.  
8 Lubricating oil testing activities include sampling and analysis of lubricating oil for detrimental  
9 contaminants. The presence of water or particulates may also be indicative of inleakage and  
10 corrosion product buildup.

11 Although primarily a sampling program, the lubricating oil analysis program is generally effective  
12 in monitoring and controlling impurities. The GALL-SLR Report identifies when the program is  
13 to be augmented to manage the effects of aging for subsequent license renewal (SLR).  
14 Accordingly, in certain cases identified in this GALL-SLR Report, verification of the effectiveness  
15 of the Lubricating Oil Analysis program is undertaken to ensure that significant degradation is  
16 not occurring and that the component's intended function is maintained during the subsequent  
17 period of extended operation. For these specific cases, an acceptable verification program is a  
18 one-time inspection of selected components at susceptible locations in the system.

## 19 Evaluation and Technical Basis

20 1. **Scope of Program:** The program manages the aging effects of loss of material due to  
21 corrosion or reduction of heat transfer due to fouling. Components within the scope of  
22 the program include piping, piping components, and piping elements; heat exchanger  
23 tubes; reactor coolant pump elements; and any other plant components subject to aging  
24 management review (AMR) that are exposed to an environment of lubricating oil  
25 (including nonwater-based hydraulic oils).

26 2. **Preventive Actions:** The Lubricating Oil Analysis program maintains oil system  
27 contaminants (primarily water and particulates) within acceptable limits.

28 3. **Parameters Monitored or Inspected:** This program performs a check for water and a  
29 particle count to detect evidence of contamination by moisture or excessive corrosion.

30 4. **Detection of Aging Effects:** Moisture or corrosion products increase the potential for,  
31 or may be indicative of, loss of material due to corrosion and reduction of heat transfer  
32 due to fouling. The program performs periodic sampling and testing of lubricating oil for  
33 moisture and corrosion particles in accordance with industry standards. The program  
34 recommends sampling and testing of the old oil following periodic oil changes or on a  
35 schedule consistent with equipment manufacturer's recommendations or industry  
36 standards (e.g., ASTM D 6224-02). Plant-specific operating experience also may be  
37 used to augment manufacturer's recommendations or industry standards in determining  
38 the schedule for periodic sampling and testing when justified by prior sampling results.

39 In certain cases, as identified by the AMR Items in this GALL-SLR Report, inspection of  
40 selected components is to be undertaken to verify the effectiveness of the program and  
41 to ensure that significant degradation is not occurring and that the component intended  
42 function is maintained during the subsequent period of extended operation.

- 1 5. **Monitoring and Trending:** Oil analysis results are reviewed to determine if alert levels  
2 or limits have been reached or exceeded. This review also checks for unusual trends.
- 3 6. **Acceptance Criteria:** Water and particle concentration should not exceed limits based  
4 on equipment manufacturer's recommendations or industry standards. Phase-separated  
5 water in any amount is not acceptable.
- 6 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
7 conditions adverse to quality or significant conditions adverse to quality under those  
8 specific portions of the quality assurance (QA) program that are used to meet  
9 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
10 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
11 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
12 fulfill the corrective actions element of this aging management program (AMP) for both  
13 safety-related and nonsafety-related structures and components (SCs) within the scope  
14 of this program.
- 15 Corrective actions may include increased monitoring, corrective maintenance, further  
16 laboratory analysis, and engineering evaluation of the system. If a limit is reached or  
17 exceeded, actions to address the condition are taken.
- 18 8. **Confirmation Process:** The confirmation process is addressed through those specific  
19 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
20 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
21 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
22 confirmation process element of this AMP for both safety-related and nonsafety-related  
23 SCs within the scope of this program.
- 24 9. **Administrative Controls:** Administrative controls are addressed through the QA  
25 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
26 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
27 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
28 fulfill the administrative controls element of this AMP for both safety-related and  
29 nonsafety-related SCs within the scope of this program.
- 30 10. **Operating Experience:** The operating experience at some plants has identified  
31 (a) water in the lubricating oil and (b) particulate contamination. However, no instances  
32 of component failures attributed to lubricating oil contamination have been identified.
- 33 The program is informed and enhanced when necessary through the systematic and  
34 ongoing review of both plant-specific and industry operating experience, as discussed in  
35 Appendix B of the GALL-SLR Report.

## 36 **References**

- 37 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
38 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 39 ASTM. ASTM D 6224-02, "Standard Practice for In-Service Monitoring of Lubricating Oil for  
40 Auxiliary Power Plant Equipment." West Conshohocken, Pennsylvania: American Society of  
41 Testing Materials. 2002.

## XI.M40 MONITORING OF NEUTRON-ABSORBING MATERIALS OTHER THAN BORAFLEX

### Program Description

Many neutron-absorbing materials are used in spent fuel pools. This aging management program (AMP) addresses aging management of spent fuel pools that use materials other than Boraflex, such as Boral, Metamic, boron steel, and Carborundum. Information Notice (IN) 2009-26, Degradation of Neutron-Absorbing Materials in the Spent Fuel Pool, discusses the degradation of Carborundum as well as the deformation of Boral panels in spent fuel pools. GALL-SLR Report AMP XI.M22, "Boraflex Monitoring," addresses aging management of spent fuel pools that use Boraflex as the neutron-absorbing material. When a spent fuel pool criticality analysis credits both Boraflex and materials other than Boraflex, the guidance in both AMPs XI.M22 and XI.M40 applies.

A monitoring program is implemented to assure that degradation of the neutron-absorbing material used in spent fuel pools that could compromise the criticality analysis will be detected. The AMP relies on periodic inspection, testing, monitoring, and analysis of the criticality design to assure that the required 5 percent subcriticality margin is maintained during the period of subsequent license renewal (SLR).

### Evaluation and Technical Basis

- Scope of Program:** The AMP manages the effects of aging on neutron-absorbing components/materials other than Boraflex used in spent fuel racks.
- Preventive Actions:** This AMP is a condition monitoring program. Therefore, there are no preventative actions.
- Parameters Monitored or Inspected:** For these materials, gamma irradiation and/or long-term exposure to the wet pool environment may cause loss of material and changes in dimension (such as gap formation, formation of blisters, pits and bulges) that could result in loss of neutron-absorbing capability of the material. The parameters monitored include the physical condition of the neutron-absorbing materials, such as *in-situ* gap formation, geometric changes in the material (formation of blisters, pits, and bulges) as observed from coupons or *in situ*, and decreased boron-10 areal density, etc. The parameters monitored are directly related to determination of the loss of material or loss of neutron absorption capability of the material(s).
- Detection of Aging Effects:** The loss of material and the degradation of neutron absorbing material capacity are determined through coupon and/or direct *in-situ* testing. Such testing should include periodic verification of boron loss through boron-10 areal density measurement of coupons or through direct *in-situ* techniques. In addition to measuring boron content, testing should also be capable of identifying indications of geometric changes in the material (blistering, pitting, and bulging). The frequency of the inspection and testing depends on the condition of the neutron-absorbing material and is determined and justified with plant-specific operating experience by the licensee. The maximum interval between inspections for polymer-based materials (e.g., Carborundum, Tetrabor), regardless of operating experience, should not exceed 5 years. The maximum interval between inspections for nonpolymer-based materials [(e.g., Boral,

1 Metamic, Boralcan, borated stainless steel (SS)], regardless of operating experience,  
2 should not exceed 10 years.

3 5. **Monitoring and Trending:** The measurements from periodic inspections and analysis  
4 are compared to baseline information or prior measurements and analysis for trend  
5 analysis. The approach for relating the measurements to the performance of the spent  
6 fuel neutron absorber materials is specified by the applicant, considering differences in  
7 exposure conditions, vented/nonvented test samples, and spent fuel racks, etc.

8 6. **Acceptance Criteria:** Although the goal is to ensure maintenance of the 5 percent  
9 subcriticality margin for the spent fuel pool, the specific acceptance criteria for the  
10 measurements and analyses are specified by the applicant.

11 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
12 conditions adverse to quality or significant conditions adverse to quality under those  
13 specific portions of the quality assurance (QA) program that are used to meet  
14 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
15 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
16 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
17 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
18 related structures and components (SCs) within the scope of this program.

19 Corrective actions are initiated if the results from measurements and analysis indicate  
20 that the 5 percent subcriticality margin cannot be maintained because of current or  
21 projected future degradation of the neutron-absorbing material. Corrective actions may  
22 consist of providing additional neutron-absorbing capacity with an alternate material, or  
23 applying other options, which are available to maintain the subcriticality margin.

24 8. **Confirmation Process:** The confirmation process is addressed through those specific  
25 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
26 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
27 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
28 confirmation process element of this AMP for both safety-related and nonsafety-related  
29 SCs within the scope of this program.

30 9. **Administrative Controls:** Administrative controls are addressed through the QA  
31 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
32 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
33 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
34 fulfill the administrative controls element of this AMP for both safety-related and  
35 nonsafety-related SCs within the scope of this program.

36 10. **Operating Experience:** Applicants for license renewal reference plant-specific  
37 operating experience and industry experience to provide reasonable assurance that the  
38 program is able to detect degradation of the neutron absorbing material in the applicant's  
39 spent fuel pool. Some of the industry operating experience that should be included is  
40 listed below:

41 1. Loss of material from the neutron absorbing material has been seen at many  
42 plants, including loss of aluminum, which was detected by monitoring the  
43 aluminum concentration in the spent fuel pool. One instance of this was

- 1 documented in the Vogtle license renewal application Water Chemistry  
2 Program B.3.28.
- 3 2. Blistering has also been noted at many plants. Examples include blistering at  
4 Seabrook and Beaver Valley.
- 5 3. The significant loss of neutron-absorbing capacity of the plate-type Carborundum  
6 material has been reported at Palisades.
- 7 4. The coupon testing program at Kewaunee has observed loss of boron-10 areal  
8 density of Tetrabor.
- 9 5. The coupon testing programs at Calvert Cliffs Unit 1 and Crystal River Unit 3  
10 have observed weight loss of sheet-type Carborundum.

11 The applicant should describe how the monitoring program described above is capable  
12 of detecting the aforementioned degradation mechanisms.

13 The program is informed and enhanced when necessary through the systematic and  
14 ongoing review of both plant-specific and industry operating experience, as discussed in  
15 Appendix B of the GALL-SLR Report.

## 16 **References**

- 17 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
18 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.
- 19 Letter from Christopher J. Schwarz, Entergy Nuclear Operations, Inc., Palisades Nuclear Plant,  
20 to the U.S. Nuclear Regulatory Commission, Commitments to Address Degraded Spent Fuel  
21 Pool Storage Rack Neutron Absorber. ML082410132. August 2008.
- 22 Letter from James A. Spina, Constellation Energy Nuclear Generation Group, to the  
23 U.S. Nuclear Regulatory Commission, Calvert Cliffs 1 Response to Request for Additional  
24 Information—Long-Term Carborundum Coupon Surveillance Program. ML080140341.  
25 January 2008.
- 26 Letter from Jon A. Franke, Progress Energy, to the U.S. Nuclear Regulatory Commission,  
27 Crystal River Unit 3—Response to Request for Additional Information for the Review of the  
28 Crystal River Unit 3, Nuclear Generating Plant, License Renewal Application. ML100290366.  
29 January 2010.
- 30 Letter from Kevin L. Ostrowski, FirstEnergy Nuclear Operating Company, to the U.S. Nuclear  
31 Regulatory Commission, Supplemental Information for the Review of the Beaver Valley Power  
32 Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594) and  
33 License Renewal Application Amendment No. 34. ML090220216. January 2009.
- 34 Letter from Mark E. Warner, FPL Energy Seabrook Station, to the U.S. Nuclear Regulatory  
35 Commission, Seabrook Station Boral Spent Fuel Pool Test Coupons Report Pursuant to  
36 10 CFR Part 21.21, ML032880525. October 2003.

- 1 NRC. Interim Staff Guidance LR-ISG-2009-01, "Aging Management of Spent Fuel Pool
- 2 Neutron-Absorbing Materials Other Than Boraflex." Washington, DC: U.S. Nuclear Regulatory
- 3 Commission. 2010.
  
- 4 \_\_\_\_\_. NRC Information Notice 2009-26, "Degradation of Neutron-Absorbing Materials in the
- 5 Spent Fuel Pool." Washington, DC: U.S. Nuclear Regulatory Commission. October 2009.
  
- 6 Southern Nuclear Operating Company. "License Renewal Application Vogtle Electric
- 7 Generating Plant Units 1 and 2." ML071840360. Southern Nuclear Operating Company, Inc.
- 8 June 2007.

1 **XI.M41 BURIED AND UNDERGROUND PIPING AND TANKS**

2 **Program Description**

3 This aging management program (AMP) manages the aging of the external surfaces of buried  
4 and underground piping and tanks. It addresses piping and tanks composed of any material,  
5 including metallic, polymeric, and cementitious materials. This program manages aging through  
6 preventive, mitigative, inspection, and in some cases, performance monitoring activities. It  
7 manages applicable aging effects such as loss of material, cracking, and changes in material  
8 properties (for cementitious piping only).

9 Depending on the material, preventive and mitigative techniques may include external coatings,  
10 cathodic protection, and the quality of backfill. Also, depending on the material, inspection  
11 activities may include electrochemical verification of the effectiveness of cathodic protection,  
12 nondestructive evaluation of pipe or tank wall thicknesses, hydro testing of the pipe,  
13 performance monitoring of fire mains, and visual inspections of the pipe or tank from the  
14 exterior.

15 This program does not provide aging management of selective leaching. The Selective  
16 Leaching program (GALL-SLR Report AMP XI.M33) is applied in addition to this program for  
17 applicable materials and environments.

18 **Evaluation and Technical Basis**

19 1. **Scope of Program:** This program manages the effects of aging of the external surfaces  
20 of buried and underground piping and tanks constructed of any material including  
21 metallic, polymeric, and cementitious materials. The term “polymeric” material refers to  
22 plastics, or other polymers that comprise the structural element of the component. The  
23 program addresses aging effects such as loss of material, cracking, and changes in  
24 material properties (for cementitious piping only). The program also manages loss of  
25 material due to corrosion of piping system bolting within the scope of this program. The  
26 Bolting Integrity Program (GALL-SLR Report AMP XI.M18) manages other aging effects  
27 associated with piping system bolting.

28 2. **Preventive Actions:** Preventive actions utilized by this program vary with the material  
29 of the tank or pipe and the environment (e.g., air, soil, concrete) to which it is exposed.  
30 There are no recommended preventive actions for titanium alloy, super austenitic  
31 stainless steels, and nickel alloy materials. Preventive actions for buried and  
32 underground piping and tanks are conducted in accordance with Table 1 of the National  
33 Association of Corrosion Engineers (NACE) SP0169-2007 and the following:

<b>Material</b>	<b>Buried</b>	<b>Underground</b>
Stainless Steel	C, B	None
Steel	C, CP, B	C
Copper alloy	C, CP, B	C
Aluminum alloy	C, CP, B	None
Cementitious	C, B	None
Polymer	B	None

C: Coatings; CP: Cathodic Protection; B: Backfill

- 1
- 2 a. For buried stainless steel or cementitious piping or tanks, coatings are provided  
3 based on the environmental conditions (e.g., stainless steel in chloride containing  
4 environments). Applicants provide justification when coatings are not provided.  
5 Coatings are in accordance with Table 1 of the National Association of Corrosion  
6 Engineers (NACE) SP0169-2007 or Section 3.4 of NACE RP0285-2002.
- 7 b. For buried steel, copper alloy, and aluminum alloy piping and tanks, and  
8 underground steel and copper alloy piping and tanks, coatings are in accordance  
9 with Table 1 of NACE SP0169-2007 or Section 3.4 of NACE RP0285-2002.
- 10 c. Cathodic protection is in accordance with NACE SP0169-2007 or NACE  
11 RP0285-2002. The system is operated so that the cathodic protection criteria  
12 and other considerations described in the standards are met at every location in  
13 the system. The system monitoring interval discussed in Section 10.3 of NACE  
14 SP0169-2007 may not be extended beyond one year. The equipment used to  
15 implement cathodic protection need not be qualified in accordance with  
16 10 CFR Part 50, Appendix B. To prevent damage to the coating, the limiting  
17 critical potential should not be more negative than -1,200 mV.
- 18 d. Backfill is consistent with SP0169-2007 Section 5.2.3 or NACE RP0285-2002,  
19 Section 3.6. The staff considers backfill that is located within 6 inches of the  
20 component that meets ASTM D 448-08 size number 67 (size number 10 for  
21 polymeric materials) to meet the objectives of NACE SP0169-2007 and NACE  
22 RP0285-2002. For stainless steel and cementitious materials, backfill limits  
23 apply only if the component is coated. For materials other than aluminum alloy,  
24 the staff also considers the use of controlled low strength materials (flowable  
25 backfill) acceptable to meet the objectives of SP0169-2007.
- 26 e. Alternatives to the preventive actions in Table XI.M41-1 are as follows:
- 27 i. A broader range of coatings may be used if justification is provided in  
28 the LRA.
- 29 ii. Backfill quality may be demonstrated by plant records or by examining the  
30 backfill while conducting the inspections described in the “detection of  
31 aging effects” program element of this AMP.
- 32 iii. For fire mains installed in accordance with National Fire Protection  
33 Association (NFPA) 24, preventive actions beyond those in NFPA 24

1 need not be provided if: (a) the system undergoes either a periodic flow  
2 test in accordance with NFPA 25; (b) the activity of the jockey pump  
3 (e.g., number of pump starts, run time) is monitored as described in  
4 “detection of aging effects” program element of this AMP; or (c) an annual  
5 system leakage rate test is conducted.

- 6 iv. Failure to provide cathodic protection in accordance with Table XI.M41-1  
7 may be acceptable if justified in the LRA. The justification addresses soil  
8 sample locations, soil sample results, the methodology and results of how  
9 the overall soil corrosivity was determined, pipe to soil potential  
10 measurements and other relevant parameters. Inspections in excess of  
11 those recommended in the “detection of aging effects” program element  
12 of this AMP may be necessary based on plant-specific operating  
13 experience.

14 If cathodic protection is not provided for any reason, the applicant reviews  
15 the most recent 10 years of plant specific operating experience to  
16 determine if degraded conditions that would not have met the acceptance  
17 criteria of this AMP have occurred at the facility. This search includes  
18 components that are not in-scope for license renewal if, when compared  
19 to in-scope piping, they are similar materials and coating systems and are  
20 buried in a similar soil environment. The results of this expanded plant  
21 specific operating experience search are included in the LRA.

22 3. ***Parameters Monitored or Inspected:***

- 23 a. Visual inspections of buried or underground piping or tanks, or their coatings, are  
24 performed to monitor for:
- 25 i. loss of material due to general, pitting, crevice, and microbiological-  
26 induced corrosion for aluminum alloy, copper alloy, steel, stainless steel,  
27 super austenitic, and titanium alloy components;
  - 28 ii. cracking due to stress corrosion cracking for stainless steel and  
29 susceptible aluminum alloy materials;
  - 30 iii. loss of material due to wear for polymeric materials;
  - 31 iv. cracking, spalling, and corrosion or exposure of rebar for asbestos  
32 cement pipe, and concrete pipe;
  - 33 v. cracking, blistering, change in color due to water absorption for  
34 high-density polyethylene (HDPE) and fiberglass components; and
  - 35 vi. cracking due to aggressive chemical attack and leaching; changes in  
36 material properties due to aggressive chemical attack for reinforced  
37 concrete and asbestos cement piping.
- 38 b. Ultrasonic testing (UT) may be performed to monitor wall thickness. Pit depth  
39 gages, calipers or other techniques qualified for measuring wall thickness may  
40 also be used.
- 41 c. Inspections for cracking utilize a method that has been demonstrated to be  
42 capable of detecting cracking. Intact coatings do not have to be removed to  
43 inspect for potential cracking.

1 d. Pipe-to-soil potential and the cathodic protection current are monitored for steel,  
 2 copper alloy, and aluminum alloy piping and tanks in contact with soil to  
 3 determine the effectiveness of cathodic protection systems.

4 4. **Detection of Aging Effects:** Methods and frequencies used for the detection of aging  
 5 effects vary with the material and environment of the buried and underground piping  
 6 and tanks. Inspections of buried and underground piping and tanks are conducted  
 7 in accordance with Table XI.41-2 and the following. There are no inspection  
 8 recommendations for titanium alloy, super austenitic, or nickel alloy materials.  
 9 Table XI.41-2 inspection quantities are for a single unit plant. For two-unit sites, the  
 10 inspection quantities (i.e., not the percentage of pipe length) are increased by 50  
 11 percent. For a three-unit site, the inspection quantities are doubled. For multi-unit sites  
 12 the inspections are distributed evenly among the units. Modifications to Table XI.41-2  
 13 may be appropriate if exceptions are taken to program element 2, "preventive actions,"  
 14 or in response to plant-specific operating experience.

15 Inspections of buried and underground piping and tanks are conducted during each  
 16 10 year period, commencing 10 years prior to the subsequent period of extended  
 17 operation. Piping inspections are typically conducted by visual examination of the  
 18 external surfaces of pipe or coatings. Tank inspections are conducted externally by  
 19 visual examination of the surfaces of the tank or coating or internally by volumetric  
 20 methods. Opportunistic inspections are conducted for in scope piping whenever they  
 21 become accessible. Visual inspections are supplemented with surface and/or volumetric  
 22 nondestructive testing if evidence of wall loss beyond minor surface scale is observed.

<b>Table XI.M41-2. Inspection of Buried and Underground Piping and Tanks</b>		
<b>Inspections of Buried Piping</b>		
<b>Material</b>	<b>Preventive Action Categories</b>	<b>Inspection See section 4.c. for extent of inspections</b>
Stainless Steel		1 inspection
Polymeric	Backfill is in accordance with preventive actions program element	1 inspection
	Backfill is not in accordance with preventive actions program element	The smaller of 1% of the length of pipe or 2 inspections
Cementitious		1 inspection
Steel	C	The smaller of 0.5% of the piping length or 1 inspection
	D	The smaller of 1% of the piping length or 2 inspections
	E	The smaller of 5% of the piping length or 3 inspections
	F	The smaller of 10% of the piping length or 6 inspections

<b>Table XI.M41-2. Inspection of Buried and Underground Piping and Tanks</b>			
<b>Inspections of Buried Piping</b>			
Copper alloy	C	The smaller of 0.5% of the piping length or 1 inspection	
	D	The smaller of 1% of the piping length or 2 inspections	
	E	The smaller of 5% of the piping length or 3 inspections	
	F	The smaller of 10% of the piping length or 6 inspections	
Aluminum alloy	C	The smaller of 0.5% of the piping length or 1 inspection	
	D	The smaller of 1% of the piping length or 2 inspections	
	E	The smaller of 5% of the piping length or 3 inspections	
	F	The smaller of 10% of the piping length or 6 inspections	
<b>Inspections of Buried Tanks and Underground Piping and Tanks</b>			
<b>Material</b>	<b>Buried Tanks</b>	<b>Underground Piping</b>	<b>Underground Tanks</b>
Stainless Steel	All tanks	1 inspection	All tanks
Polymeric	All tanks	1 inspection	None
Cementitious	All tanks	1 inspection	None
Steel	All tanks	The smaller of 2% of the piping length or 2 inspections	All tanks
Copper alloy or Aluminum alloy	All tanks	The smaller of 1% of the length of piping or 1 inspection	All tanks
<b>The Preventive Action Categories are used as follows:</b>			
<p>A: Category A no longer used.</p> <p>B: Category B no longer used.</p> <p>C: Category C applies when:</p> <ol style="list-style-type: none"> <li>a. Cathodic protection was installed or refurbished 5 years prior to the end of the inspection period of interest; and</li> <li>b. Cathodic protection has operated at least 85 percent of the time since either 10 years prior to the subsequent period of extended operation or since installation/refurbishment, whichever is shorter. Time periods in which the cathodic protection system is off-line for testing do not have to be included in the total non-operating hours; and</li> <li>c. Cathodic protection has provided effective protection for buried piping as evidenced by meeting the acceptance criteria of Table XI.41-3 of this AMP at least 80 percent of the time since either 10 years prior to the subsequent period of extended operation or since installation/refurbishment, whichever is shorter. As found results of annual surveys are to be used to demonstrate locations within the plant's population of buried pipe where cathodic protection acceptance criteria have, or have not, been met.</li> </ol> <p>D: Inspection criteria provided for Category D piping may be used for those portions of in-scope buried piping where the plant has demonstrated, in accordance with Section e.iv. of the "preventive actions" program element of this AMP, that external corrosion control is not required.</p> <p>E: Inspection criteria provided for Category E piping may be used for those portions of the plant's population of buried piping where:</p> <ol style="list-style-type: none"> <li>a. An analysis, conducted in accordance with the "preventive actions" program element of this AMP, has</li> </ol>			

**Table XI.M41-2. Inspection of Buried and Underground Piping and Tanks**

- demonstrated that installation or operation of a cathodic protection system is impractical; or
- b. A cathodic protection system has been installed but all or portions of the piping covered by that system fail to meet any of the criteria of Category C piping above, provided:
    - i. Coatings and backfill are provided in accordance with the “preventive actions” program element of this AMP; and
    - ii. Plant-specific operating experience is acceptable (i.e., no leaks in buried piping due to external corrosion, no significant coating degradation or metal loss in more than 10 percent of inspections conducted); and
    - iii. Soil has been demonstrated to be not corrosive for the material type. In order to demonstrate that the soil is not corrosive, the applicant:
      - 1) Obtains a minimum of three sets of soil samples in each soil environment (e.g., moisture content, soil composition) in the vicinity in which in-scope components are buried.
      - 2) Tests the soil for soil resistivity, corrosion accelerating bacteria, pH, moisture, chlorides, sulfates, and redox potential.
      - 3) Determines the potential soil corrosivity for each material type of buried in-scope piping. In addition to evaluating each individual parameter, the overall soil corrosivity is determined.
      - 4) Conducts soil testing prior to submitting the application and once in each 10-year period starting 10 years prior to the subsequent period of extended operation.
      - 5) Provides a summary of the results and conclusions of the soil testing in the LRA.

F: Inspection criteria provided for Category F piping is used for those portions of in-scope buried piping which cannot be classified as Category C, D, or E.

- 1 a. Transitioning to a Higher Number of Inspections: Plant specific conditions can  
2 result in transitioning to a higher number of inspections than originally planned at  
3 the beginning of a 10 year interval. For example, degraded performance of the  
4 cathodic protections system could result in transitioning from Preventive Action  
5 Category C to Preventive Action Category E. Coating, backfill, or the condition of  
6 exposed piping that do not meet acceptance criteria could result in transitioning  
7 from Preventive Action Category E to Preventive Action Category F. If this  
8 transition occurs in the latter half of the current 10 year interval, the timing of the  
9 additional examinations is based on the severity of the degradation identified and  
10 is commensurate with the consequences of a leak or loss of function, but in all  
11 cases, the examinations are completed within 4 years after the end of the  
12 particular 10 year interval. These additional inspections conducted in an  
13 inspection interval cannot be credited towards the number of inspections stated  
14 in Table XI.41-2 for the 10 year interval.
- 15 b. Exceptions to Table XI.41-2 inspection quantities:
  - 16 i. Where piping constructed of steel, copper alloy, or aluminum alloy has  
17 been coated with the same coating system and the backfill has the same  
18 requirements, the total inspections for this piping may be combined to  
19 satisfy the recommended inspection quantity. For example, for  
20 Preventive Action Category F, 10 percent of the total of the associated  
21 steel, copper alloy, or aluminum alloy is inspected; or 6 10 foot segments  
22 of steel, copper alloy, or aluminum alloy piping is inspected.
  - 23 ii. For buried piping, inspections may be reduced to one-half the number of  
24 inspections indicated in Table XI.41-2 when performance of the indicated  
25 inspections necessitates excavation of piping that has been fully  
26 backfilled using controlled low strength material. The inspection quantity

- 1 is rounded up (e.g., where three inspections are recommended in Table  
2 XI.41-2, two inspections are conducted). In conducting these inspections,  
3 the backfill may be excavated and the pipe examined, or the soil around  
4 the backfill may be excavated and the controlled low strength material  
5 backfill examined. The backfill inspection includes excavation of the top  
6 surfaces and at least 50 percent of the side surface to visually inspect for  
7 cracks in the backfill that could admit groundwater to the external  
8 surfaces of the piping components. When conducting inspection of  
9 backfill based on the number of inspections designated for that material  
10 type, 10 linear feet of the backfill is exposed for each inspection.
- 11 iii. When Preventive Action Category A or C is met for all materials except  
12 for aluminum alloys, no inspections are necessary if all the piping  
13 constructed from a specific material type is fully backfilled using controlled  
14 low strength material.
- 15 iv. If all of the in scope polymeric material is nonsafety related, the inspection  
16 quantities for Preventive Action Category B may be reduced by half.
- 17 v. Buried polymeric tanks are only inspected if backfill is not in accordance  
18 with the preventive actions.
- 19 vi. Stainless steel tanks are inspected when they are not coated and the  
20 underground environment is potentially exposed to in-leakage of  
21 groundwater or rain water.
- 22 vii. Steel, copper alloy, and aluminum alloy buried tanks are not inspected if  
23 the cathodic protection provided for the tank met the criteria for  
24 Preventive Action Category C.
- 25 c. Guidance related to the extent of inspections for piping is as follows:
- 26 i. When the inspections are based on the number of inspections in lieu of  
27 percentage of piping length, 10 feet of piping is exposed for each  
28 inspection.
- 29 ii. When the percentage of inspections for a given material type results in an  
30 inspection quantity of less than 10 feet, then 10 feet of piping is  
31 inspected. If the entire run of piping of that material type is less than  
32 10 feet in total length, then the entire run of piping is inspected.
- 33 iii. If fire protection piping is inspected by excavations in lieu of alternative  
34 testing (e.g., flow test, jockey pump monitoring, leak rate testing) and the  
35 extent of inspections is not based on the percentage of piping in the  
36 material group, then two additional inspections are added to the  
37 inspection quantity for that material type.
- 38 d. Piping inspection location selection: Piping inspection locations are selected  
39 based on risk (i.e., susceptibility to degradation and consequences of failure).  
40 Characteristics such as coating type, coating condition, cathodic protection  
41 efficacy, backfill characteristics, soil resistivity, pipe contents, and pipe function

1 are considered. For many piping systems, External Corrosion Direct  
2 Assessment (ECDA), as described in NACE SP0502-2010, "Pipeline External  
3 Corrosion Direct Assessment Methodology," has been effective in identifying pipe  
4 locations that merit further inspection. Opportunistic examinations of nonleaking  
5 pipes may be credited toward examinations if the location selection criteria are  
6 met. The use of guided wave ultrasonic or other advanced inspection techniques  
7 is encouraged for the purpose of determining the piping locations that will be  
8 inspected. These methods may not be substituted for the inspections listed in  
9 the table.

10 e. Alternatives to visual examination of piping are as follows:

11 i. Fire mains are inspected in accordance with Table XI.41-2, unless they  
12 are either: (a) subjected to a flow test as described in Section 7.3 of  
13 NFPA 25 at a frequency of at least one test in each one-year period;  
14 (b) the activity of the jockey pump (e.g., pump starts, run time) is  
15 monitored on an interval not to exceed one month; or (c) an annual  
16 system leak rate test is conducted.

17 ii. At least 25 percent of the in-scope piping constructed from the material  
18 under consideration is hydrostatically tested on an interval not to exceed  
19 5 years. The piping is pressurized to 110 percent of the design pressure  
20 of any component within the boundary with test pressure being held for  
21 8 hours.

22 iii. At least 25 percent of the in-scope piping constructed from the material  
23 under consideration is internally inspected by a method capable of  
24 precisely determining pipe wall thickness. The inspection method has  
25 been demonstrated to be capable of detecting both general and pitting  
26 corrosion and is qualified by the applicant. UT examinations, in general,  
27 satisfy this criterion. As of the effective date of this document, guided  
28 wave ultrasonic examinations do not meet the intent of this paragraph. If  
29 internal inspections are to be conducted in lieu of direct visual  
30 examination, they are conducted at an interval not to exceed 10 years.

31 f. Guidance related to the extent of inspections for tanks is as follows.  
32 Examinations are conducted from the external surface of the tank using visual  
33 techniques or from the internal surface of the tank using volumetric techniques.  
34 A minimum of 25 percent coverage is obtained. This area includes at least some  
35 of both the top and bottom of the tank. If the tank is inspected internally by  
36 volumetric methods, the method is: capable of determining tank wall thickness,  
37 demonstrated to be capable of detecting both general and pitting corrosion, and  
38 qualified by the applicant. Double wall tanks may be examined by monitoring the  
39 annular space for leakage.

40 5. **Monitoring and Trending:** For piping and tanks protected by cathodic protection  
41 systems, potential difference and current measurements are trended to identify changes  
42 in the effectiveness of the systems and/or coatings. If aging of fire mains is managed  
43 through monitoring jockey pump activity (or similar parameter), the jockey pump activity  
44 (or similar parameter) is trended to identify changes in pump activity that may be the  
45 result of increased leakage from buried fire main piping. Likewise, if leak rate testing is

1 conducted, leak rates are trended. Where wall thickness measurements are conducted,  
2 the results are trended when follow up examinations are conducted.

3 6. **Acceptance Criteria:** The acceptance criteria associated with this AMP are:

4 a. For coated piping or tanks, there is either no evidence of coating degradation, or  
5 the type and extent of coating degradation is evaluated as insignificant by an  
6 individual possessing a NACE Coating Inspector Program Level 2 or 3 inspector  
7 qualification, or an individual who has attended the Electric Power Research  
8 Institute (EPRI) Comprehensive Coatings Course and completed the EPRI  
9 Buried Pipe Condition Assessment and Repair Training Computer Based  
10 Training Course.

11 b. Cracking, blistering, gouges, or wear of nonmetallic piping is evaluated.

12 c. Cementitious piping may exhibit minor cracking and spalling provided there is no  
13 evidence of leakage, exposed rebar, or reinforcing “hoop” bands.

14 d. Backfill is acceptable if the inspections do not reveal evidence that the backfill  
15 caused damage to the component’s coatings or the surface of the component (if  
16 not coated).

17 e. Flow test results for fire mains are in accordance with NFPA 25, Section 7.3.

18 f. For hydrostatic tests, the test acceptance criteria are that there are no visible  
19 indications of leakage, and no drop in pressure within the isolated portion of the  
20 piping, that is not accounted for by a temperature change in the test media or by  
21 quantified leakage across test boundary valves.

22 g. Changes in jockey pump activity (or similar parameter) that cannot be attributed  
23 to causes other than leakage from buried piping, are not occurring.

24 h. When fire water system leak rate testing is conducted, leak rates are within  
25 acceptance limits of plant specific documents.

26 i. Criteria for soil-to-pipe potential when using a saturated CSE reference electrode  
27 is as stated in Table XI.41-3, or acceptable alternatives as stated below.

28 j. Alternatives to the -850 mV criterion for steel piping in Table XI.41-3 are as  
29 follows.

30 i. 100 mV minimum polarization

31 ii. -750 mV relative to a CSE, instant off where soil resistivity is  
32 greater than 10,000 ohm-cm to less than 100,000 ohm-cm

<b>Material</b>	<b>Criteria<sup>1,2</sup></b>
Steel	-850 mV relative to a CSE, instant off
Copper alloy	100 mV minimum polarization
Aluminum alloy	100 mV minimum polarization

<sup>1</sup>Plants with sacrificial anode systems state the test method and acceptance criteria and the basis for the method and criteria in the application.  
<sup>2</sup>Where an impressed current cathodic protection system is utilized with prestressed concrete pipe, steps are taken to avoid an excessive level of potential that could damage the prestressing wire. Therefore, polarized potentials more negative than -1,000 mV relative to a CSE are avoided to prevent hydrogen generation and possible hydrogen embrittlement of the high-strength prestressing wire.

- 1                   iii.           -650 mV relative to a CSE, instant off where soil resistivity is
- 2   greater than 100,000 ohm-cm
- 3                   iv.           Verify less than 1 mil/year (mpy) loss of material

4                   When using the 100 mV, -750 mV, or -650 mV polarization criteria as an alternative to  
5                   the -850 mV criterion for steel piping, means to verify the effectiveness of the protection  
6                   of the most anodic metal is incorporated into the program. One acceptable means to  
7                   verify the effectiveness of the cathodic protection system, or to demonstrate that the  
8                   corrosion rate is less than 1 mpy, is to use installed electrical resistance corrosion  
9                   rate probes.

10                  The acceptance criterion (for external loss of material) to demonstrate that a cathodic  
11                  protection system is operating in a satisfactory manner is 1 mpy or less. This 1 mpy  
12                  criterion is related to the performance of the cathodic protection system and has no  
13                  relationship to available corrosion allowances or to the remaining operational life of the  
14                  piping system under consideration. Applicants separately evaluate whether a 1 mpy  
15                  corrosion rate is acceptable from the perspective of the intended function (e.g., pressure  
16                  boundary) of the piping under consideration. The external loss of material rate is  
17                  verified:

- 18                  • Every year when verifying less than 1 mpy loss of material.
- 19                  • Every 2 years when using the 100 mV minimum polarization.
- 20                  • Every 5 years when using the -750 or -650 criteria associated with higher  
21                  resistivity soils. The soil resistivity is verified every 5 years.

22                  If electrical resistance corrosion rate probes will be used, the application states:

- 23                  • The qualifications of the individuals that will determine the installation locations of  
24                  the probes and the methods of use (e.g., NACE CP-4, "Cathodic Protection  
25                  Specialist").
- 26                  • How the impact of significant site features (e.g., large cathodic protection current  
27                  collectors, shielding due to large objects located in the vicinity of the protected  
28                  piping) and local soil conditions will be factored into placement of the probes and  
29                  use of probe data.

- 1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
6 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
7 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
8 related structures and components (SCs) within the scope of this program.
- 9 a. Where damage to the coating has been evaluated as significant and the damage  
10 was caused by nonconforming backfill, an extent of condition evaluation is  
11 conducted to ensure that the as-left condition of backfill in the vicinity of the  
12 observed damage will not lead to further degradation.
- 13 b. If coated or uncoated metallic piping or tanks show evidence of corrosion, the  
14 remaining wall thickness in the affected area is determined to ensure that the  
15 minimum wall thickness is maintained. This may include different values for  
16 large area minimum wall thickness, and local area wall thickness. If the wall  
17 thickness meets minimum wall thickness requirements, recommendations for  
18 expansion of sample size (see 7.c.) do not apply.
- 19 c. Where the coatings, backfill, or the condition of exposed piping does not meet  
20 acceptance criteria, the degraded condition is repaired or the affected component  
21 is replaced. In addition, an expansion of sample size is conducted. The number  
22 of inspections within the affected piping categories are doubled or increased by  
23 5, whichever is smaller. If the acceptance criteria are not met in any of the  
24 expanded samples, an analysis is conducted to determine the extent of condition  
25 and extent of cause. The number of the follow on inspections is determined  
26 based on the extent of condition and extent of cause.
- 27 The timing of the additional examinations is based on the severity of the  
28 degradation identified and is commensurate with the consequences of a leak or  
29 loss of function. However, in all cases, the expanded sample inspection is  
30 completed within the 10-year interval in which the original inspection was  
31 conducted or, if identified in the latter half of the current 10 year interval, within 4  
32 years after the end of the 10 year interval. The number of inspections may be  
33 limited by the extent of piping or tanks subject to the observed degradation  
34 mechanism.
- 35 The expansion of sample inspections may be halted in a piping system or portion  
36 of system that will be replaced within the 10-year interval in which the inspections  
37 were conducted or, if identified in the latter half of the current 10 year interval,  
38 within 4 years after the end of the 10 year interval.
- 39 d. Unacceptable cathodic protection survey results are entered into the plant  
40 corrective action program.
- 41 e. Sources of leakage detected during pressure tests are identified and corrected.
- 42 f. When using the alternatives to the -850 mV relative to a CSE instant off  
43 acceptance criterion for the cathodic protection system, the application states

- 1 what actions will be taken if the measured external loss of material acceptance  
2 criterion, or internal loss of material rates (if opportunistic inspections are  
3 conducted by other AMPs) is exceeded.
- 4 g. When using the option of monitoring the activity of a jockey pump instead of  
5 inspecting buried fire water system piping (see 4.e.i.), a flow test or system leak  
6 rate test is conducted by the end of the next refueling outage or as directed by  
7 the current licensing basis, whichever is shorter, when unexplained changes in  
8 jockey pump activity (or equivalent equipment or parameter) are observed.
- 9 8. **Confirmation Process:** The confirmation process is addressed through those specific  
10 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
11 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
12 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
13 confirmation process element of this AMP for both safety-related and nonsafety-related  
14 SCs within the scope of this program.
- 15 9. **Administrative Controls:** Administrative controls are addressed through the QA  
16 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
17 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
18 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
19 fulfill the administrative controls element of this AMP for both safety-related and  
20 nonsafety-related SCs within the scope of this program.
- 21 10. **Operating Experience:** Operating experience shows that buried and underground  
22 piping and tanks are subject to corrosion. Corrosion of buried oil, gas, and hazardous  
23 materials pipelines have been adequately managed through a combination of  
24 inspections and mitigative techniques, such as those prescribed in NACE SP0169-2007  
25 and NACE RP0285-2002. Given the differences in piping and tank configurations  
26 between transmission pipelines and those in nuclear facilities, it is necessary for the  
27 applicant to evaluate both plant-specific and nuclear industry operating experience and  
28 to modify its AMP accordingly. The following examples of industry experience may be of  
29 significance to an applicant's program:
- 30 a. In August 2009, a leak was discovered in a portion of buried aluminum pipe  
31 where it passed through a concrete wall. The piping is in the condensate transfer  
32 system. The failure was caused by vibration of the pipe within its steel support  
33 system. This vibration led to coating failure and eventual galvanic corrosion  
34 between the aluminum pipe and the steel supports. (ADAMS Accession Number  
35 ML093160004).
- 36 b. In June 2009, an active leak was discovered in buried piping associated with the  
37 condensate storage tank. The leak was discovered because elevated levels of  
38 tritium were detected. The cause of the through-wall leaks was determined to be  
39 the degradation of the protective moisture barrier wrap that allowed moisture  
40 to come in contact with the piping resulting in external corrosion.  
41 (ADAMS Accession Number ML093160004).
- 42 c. In April 2010, while performing inspections as part of its buried pipe program, a  
43 licensee discovered that major portions of their auxiliary feedwater (AFW) piping  
44 were substantially degraded. The licensee's cause determination attributes the

1 cause of the corrosion to the failure to properly coat the piping “as specified”  
2 during original construction. The affected piping was replaced during the next  
3 refueling outage. (ADAMS Accession Number ML103000405).

- 4 d. In November 2013, minor weepage was noted in a 10-inch service water supply  
5 line to the emergency diesel generators while performing a modification to a main  
6 transformer moat. Coating degradation was noted at approximately 10 locations  
7 along the exposed piping. The leaking and unacceptable portions of the  
8 degraded pipe were clamped and recoated until a permanent replacement could  
9 be implemented. (ADAMS Accession Number ML13329A422).

10 The program is informed and enhanced when necessary through the systematic and  
11 ongoing review of both plant-specific and industry operating experience, as discussed in  
12 Appendix B of the GALL-SLR Report.

### 13 **References**

14 10 CFR Part 50, Appendix B, “Quality Assurance Criteria for Nuclear Power Plants.”  
15 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

16 ASTM. ASTM Standard D 448-08, “Classification for Sizes of Aggregate for Road and Bridge  
17 Construction.” West Conshohocken, Pennsylvania: ASTM International. 2008.

18 NACE. NACE Standard Practice SP0169-2007, “Control of External Corrosion on Underground  
19 or Submerged Metallic Piping Systems.” Houston, Texas: NACE International. 2007.

20 \_\_\_\_\_. NACE Standard RP0100-2004, “Standard Recommended Practice, Cathodic Protection  
21 of Prestressed Concrete Cylinder Pipelines.” Houston, Texas: NACE International. 2004.

22 \_\_\_\_\_. NACE Recommended Practice RP0285-2002, “Corrosion Control of Underground  
23 Storage Tank Systems by Cathodic Protection.” Houston, Texas: NACE International.  
24 April 2002.

25 NFPA. NFPA Standard 24, “Standard for the Installation of Private Fire Service Mains and  
26 Their Appurtenances.” Quincy, Massachusetts. National Fire Protection Association. 2010.

27 \_\_\_\_\_. NFPA Standard 25, “Standard for the Inspection, Testing, and Maintenance of Water-  
28 Based Fire Protection Systems.” Quincy, Massachusetts. National Fire Protection Association.  
29 2008.

30 ISO. ISO 15589-1, “Petroleum and Natural Gas Industries—Cathodic Protection of Pipeline  
31 Transportation Systems—Part 1: On Land Pipelines.” Vernier, Geneva, Switzerland:  
32 International Organization for Standardization. November 2003.



## XI.M42 INTERNAL COATINGS/LININGS FOR IN SCOPE PIPING, PIPING COMPONENTS, HEAT EXCHANGERS, AND TANKS

### Program Description

Proper maintenance of internal coatings/linings is essential to ensure that the intended functions of in scope components are met. Degradation of coatings/linings can lead to loss of material of base materials and downstream effects such as reduction in flow, reduction in pressure, or reduction in heat transfer when coatings/linings become debris. The program consists of periodic visual inspections of internal coatings/linings exposed to closed-cycle cooling water (CCCW), raw water, treated water, treated borated water, waste water, fuel oil, and lubricating oil. Where the visual inspection of the coated/lined surfaces determines that the coating/lining is deficient or degraded, physical tests are performed, where physically possible, in conjunction with the visual inspection. Electric Power Research Institute (EPRI) Report 1019157, "Guideline on Nuclear Safety Related Coatings," provides information on the American Society for Testing and Materials (ASTM) standard guidelines and coatings. American Concrete Institute (ACI) Standard 201.1R 08, "Guide for Conducting a Visual Inspection of Concrete in Service," provides guidelines for inspecting concrete.

### Evaluation and Technical Basis

- Scope of Program:** The scope of the program is internal coatings/linings for in scope piping, piping components, heat exchangers, and tanks exposed to CCCW, raw water, treated water, treated borated water, waste water, fuel oil, and lubricating oil where loss of coating or lining integrity could prevent satisfactory accomplishment of any of the component's or downstream component's current licensing basis (CLB) intended functions identified under 10 CFR 54.4(a)(1), (a)(2), or (a)(3). The aging effects associated with fire water tank internal coatings/linings are managed by Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) aging management program (AMP) XI.M27, "Fire Water System," instead of this AMP. However, where the fire water storage tank internals are coated, the Fire Water System Program and Final Safety Analysis Report (FSAR) Summary Description of the Program should be enhanced to include the recommendations associated with training and qualification of personnel and the "corrective actions" program element. The Fire Water System Program should also be enhanced to include the recommendations from the "acceptance criteria" program element.

If a coating/lining has a qualified life, and it will be replaced prior to the end of its qualified life without consideration of extending the life through condition monitoring, it would not be considered long lived and therefore, it would not be within the scope of this AMP.

Coatings/linings are an integral part of an in scope component. The CLB-intended function(s) of the component dictates whether the component has an intended function(s) that meets the scoping criteria of 10 CFR 54.4(a). Internal coatings/linings for in scope piping, piping components, heat exchangers, and tanks are not evaluated as standalone components to determine whether they meet the scoping criteria of 10 CFR 54.4(a). It is immaterial whether the coating/lining has an intended function identified in the CLB because it is the CLB-intended function of the component that dictates whether the component is in scope and thereby the aging effects of the

1 coating/lining integral to the component must be evaluated for potential impact on the  
2 component's and downstream component's intended function(s).

3 An applicant may elect to manage the aging effects for internal coatings/linings for  
4 in-scope piping, piping components, heat exchangers, and tanks in an alternative AMP  
5 that is specific to the component or system in which the coatings/linings are installed  
6 (e.g., GALL-SLR Report AMP XI.M20, "Open-Cycle Cooling Water System," for service  
7 water coatings/linings) as long as the following are met:

- 8 • The recommendations of this AMP are incorporated into the  
9 alternative program.
- 10 • Exceptions or enhancements associated with the recommendations in  
11 this AMP are included in the alternative AMP.
- 12 • The FSAR supplement for this AMP as shown in Standard Review Plan-  
13 Subsequent License Renewal (SRP-SLR) Table 3.0-1, "FSAR  
14 Supplement for Aging Management of Applicable Systems," is included in  
15 the application with a reference to the alternative AMP.

16 For components where the aging effects of internally coated/lined surfaces are managed  
17 by this program, loss of material, cracking, and loss of material due to selective leaching  
18 need not be managed for these components by another program.

19 2. **Preventive Actions:** The program is a condition monitoring program and does not  
20 recommend any preventive actions.

21 3. **Parameters Monitored or Inspected:** Visual inspections are intended to identify  
22 coatings/linings that do not meet acceptance criteria, such as peeling and delamination.  
23 Aging mechanisms associated with coatings/linings are described as follows:

- 24 • Blistering—formation of bubbles in a coating/lining
- 25 • Cracking—formation of breaks in a coating/lining that extend through to the  
26 underlying surface
- 27 • Flaking—detachment of pieces of the coating/lining itself either from its substrate  
28 or from previously applied layers
- 29 • Peeling—separation of one or more coats or layers of a coating/lining from  
30 the substrate
- 31 • Delamination—separation of one coat or layer from another coat or layer, or from  
32 the substrate
- 33 • Rusting—corrosion of the substrate that occurs beneath or through the applied  
34 coating/lining
- 35 • Spalling—a fragment, usually in the shape of a flake, detached from a  
36 concrete member.

1 Physical damage consists of removal or reduction of the thickness of coating/lining by  
2 mechanical damage. For the purposes of this AMP, this would include damage such as  
3 that which could occur downstream of a throttled valve as a result of cavitation or  
4 erosion. It does not include physical damage caused by actions such as installing  
5 scaffolding or assembly and disassembly of flanged joints.

6 Physical testing is intended to identify the extent of potential degradation of the  
7 coating/lining.

- 8 4. **Detection of Aging Effects:** Baseline coating/lining inspections occur in the 10-year  
9 period prior to the subsequent period of extended operation. Subsequent inspections  
10 are based on an evaluation of the effect of a coating/lining failure on the inscope  
11 component's intended function, potential problems identified during prior inspections,  
12 and known service life history. Subsequent inspection intervals are established by a  
13 coating specialist qualified in accordance with an ASTM International standard endorsed  
14 in Regulatory Guide (RG) 1.54. However, inspection intervals should not exceed those  
15 in Table XI.M42-1, "Inspection Intervals for Internal Coatings/Linings for Tanks, Piping,  
16 Piping Components, and Heat Exchangers."

17 The extent of baseline and periodic inspections is based on an evaluation of the effect of  
18 a coating/lining failure on the in-scope component's intended function(s), potential  
19 problems identified during prior inspections, and known service life history; however, the  
20 extent of inspection is not any less than the following for each coating/lining material and  
21 environment combination.

- 22 • All tanks—all accessible internal surfaces
- 23 • All heat exchangers—all accessible internal surfaces
- 24 • Piping—either inspect a representative sample of 73 1-foot axial length  
25 circumferential segments of piping or 50 percent of the total length of each  
26 coating/lining material and environment combination, whichever is less at each  
27 unit. The inspection surface includes the entire inside surface of the 1-foot  
28 sample. If geometric limitations impede movement of remote or robotic  
29 inspection tools, the number of inspection segments is increased in order to  
30 cover an equivalent of 73 1-foot axial length sections. For example, if the remote  
31 tool can only be maneuvered to view one-third of the inside surface, 219 feet of  
32 pipe is inspected.

33 Where documentation exists that manufacturer recommendations and industry  
34 consensus documents (i.e., those recommended in RG 1.54, or earlier versions  
35 of those standards) were complied with during installation, the extent of piping  
36 inspections may be reduced to the lesser of 25 1-foot axial length circumferential  
37 segments of piping or 20 percent of the total length of each coating/lining  
38 material and environment combination at each unit.

1 For multiunit sites where the piping sample size is not based on the percentage of the  
 2 population, it is acceptable to reduce the total number of inspections at the site as follows:

<b>Table XI.M42-1. Inspection Intervals for Internal Coatings/Linings for Tanks, Piping, Piping Components, and Heat Exchangers<sup>1, 6</sup></b>	
<b>Inspection Category<sup>2</sup></b>	<b>Inspection Interval</b>
A	6 years <sup>3</sup>
B <sup>4,5</sup>	4 years
1. CLB requirements (e.g., Generic Letter 89-13) might require more frequent inspections. 2. Inspection Categories A. No peeling, delamination, blisters, or rusting are observed during inspections. Any cracking and flaking has been found acceptable in accordance with the "acceptance criteria" program element of this AMP. No cracking or spalling in cementitious coatings/linings. B. Prior inspection results do not meet Category A. As an alternative to conducting inspections at the intervals in inspection Category B, an extent of condition inspection is conducted prior to the end of the next refueling outage. The extent of condition inspects either double the number of components or an additional 5 piping inspections (i.e., 5 1-foot segments of piping). If Inspection Category A criteria is satisfied for the other coatings in the initial sample and the expanded scope, Inspection Category A may be used for subsequent inspections.  3. If the following conditions are met, the inspection interval may be extended to 12 years: a. The identical coating/lining material was installed with the same installation requirements in redundant trains (e.g., piping segments, tanks) with the same operating conditions and at least one of the trains is inspected every 6 years. b. The coating/lining is not in a location subject to erosion that could result in mechanical damage to the coating/lining (e.g., certain heat exchanger end bells, piping downstream of certain control valves). 4. Subsequent inspections for Inspection Category B are reinspections at the original location(s), when the coatings/linings have not been repaired, replaced, or removed, as well as inspections of new locations. 5. When conducting inspections for Inspection Category B, if two sequential subsequent inspections demonstrate no change in coating/lining condition (i.e., at least three consecutive inspections with no change in condition), subsequent inspections at those locations may be conducted to Inspection Category A. 6. Internal inspection intervals for diesel fuel oil storage tanks may meet either Table XI.42-1, or if the inspection results meet Inspection Category A, GALL-SLR Report AMP XI.M30, "Fuel Oil Chemistry."	

3

4 • For two-unit sites, 55 1-foot axial length sections of piping (19 if manufacturer  
 5 recommendations and industry consensus documents were complied with during  
 6 installation) are inspected per unit.

7 • For a three-unit site, 49 1-foot axial length sections of piping (17 if manufacturer  
 8 recommendations and industry consensus documents were complied with during  
 9 installation) are inspected per unit.

10 In order to conduct the reduced number of inspections, the applicant states in the  
 11 SLRA the basis for why the operating conditions at each unit are similar enough  
 12 (e.g., flowrate, temperature, excursions) to provide representative inspection  
 13 results.

14 The coating/lining environment includes both the environment inside the component and  
 15 the metal to which the coating/lining is attached. Inspection locations are selected  
 16 based on susceptibility to degradation and consequences of failure.

17 Coating/lining surfaces captured between interlocking surfaces (e.g., flange faces) are  
 18 not required to be inspected unless the joint has been disassembled to allow access for

1 an internal coating/lining inspection or other reasons. For areas not readily accessible  
2 for direct inspection, such as small pipelines, heat exchangers, and other equipment,  
3 consideration is given to the use of remote or robotic inspection tools.

4 Either of the following options [i.e., item (a) or (b)] is an acceptable alternative to the  
5 inspections recommended in this AMP when all of the following conditions exist:

- 6 • Loss of coating or lining integrity cannot result in downstream effects such as  
7 reduction in flow, drop in pressure, or reduction in heat transfer for in scope  
8 components,
- 9 • The component's only CLB intended function is leakage boundary (spatial) or  
10 structural integrity (attached) as defined in SRP LR Table 2.1-4(b),
- 11 • The internal environment does not contain chemical compounds that could cause  
12 accelerated corrosion of the base material if coating/lining degradation resulted in  
13 exposure of the base metal,
- 14 • The internal environment would not promote microbiologically-induced corrosion  
15 of the base metal,
- 16 • The coated/lined components are not located in the vicinity of uncoated  
17 components that could cause a galvanic couple to exist, and
- 18 • The design for the component did not credit the coating/lining (e.g., the corrosion  
19 allowance was not zero).

20 (a) A representative sample of external wall thickness measurements can be  
21 performed every 10 years commencing 10 years prior to the subsequent  
22 period of extended operation to confirm the acceptability of the corrosion  
23 rate of the base metal. For heat exchangers and tanks, a representative  
24 sample includes 25 percent coverage of the accessible external surfaces.  
25 For piping, a representative sample size is defined above. The grid  
26 dimensions for the representative sample should be consistent with those  
27 for inspections for flow-accelerated corrosion.

28 (b) In lieu of external wall thickness measurements, use GALL-SLR Report  
29 AMP XI.M36, "External Surfaces Monitoring of Mechanical Components,"  
30 and GALL-SLR Report AMP XI.M38, "Inspection of Internal Surfaces in  
31 Miscellaneous Piping and Ducting Components," or other appropriate  
32 internal surfaces inspection program (e.g., GALL-SLR Report  
33 AMP XI.M20, GALL-SLR Report AMP XI. GALL-SLR Report M21A) to  
34 manage loss of coating or lining integrity.

35 In addition, where loss of coating or lining integrity cannot result in downstream effects  
36 such as reduction in flow, drop in pressure, or reduction in heat transfer for in-scope  
37 components, a representative sample of external wall thickness measurements can be  
38 performed every 10 years commencing 10 years prior to the subsequent period of  
39 extended operation to confirm the acceptability of the corrosion rate of the base metal in  
40 lieu of visual inspections of the coatings/linings. A representative sample size is

1 described above with grid dimensions being those consistent with inspections for  
2 flow-accelerated corrosion.

3 The training and qualification of individuals involved in coating/lining inspections and  
4 evaluating degraded conditions is conducted in accordance with an ASTM International  
5 standard endorsed in RG 1.54 including staff limitations associated with a particular  
6 standard, except for cementitious materials. For cementitious coatings/linings inspectors  
7 should have a minimum of 5 years of experience inspecting or testing concrete  
8 structures or cementitious coatings/linings or a degree in the civil/structural discipline  
9 and a minimum of 1 year of experience.

10 5. **Monitoring and Trending:** A preinspection review of the previous two inspections,  
11 when available (i.e., two sets of inspection results may not be available to review for the  
12 baseline and first subsequent inspection of a particular coating/lining location), is  
13 conducted that includes reviewing the results of inspections and any subsequent repair  
14 activities. A coatings specialist prepares the post-inspection report to include: a list and  
15 location of all areas evidencing deterioration, a prioritization of the repair areas into  
16 areas that must be repaired before returning the system to service and areas where  
17 repair can be postponed to the next refueling outage, and where possible, photographic  
18 documentation indexed to inspection locations. When corrosion of the base material is  
19 the only issue related to coating/lining degradation of the component and external wall  
20 thickness measurements are used in lieu of internal visual inspections of the  
21 coating/lining, the corrosion rate of the base metal is trended.

22 6. **Acceptance Criteria:** Acceptance criteria are as follows:

23 a. There are no indications of peeling or delamination.

24 b. Blisters are evaluated by a coatings specialist qualified in accordance with an  
25 ASTM International standard endorsed in RG 1.54 including staff limitations  
26 associated with use of a particular standard. Blisters should be limited to a few  
27 intact small blisters that are completely surrounded by sound coating/lining  
28 bonded to the substrate. Blister size and frequency should not be increasing  
29 between inspections (e.g., ASTM D714-02, "Standard Test Method for Evaluating  
30 Degree of Blistering of Paints").

31 c. Indications such as cracking, flaking, and rusting are to be evaluated by a  
32 coatings specialist qualified in accordance with an ASTM International standard  
33 endorsed in RG 1.54 including staff limitations associated with use of a  
34 particular standard.

35 d. Minor cracking and spalling of cementitious coatings/linings is acceptable  
36 provided there is no evidence that the coating/lining is debonding from the  
37 base material.

38 e. As applicable, wall thickness measurements, projected to the next inspection,  
39 meet design minimum wall requirements.

40 f. Adhesion testing results, when conducted, meet or exceed the degree of  
41 adhesion recommended in plant specific design requirements specific to the  
42 coating/lining and substrate.

1 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
2 conditions adverse to quality or significant conditions adverse to quality under those  
3 specific portions of the quality assurance (QA) program that are used to meet  
4 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
5 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
6 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
7 safety-related and nonsafety-related structures and components (SCs) within the scope  
8 of this program.

9 Coatings/linings that do not meet acceptance criteria are repaired, replaced, or removed.  
10 Physical testing is performed where physically possible (i.e., sufficient room to conduct  
11 testing) or examination is conducted to ensure that the extent of repaired or replaced  
12 coatings/linings encompasses sound coating/lining material.

13 As an alternative, coatings exhibiting indications of peeling and delamination may be  
14 returned to service if: (a) physical testing is conducted to ensure that the remaining  
15 coating is tightly bonded to the base metal; (b) the potential for further degradation of the  
16 coating is minimized, (i.e., any loose coating is removed, the edge of the remaining  
17 coating is feathered); (c) adhesion testing using ASTM International standards endorsed  
18 in RG 1.54 (e.g., pull-off testing, knife adhesion testing) is conducted at a minimum of  
19 3 sample points adjacent to the defective area; (d) an evaluation is conducted of the  
20 potential impact on the system, including degraded performance of downstream  
21 components due to flow blockage and loss of material or cracking of the coated  
22 component; and (e) followup visual inspections of the degraded coating are conducted  
23 within 2 years from detection of the degraded condition, with a reinspection within an  
24 additional 2 years, or until the degraded coating is repaired or replaced.

25 If coatings/linings are credited for corrosion prevention (e.g., corrosion allowance in  
26 design calculations is zero, the "preventive actions" program element credited the  
27 coating/lining) and the base metal has been exposed or it is beneath a blister, the  
28 component's base material in the vicinity of the degraded coating/lining is examined to  
29 determine if the minimum wall thickness is met and will be met until the next inspection.

30 If a blister is not repaired, physical testing is conducted to ensure that the blister is  
31 completely surrounded by sound coating/lining bonded to the surface. Physical testing  
32 consists of adhesion testing using ASTM International standards endorsed in RG 1.54.  
33 Where adhesion testing is not possible due to physical constraints, another means of  
34 determining that the remaining coating/lining is tightly bonded to the base metal is  
35 conducted such as lightly tapping the coating/lining. Acceptance of a blister to remain  
36 in-service should be based both on the potential effects of flow blockage and  
37 degradation of the base material beneath the blister.

38 8. **Confirmation Process:** The confirmation process is addressed through those specific  
39 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
40 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
41 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
42 confirmation process element of this AMP for both safety-related and nonsafety-related  
43 SCs within the scope of this program.

44 9. **Administrative Controls:** Administrative controls are addressed through the QA  
45 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,

1 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
2 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
3 fulfill the administrative controls element of this AMP for both safety-related and  
4 nonsafety-related SCs within the scope of this program.

5 10. **Operating Experience:** The inspection techniques and training of inspection personnel  
6 associated with this program are consistent with industry practice and have been  
7 demonstrated effective at detecting loss of coating or lining integrity. Not to exceed  
8 inspection intervals have been established that are dependent on the results of previous  
9 plant specific inspection results. The following examples describe operating experience  
10 pertaining to loss of coating or lining integrity for coatings/linings installed on the internal  
11 surfaces of piping systems:

12 a. In 1982, a licensee experienced degradation of internal coatings in its spray pond  
13 piping system. This issue contains many key aspects related to coating  
14 degradation. These include installation details such as improper curing time,  
15 restricted availability of air flow leading to improper curing, installation layers that  
16 were too thick, and improper surface preparation (e.g., oils on surface, surface  
17 too smooth). The aging mechanisms included severe blistering, moisture  
18 entrapment between layers of the coating, delamination, peeling, and widespread  
19 rusting. The failure to install the coatings to manufacturer recommendations  
20 resulted in flow restrictions to the ultimate heat sink and blockage of an  
21 emergency diesel generator governor oil cooler. [Information Notice (IN) 85-24,  
22 "Failures of Protective Coatings in Pipes and Heat Exchangers"].

23 b. During an U.S. Nuclear Regulatory Commission (NRC) inspection, the staff found  
24 that coating degradation, which occurred as a result of weakening of the  
25 adhesive bond of the coating to the base metal due to turbulent flow, resulted in  
26 the coating eroding away and leaving the base metal subject to wall thinning and  
27 leakage. (ADAMS Accession Number ML12045A544).

28 c. In 1994, a licensee replaced a portion of its cement lined steel service water  
29 piping with piping lined with polyvinyl chloride material. The manufacturer stated  
30 that the lining material had an expected life of 15–20 years. An inspection in  
31 1997 showed some bubbles and delamination in the coating material at a flange.  
32 A 2002 inspection found some locations that had lack of adhesion to the base  
33 metal. In 2011, diminished flow was observed downstream of this line.  
34 Inspections revealed that a majority of the lining in one spool piece was loose or  
35 missing. The missing material had clogged a downstream orifice. A sample of  
36 the lining was sent to a testing lab where it was determined that cracking was  
37 evident on both the base metal and water side of the lining and there was a  
38 noticeable increase in the hardness of the in service sample as compared to an  
39 unused sample. (ADAMS Accession Number ML12041A054).

40 d. A licensee has experienced multiple instances of coating degradation resulting in  
41 coating debris found downstream in heat exchanger end bells. None of the  
42 debris had been large enough to result in reduced heat exchanger performance.  
43 (ADAMS Accession Number ML12097A064).

44 e. A licensee experienced continuing flow reduction over a 14 day period, resulting  
45 in the service water room cooler being declared inoperable. The flow reduction

- 1 occurred due to the rubber coating on a butterfly valve becoming detached.  
2 (ADAMS Accession Number ML073200779).
- 3 f. At an international plant, cavitation in the piping system damaged the coating of a  
4 piping system, which subsequently resulted in unanticipated corrosion through  
5 the pipe wall. (ADAMS Accession Number ML13063A135).
- 6 g. A licensee experienced degradation of the protective concrete lining which  
7 allowed brackish water to contact the unprotected carbon steel piping resulting in  
8 localized corrosion. The degradation of the concrete lining was likely caused by  
9 the high flow velocities and turbulence from the valve located just upstream of  
10 the degraded area. (ADAMS Accession Number ML072890132).
- 11 h. A licensee experienced through wall corrosion when a localized area of coating  
12 degradation resulted in base metal corrosion. The cause of the coating  
13 degradation is thought to have been nonage related mechanical damage.  
14 (ADAMS Accession Number ML14087A210).
- 15 i. A licensee experienced through wall corrosion when a localized polymeric repair  
16 of a rubber lined spool failed. (ADAMS Accession Number ML14073A059).
- 17 j. A licensee experienced accelerated galvanic corrosion when loss of coating  
18 integrity occurred in the vicinity of carbon steel components attached to AL6XN  
19 components. (ADAMS Accession Number ML12297A333).

20 The program is informed and enhanced when necessary through the systematic and  
21 ongoing review of both plant-specific and industry operating experience, as discussed in  
22 Appendix B of the GALL-SLR Report.

## 23 **References**

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1 **XI.S1 ASME SECTION XI, SUBSECTION IWE**

2 **Program Description**

3 10 CFR 50.55a imposes the inservice inspection (ISI) requirements of the American Society of  
4 Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code<sup>1</sup>, Section XI,  
5 Subsection IWE, for steel containments (Class MC) and steel liners for concrete containments  
6 (Class CC). The scope of Subsection IWE includes steel containment shells and their integral  
7 attachments, steel liners for concrete containments and their integral attachments, containment  
8 penetrations, hatches, airlocks, moisture barriers, and pressure-retaining bolting. The  
9 requirements of ASME Code, Section XI, Subsection IWE, with the additional requirements  
10 specified in 10 CFR 50.55a(b)(2), are supplemented herein to constitute an existing program  
11 applicable to managing aging of steel containments, steel liners of concrete containments, and  
12 other containment components for the subsequent period of extended operation.

13 The primary ISI method specified in IWE is visual examination (general visual, VT-3, VT-1).  
14 Limited volumetric examination (ultrasonic thickness measurement) and surface examination  
15 (e.g., liquid penetrant) may also be necessary in some instances to detect aging effects. IWE  
16 specifies acceptance criteria, corrective actions, and expansion of the inspection scope when  
17 degradation exceeding the acceptance criteria is found.

18 Subsection IWE requires examination of coatings that are intended to prevent corrosion. Aging  
19 management program (AMP) XI.S8 is a protective coating monitoring and maintenance program  
20 that is recommended to ensure emergency core cooling system (ECCS) operability, whether or  
21 not the GALL-SLR Report AMP XI.S8 is credited in GALL-SLR Report AMP XI.S1.

22 The program attributes are supplemented to incorporate aging management activities,  
23 recommended in the Final Interim Staff Guidance LR-ISG-2006-01, needed to address the  
24 potential loss of material due to corrosion in the inaccessible areas of the boiling water reactor  
25 (BWR) Mark I steel containment.

26 The attributes also are supplemented to recommend surface or augmented examination of  
27 two-ply bellows for detection of cracking described in the U.S. Nuclear Regulatory Commission  
28 (NRC) Information Notice (IN) 92-20, "Inadequate Local Leak Rate Testing," and to include  
29 preventive actions to ensure bolting integrity. The program is also supplemented to perform  
30 surface examination of stainless steel (SS) and dissimilar metal welds of penetration sleeves,  
31 penetration bellows, vent line bellows; and volumetric examination of metal shell or liner  
32 surfaces that are inaccessible from one side, during each inspection interval.

33 **Evaluation and Technical Basis**

- 34 1. **Scope of Program:** The scope of this program addresses the pressure-retaining  
35 components of steel containments and steel liners of concrete containments specified in  
36 Subsection IWE-1000 and are supplemented to address aging management of potential  
37 corrosion in inaccessible areas of the drywell shell exterior of BWR Mark I steel  
38 containments. The components within the scope of Subsection IWE are Class Metal

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<sup>1</sup>Refer to the GALL Report, Chapter I, for applicability of other editions of the ASME Code, Section XI.

1 Containment (MC) pressure-retaining components (steel containments) and their integral  
2 attachments, metallic shell and penetration liners of Class CC containments and their  
3 integral attachments, containment moisture barriers, containment pressure-retaining  
4 bolting, and metal containment surface areas, including welds and base metal. The  
5 concrete portions of containments are inspected in accordance with Subsection IWL.  
6 Subsection IWE requires examination of coatings that are intended to prevent corrosion,  
7 including those inside BWR suppression chambers. XI.S8 is a protective coating  
8 monitoring and maintenance program that is recommended to ensure ECCS operability,  
9 whether or not the GALL-SLR Report AMP XI.S8 is credited in GALL-SLR Report  
10 AMP XI.S1.

11 Subsection IWE exempts the following from examination:

- 12 (a) Components that are outside the boundaries of the containment, as  
13 defined in the plant-specific design specification;
- 14 (b) Embedded or inaccessible portions of containment components that met  
15 the requirements of the original construction code of record;
- 16 (c) Components that become embedded or inaccessible as a result of  
17 containment structure (i.e., steel containments [Class MC] and steel liners  
18 of concrete containments [Class CC]) repair or replacement, provided the  
19 requirements of IWE-1232 and IWE-5220 are met; and
- 20 (d) Piping, pumps, and valves that are part of the containment system or that  
21 penetrate or are attached to the containment vessel (governed by IWB  
22 or IWC).

23 10 CFR 50.55a(b)(2)(ix) and IWE-2420 (2006 and later editions/addenda) specify  
24 additional requirements for inaccessible areas. It states that the licensee is to evaluate  
25 the acceptability of inaccessible areas when conditions exist in accessible areas that  
26 could indicate the presence of or result in degradation to such inaccessible areas.  
27 Examination requirements for containment supports are not within the scope of  
28 Subsection IWE.

29 2. **Preventive Action:** The ASME Code Section XI, Subsection IWE, is a condition  
30 monitoring program. The program is supplemented to include preventive actions that  
31 ensure that moisture levels associated with an accelerated corrosion rate do not exist in  
32 the exterior portion of the BWR Mark I steel containment drywell shell. The actions  
33 consist of ensuring that the sand pocket area drains and/or the refueling seal drains are  
34 clear. The program is also supplemented to include preventive actions to ensure bolting  
35 integrity, as discussed in Electric Power Research Institute (EPRI) documents (such as  
36 EPRI NP-5067 and TR-104213), American Society for Testing and Materials (ASTM)  
37 standards, and American Institute of Steel Construction (AISC) specifications, as  
38 applicable. The preventive actions should emphasize proper selection of bolting  
39 material and lubricants, and appropriate installation torque or tension to prevent or  
40 minimize loss of bolting preload and cracking of high-strength bolting. If the structural  
41 bolting consists of ASTM A325 and/or ASTM A490 bolts (including respective equivalent  
42 twist-off type ASTM F1852 and/or ASTM F2280 bolts), the preventive actions for  
43 storage, lubricant selection, and bolting and coating material selection discussed in

1 Section 2 of Research Council for Structural Connections (RCSC) publication  
2 “Specification for Structural Joints Using High-Strength Bolts,” need to be considered.

- 3 3. **Parameters Monitored or Inspected:** Table IWE-2500-1 references the applicable  
4 sections in IWE-2300 and IWE-3500 that identify the parameters examined or  
5 monitored. Noncoated surfaces are examined for evidence of cracking, discoloration,  
6 wear, pitting, excessive corrosion, arc strikes, gouges, surface discontinuities, dents,  
7 liner plate bulges, and other signs of surface irregularities. Painted or coated surfaces,  
8 including those inside BWR suppression chambers, are examined for evidence of  
9 flaking, blistering, peeling, discoloration, liner bulges, and other signs of potential  
10 distress of the underlying metal shell or liner. Stainless steel (SS) and dissimilar metal  
11 welds of penetration sleeves, penetration bellows, and vent line bellows; and steel  
12 bellows components that are subject to cyclic loading but have no current licensing basis  
13 (CLB) fatigue analysis, are monitored for cracking. The moisture barriers are examined  
14 for wear, damage, erosion, tear, surface cracks, or other defects that permit intrusion of  
15 moisture in the inaccessible areas of the pressure retaining surfaces of the metal  
16 containment shell or liner. Pressure-retaining bolting is examined for loosening and  
17 material conditions that cause the bolted connection to affect either containment  
18 leak-tightness or structural integrity.

19 Subsequent license renewal applicants with BWR Mark I steel containments should  
20 periodically monitor the sand pocket area drains and/or the refueling seal drains for  
21 water leakage. The applicants should also ensure the drains are clear to prevent  
22 moisture levels associated with accelerated corrosion rates in the exterior portion of the  
23 drywell shell.

- 24 4. **Detection of Aging Effects:** The examination methods, frequency, and scope of  
25 examination specified in 10 CFR 50.55a and Subsection IWE ensure that aging effects  
26 are detected before they compromise the design-basis requirements. IWE-2500-1 and  
27 the requirements of 10 CFR 50.55a provide information regarding the examination  
28 categories, parts examined, and examination methods to be used to detect aging.

29 Regarding the extent of examination, all accessible surfaces receive at least a general  
30 visual examination as specified in Table IWE-2500-1 and the requirements of  
31 10 CFR 50.55a. The acceptability of inaccessible areas of the steel containment shell or  
32 concrete containment steel liner is evaluated when conditions are found in accessible  
33 areas that could indicate the presence of, or could result in, flaws or degradation in such  
34 inaccessible areas. IWE-1240 requires augmented examinations (Examination  
35 Category E-C) of containment surface areas subject to or susceptible to accelerated  
36 degradation. A VT-1 visual examination is performed for areas accessible from both  
37 sides, and volumetric (ultrasonic thickness measurement) examination is performed for  
38 areas accessible from only one side. Liner plate bulges should be evaluated for  
39 corrosion potential.

40 The requirements of ASME Section XI, Subsection IWE and 10 CFR 50.55a are  
41 supplemented to perform surface examination, in addition to visual examination, to  
42 detect cracking in (a) SS and dissimilar metal welds of penetration sleeves, penetration  
43 bellows, and vent line bellows; and (b) steel bellows components that are subject to  
44 cyclic loading but have no CLB fatigue analysis. The supplemental surface examination  
45 of dissimilar metal welds may be performed in accordance with Table IWE-2500-1,  
46 Examination Category E-F, as specified in the 1995 edition with 1996 addenda of the

1 ASME Code, Section XI, Subsection IWE. Components for which supplemental surface  
2 examination is not feasible are identified and appropriate Appendix J leak rate tests  
3 (GALL-SLR Report AMP XI.S4) justified to detect cracking are conducted in lieu of the  
4 supplemental surface examination. For two-ply bellows of the type described in NRC  
5 IN 92-20 for which it is not possible to perform a valid local leak rate test, augmented  
6 examination using qualified enhanced techniques that can detect cracking is  
7 recommended.

8 The requirements of ASME Section XI, Subsection IWE and 10 CFR 50.55a are further  
9 supplemented to require volumetric examination of metal shell or liner surfaces that are  
10 inaccessible from one side, during each inspection interval. The supplemental  
11 examination consists of (1) a sample of one-foot square randomly selected locations and  
12 (2) a sample of one-foot square locations focused on areas most likely to experience  
13 degradation. The sample size, locations, frequency and schedule for each set of  
14 volumetric examinations should be determined on a plant-specific basis during  
15 each interval.

- 16 5. **Monitoring and Trending:** With the exception of inaccessible areas, all surfaces are  
17 monitored by virtue of the examination requirements on a scheduled basis.

18 IWE-2420 specifies that:

- 19 (a) The sequence of component examinations established during the first  
20 inspection interval shall be repeated during successive intervals, to the  
21 extent practical.
- 22 (b) When examination results require evaluation of flaws or areas of  
23 degradation in accordance with IWE-3000, and the component is  
24 acceptable for continued service, the areas containing such flaws or  
25 areas of degradation shall be reexamined during the next inspection  
26 period listed in the schedule of the inspection program of IWE-2411 or  
27 IWE-2412, in accordance with Table IWE-2500-1, Examination  
28 Category E-C.
- 29 (c) When the reexaminations required by IWE-2420(b) reveal that the flaws  
30 or areas of degradation remain essentially unchanged for the next  
31 inspection period, these areas no longer require augmented examination  
32 in accordance with Table IWE-2500-1 and the regular inspection  
33 schedule is continued.

34 IWE-3120 requires examination results to be compared with recorded results of prior  
35 inservice examinations and evaluated for acceptance.

36 Applicants for subsequent license renewal (SLR) for plants with BWR Mark I  
37 containment should augment IWE monitoring and trending requirements to address  
38 inaccessible areas of the drywell. The applicant should consider the following  
39 recommended actions based on plant-specific operating experience.

- 40 (a) Develop a corrosion rate that can be inferred from past ultrasonic testing  
41 (UT) examinations or establish a corrosion rate using representative  
42 samples in similar operating conditions, materials, and environments. If

1 degradation has occurred, provide a technical basis using the developed  
2 or established corrosion rate to demonstrate that the drywell shell will  
3 have sufficient wall thickness to perform its intended function through the  
4 subsequent period of extended operation.

5 (b) Demonstrate that UT measurements performed in response to NRC  
6 Generic Letter (GL) 87-05, "Request for Additional Information  
7 Assessment of Licensee Measures to Mitigate and/or Identify Potential  
8 Degradation of Mark I Drywells" did not show degradation inconsistent  
9 with the developed or established corrosion rate.

10 6. **Acceptance Criteria:** IWE-3000 provides acceptance standards for components of  
11 steel containments and liners of concrete containments. IWE-3410 refers to criteria to  
12 evaluate the acceptability of the containment components for service following the  
13 preservice examination and each inservice examination. Most of the acceptance  
14 standards rely on visual examinations. Areas that are suspect require an engineering  
15 evaluation or require correction by repair or replacement. For some examinations, such  
16 as augmented examinations, numerical values are specified for the acceptance  
17 standards. For the containment steel shell or liner, material loss locally exceeding  
18 10 percent of the nominal containment wall thickness or material loss that is projected to  
19 locally exceed 10 percent of the nominal containment wall thickness before the next  
20 examination are documented. Such areas are corrected by repair or replacement in  
21 accordance with IWE-3122 or accepted by engineering evaluation. Cracking of SS and  
22 dissimilar metal welds of penetration sleeves, penetration bellows, and vent line bellows;  
23 and steel bellows components that are subject to cyclic loading but have no CLB fatigue  
24 analysis is corrected by repair or replacement or accepted by engineering evaluation.  
25 Where applicable, the program should establish quantitative acceptance criteria for  
26 containment liner bulges consistent with the CLB for the liner.

27 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
28 conditions adverse to quality or significant conditions adverse to quality under those  
29 specific portions of the quality assurance (QA) program that are used to meet  
30 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
31 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
32 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
33 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
34 related structures and components (SCs) within the scope of this program.

35 Subsection IWE states that components whose examination results indicate flaws or  
36 areas of degradation that do not meet the acceptance standards listed in IWE-3500 are  
37 acceptable if an engineering evaluation indicates that the flaw or area of degradation is  
38 nonstructural in nature or has no effect on the structural integrity of the containment.  
39 Components that do not meet the acceptance standards are subject to additional  
40 examination requirements, and the components are repaired or replaced to the extent  
41 necessary to meet the acceptance standards of IWE-3000. For repair of components  
42 within the scope of Subsection IWE, IWE-3124 states that repairs and reexaminations  
43 are to comply with IWA-4000. IWA-4000 provides repair specifications for pressure  
44 retaining components, including metal containments and metallic liners of  
45 concrete containments.

1 For BWR Mark I steel containments, if moisture has been detected or suspected in the  
2 inaccessible area on the exterior of the containment drywell shell or the source of  
3 moisture cannot be determined subsequent to root cause analysis, then:

- 4 (a) Include in the scope of SLR any components that are identified as a  
5 source of moisture, if applicable, such as the refueling seal or cracks in  
6 the SS liners of the refueling cavity pool walls, and perform an aging  
7 management review (AMR).
- 8 (b) Pursuant to Subsection IWE-1240, identify in the inspection program  
9 affected drywell surfaces requiring augmented examination for the  
10 subsequent period of extended operation in accordance with  
11 Table IWE-2500-1, Examination Category E-C.
- 12 (c) Conduct augmented inspections of the identified drywell surfaces using  
13 examination methods that are in accordance with Subsection IWE-2500.
- 14 (d) Demonstrate, through use of augmented inspections performed in  
15 accordance with Subsection IWE, that corrosion is not occurring or that  
16 corrosion is progressing so slowly that the age-related degradation will  
17 not jeopardize the intended function of the drywell shell through the  
18 subsequent period of extended operation.

- 19 8. **Confirmation Process:** The confirmation process is addressed through those specific  
20 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
21 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
22 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
23 confirmation process element of this AMP for both safety-related and nonsafety-related  
24 SCs within the scope of this program.

25 When areas of degradation are identified, an evaluation is performed to determine  
26 whether repair or replacement is necessary. If the evaluation determines that repair or  
27 replacement is necessary, Subsection IWE specifies confirmation that appropriate  
28 corrective actions have been completed and are effective. Subsection IWE states that  
29 repairs and re-examinations are to comply with the requirements of IWA-4000.  
30 Re-examinations are conducted in accordance with the requirements of IWA-2200, and  
31 the recorded results are to demonstrate that the repair meets the acceptance standards  
32 set forth in IWE-3500.

- 33 9. **Administrative Controls:** Administrative controls are addressed through the QA  
34 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
35 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
36 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
37 fulfill the administrative controls element of this AMP for both safety-related and  
38 nonsafety-related SCs within the scope of this program.

39 IWA-6000 provides specifications for the preparation, submittal, and retention of records  
40 and reports.

- 41 10. **Operating Experience:** ASME Section XI, Subsection IWE, was incorporated into  
42 10 CFR 50.55a in 1996. Prior to this time, operating experience pertaining to

1 degradation of steel components of containment was gained through the inspections  
2 required by 10 CFR Part 50, Appendix J and ad hoc inspections conducted by licensees  
3 and the NRC. NRC IN 86-99, IN 88-82, IN 89-79, IN 2004-09, IN 2010-12 and  
4 NUREG-1522 described occurrences of corrosion in steel containment shells and  
5 containment liners. NRC GL 87-05 addressed the potential for corrosion of BWR Mark I  
6 steel drywells in the "sand pocket region." IN 2011-15 described occurrences of  
7 corrosion in BWR Mark I steel containments, both inside the suppression chamber  
8 (torus) and outside the drywell. IN 2014-07 described operating experience concerning  
9 degradation of floor weld leak-chase channel systems of the steel containment shell and  
10 concrete containment steel liner that could affect leak tightness and aging management  
11 of containment structures.

12 NRC IN 97-10 identified specific locations where concrete containments are susceptible  
13 to liner plate corrosion; IN 92-20 described instances of two-ply containment bellows  
14 cracking for which leak rate testing was inadequate for detection, resulting in loss of leak  
15 tightness. Based on occurrences of transgranular stress corrosion cracking (SCC),  
16 NUREG-1611 (Tables 1 and 2) recommends augmented examination on the surfaces of  
17 two-ply bellow bodies using qualified enhanced techniques so that cracking can be  
18 detected. Other operating experience indicates that foreign objects embedded in  
19 concrete have caused through-wall corrosion of the liner plate at a few plants with  
20 reinforced concrete containments. NRC Technical Report, "Containment Liner  
21 Corrosion Operating Experience Summary" dated August 2, 2011, summarizes the  
22 industry operating experience related to containment liner corrosion and containment  
23 liner bulges.

24 NRC IN 2006-01 described through-wall cracking and its probable cause in the torus  
25 of a BWR Mark I containment. The cracking was identified by the licensee in the  
26 heat-affected zone at the high-pressure coolant injection (HPCI) turbine exhaust pipe  
27 torus penetration. The licensee concluded that the cracking was most likely initiated by  
28 cyclic loading due to condensation oscillation during HPCI operation. These  
29 condensation oscillations induced on the torus shell may have been excessive due to a  
30 lack of an HPCI turbine exhaust pipe sparger that many licensees have installed.

31 The program is to consider the liner plate and containment shell corrosion and cracking  
32 concerns described in these generic communications and technical report.  
33 Implementation of the ISI requirements of Subsection IWE, in accordance with  
34 10 CFR 50.55a, augmented to consider operating experience, and as recommended in  
35 LR-ISG-2006-01, is a necessary element of aging management for steel components of  
36 steel and concrete containments through the subsequent period of extended operation.

37 Degradation of threaded bolting and fasteners in closures for the reactor coolant  
38 pressure boundary has occurred from boric acid corrosion, stress corrosion cracking  
39 (SCC), and fatigue loading (NRC IE Bulletin 82-02, NRC GL 91-17). SCC has occurred  
40 in high strength bolts used for nuclear steam supply system component supports (EPRI  
41 NP-5769).

42 The program is informed and enhanced when necessary through the systematic and  
43 ongoing review of both plant-specific and industry operating experience, as discussed in  
44 Appendix B of the GALL-SLR Report.

1 **References**

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<sup>2</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

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2 U.S. Nuclear Regulatory Commission. June 2010.

3 \_\_\_\_\_. NRC Information Notice 2006-01, "Torus Cracking in a BWR Mark I Containmentment."  
4 ML053060311. Washington, DC: U.S. Nuclear Regulatory Commission. January 2006.

5 \_\_\_\_\_. Staff Position and Rationale for the Final License Renewal Interim Staff Guidance  
6 LR-ISG-2006-01, "Plant-Specific Aging Management Program for Inaccessible Areas of Boiling  
7 Water Reactor (BWR) Mark I Steel Containments Drywell Shell." Washington, DC:  
8 U.S. Nuclear Regulatory Commission. November 2006.

9 \_\_\_\_\_. NRC Information Notice 2004-09, "Corrosion of Steel Containmentment and Containmentment  
10 Liner." ML041170030. Washington DC: U.S. Nuclear Regulatory Commission. April 2004.

11 \_\_\_\_\_. NRC Information Notice 97-10, "Liner Plate Corrosion in Concrete Containmentment."  
12 ML031050365. Washington, DC: U.S. Nuclear Regulatory Commission. March 1997.

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27 \_\_\_\_\_. NRC Information Notice 89-79, "Degraded Coatings and Corrosion of Steel  
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32 Regulatory Commission. October 1988. Supplement 1 May 1989.

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38 Commission. June 1982.

- 1 Research Council on Structural Connections. "Specification for Structural Joints Using
- 2 High-Strength Bolts." December 2009.

1 **XI.S2 ASME SECTION XI, SUBSECTION IWL**

2 **Program Description**

3 10 CFR 50.55a imposes the examination requirements of the American Society of Mechanical  
4 Engineers (ASME) Boling and Pressure Vessel (B&PV) Code, Section XI, Subsection IWL,<sup>1</sup> for  
5 reinforced and prestressed concrete containments (Class CC). The scope of IWL includes  
6 reinforced concrete and unbonded post-tensioning systems. ASME Code, Section XI,  
7 Subsection IWL and the additional requirements specified in 10 CFR 50.55a(b)(2) constitute an  
8 existing mandated program applicable to managing aging of containment reinforced concrete  
9 and unbonded post-tensioning systems, and supplemented herein, for subsequent license  
10 renewal (SLR). Containments with grouted tendons may require an additional plant-specific  
11 aging management program (AMP), based on the guidance in U.S. Nuclear Regulatory  
12 Commission (NRC) Regulatory Guide (RG) 1.90, "Inservice Inspection of Prestressed Concrete  
13 Containment Structures with Grouted Tendons," to address the adequacy of prestressing  
14 forces.

15 The primary inspection method specified in IWL-2500 is visual examination, supplemented by  
16 testing. For prestressed containments, tendon wires are tested for yield strength, ultimate  
17 tensile strength, and elongation. Tendon corrosion protection medium is analyzed for alkalinity,  
18 water content, and soluble ion concentrations. The quantity of free water contained in the  
19 anchorage end cap and any free water that drains from tendons during the examination is  
20 documented. Samples of free water are analyzed for pH. Prestressing forces are measured in  
21 selected sample tendons. IWL specifies acceptance criteria, corrective actions, and expansion  
22 of the inspection scope when degradation exceeding the acceptance criteria is found.

23 The Code specifies augmented examination requirements following post-tensioning system  
24 repair/replacement activities.

25 **Evaluation and Technical Basis**

26 1. **Scope of Program:** Subsection IWL-1000 specifies the components of concrete  
27 containments within its scope. The components within the scope of Subsection IWL are  
28 reinforced concrete and unbonded post-tensioning systems of Class CC containments,  
29 as defined by CC-1000. The program also includes testing of the tendon corrosion  
30 protection medium and the pH of free water. Subsection IWL exempts from  
31 examination portions of the concrete containment that are inaccessible (e.g., concrete  
32 covered by liner, foundation material, or backfill or obstructed by adjacent structures or  
33 other components).

34 10 CFR 50.55a(b)(2)(viii) and the 2009 and later editions/addenda of the Code specify  
35 additional requirements for inaccessible areas. The Code states that the licensee is to  
36 evaluate the acceptability of concrete in inaccessible areas when conditions exist in  
37 accessible areas that could indicate the presence of or result in degradation to such  
38 inaccessible areas. Steel liners for concrete containments and their integral attachments

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<sup>1</sup>GALL-SLR Report Chapter 1, Table 1 identifies the ASME Code Section XI editions and addenda that are acceptable to use of aging management programs.

1 are not within the scope of Subsection IWL but are included within the scope of  
2 Subsection IWE. Subsection IWE is evaluated in GALL-SLR Report AMP XI.S1, "ASME  
3 Section XI, Subsection IWE."

4 2. **Preventive Action:** ASME Code Section XI, Subsection IWL is a condition monitoring  
5 program. However, the program includes actions to prevent or minimize corrosion of the  
6 prestressing tendons by maintaining corrosion protection medium chemistry within  
7 acceptable limits specified in IWL.

8 3. **Parameters Monitored or Inspected:** Table IWL-2500-1 specifies two categories for  
9 examination of concrete surfaces: (i) Category L-A for all accessible concrete surfaces  
10 and (ii) Category L-B for concrete surfaces surrounding anchorages of tendons selected  
11 for testing in accordance with IWL-2521. Both of these categories rely on visual  
12 examination methods. Concrete surfaces are examined for evidence of damage or  
13 degradation, such as concrete cracks. IWL-2510 specifies that concrete surfaces are  
14 examined for conditions indicative of degradation, such as those defined in American  
15 Concrete Institute (ACI) 201.1R and ACI 349.3R. Table IWL-2500-1 also specifies  
16 Category L-B for test and examination requirements for unbonded post tensioning  
17 systems. The number of tendons selected for examination is in accordance with  
18 Table IWL-2521-1. Additional augmented examination requirements for post-tensioning  
19 system repair/replacement activities are to be in accordance with Table IWL-2521-2.  
20 Tendon anchorage and wires or strands are visually examined for cracks, corrosion, and  
21 mechanical damage. Tendon wires or strands are also tested for yield strength, ultimate  
22 tensile strength, and elongation. The tendon corrosion protection medium is tested by  
23 analysis for alkalinity, water content, and soluble ion concentrations. The pH of free  
24 water samples is analyzed.

25 4. **Detection of Aging Effects:** The frequency and scope of examinations specified in  
26 10 CFR 50.55a and Subsection IWL ensure that aging effects would be detected before  
27 they would compromise the design-basis requirements. The frequency of inspection is  
28 specified in IWL-2400. Concrete inspections are performed in accordance with  
29 Examination Category L-A. Under Subsection IWL, inservice inspection (ISI) of concrete  
30 and unbonded post-tensioning systems is required at 1, 3, and 5 years following the  
31 initial structural integrity test. Thereafter, inspections are performed at 5-year intervals.  
32 For sites with multiple plants, the schedule for ISI is provided in IWL-2421. In the case  
33 of tendons, only a sample of the tendons of each tendon type requires examination  
34 during each inspection.

35 The tendons to be examined during an inspection are selected on a random basis.  
36 Regarding detection methods for aging effects, all accessible concrete surfaces receive  
37 General Visual examination (as defined by the ASME Code). Selected areas, such as  
38 those that indicate suspect conditions and concrete surface areas surrounding tendon  
39 anchorages (Category L-B), receive a more rigorous Detailed Visual examination  
40 (as defined by the ASME Code). Prestressing forces in sample tendons are measured.  
41 In addition, one sample tendon of each type is detensioned. A single wire or strand is  
42 removed from each detensioned tendon for examination and testing. These visual  
43 examination methods and testing would identify the aging effects of accessible concrete  
44 components and prestressing systems in concrete containments. Examination of  
45 corrosion protection medium and free water is tested for each examined tendon as  
46 specified in Table IWL-2525-1.

1 5. **Monitoring and Trending:** Except in inaccessible areas, all concrete surfaces are  
2 monitored on a regular basis by virtue of the examination requirements. Inspection  
3 results are documented and compared to previous results to identify changes from prior  
4 inspections. Quantitative measurements are recorded and trended for all applicable  
5 parameters monitored or inspected, and the use of photographs or surveys is  
6 recommended. Photography and its variations may be used to trend aging effects such  
7 as cracking, spalling, delamination, pop-outs, or other age-related concrete degradation  
8 as illustrated in ACI 201.1R. Photographic records may be used to document and trend  
9 the type, severity, extent and progression of degradation.

10 For prestressed containments, trending of prestressing forces in tendons is required in  
11 accordance with the acceptance by examination criteria in IWL-3220. In addition to the  
12 random sampling used for tendon examination, one tendon of each type is selected from  
13 the first-year inspection sample and designated as a common tendon. Each common  
14 tendon is then examined during each inspection. Corrosion protection medium  
15 chemistry and free water pH are monitored for each examined tendon. This procedure  
16 provides monitoring and trending information over the life of the plant. 10 CFR 50.55a  
17 and Subsection IWL also require that prestressing forces in all inspection sample  
18 tendons be measured by lift-off or equivalent tests and compared with acceptance  
19 standards based on the predicted force for that type of tendon over its life.

20 6. **Acceptance Criteria:** IWL-3000 provides acceptance criteria for concrete  
21 containments. In addition, this program includes quantitative acceptance criteria for  
22 concrete surfaces based on the "Evaluation Criteria" provided in Chapter 5 of  
23 ACI 349.3R.

24 The acceptance standards for the unbonded post-tensioning system are quantitative in  
25 nature. For the post-tensioning system, quantitative acceptance criteria are given for  
26 tendon force and elongation, tendon wire or strand samples, and corrosion protection  
27 medium. Free water in the tendon anchorage areas is not acceptable, as specified in  
28 IWL-3221.3. If free water is found, the recommendations in Table IWL-2525-1 are  
29 followed. 10 CFR 50.55a and Subsection IWL do not define the method for calculating  
30 predicted tendon prestressing forces for comparison to the measured tendon lift-off  
31 forces. The predicted tendon forces are calculated in accordance with RG 1.35.1,  
32 "Determining Prestressing Forces for Inspection of Prestressed Concrete  
33 Containments," which provides an acceptable methodology for use through the  
34 subsequent period of extended operation.

35 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
36 conditions adverse to quality or significant conditions adverse to quality under those  
37 specific portions of the quality assurance (QA) program that are used to meet  
38 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
39 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
40 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
41 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
42 related structures and components (SCs) within the scope of this program.

43 Subsection IWL specifies that items for which examination results do not meet the  
44 acceptance standards are to be evaluated in accordance with IWL-3300,  
45 "Evaluation," and described in an engineering evaluation report. The report is to  
46 include an evaluation of whether the concrete containment is acceptable without

1 repair of the item and, if repair is required, the extent, method, and completion date of  
2 the repair or replacement. The report also identifies the cause of the condition and  
3 the extent, nature, and frequency of additional examinations. Subsection IWL also  
4 provides repair procedures to follow in IWL-4000. This includes requirements for the  
5 concrete repair, repair of reinforcing steel, and repair of the post-tensioning system.

6 8. **Confirmation Process:** The confirmation process is addressed through those specific  
7 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
8 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
9 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
10 confirmation process element of this AMP for both safety-related and nonsafety-related  
11 SCs within the scope of this program.

12 9. **Administrative Controls:** Administrative controls are addressed through the QA  
13 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
14 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
15 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
16 fulfill the administrative controls element of this AMP for both safety-related and  
17 nonsafety-related SCs within the scope of this program.

18 IWA-1400 specifies the preparation of plans, schedules, and inservice inspection (ISI)  
19 summary reports. In addition, written examination instructions and procedures,  
20 verification of qualification level of personnel who perform the examinations, and  
21 documentation of a QA program are specified. IWA-6000 specifically covers the  
22 preparation, submittal, and retention of records and reports.

23 10. **Operating Experience:** ASME Section XI, Subsection IWL was incorporated into  
24 10 CFR 50.55a in 1996. Prior to this time, the prestressing tendon inspections were  
25 performed in accordance with the guidance provided in RG 1.35, "Inservice Inspection of  
26 UngROUTed Tendons in Prestressed Concrete Containments." Operating experience  
27 pertaining to degradation of reinforced concrete in concrete containments was gained  
28 through the inspections required by 10 CFR 50.55a(g)(4) (i.e., Subsection IWL),  
29 10 CFR Part 50, Appendix J, and ad hoc inspections conducted by licensees and the  
30 NRC. NUREG-1522, "Assessment of Inservice Condition of Safety-Related Nuclear  
31 Power Plant Structures," described instances of cracked, spalled, and degraded  
32 concrete for reinforced and prestressed concrete containments. The NUREG also  
33 described cracked anchor heads for the prestressing tendons at three prestressed  
34 concrete containments. NRC IN 99-10, Rev. 1, "Degradation of Prestressing Tendon  
35 Systems in Prestressed Concrete Containment," described occurrences of degradation  
36 in prestressing systems. IN 2010-14, "Containment Concrete Surface Condition  
37 Examination Frequency and Acceptance Criteria," describes issues concerning the  
38 containment concrete surface condition examination frequency and acceptance criteria.  
39 The program considers the degradation concerns described in these generic  
40 communications. Implementation of Subsection IWL, in accordance with 10 CFR 50.55a,  
41 is a necessary element of aging management for concrete containments through the  
42 subsequent period of extended operation.

43 NRC Inspection Report 05000302/2009007 documents operating experience of an  
44 unprecedented delamination event that occurred during a major containment  
45 modification of a post-tensioned concrete containment. Although the event is not  
46 considered attributable to an aging mechanism, aging characteristics of prestressed

1 concrete containments and lessons learned should be an important consideration for  
2 major containment modification repair/replacement activities, especially those involving  
3 significant detensioning and retensioning of tendons, during the subsequent period of  
4 extended operation.

5 The program is informed and enhanced when necessary through the systematic and  
6 ongoing review of both plant-specific and industry operating experience, as discussed in  
7 Appendix B of the GALL-SLR Report.

## 8 **References**

- 9 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."  
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- 11 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled  
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20 Subsection IWA, General Requirements." The ASME Boiler and Pressure Vessel Code.  
21 New York, New York: The American Society of Mechanical Engineers.<sup>2</sup> 2013.
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3 U.S. Nuclear Regulatory Commission. August 2010.
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13 Prestressed Concrete Containments." ML003740007. Washington, DC: U.S. Nuclear  
14 Regulatory Commission. July 1990.

1 **XI.S3 ASME SECTION XI, SUBSECTION IWF**

2 **Program Description**

3 The 10 CFR 50.55a, imposes the inservice inspection (ISI) requirements of the American  
4 Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV),<sup>1</sup>  
5 Section XI, for Class 1, 2, 3, and metal containment (MC) piping and components and their  
6 associated supports. ISI of supports for ASME piping and components is addressed in Section  
7 XI, Subsection IWF. ASME Code, Section XI, Subsection IWL and the additional requirements  
8 specified in 10 CFR 50.55a(b)(2) constitute an existing mandated program applicable to  
9 managing aging of containment reinforced concrete and unbonded post-tensioning systems,  
10 and supplemented by guidance herein, for subsequent license renewal (SLR). This evaluation  
11 covers the 2004 edition of the ASME Code as approved in 10 CFR 50.55a. This program  
12 supplements ASME Code, Section XI, Subsection IWF, which constitutes an existing mandated  
13 program applicable to managing aging of ASME Class 1, 2, 3, and MC component supports for  
14 subsequent license renewal (SLR).

15 The scope of inspection for supports is based on sampling of the total support population. The  
16 sample size varies depending on the ASME Class. The largest sample size is specified for the  
17 most critical supports (ASME Class 1). The sample size decreases for the less critical supports  
18 (ASME Class 2 and 3). Discovery of support deficiencies during regularly scheduled  
19 inspections triggers an increase of the inspection scope in order to ensure that the full extent of  
20 deficiencies is identified. The primary inspection method employed is visual examination.  
21 Degradation that potentially compromises support function or load capacity is identified for  
22 evaluation. ASME Section XI, Subsection IWF specifies acceptance criteria and corrective  
23 actions. Supports requiring corrective actions are reexamined during the next inspection period.

24 The requirements of subsection IWF are supplemented to include monitoring of high-strength  
25 bolting (actual measured yield strength greater than or equal to 150 kilo-pounds per square inch  
26 (ksi) or 1,034 megapascals (MPa) for cracking. This program emphasizes proper selection of  
27 bolting material, lubricants, and installation torque or tension to prevent or minimize loss of  
28 bolting preload and cracking of high-strength bolting. This program includes inspections of  
29 randomly selected additional supports for each group of materials used and the environments to  
30 which they are exposed outside of the existing IWF sample population.

31 **Evaluation and Technical Basis**

- 32 1. **Scope of Program:** This program addresses ASME Class 1, 2, 3, and MC component  
33 supports. The scope of the program includes support members, structural bolting,  
34 high-strength structural bolting (actual measured yield strength greater than or equal to  
35 150 ksi or 1,034 MPa), anchor bolts, support anchorage to the building structure, accessible  
36 sliding surfaces, constant and variable load spring hangers, guides, stops, and vibration  
37 isolation elements. The acceptability of inaccessible areas (e.g., portions of supports  
38 encased in concrete, buried underground, or encapsulated by guard pipe) is evaluated when

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<sup>1</sup>GALL-SLR Report Chapter 1, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for AMPs.

1 conditions exist in accessible areas that could indicate the presence of, or result in,  
2 degradation to such inaccessible areas.

3 2. **Preventive Action:** Operating experience and laboratory examinations show that the  
4 use of molybdenum disulfide (MoS<sub>2</sub>) as a lubricant is a potential contributor to stress  
5 corrosion cracking (SCC), especially when applied to high-strength bolting. Thus,  
6 molybdenum disulfide and other lubricants containing sulfur should not be used.  
7 Preventive measures also include using bolting material that has actual measured yield  
8 strength less than 150 ksi or 1,034 MPa. Bolting replacement and maintenance  
9 activities include proper selection of bolting material and lubricants, and appropriate  
10 installation torque or tension, as recommended in Electric Power Research Institute  
11 (EPRI) documents (e.g., EPRI NP-5067 and EPRI TR-104213), American Society for  
12 Testing and Materials (ASTM) standards, and American Institute of Steel Construction  
13 (AISC) Specifications, as applicable. If bolting within the scope of the program consists  
14 of ASTM A325 and/or ASTM A490 bolts (including respective equivalent twist-off type  
15 ASTM F1852 and/or ASTM F2280 bolts), the preventive actions for storage, lubricant  
16 selection, and bolting and coating material selection discussed in Section 2 of Research  
17 Council for Structural Connections (RCSC) publication "Specification for Structural Joints  
18 Using High-Strength Bolts" need to be used.

19 3. **Parameters Monitored or Inspected:** The parameters monitored or inspected include  
20 corrosion; deformation; misalignment of supports; missing, detached, or loosened  
21 support items; cracking of welds; improper clearances of guides and stops; and improper  
22 hot or cold settings of spring supports and constant load supports. Accessible areas of  
23 sliding surfaces are monitored for debris, dirt, or indications of excessive loss of material  
24 due to wear that could prevent or restrict sliding as intended in the design basis of the  
25 support. Elastomeric vibration isolation elements are monitored for cracking, loss of  
26 material, and hardening. All bolting within the scope of the program is monitored for  
27 corrosion, loss of integrity of bolted connections due to self-loosening, and material  
28 conditions that can affect structural integrity. In addition, the concrete around anchor  
29 bolts is monitored for cracking. High strength bolting in sizes greater than 1 inch  
30 nominal diameter, including ASTM A325 and/or ASTM A490 bolts (including respective  
31 equivalent twist-off type ASTM F1852 and/or ASTM F2280 bolts), should be monitored  
32 for SCC.

33 4. **Detection of Aging Effects:** The program requires that a sample of ASME Class 1, 2,  
34 and 3 piping supports that are not exempt from examination and 100 percent of supports  
35 other than piping supports (Class 1, 2, 3, and MC), be examined as specified in  
36 Table IWF-2500-1. The sample size examined for ASME Class 1, 2, and 3 component  
37 supports is as specified in Table IWF-2500-1, plus an additional 5 percent of Class 1, 2,  
38 and 3 piping supports. The additional supports are randomly selected from the  
39 remaining population of IWF piping supports. The extent, frequency, and examination  
40 methods are designed to detect, evaluate, or repair age-related degradation before there  
41 is a loss of component support intended function. The VT-3 examination method  
42 specified by the program can reveal loss of material due to corrosion and wear,  
43 verification of clearances, settings, physical displacements, loose or missing parts,  
44 debris or dirt in accessible areas of the sliding surfaces, or loss of integrity at bolted  
45 connections. The VT-3 examination can also detect loss of material and cracking of  
46 elastomeric vibration isolation elements. Elastomeric vibration isolation elements should  
47 be felt to detect hardening if the vibration isolation function is suspect. IWF-3200  
48 specifies that visual examinations that detect surface flaws which exceed acceptance

1 criteria may be supplemented by either surface or volumetric examinations to determine  
2 the character of the flaw.

3 For high-strength bolting in sizes greater than 1 inch nominal diameter, volumetric  
4 examination comparable to that of ASME Code Section XI, Table IWB-2500-1,  
5 Examination Category B-G-1 should be performed to detect cracking in addition to the  
6 VT-3 examination. This volumetric examination may be waived with plant-specific  
7 justification. High-strength ASTM A325, and/or ASTM A490 bolting (including respective  
8 equivalent twist-off type ASTM F1852 and/or ASTM F2280 bolts), in sizes greater than  
9 1 inch nominal diameter, within the scope of this program is not exempt from volumetric  
10 examination unless additional justification is provided.

11 5. **Monitoring and Trending:** The ASME Class 1, 2, 3, and MC component supports are  
12 examined periodically, as specified in Table IWF-2500-1. As required by IWF-2420(a),  
13 the sequence of component support examinations established during the first inspection  
14 interval is repeated during each successive inspection interval, to the extent practical.  
15 Component supports whose examinations do not reveal unacceptable degradation are  
16 accepted for continued service. Verified changes of conditions from prior examination  
17 are recorded in accordance with IWA-6230. Component supports whose examinations  
18 reveal unacceptable conditions and are accepted for continued service by corrective  
19 measures or repair/replacement activity are reexamined during the next inspection  
20 period. When the reexamined component support no longer requires additional  
21 corrective measures during the next inspection period, the inspection schedule may  
22 revert to its regularly scheduled inspection. Examinations that reveal indications which  
23 exceed the acceptance standards and require corrective measures are extended to  
24 include additional examinations in accordance with IWF-2430. If a component support  
25 does not exceed the acceptance standards of IWF-3400 but is repaired to as-new  
26 condition, the sample is increased or modified to include another support that is  
27 representative of the remaining population of supports that were not repaired.

28 6. **Acceptance Criteria:** The acceptance standards for visual examination are specified in  
29 IWF-3400. IWF-3410(a) identifies the following conditions as unacceptable:

- 30 (a) Deformations or structural degradations of fasteners, springs, clamps, or other  
31 support items;
- 32 (b) Missing, detached, or loosened support items, including bolts and nuts;
- 33 (c) Arc strikes, weld spatter, paint, scoring, roughness, or general corrosion on close  
34 tolerance machined or sliding surfaces;
- 35 (d) Improper hot or cold positions of spring supports and constant load supports;
- 36 (e) Misalignment of supports; and
- 37 (f) Improper clearances of guides and stops.

38 Other unacceptable conditions include:

- 39 (a) Loss of material due to corrosion or wear

- 1 (b) Debris, dirt, or excessive wear that could prevent or restrict sliding of the sliding  
2 surfaces as intended in the design basis of the support;
- 3 (c) Cracked or sheared bolts, including high-strength bolts, and anchors; and
- 4 (d) Loss of material, cracking, and hardening of elastomeric vibration isolation  
5 elements that could reduce the vibration isolation function.

6 The above conditions may be accepted provided the technical basis for their acceptance  
7 is documented.

8 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
9 conditions adverse to quality or significant conditions adverse to quality under those  
10 specific portions of the quality assurance (QA) program that are used to meet  
11 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
12 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
13 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
14 fulfill the corrective actions element of this aging management program (AMP) for both  
15 safety-related and nonsafety-related structures and components (SCs) within the scope  
16 of this program.

17 Identification of unacceptable conditions triggers an expansion of the inspection scope,  
18 in accordance with IWF-2430, and reexamination of the supports requiring corrective  
19 actions during the next inspection period, in accordance with IWF-2420(b). In  
20 accordance with IWF-3122, supports containing unacceptable conditions are evaluated  
21 or tested or corrected before returning to service. Corrective actions are delineated in  
22 IWF-3122.2. IWF-3122.3 provides an alternative for evaluation or testing to substantiate  
23 structural integrity and/or functionality.

24 8. **Confirmation Process:** The confirmation process is addressed through those specific  
25 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
26 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
27 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
28 confirmation process element of this AMP for both safety-related and nonsafety-related  
29 SCs within the scope of this program.

30 9. **Administrative Controls:** Administrative controls are addressed through the QA  
31 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
32 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
33 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
34 fulfill the administrative controls element of this AMP for both safety-related and  
35 nonsafety-related SCs within the scope of this program.

36 10. **Operating Experience:** Degradation of threaded bolting and fasteners has occurred  
37 from boric acid corrosion, SCC, and fatigue loading U.S. Nuclear Regulatory  
38 Commission (NRC) Inspection and Enforcement (IE) Bulletin 82-02, "Degradation of  
39 Threaded Fasteners In the Reactor Coolant Pressure Boundary of PWR Plants," NRC  
40 Generic Letter (GL) 91-17, "Generic Safety Issue 79, Bolting Degradation of Failure in  
41 Nuclear Power Plants"). SCC has occurred in high-strength bolts used for nuclear steam  
42 supply system (NSSS) component supports (EPRI NP-5769). NRC Information Notice  
43 (IN) 2009-04 describes deviations in the supporting forces of mechanical constant

1 supports, from code allowable load deviation, due to age-related wear on the linkages  
2 and increased friction between the various moving parts and joints within the constant  
3 support, which can adversely affect the analyzed stresses of connected piping systems.

4 The program is informed and enhanced when necessary through the systematic and  
5 ongoing review of both plant-specific and industry operating experience, as discussed in  
6 Appendix B of the GALL-SLR Report.

## 7 **References**

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27 New York: The American Society of Mechanical Engineers. 2013.
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29 Subsection IWF, Requirements for Class 1, 2, 3, and MC Component Supports of Light-Water  
30 Cooled Power Plants." The ASME Boiler and Pressure Vessel Code. New York, New York:  
31 The American Society of Mechanical Engineers. 2013.
- 32 EPRI. EPRI TR-104213, "Bolted Joint Maintenance & Application Guide." Palo Alto, California:  
33 Electric Power Research Institute. December 1995.

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<sup>2</sup>GALL Report Chapter I, Table 1, identifies the ASME Code Section XI editions and addenda that are acceptable to use for this AMP.

- 1 \_\_\_\_\_. EPRI NP-5067, "Good Bolting Practices, A Reference Manual for Nuclear Power Plant  
2 Maintenance Personnel." Volume 1: Large Bolt Manual, 1987; Volume 2: Small Bolts and  
3 Threaded Fasteners, Palo Alto, California: Electric Power Research Institute. 1990.
- 4 \_\_\_\_\_. EPRI NP-5769, "Degradation and Failure of Bolting in Nuclear Power Plants."  
5 Volumes 1 and 2. Palo Alto, California: Electric Power Research Institute. April 1988.
- 6 NRC. NRC Information Notice 2009-04, "Age-Related Constant Support Degradation."  
7 ML090340754. Washington, DC: U.S. Nuclear Regulatory Commission. February 2009.
- 8 \_\_\_\_\_. NRC Generic Letter 91-17, "Generic Safety Issue 79, Bolting Degradation or Failure in  
9 Nuclear Power Plants." ML031140534. Washington, DC: U.S. Nuclear Regulatory  
10 Commission. October 1991.
- 11 \_\_\_\_\_. NRC IE Bulletin 82-02, "Degradation of Threaded Fasteners in the Reactor Coolant  
12 Pressure Boundary of PWR Plants." ML03120720. Washington, DC: U.S. Nuclear Regulatory  
13 Commission. June 1982.
- 14 Research Council on Structural Connections. "Specification for Structural Joints Using High-  
15 Strength Bolts." 2009.

1 **XI.S4 10 CFR PART 50, APPENDIX J**

2 **Program Description**

3 A typical primary reactor containment system consists of a containment structure (containment),  
4 and a number of electrical, mechanical, equipment hatch, and personnel air lock penetrations.  
5 As described in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix J,  
6 “Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors,”  
7 (Appendix J) periodic containment leak rate tests are required to ensure that (a) leakage  
8 through these containments or systems and components penetrating these containments does  
9 not exceed allowable leakage rates specified in the Technical Specification (TS) and (b) integrity  
10 of the containment structure is maintained during its service life.

11 This aging management program (AMP) credits the existing program required by  
12 10 CFR Part 50 Appendix J, and augments it to ensure that all containment pressure-retaining  
13 components are managed for age-related degradation.

14 Appendix J provides two options, Option A and Option B, to meet the requirements of a  
15 containment leak rate test (LRT) program. Option A is prescriptive with all testing performed on  
16 specified periodic intervals. Option B is a performance-based approach. The U.S. Nuclear  
17 Regulatory Commission (NRC) Regulatory Guide (RG) 1.163, “Performance-Based  
18 Containment Leak-Test Program” and Nuclear Energy Institute (NEI) 94-01, Industry Guideline  
19 for Implementing Performance-Based Option for 10 CFR Part 50, Appendix J, as approved by  
20 the NRC final safety evaluation for NEI 94-01, Revision 3, provide additional information  
21 regarding Option B. Three types of tests are performed under either Option A or Option B, or a  
22 mix as adopted by licensees on a voluntary basis.

23 Type A integrated leak rate tests (ILRTs) determine the overall containment integrated leakage  
24 rate, at the calculated peak containment internal pressure (Pa) related to the design basis loss  
25 of coolant accident (LOCA). Type B (containment penetration leak rate) tests detect local leaks  
26 and measure leakage across each pressure-containing or leakage-limiting boundary of  
27 containment penetrations.

28 Type C (containment isolation valve leak rate) tests detect local leaks and measure leakage  
29 across containment isolation valves installed in containment penetrations or lines penetrating  
30 the containment. If Type C tests are not performed under this program, they could be  
31 included under an Inservice Testing Program for systems containing the isolation valves  
32 [e.g., American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance  
33 of Nuclear Power Plants (NPPs) or ASME Code, Section XI, Division 1, Rules for inservice  
34 inspection (ISI) of NPP Components, incorporated by reference in 10 CFR 50.55a].

35 Appendix J requires a general visual inspection of the accessible interior and exterior surfaces  
36 of the containment structures and components (SCs) to be performed prior to any Type A test  
37 and at periodic intervals between tests based on the performance of the containment system.  
38 The visual inspections required by ASME Section XI, Subsection IWE and ASME Section XI,  
39 Subsection IWL are acceptable substitutes for the general visual inspection. The purpose of the  
40 Appendix J general visual inspection is to uncover any evidence of structural deterioration that  
41 may affect the containment structure leakage integrity or the performance of the Type A test.

## 1 Evaluation and Technical Basis

- 2 1. **Scope of Program:** The scope of the containment LRT program includes the  
3 containment system and related systems and components penetrating the containment  
4 pressure-retaining or leakage-limiting boundary. Containment pressure-retaining  
5 boundary components within the scope of subsequent license renewal (SLR) and  
6 excluded from Appendix J testing must still be age-managed. Other programs may be  
7 credited for aging management of these components; however, the component and the  
8 proposed AMP should be clearly identified.
- 9 2. **Preventive Action:** The containment LRT program is a performance monitoring  
10 program with no specific preventive actions.
- 11 3. **Parameters Monitored or Inspected:** The monitored parameters are leakage rates  
12 through the containment shell, containment liner, penetrations, associated welds, access  
13 openings, and associated pressure boundary components.
- 14 4. **Detection of Aging Effects:** A containment LRT program is effective in detecting  
15 leakage rates of the containment pressure boundary components, including seals and  
16 gaskets, and in identifying and correcting sources of leakage. While the calculation of  
17 leakage rates and satisfactory performance of containment leak rate testing  
18 demonstrates the leakage integrity of the containment, it does not by itself provide  
19 information that would indicate that age-related degradation has initiated or that the  
20 capacity of the containment may have been reduced for other types of loading  
21 conditions. This would be achieved with the implementation of acceptable containment  
22 ISI programs such as ASME Section XI, Subsection IWE (GALL-SLR Report AMP  
23 XI.S1), and ASME Section XI, Subsection IWL (GALL-SLR Report AMP XI.S2).
- 24 5. **Monitoring and Trending:** Because the containment LRT program is repeated  
25 periodically throughout the operating license period, the entire containment pressure  
26 boundary is monitored over time. The frequency of these tests depends on which option  
27 (A or B) is selected. With Option A, testing is performed on a regular fixed time interval  
28 as defined in Appendix J. In the case of Option B, acceptable performance in prior tests  
29 meeting leakage rate limits serves as a basis to adjust the testing interval. For valves  
30 and penetrations administrative leakage rate limits may be set lower than the regulatory  
31 acceptance criteria for early detection of age-related degradation.
- 32 6. **Acceptance Criteria:** Plant TS define the regulatory acceptance criteria for leakage  
33 rate limits. The regulatory acceptance criteria meet the requirements as set forth in  
34 Appendix J, and are part of each plant's licensing basis.
- 35 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
36 conditions adverse to quality or significant conditions adverse to quality under those  
37 specific portions of the quality assurance (QA) program that are used to meet  
38 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
39 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
40 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
41 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
42 related SCs within the scope of this program.

1 Corrective actions are taken in accordance with Appendix J and NEI 94-01. When  
2 leakage rates do not meet the acceptance criteria, an evaluation is performed to identify  
3 the cause of the unacceptable performance and appropriate corrective actions  
4 are taken.

- 5 8. **Confirmation Process:** The confirmation process is addressed through those specific  
6 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
7 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
8 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
9 confirmation process element of this AMP for both safety-related and nonsafety-related  
10 SCs within the scope of this program.

- 11 9. **Administrative Controls:** Administrative controls are addressed through the QA  
12 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
13 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
14 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
15 fulfill the administrative controls element of this AMP for both safety-related and  
16 nonsafety-related SCs within the scope of this program.

17 Results of the containment LRT program are documented as described in Appendix J, to  
18 demonstrate that the acceptance criteria for leakage rates have been satisfied. The test  
19 results that exceed the acceptance criteria are assessed under 10 CFR 50.72 and  
20 10 CFR 50.73.

- 21 10. **Operating Experience:** To date, Appendix J, containment LRT program, in conjunction  
22 with the containment ISI program, have been effective in preventing unacceptable  
23 leakage through the containment pressure boundary. Implementation of Option B for  
24 testing frequency must be consistent with plant-specific operating experience.

25 The program is informed and enhanced when necessary through the systematic and  
26 ongoing review of both plant-specific and industry operating experience, as discussed in  
27 Appendix B of the GALL-SLR Report.

28 NRC Information Notice (IN) 92-20, "Inadequate Local Leak Rate Testing," describes  
29 operating experience of inadequate local leak rate testing of two-ply steel expansion  
30 bellows that were used on some piping penetrations.

## 31 **References**

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33 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

34 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled  
35 Power Reactors." Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

36 10 CFR 50.55a, "Codes and Standards." Washington, DC: U.S. Nuclear Regulatory  
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38 10 CFR 50.72, "Immediate Notification Requirements for Operating Nuclear Power Reactors."  
39 Washington, DC: U.S. Nuclear Regulatory Commission. 2015.

- 1 10 CFR 50.73, "Licensee Event Report System." Washington, DC: U.S. Nuclear Regulatory  
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- 3 ASME. ASME Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components,  
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## 1 XI.S5 MASONRY WALLS

### 2 Program Description

3 The U.S. Nuclear Regulatory Commission (NRC) Inspection and Enforcement Bulletin  
4 (IEB) 80-11, "Masonry Wall Design," and NRC Information Notice (IN) 87-67, "Lessons Learned  
5 from Regional Inspections of Licensee Actions in Response to IEB 80-11," constitute an  
6 acceptable basis for a masonry wall aging management program (AMP). IEB 80-11 required  
7 (a) the identification of masonry walls in close proximity to or having attachments from safety-  
8 related systems or components and (b) the evaluation of design adequacy and construction  
9 practice. NRC IN 87-67 recommended plant-specific condition monitoring of masonry walls and  
10 administrative controls to ensure that the evaluation basis developed in response to NRC IEB  
11 80-11 is not invalidated by (a) deterioration of the masonry walls (e.g., new cracks not  
12 considered in the reevaluation), (b) physical plant changes such as installation of new safety-  
13 related systems or components in close proximity to masonry walls, or (c) reclassification of  
14 systems or components from nonsafety-related to safety-related, provided appropriate  
15 evaluation is performed to account for such occurrences.

16 Important elements in the evaluation of many masonry walls during the NRC IEB 80-11 program  
17 included (a) installation of steel edge supports to provide a sound technical basis for boundary  
18 conditions used in seismic analysis and (b) installation of steel bracing to ensure stability or  
19 containment of unreinforced masonry walls during a seismic event. Consequently, in addition to  
20 the development of cracks in the masonry walls, loss of function of the structural steel supports  
21 and bracing would also invalidate the evaluation basis. The steel edge supports and steel  
22 bracings are considered component supports and aging effects are managed by the Structures  
23 Monitoring program (GALL-SLR Report AMP XI.S6).

24 The program consists of periodic visual inspection of masonry walls within the scope of  
25 subsequent license renewal (SLR) to detect loss of material and cracking of masonry units and  
26 mortar. The aging effects that could impact masonry wall intended function or potentially  
27 invalidate its evaluation basis are entered into the corrective action process for further analysis,  
28 repair, or replacement.

29 Since the issuance of NRC IEB 80-11 and NRC IN 87-67, the NRC promulgated 10 CFR 50.65,  
30 "Maintenance Rule." For SLR, masonry walls may be inspected as part of GALL-SLR Report  
31 AMP XI.S6 conducted for the Maintenance Rule, provided the 10 attributes described below are  
32 incorporated in GALL-SLR Report AMP XI.S6. The aging effects on masonry walls that are  
33 considered fire barriers are managed by GALL-SLR Report AMP XI.M26, "Fire Protection."

### 34 Evaluation and Technical Basis

35 1. **Scope of Program:** The scope includes all masonry walls identified as performing  
36 intended functions in accordance with 10 CFR 54.4. Masonry walls consist of solid or  
37 hollow concrete block, mortar, grout, steel bracing, reinforcing and supports. The aging  
38 effects on masonry walls that are considered fire barriers are also managed by  
39 GALL-SLR Report AMP XI.M26, Fire Protection, as well as being managed by this  
40 program. Aging effects on the steel elements of masonry walls are managed by  
41 GALL-SLR Report AMP XI.S6.

42 2. **Preventive Action:** This is a condition monitoring program and no specific preventive  
43 actions are required.

- 1 3. **Parameters Monitored or Inspected:** The primary parameters monitored are potential  
2 shrinkage and/or separation, cracking of masonry walls, cracking or loss of material at  
3 the mortar joints and gaps between the supports and masonry walls that could impact  
4 the intended function or potentially invalidate its evaluation basis.
- 5 4. **Detection of Aging Effects:** Visual examination of the masonry walls by qualified  
6 inspection personnel is sufficient. In general, masonry walls are inspected every  
7 5 years. Walls that are both unreinforced and unbraced are inspected every 3 years.  
8 Provisions exist for more frequent inspections in areas where significant loss of material,  
9 cracking, or other signs of degradation are observed to ensure there is no loss of  
10 intended function between inspections. In addition, masonry walls that are fire barriers  
11 are visually inspected in accordance with GALL-SLR Report AMP XI.M26. Steel  
12 elements of masonry walls are visually inspected under the scope of GALL-SLR Report  
13 AMP XI.S6.
- 14 5. **Monitoring and Trending:** Condition monitoring for evidence of shrinkage and/or  
15 separation and cracking of masonry is achieved by periodic examination. Inspection  
16 results are documented and compared to previous inspections to identify changes or  
17 trends in the condition of masonry walls. Crack widths and lengths, and gaps between  
18 supports and masonry walls, are measured and assessed for trends. Degradation  
19 detected from monitoring is evaluated. Photographic records may be used to document  
20 and trend the type, severity, extent and progression of degradation.
- 21 6. **Acceptance Criteria:** For each masonry wall, observed degradation (e.g., shrinkage  
22 and/or separation, cracking of masonry walls, cracking or loss of material at the mortar  
23 joints and gaps between the supports and masonry walls) are assessed against the  
24 evaluation basis to confirm the degradation has not invalidated the original evaluation  
25 assumptions or impacted the capability to perform the intended functions. Further  
26 evaluation is conducted to determine if corrective action is required when the  
27 degradation is determined to impact the intended function of the wall or invalidate its  
28 evaluation basis. Safety-related equipment near or adjacent to masonry walls should be  
29 inspected to ensure the affected masonry walls are being properly managed for aging.  
30 Degraded conditions that are accepted without repair or other corrective actions are  
31 technically justified or supported by engineering evaluation.
- 32 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
33 conditions adverse to quality or significant conditions adverse to quality under those  
34 specific portions of the QA program that are used to meet Criterion XVI, "Corrective  
35 Action," of 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes  
36 how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
37 corrective actions element of this AMP for both safety-related and nonsafety-related SCs  
38 within the scope of this program.
- 39 A corrective action option is to develop a new analysis or evaluation basis that accounts  
40 for the degraded condition of the wall (i.e., acceptance by further evaluation). Other  
41 alternatives include repair or replacing the degraded wall.
- 42 8. **Confirmation Process:** The confirmation process is addressed through those specific  
43 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
44 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
45 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the

1 confirmation process element of this AMP for both safety-related and nonsafety-related  
2 SCs within the scope of this program.

3 9. **Administrative Controls:** Administrative controls are addressed through the QA  
4 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
5 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
6 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
7 fulfill the administrative controls element of this AMP for both safety-related and  
8 nonsafety-related SCs within the scope of this program.

9 10. **Operating Experience:** Since 1980, masonry walls that perform an intended function  
10 have been systematically identified through licensee programs in response to NRC  
11 Inspection and Enforcement Bulletin (IEB) 80-11, NRC Generic Letter (GL) 87-02, and  
12 10 CFR 50.48. NRC IN 87-67 documented lessons learned from the NRC IEB 80-11  
13 program and provided recommendations for administrative controls and periodic  
14 inspection to ensure that the evaluation basis for each safety-significant masonry wall is  
15 maintained. NUREG–1522 documents instances of observed cracks and other  
16 deterioration of masonry-wall joints at nuclear power plants (NPPs). Whether conducted  
17 as a stand-alone program or as a part of structures monitoring, a masonry wall AMP that  
18 incorporates the recommendations delineated in NRC IN 87-67 should ensure that the  
19 intended functions of all masonry walls within the scope of license renewal are  
20 maintained for the subsequent period of extended operation.

21 The program is informed and enhanced when necessary through the systematic and  
22 ongoing review of both plant-specific and industry operating experience, as discussed in  
23 Appendix B of the GALL-SLR Report.

## 24 **References**

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# 1 XI.S6 STRUCTURES MONITORING

## 2 Program Description

3 Implementation of structures monitoring under 10 CFR 50.65 (the Maintenance Rule) is  
4 addressed in the U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) 1.160,  
5 and Nuclear Management and Resources Council (NUMARC) 93-01. These two documents  
6 and supplemental guidance herein provide guidance for development of licensee-specific  
7 programs to monitor the condition of structures and structural components within the scope  
8 of the license renewal rule, such that there is no loss of structure or structural component  
9 intended function.

10 The structures monitoring program consists primarily of periodic visual inspections by personnel  
11 qualified to monitor structures and components (SCs), including protective coatings, for  
12 applicable aging effects from degradation mechanisms, such as those described in the  
13 American Concrete Institute (ACI) Standards 349.3R, ACI 201.1R, and Structural Engineering  
14 Institute/American Society of Civil Engineers Standard (SEI/ASCE) 11. Visual inspections are  
15 supplemented with volumetric or surface examinations to detect stress corrosion cracking  
16 (SCC) in high-strength (actual measured yield strength greater than or equal to 150 thousand-  
17 pound per square inch [ksi] or greater than or equal to 1,034 MPa) structural bolts greater than  
18 1 inch [25 mm] in diameter. Identified aging effects are evaluated by qualified personnel using  
19 criteria derived from industry codes and standards contained in the plant current licensing  
20 bases, including ACI 349.3R, ACI 318, SEI/ASCE 11, and the American Institute of Steel  
21 Construction (AISC) specifications, as applicable.

22 The program includes preventive actions to ensure structural bolting integrity. The program also  
23 includes periodic sampling and testing of groundwater and the need to assess the impact of any  
24 changes in its chemistry on below grade concrete structures.

## 25 Evaluation and Technical Basis

26 1. **Scope of Program:** The scope of the program includes all structures, SCs, component  
27 supports, and structural commodities in the scope of license renewal that are not  
28 covered by other structural aging management programs (AMPs) (i.e., “ASME  
29 Section XI, Subsection IWE” (GALL-SLR Report AMP XI.S1); “ASME Section XI,  
30 Subsection IWL” (GALL-SLR Report AMP XI.S2); “ASME Section XI, Subsection IWF”  
31 (GALL-SLR Report AMP XI.S3); “Masonry Walls” (GALL-SLR Report AMP XI.S5); and  
32 NRC RG 1.127, “Inspection of Water-Control Structures Associated with Nuclear Power  
33 Plants” (GALL-SLR Report AMP XI.S7).

34 Examples of structures, SCs, and commodities in the scope of the program are concrete  
35 and steel structures, structural bolting and high-strength structural bolting  
36 (actual measured yield strength greater than or equal to 150 ksi or greater than or equal  
37 to 1,034 MPa), anchor bolts and embedments, component support members, steel edge  
38 supports and steel bracings associated with masonry walls, pipe whip restraints and jet  
39 impingement shields, transmission towers, panels and other enclosures, racks, sliding  
40 surfaces, sump and pool liners, electrical cable trays and conduits, trash racks  
41 associated with water control structures, electrical duct banks, manholes, doors,  
42 penetration seals, seismic joint filler and other elastomeric materials, and tube tracks.  
43 Associated coatings are also included as an indication of the condition of the  
44 underlying material.

1 The scope of this program includes periodic sampling and testing of groundwater. The  
2 scope may also include inspection of masonry walls and water-control structures  
3 provided all the attributes of “Masonry Walls” (GALL-SLR Report AMP XI.S5) and  
4 “Inspection of Water-Control Structures Associated with Nuclear Power Plants”  
5 (GALL-SLR Report AMP XI.S7) are incorporated in the attributes of this program.

- 6 2. **Preventive Action:** The structures monitoring program is primarily a condition  
7 monitoring program; however, the program includes preventive actions to ensure  
8 structural bolting integrity, as discussed in Electric Power Research Institute (EPRI)  
9 documents (such as EPRI NP-5067 and TR-104213), American Society for Testing and  
10 Materials (ASTM) standards, and American Institute of Steel Construction (AISC)  
11 specifications, as applicable. The preventive actions emphasize proper selection of  
12 bolting material and lubricants, and appropriate installation torque or tension to prevent  
13 or minimize loss of bolting preload and cracking of high-strength bolting. If the structural  
14 bolting consists of ASTM A325 and/or ASTM A490 bolts (including respective equivalent  
15 twist-off type ASTM F1852 and/or ASTM F2280 bolts), the preventive actions for  
16 storage, lubricant selection, and bolting and coating material selection discussed in  
17 Section 2 of Research Council for Structural Connection (RCSC) publication  
18 “Specification for Structural Joints Using High-Strength Bolts,” need to be used.

- 19 3. **Parameters Monitored or Inspected:** For each structure/aging effect combination, the  
20 specific parameters monitored or inspected depend on the particular structure, SC, or  
21 commodity. Parameters monitored or inspected are commensurate with industry codes,  
22 standards, and guidelines and also consider industry and plant-specific operating  
23 experience. ACI 349.3R and SEI/ASCE 11 provide an acceptable basis for selection of  
24 parameters to be monitored or inspected for concrete and steel structural elements and  
25 for steel liners, joints, coatings, and waterproofing membranes (if applicable).

26 For concrete structures, parameters monitored include loss of material, cracking,  
27 increase in porosity and permeability, loss of strength, and reduction in concrete anchor  
28 capacity due to local concrete degradation. Steel SCs are monitored for loss of material  
29 due to corrosion. Structural steel bracing and edge supports associated with masonry  
30 walls are inspected for deflection or distortion, loose bolts, loss of material due to  
31 corrosion, and coating degradation. Painted or coated areas are examined for evidence  
32 of flaking, blistering, cracking, peeling, delamination, discoloration, and other signs of  
33 distress that could indicate degradation of the underlying material.

34 Bolting within the scope of the program is monitored for loss of material, loose bolts,  
35 missing or loose nuts, and other conditions indicative of loss of preload. In addition,  
36 concrete around anchor bolts is monitored for cracking. High-strength structural bolts  
37 greater than 1 inch [25 mm] in diameter are monitored for stress corrosion cracking  
38 (SCC). However, ASTM A325 and ASTM A490 bolts (or equivalent) used in civil  
39 structures have not been shown to be prone to SCC. Therefore, SCC potential need not  
40 be evaluated for high-strength bolts of those classifications when used in civil structures.

41 Accessible sliding surfaces are monitored for indication of significant loss of material due  
42 to wear or corrosion, and for accumulation of debris or dirt. Elastomeric vibration  
43 isolators, structural sealants, and seismic joint fillers are monitored for cracking, loss of  
44 material, and hardening. Groundwater chemistry (pH, chlorides, and sulfates) is  
45 monitored periodically to assess its impact, if any, on below-grade concrete structures.  
46 If through-wall leakage or groundwater infiltration is identified, leakage volumes and

1 chemistry are monitored and trended for signs of concrete or steel  
2 reinforcement degradation.

3 If necessary for managing settlement and erosion of porous concrete subfoundations,  
4 the continued functionality of a site dewatering system is monitored.

- 5 4. **Detection of Aging Effects:** Structures are monitored under this program using  
6 periodic visual inspection of each structure/aging effect combination by a qualified  
7 inspector to ensure that aging degradation will be detected and quantified before there is  
8 loss of intended function. It may be necessary to enhance or supplement visual  
9 inspections with nondestructive examination, destructive testing and/or analytical  
10 methods, based on the conditions observed or the parameter being monitored. Visual  
11 inspection of high-strength structural bolting greater than 1 inch [25 mm] in diameter is  
12 supplemented with volumetric or surface examinations to detect cracking. Visual  
13 inspection of elastomeric elements is supplemented by tactile inspection to detect  
14 hardening if the intended function is suspect. The inspection frequency depends on  
15 safety significance and the condition of the structure as specified in NRC RG 1.160. In  
16 general, all structures are monitored on an interval not to exceed 5 years. The program  
17 includes provisions for more frequent inspections based on an evaluation of the  
18 observed degradation. The responsible engineer for this program evaluates  
19 groundwater chemistry with a frequency that can identify potential seasonal variations  
20 (e.g., quarterly or semiannually). Groundwater is sampled from a location that is  
21 representative of the groundwater in contact with structures within the scope of license  
22 renewal. Inspector qualifications should be consistent with industry guidelines and  
23 standards and guidelines for implementing the requirements of 10 CFR 50.65.  
24 Qualifications of inspection and evaluation personnel specified in ACI 349.3R are  
25 acceptable for inspection of concrete structures.

26 Indications of groundwater infiltration or through-concrete leakage should lead to  
27 corrective actions. Corrective actions may include engineering evaluation, more frequent  
28 inspections, or destructive testing of affected concrete to validate existing concrete  
29 properties, including concrete pH levels. When leakage volumes allow, corrective  
30 actions should include analysis of the leakage pH, along with mineral, chloride, sulfate  
31 and iron content in the water.

32 The program recommends the use of accepted nondestructive examination (NDE)  
33 techniques, when applicable, to supplement visual inspections.

34 The structures monitoring program addresses detection of aging affects for inaccessible,  
35 below-grade concrete structural elements. For plants with nonaggressive ground  
36 water/soil (pH > 5.5, chlorides < 500 ppm, or sulfates <1,500 ppm), the program  
37 recommends: (a) evaluating the acceptability of inaccessible areas when conditions  
38 exist in accessible areas that could indicate the presence of, or result in, degradation to  
39 such inaccessible areas and (b) examining representative samples of the exposed  
40 portions of the below grade concrete, when excavated for any reason.

41 For plants with aggressive ground water/soil (pH < 5.5, chlorides > 500 ppm, or sulfates  
42 > 1,500 ppm) and/or where the concrete structural elements have experienced  
43 degradation, a plant-specific AMP accounting for the extent of the degradation  
44 experienced should be implemented to manage the concrete aging during the period of  
45 extended operation. The plant-specific AMP includes focused inspections of

1 below-grade, inaccessible concrete structural elements exposed to aggressive  
2 groundwater/soil, on an interval not to exceed 5 years.

- 3 5. **Monitoring and Trending:** Results of periodic inspections are documented and  
4 compared to previous results to identify changes from prior inspections. Quantitative  
5 measurements and qualitative data are recorded and trended for all applicable  
6 parameters monitored or inspected, and the use of photographs or surveys is  
7 encouraged. Photographic records may be used to document and trend the type,  
8 severity, extent and progression of degradation.

9 Quantitative baseline inspection data should be established per the acceptance criteria  
10 described herein prior to the period of subsequent license renewal (SLR).

- 11 6. **Acceptance Criteria:** Inspection results are evaluated by qualified engineering  
12 personnel based on acceptance criteria selected for each structure/aging effect to  
13 ensure that the need for corrective actions is identified before loss of intended functions.  
14 The criteria are derived from applicable codes and standards that include but are not  
15 limited to ACI 349.3R, ACI 318, SEI/ASCE 11, or the relevant AISC specifications and  
16 consider industry and plant operating experience. The criteria are directed at the  
17 identification and evaluation of degradation that may affect the ability of the structure or  
18 component to perform its intended function. Justified quantitative acceptance criteria are  
19 used whenever applicable. For concrete, the quantitative acceptance criteria of  
20 ACI 349.3R are acceptable. Applicants who are not committed to ACI 349.3R and elect  
21 to use plant-specific criteria for concrete structures should describe the criteria and  
22 provide a technical basis for deviations from those in ACI 349.3R. Loose bolts and nuts  
23 and cracked high-strength bolts are not acceptable unless accepted by engineering  
24 evaluation. Structural sealants are acceptable if the observed loss of material, cracking,  
25 and hardening will not result in loss of sealing. Elastomeric vibration isolation elements  
26 are acceptable if there is no loss of material, cracking, or hardening that could lead to  
27 the reduction or loss of isolation function. Acceptance criteria for sliding surfaces are  
28 (a) no indications of excessive loss of material due to corrosion or wear and (b) no  
29 debris or dirt that could restrict or prevent sliding of the surfaces as required by design.  
30 The structures monitoring program is to contain sufficient detail on acceptance criteria to  
31 conclude that this program attribute is satisfied.

- 32 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
33 conditions adverse to quality or significant conditions adverse to quality under those  
34 specific portions of the quality assurance (QA) program that are used to meet  
35 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
36 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
37 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
38 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
39 related SCs within the scope of this program.

- 40 8. **Confirmation Process:** The confirmation process is addressed through those specific  
41 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
42 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
43 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
44 confirmation process element of this AMP for both safety-related and nonsafety-related  
45 SCs within the scope of this program.

- 1 9. **Administrative Controls:** Administrative controls are addressed through the QA  
2 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
3 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
4 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
5 fulfill the administrative controls element of this AMP for both safety-related and  
6 nonsafety-related SCs within the scope of this program.
- 7 10. **Operating Experience:** NUREG–1522 documents the results of a survey sponsored in  
8 1992 by the Office of Nuclear Reactor Regulation to obtain information on the types of  
9 distress in the concrete and steel SCs, the type of repairs performed, and the durability  
10 of the repairs. Licensees who responded to the survey reported cracking, scaling, and  
11 leaching of concrete structures. The degradation was attributed to drying shrinkage,  
12 freeze-thaw, and abrasion. The NUREG also describes the results of NRC staff  
13 inspections at six plants. The staff observed concrete degradation, corrosion of  
14 component support members and anchor bolts, cracks and other deterioration of  
15 masonry walls, and groundwater leakage and seepage into underground structures.  
16 Information Notice (IN) 2011-20 discusses an instance of groundwater infiltration leading  
17 to alkali-silica reaction degradation in below-grade concrete structures, while IN 2004-05  
18 and IN 2006-13 discuss instances of through-wall water leakage from spent fuel pools.  
19 Many license renewal applicants have found it necessary to enhance their structures  
20 monitoring program to ensure that the aging effects of SCs in the scope of 10 CFR 54.4  
21 are adequately managed during the period of extended operation. There is reasonable  
22 assurance that implementation of the structures monitoring program described above  
23 will be effective in managing the aging of the in-scope SC supports through the period  
24 of SLR.
- 25 The program is informed and enhanced when necessary through the systematic and  
26 ongoing review of both plant-specific and industry operating experience, as discussed in  
27 Appendix B of the GALL-SLR Report.

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1 **XI.S7 INSPECTION OF WATER-CONTROL STRUCTURES**  
2 **ASSOCIATED WITH NUCLEAR POWER PLANTS**

3 **Program Description**

4 This program describes an acceptable basis for developing an inservice inspection (ISI) and  
5 surveillance program for dams, slopes, canals, and other raw water-control structures  
6 associated with emergency cooling water systems or flood protection of nuclear power plants  
7 (NPPs). The program addresses age-related deterioration, degradation due to environmental  
8 conditions, and the effects of natural phenomena that may affect water-control structures. The  
9 program recognizes the importance of periodic monitoring and maintenance of water-control  
10 structures so that the consequences of age-related deterioration and degradation can be  
11 prevented or mitigated in a timely manner.

12 The U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) 1.127, "Inspection of  
13 Water-Control Structures Associated with Nuclear Power Plants," provides additional detailed  
14 guidance for an inspection program for water-control structures, including guidance on  
15 engineering data compilation, inspection activities, technical evaluation, inspection frequency,  
16 and the content of inspection reports. NRC RG 1.127 delineates current NRC practice in  
17 evaluating ISI programs for water-control structures.

18 An aging management program (AMP) addressing water-control structures, commensurate with  
19 the program elements described below, is expected regardless of whether a plant is committed  
20 to NRC RG 1.127. Aging management of water-control structures and components (SCs) may  
21 be included in "Structures Monitoring" (GALL-SLR Report AMP XI.S6); however, details  
22 pertaining to water-control structures, as described herein, should be explicitly incorporated and  
23 identified in GALL-SLR Report AMP XI.S6 program attributes if this approach is taken.

24 Attributes evaluated below do not include inspection of dams. For dam inspection and  
25 maintenance, programs under the regulatory jurisdiction of the Federal Energy Regulatory  
26 Commission (FERC) or the U.S. Army Corps of Engineers (USACE), continued through the  
27 subsequent period of extended operation, are adequate for the purpose of aging management.  
28 For programs not falling under the regulatory jurisdiction of FERC or the USACE the staff  
29 evaluates the effectiveness of the AMP based on compatibility to the common practices of the  
30 FERC and USACE programs.

31 **Evaluation and Technical Basis**

32 1. **Scope of Program:** The scope includes raw water-control structures associated with  
33 emergency cooling water systems or flood protection of NPPs. The water-control  
34 structures included in the program are concrete structures, embankment structures,  
35 spillway structures and outlet works, reservoirs, cooling water channels and canals, flood  
36 protection walls and gates, and intake and discharge structures. The scope of the  
37 program also includes structural steel, and high-strength structural bolting  
38 (actual measured yield strength greater than or equal to 150 kilo-pounds per square inch  
39 [150 ksi] or greater than or equal to 1,034 megapascals (MPa) associated with  
40 water-control structures, steel or wood piles and sheeting required for the stability of  
41 embankments and channel slopes, and miscellaneous steel, such as sluice gates and  
42 trash racks. Associated coatings are also included as an indication of the condition of  
43 the underlying material.

1 2. **Preventive Action:** This is a condition monitoring program. The program is augmented  
2 to include preventive actions to ensure structural bolting integrity, as discussed in  
3 Electric Power Research Institute (EPRI) documents (such as EPRI NP-5067 and  
4 TR-104213), American Society for Testing and Materials (ASTM) standards, and  
5 American Institute of Steel Construction (AISC) specifications, as applicable. The  
6 preventive actions emphasize proper selection of bolting material and lubricants, and  
7 appropriate installation torque or tension to prevent or minimize loss of bolting preload  
8 and cracking of high-strength bolting. If the structural bolting consists of ASTM A325  
9 and/or ASTM A490 bolts (including respective equivalent twist-off type ASTM F1852  
10 and/or ASTM F2280 bolts), the preventive actions for storage, lubricant selection, and  
11 bolting and coating material selection discussed in Section 2 of Research Council for  
12 Structural Connections (RCSC) (publication "Specification for Structural Joints Using  
13 High-Strength Bolts" need to be used).

14 3. **Parameters Monitored or Inspected:** NRC RG 1.127 identifies parameters to be  
15 monitored and inspected for water-control structures.

16 Parameters to be monitored and inspected for concrete structures are those described in  
17 American Concrete Institute (ACI) 201.1R and ACI 349.3R. These include cracking,  
18 movements (e.g., settlement, heaving, and deflection), conditions at junctions with  
19 abutments and embankments, loss of material, increase in porosity and permeability,  
20 seepage, and leakage.

21 Parameters to be monitored and inspected for earthen embankment structures include  
22 settlement, depressions, sink holes, slope stability (e.g., irregularities in alignment and  
23 variances from originally constructed slopes), seepage, proper functioning of drainage  
24 systems, and degradation of slope protection features. Parameters monitored for  
25 channels and canals include erosion or degradation that may impose constraints on the  
26 function of the cooling system and present a potential hazard to the safety of the plant.  
27 Submerged emergency canals (e.g., artificially dredged canals at the river bed or the  
28 bottom of the reservoir) are monitored for sedimentation, debris, or instability of slopes  
29 that may impair the function of the canals under extreme low flow conditions.

30 Further details of parameters to be monitored and inspected for these and other  
31 water-control structures are specified in Section C of NRC RG 1.127.

32 Steel components are monitored for loss of material due to corrosion.

33 Painted or coated areas are examined for evidence of flaking, blistering, cracking,  
34 peeling, delamination, discoloration, and other signs of distress that could indicate  
35 degradation of the underlying material.

36 Bolting within the scope of the program is monitored for loss of material, loose bolts,  
37 missing or loose nuts, and other conditions indicative of loss of preload. In addition,  
38 concrete around anchor bolts is monitored for cracking. High-strength (actual measured  
39 yield strength  $\geq 150$  ksi or 1,034 MPa) structural bolts greater than 1 inch [25 mm] in  
40 diameter are monitored for stress corrosion cracking (SCC), with the exception of  
41 ASTM A325 and ASTM A490 bolts (including equivalent twist-off type F1852 and F2280  
42 bolts) used in civil structures, which have not shown to be prone to SCC.

1 Accessible sliding surfaces are monitored for indication of loss of material due to wear or  
2 corrosion, and accumulation of debris or dirt.

3 Wooden components are monitored for loss of material and change in  
4 material properties.

5 4. **Detection of Aging Effects:** Inspection of water-control structures is conducted under  
6 the direction of licensed professional engineers experienced in the investigation, design,  
7 construction, and operation of these types of facilities. Qualifications of inspection and  
8 evaluation personnel specified in ACI 349.3R are acceptable for reinforced concrete  
9 water control structures. Visual inspections are primarily used to detect degradation of  
10 water-control structures. In some cases, instruments have been installed to measure  
11 the behavior of water-control structures. Available records and readings of installed  
12 instruments are to be reviewed to detect any unusual performance or distress that may  
13 be indicative of degradation. Periodic inspections are to be performed at least once  
14 every 5 years. This interval has been shown to be adequate to detect degradation of  
15 water-control structures before a loss of an intended function. The program includes  
16 provisions for increased inspection frequency based on an evaluation of the observed  
17 degradation. The program also includes provisions for special inspections immediately  
18 following the occurrence of significant natural phenomena, such as large floods,  
19 earthquakes, hurricanes, tornadoes, or intense local rainfalls. The responsible engineer  
20 for this program evaluates raw water and ground water chemistry with a frequency that  
21 can identify potential seasonal variations (e.g. quarterly or semiannually). Ground water  
22 is sampled from a location that is representative of the water in contact with structures  
23 within the scope of subsequent license renewal (SLR).

24 Visual inspection of high-strength (actual measured yield strength  $\geq 150$  ksi or  
25 1,034 MPa) structural bolting greater than 1 inch [25 mm] in diameter is supplemented  
26 with volumetric or surface examinations to detect cracking.

27 The program addresses detection of aging affects for inaccessible, below-grade, and  
28 submerged concrete structural elements. For plants with nonaggressive raw water and  
29 ground water/soil (pH  $> 5.5$ , chlorides  $< 500$  parts per million [ppm], or sulfates  
30  $< 1,500$  ppm), the program includes (a) evaluation of the acceptability of inaccessible  
31 areas when conditions exist in accessible areas that could indicate the presence of, or  
32 result in, degradation to such inaccessible areas and (b) examination of representative  
33 samples of the exposed portions of the below-grade concrete when excavated for any  
34 reason. Submerged concrete structures may be inspected during periods of low tide or  
35 when dewatered and accessible. Plant-specific justification is provided in the  
36 subsequent license renewal application (SLRA) for the acceptability of submerged  
37 concrete if inspections do not occur within the 5 year interval. Areas covered by silt,  
38 vegetation, or marine growth are not considered inaccessible and are cleaned and  
39 inspected in accordance with the standard inspection frequency.

40 For plants with aggressive raw water (pH  $< 5.5$ , chlorides  $> 500$  ppm, or sulfates  
41  $> 1,500$  ppm) or groundwater/soil and/or where the structural elements have  
42 experienced degradation, a plant-specific AMP accounting for the extent of the  
43 degradation experienced is implemented to manage aging during the subsequent period  
44 of extended operation. The plant-specific AMP includes inspections of below-grade,  
45 inaccessible structural elements exposed to aggressive raw water or ground water/soil

1 on an interval not to exceed 5 years, and submerged structural elements are visually  
2 inspected (e.g., dewatering, divers) at least once every 5 years.

3 5. **Monitoring and Trending:** Results of periodic inspections are documented and  
4 compared to previous results to identify changes from prior inspections. Quantitative  
5 measurements and qualitative data are recorded and trended for all applicable  
6 parameters monitored or inspected, and the use of photographs or surveys is  
7 encouraged. Photographic records may be used to document and trend the type,  
8 severity, extent and progression of degradation.

9 Quantitative baseline inspection data should be established per the acceptance criteria  
10 described herein prior to the subsequent period of extended operation.

11 6. **Acceptance Criteria:** "Evaluation Criteria" provided in Chapter 5 of ACI 349.3R provide  
12 acceptance criteria (including quantitative criteria) for concrete and specifies criteria for  
13 further evaluation. Although not required, plant-specific acceptance criteria based on  
14 Chapter 5 of ACI 349.3R are acceptable. Acceptance criteria for earthen structures,  
15 such as canals and embankments, are consistent with programs falling within the  
16 regulatory jurisdiction of the FERC or the USACE. Loose bolts and nuts, cracked  
17 high-strength bolts, and degradation of piles and sheeting are accepted by engineering  
18 evaluation or subject to corrective actions. Engineering evaluation is documented and  
19 based on codes, specifications, and standards such as AISC specifications, Structural  
20 Engineering Institute/American Society of Civil Engineers Standard (SEI/ ASCE) 11-99,  
21 "Guideline for Structural Condition Assessment of Existing Buildings," and those  
22 referenced in the plant's current licensing basis (CLB).

23 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
24 conditions adverse to quality or significant conditions adverse to quality under those  
25 specific portions of the quality assurance (QA) program that are used to meet  
26 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
27 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
28 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
29 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
30 related SCs within the scope of this program.

31 When inspection findings indicate that significant changes have occurred, the conditions  
32 are to be evaluated. This includes a technical assessment of the causes of distress or  
33 abnormal conditions, an evaluation of the behavior or movement of the structure, and  
34 recommendations for remedial or mitigating measures. Indications of groundwater  
35 infiltration or through-concrete leakage are assessed for aging effects. This may include  
36 engineering evaluation, more frequent inspections, or destructive testing of affected  
37 concrete to validate existing concrete properties, including concrete pH levels. When  
38 leakage volumes allow, assessments include analysis of the leakage pH, along with  
39 mineral, chloride, sulfate and iron content in the water.

40 8. **Confirmation Process:** The confirmation process is addressed through those specific  
41 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
42 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
43 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
44 confirmation process element of this AMP for both safety-related and nonsafety-related  
45 SCs within the scope of this program.

- 1 9. **Administrative Controls:** Administrative controls are addressed through the QA  
2 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
3 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
4 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
5 fulfill the administrative controls element of this AMP for both safety-related and  
6 nonsafety-related SCs within the scope of this program.
- 7 10. **Operating Experience:** Degradation of water-control structures has been detected,  
8 through NRC RG 1.127 programs, at a number of NPPs, and, in some cases, it has  
9 required remedial action. NRC NUREG–1522, “Assessment of Inservice Conditions of  
10 Safety-Related Nuclear Plant Structures” described instances and corrective actions of  
11 severely degraded steel and concrete components at the intake structure and pump  
12 house of coastal plants. Other degradation described in the NUREG include appreciable  
13 leakage from the spillway gates, concrete cracking, corrosion of spillway bridge beam  
14 seats of a plant dam and cooling canal, and appreciable differential settlement of the  
15 outfall structure of another. No loss of intended functions has resulted from these  
16 occurrences. Therefore, it can be concluded that the inspections implemented in  
17 accordance with the guidance in NRC RG 1.127 have been successful in detecting  
18 significant degradation before loss of intended function occurs.
- 19 The program is informed and enhanced when necessary through the systematic and  
20 ongoing review of both plant-specific and industry operating experience, as discussed in  
21 Appendix B of the GALL-SLR Report.

## 22 **References**

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# 1 XI.S8 PROTECTIVE COATING MONITORING AND MAINTENANCE

## 2 Program Description

3 Proper maintenance of protective coatings inside containment (defined as Service Level I in the  
4 U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) 1.54, Revision 1, or latest  
5 version) is essential to ensure operability of post-accident safety systems that rely on water  
6 recycled through the containment sump/drain system. Degradation of coatings can lead to  
7 clogging of Emergency Core Cooling System (ECCS) suction strainers, which reduces flow  
8 through the system and could cause unacceptable head loss for the pumps.

9 Maintenance of Service Level I coatings applied to carbon steel and concrete surfaces inside  
10 containment (e.g., steel liner, steel containment shell, structural steel, supports, penetrations,  
11 and concrete walls and floors) also serve to prevent or minimize loss of material due to  
12 corrosion of carbon steel components and aids in decontamination. Regulatory Position C4 in  
13 NRC RG 1.54, Revision 2, describes an acceptable technical basis for a Service Level I  
14 coatings monitoring and maintenance program that can be credited for managing the effects of  
15 corrosion for carbon steel elements inside containment. American Society for Testing and  
16 Materials (ASTM) D 5163-08 and endorsed years of the standard in NRC RG 1.54 are  
17 acceptable and considered consistent with NUREG-1801. In addition, Electric Power Research  
18 Institute (EPRI) Report 1019157, Guidelines for Inspection and Maintenance of Safety-related  
19 Protective Coatings, provides additional information on the ASTM standard guidelines.

20 A comparable program for monitoring and maintaining protective coatings inside containment,  
21 developed in accordance with NRC RG 1.54, Revision 2, is acceptable as an aging  
22 management program (AMP) for license renewal.

23 Service Level I coatings credited for preventing corrosion of steel containments and steel liners  
24 for concrete containments are subject to requirements specified by the American Society of  
25 Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI,  
26 Subsection IWE (GALL-SLR Report AMP XI.S1). However, this program (GALL-SLR Report  
27 AMP XI.S8) reviews Service Level I coatings to ensure that the protective coating monitoring  
28 and maintenance program are adequate for license renewal.

## 29 Evaluation and Technical Basis

- 30 1. **Scope of Program:** The minimum scope of the program is Service Level I coatings  
31 applied to steel and concrete surfaces inside containment (e.g., steel liner, steel  
32 containment shell, structural steel, supports, penetrations, and concrete walls and  
33 floors), defined in NRC RG 1.54, Revision 2, as follows: "Service Level I coatings are  
34 used in areas inside the reactor containment where the coating failure could adversely  
35 affect the operation of post-accident fluid systems and thereby impair safe shutdown."  
36 The scope of the program also should include any Service Level I coatings that are  
37 credited by the licensee for preventing loss of material due to corrosion in accordance  
38 with GALL-SLR Report AMP XI.S1.
- 39 2. **Preventive Action:** The program is a condition monitoring program and does not  
40 recommend any preventive actions. However, for plants that credit coatings to minimize  
41 loss of material, this program is a preventive action.

- 1 3. **Parameters Monitored or Inspected:** Regulatory Position C4 in NRC RG 1.54,  
2 Revision 1, states that “ASTM D 5163-96 provides guidelines that are acceptable to the  
3 NRC staff for establishing an inservice coatings monitoring program for Service Level I  
4 coating systems in operating nuclear power plants...” ASTM D 5163-96 has been  
5 superseded by ASTM D 5163-08. ASTM D 5163-08 identifies the parameters monitored  
6 or inspected to be “any visible defects, such as blistering, cracking, flaking, peeling,  
7 rusting, and physical damage.”
- 8 4. **Detection of Aging Effects:** ASTM D 5163-08, paragraph 6, defines the inspection  
9 frequency to be each refueling outage or during other major maintenance outages, as  
10 needed. ASTM D 5163-08, paragraph 9, discusses the qualifications for inspection  
11 personnel, the inspection coordinator, and the inspection results evaluator.  
12 ASTM D 5163-08, subparagraph 10.1, discusses development of the inspection plan  
13 and the inspection methods to be used. It states that a general visual inspection shall be  
14 conducted on all readily accessible coated surfaces during a walk-through. After a  
15 walk-through, or during the general visual inspection, thorough visual inspections shall  
16 be carried out on previously designated areas and on areas noted as deficient during the  
17 walk-through. A thorough visual inspection shall also be carried out on all coatings near  
18 sumps or screens associated with the ECCS. This subparagraph also addresses field  
19 documentation of inspection results. ASTM D 5163-08, subparagraph 10.5, identifies  
20 instruments and equipment needed for inspection.
- 21 5. **Monitoring and Trending:** ASTM D 5163-08 identifies monitoring and trending  
22 activities in subparagraph 7.2, which specifies a preinspection review of the previous two  
23 monitoring reports, and in subparagraph 11.1.2, which specifies that the inspection  
24 report should prioritize repair areas as either needing repair during the same outage or  
25 as postponed to future outages, but under surveillance in the interim period. The  
26 assessment from periodic inspections and analysis of total amount of degraded coatings  
27 in the containment is compared with the total amount of permitted degraded coatings to  
28 ensure post-accident operability of the ECCS.
- 29 6. **Acceptance Criteria:** ASTM D 5163-08, subparagraphs 10.2.1 through 10.2.6, 10.3,  
30 and 10.4, contains one acceptable method for the characterization, documentation, and  
31 testing of defective or deficient coating surfaces. Additional ASTM and other recognized  
32 test methods are available for use in characterizing the severity of observed defects and  
33 deficiencies. The evaluation covers blistering, cracking, flaking, peeling, delamination,  
34 and rusting. ASTM D 5163-08, paragraph 11, addresses evaluation. It specifies that the  
35 inspection report is to be evaluated by the responsible evaluation personnel, who  
36 prepare a summary of findings and recommendations for future surveillance or repair,  
37 and prioritization of repairs.
- 38 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
39 conditions adverse to quality or significant conditions adverse to quality under those  
40 specific portions of the quality assurance (QA) program that are used to meet  
41 Criterion XVI, “Corrective Action,” of 10 CFR Part 50, Appendix B. Appendix A of the  
42 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
43 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
44 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
45 related structures and components (SCs) within the scope of this program.

1 A recommended corrective action plan is required for major defective areas so that  
2 these areas can be repaired during the same outage, if appropriate.

3 8. **Confirmation Process:** The confirmation process is addressed through those specific  
4 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
5 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
6 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
7 confirmation process element of this AMP for both safety-related and nonsafety-related  
8 SCs within the scope of this program.

9 9. **Administrative Controls:** Administrative controls are addressed through the QA  
10 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
11 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
12 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
13 fulfill the administrative controls element of this AMP for both safety-related and  
14 nonsafety-related SCs within the scope of this program.

15 10. **Operating Experience:** NRC Information Notice (IN) 88-82, NRC Bulletin 96-03, NRC  
16 Generic Letter (GL) 04-02, and NRC GL 98-04 describe industry experience pertaining  
17 to coatings degradation inside containment and the consequential clogging of sump  
18 strainers. NRC RG 1.54, Revision 1, was issued in July 2000. Monitoring and  
19 maintenance of Service Level I coatings conducted in accordance with Regulatory  
20 Position C4 is expected to be an effective program for managing degradation of Service  
21 Level I coatings and, consequently, an effective means to manage loss of material due  
22 to corrosion of carbon steel structural elements inside containment.

23 The program is informed and enhanced when necessary through the systematic and  
24 ongoing review of both plant-specific and industry operating experience, as discussed in  
25 Appendix B of the GALL-SLR Report.

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1 **XI.E1 ELECTRICAL INSULATION FOR ELECTRICAL CABLES AND**  
2 **CONNECTIONS NOT SUBJECT TO 10 CFR 50.49**  
3 **ENVIRONMENTAL QUALIFICATION REQUIREMENTS**

4 **Program Description**

5 The purpose of this aging management program (AMP) is to provide reasonable assurance that  
6 the intended functions of electrical cable insulating material (e.g., power, control, and  
7 instrumentation) and connection insulating material that are not subject to the environmental  
8 qualification (EQ) requirements of 10 CFR 50.49 are maintained consistent with the current  
9 licensing basis (CLB) through the subsequent period of extended operation.

10 In most areas within a nuclear power plant (NPP), the actual operating environment  
11 (e.g., temperature, radiation, or moisture) is less severe than the plant design basis  
12 environment. However, in a limited number of localized areas, the actual environment may be  
13 more severe than the anticipated plant design basis environment. These localized areas are  
14 characterized as “adverse localized environments” that represent a limited plant area where the  
15 operating environment is significantly more severe than the plant design environment.

16 An adverse localized environment is an environment that exceeds the most limiting environment  
17 (e.g., temperature, radiation, or moisture) for the electrical insulation of cable and connectors.  
18 Electrical insulation used in electrical cables and connections may degrade more rapidly than  
19 expected when exposed to an adverse localized environment. Cable or connection electrical  
20 insulation subjected to an adverse localized environment may increase the rate of aging of a  
21 component or have an adverse effect on operability.

22 Adverse localized environments are identified through the use of an integrated approach. This  
23 approach includes, but is not limited to; (a) the review of EQ program radiation levels,  
24 temperatures, and moisture levels, (b) recorded information from equipment or plant  
25 instrumentation, (c) as-built and field walk down data (e.g., cable routing data base), (d) a plant  
26 spaces scoping and screening methodology, (d) the review of relevant plant-specific and  
27 industry operating experience including:

- 28 • Identification of work practices that have the potential to subject in-scope cable and  
29 connection electrical insulation to an adverse localized environment (e.g., equipment  
30 thermal insulation removal and restoration)
- 31 • Corrective actions involving in-scope electrical cable and connection electrical insulation  
32 material service life (current operating term)
- 33 • Previous walk-downs including visual inspection of accessible cable and connection  
34 electrical insulation
- 35 • Environmental monitoring (e.g., long term periodic environmental monitoring–  
36 temperature, radiation, or moisture).

37 Periodic environmental monitoring consists of a representative number of environmental  
38 measurements taken over a sufficient period of time and periodically evaluated to establish the  
39 environment for condition monitoring electrical insulation. Plant environmental data can be used  
40 in an aging evaluation in different ways, such as; (a) directly applying the plant data in the

1 evaluation, or (b) using the plant data to demonstrate conservatism. The methodology  
2 employed for monitoring, data collection, and the analysis of localized component environmental  
3 data (including temperature, radiation, and moisture) is documented in the record of the  
4 analysis. Documentation is also provided, as applicable, on the applicability of methodologies  
5 utilizing data that is collected and evaluated one time, or is of limited duration.

6 This AMP specifically addresses cables and connection electrical insulation at plants whose  
7 configuration is such that most (if not all) cables and connections including cable and  
8 connections identified as subjected to an adverse localized environment are accessible.

9 Accessible in-scope cables and connection from accessible areas are visually inspected for  
10 cable and connection degradation. In-scope cable and connection electrical insulation is also  
11 tested (e.g., testing comprised of one or more tests utilizing mechanical, electrical, or chemical  
12 means implemented on a sampling basis) and represents, with reasonable assurance, both  
13 accessible and inaccessible in-scope cable and connection electrical insulation degradation  
14 including cable and connection electrical insulation identified as subject to an adverse  
15 localized environment.

16 Accessible in-scope cable and connection inspection is considered a visual inspection  
17 performed from the floor, with the use of scaffolding as available, without the opening of junction  
18 boxes, pull boxes, or terminal boxes. The purpose of the visual inspection is to identify adverse  
19 localized environments (employing diagnostic tools such as thermography as applicable).  
20 These potential adverse localized environments are then evaluated which may require further  
21 inspection using scaffolding or other means (e.g., opening of junction boxes, pull boxes,  
22 accessible pull points (e.g., conduits), panels, terminal boxes, and junction boxes) to assess  
23 cable and connector electrical insulation aging degradation.

24 This AMP, as noted, is a cable and connection electrical insulation condition monitoring program  
25 that utilizes sampling. The visual inspection portion of the AMP uses accessible cable and  
26 connection electrical insulation visual inspection as representative of inaccessible cable and  
27 connection electrical insulation subject to the same environment.

28 The cable condition monitoring portion of the AMP utilizes component sampling for cable and  
29 connection electrical insulation testing. The following factors are considered in the development  
30 of the electrical insulation sample: environment including identified adverse localized  
31 environments (high temperature, high humidity, vibration, etc.), voltage level, circuit loading, and  
32 connection type, location (high temperature, high humidity, vibration, etc.) and the electrical  
33 insulation composition. The component sampling methodology utilizes a population that  
34 includes a representative sample of in-scope electrical cable and connection types regardless of  
35 whether or not the component was included in a previous aging management or maintenance  
36 program. The technical basis for the sample selections is documented.

37 Electrical insulation material for cables and connectors previously identified and dispositioned  
38 during the first period of extended operation as subjected to an adverse localized environment  
39 are evaluated for cumulative aging effects during the subsequent period of extended operation  
40 aging management. If an unacceptable condition or situation is identified for cable or  
41 connection electrical insulation by visual inspection or test, corrective action is taken including a  
42 determination as to whether the same condition or situation is applicable to other in-scope  
43 accessible and inaccessible cable or connection electrical insulation (e.g., extent of condition).  
44 As such, this program does not apply to plants in which most cables are inaccessible.

1 As stated in NUREG/CR-5643, “the major concern is that failures of deteriorated cable systems  
2 (cables, connection electrical insulation) might be induced during accident conditions.” Since  
3 the cable and connection electrical insulation is not subject to the EA requirements of  
4 10 CFR 50.49, an AMP is needed to manage the aging mechanisms and effects for the  
5 subsequent period of extended operation. This AMP provides reasonable assurance that the  
6 insulation for electrical cables and connections will perform its intended function for the  
7 subsequent period of extended operation.

## 8 **Evaluation and Technical Basis**

- 9 1. **Scope of Program:** This AMP applies to accessible cable and connection electrical  
10 insulation within the scope of license renewal including in-scope cables and connections  
11 subjected to an adverse localized environment.
- 12 2. **Preventive Actions:** This is a condition monitoring program and no actions are taken  
13 as part of this program to prevent or mitigate aging degradation.
- 14 3. **Parameters Monitored or Inspected:** Accessible in-scope cable and connection  
15 electrical insulation is visually inspected for cable and connection insulation surface  
16 anomalies including identification of in-scope cable and connection electrical insulation  
17 subject to an adverse localized environment. The cable insulation visual inspection  
18 portion of the AMP uses the cable or connection jacket material as representative of the  
19 aging effects experienced by the cable and connector electrical insulation. In-scope  
20 cable and connection electrical insulation evaluated for signs of reduced electrical  
21 insulation resistance due to an adverse localized environment of temperature, moisture,  
22 radiation and oxygen that includes radiolysis, photolysis (UV sensitive materials only)  
23 of organics, radiation induced oxidation, moisture intrusion, or contamination  
24 (e.g., chemical, oil, or solvents) indicated by signs of electrical insulation embrittlement,  
25 discoloration, cracking, melting, swelling or surface contamination.

26 An adverse localized environment is a plant-specific condition; therefore, the applicant  
27 should clearly define the most limiting temperature, radiation, and moisture  
28 environments and there basis. The applicant reviews plant specific operating  
29 experience for the period of extended operation for previously identified and mitigated  
30 adverse localized environments cumulative aging effects applicable to in-scope cable  
31 and connection electrical insulation (i.e., service life). The applicant should also inspect  
32 for adverse localized environments for each of the most limiting cable and connection  
33 electrical insulation plant environments (e.g., caused by temperature, radiation,  
34 moisture, or contamination), for accessible cables and connections that are within the  
35 scope of license renewal.

- 36 4. **Detection of Aging Effects:** Aging effects resulting from temperature, radiation, or  
37 moisture causes surface abnormalities in the cable jacket, and connection material.  
38 Accessible electrical cables and connections are tested for reduced electrical insulation  
39 resistance and visually inspected for cable jacket and connection electrical insulation  
40 surface anomalies such as embrittlement, discoloration, cracking, melting, swelling or  
41 surface contamination. Cable and connection electrical insulation are inspected to  
42 identify cable and connection insulation installed in an adverse localized environment.  
43 Plant specific operating experience is also evaluated to identify in-scope cable and  
44 connection insulation previously subjected to adverse localized environment during the  
45 period of extended operation. Cable and connection insulation is evaluated to confirm

1 that the dispositioned corrective actions continue to support in-scope cable and  
2 connection intended functions during the subsequent period of extended operation.

3 The inspection and testing of accessible cable and connection insulation material is used  
4 to evaluate the adequacy of inaccessible cable and connection electrical insulation.  
5 Accessible electrical cables and connections found in the performance of this AMP or  
6 previously subjected to an adverse localized environment are visually inspected and  
7 tested at least once every 10 years. This is an adequate period to preclude failures of  
8 the cables and connection electrical insulation since experience has shown that aging  
9 degradation is a slow process. The first inspection and test for SLR is to be completed  
10 prior to the subsequent period of extended operation. Cable jacket and connection  
11 insulation are inspected and tested at least once prior to the subsequent period of  
12 extended operation. Visual inspection and testing may include thermography and one or  
13 more proven condition monitoring test methods applicable to the cable and connection  
14 insulation.

15 This AMP, as noted, is a cable and connection electrical insulation condition monitoring  
16 program that utilizes sampling. The following factors are considered in the development  
17 of the cable and connection insulation test sample: environment including identified  
18 adverse localized environments (high temperature, high humidity, vibration, etc.), voltage  
19 level, circuit loading, and connection type, location (high temperature, high humidity,  
20 vibration, etc.) insulation material. The component sampling methodology utilizes a  
21 population that includes a representative sample of in-scope electrical cable and  
22 connection types regardless of whether or not the component was included in a previous  
23 aging management or maintenance program. The technical basis for the sample  
24 selection is documented.

- 25 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP,  
26 because the ability to trend visual inspection and test results is dependent on the test or  
27 visual inspection program selected. However, condition monitoring of cable and  
28 connection insulation utilizing visual inspection and test results that are trendable  
29 provide additional information on the rate of cable or connection insulation degradation.
- 30 6. **Acceptance Criteria:** Electrical cable and connection insulation material test results are  
31 to be within the acceptance criteria, as identified in the applicant's procedures. Visual  
32 inspection results show that accessible cable and connection insulation material are free  
33 from visual indications of surface abnormalities that indicate cable or connection  
34 insulation aging effects exist. An unacceptable indication is defined as a noted condition  
35 or situation that, if left unmanaged, could potentially lead to a loss of the  
36 intended function.
- 37 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
38 conditions adverse to quality or significant conditions adverse to quality under those  
39 specific portions of the quality assurance (QA) program that are used to meet  
40 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
41 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
42 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
43 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
44 related structures and components (SCs) within the scope of this program.

1 Unacceptable test results and visual indications of cable and connection electrical  
2 insulation abnormalities are subject to an engineering evaluation. Such an evaluation  
3 considers the age and operating environment of the component as well as the severity of  
4 the abnormality and whether such an abnormality has previously been correlated to  
5 degradation of cable or connection insulation. Corrective actions include, but are not  
6 limited to, testing, shielding, or otherwise mitigating the environment or relocation or  
7 replacement of the affected cables or connections. When an unacceptable condition or  
8 situation is identified, a determination is made as to whether the same condition or  
9 situation is applicable to additional in-scope accessible and inaccessible cables or  
10 connections (extent of condition).

11 8. **Confirmation Process:** The confirmation process is addressed through those specific  
12 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
13 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
14 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
15 confirmation process element of this AMP for both safety-related and nonsafety-related  
16 SCs within the scope of this program.

17 9. **Administrative Controls:** Administrative controls are addressed through the QA  
18 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
19 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
20 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
21 fulfill the administrative controls element of this AMP for both safety-related and  
22 nonsafety-related SCs within the scope of this program.

23 10. **Operating Experience:** Industry operating experience has identified cable and  
24 connection insulation aging effects due to adverse localized environments caused by  
25 elevated temperature, radiation, or moisture. For example, cable and connection  
26 insulation located near steam generators, pressurizers, or process may be subjected to  
27 an adverse localized environment. These environments have been found to cause  
28 degradation of electrical cable and connection electrical insulation that are visually  
29 observable, such as color changes or surface abnormalities. These visual indications  
30 along with cable condition monitoring can be used as indicators of cable and connection  
31 insulation degradation.

32 This AMP considers the technical information and guidance provided in  
33 NUREG/CR-5643, IEEE Std. 1205-2014, SAND96-0344, EPRI TR-109619,  
34 NUREG/CR-7000, IN 2010-25, IN 2010-26, 2010-2, RG 1.218, Generic Letter 2007-01,  
35 IEEE Std.422-2012 and IEEE Std. 576-2000.

36 The program is informed and enhanced when necessary through the systematic and  
37 ongoing review of both plant-specific and industry operating experience, as discussed in  
38 Appendix B of the GALL-SLR Report.

## 39 References

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28 September 1996.

1 **XI.E2 ELECTRICAL INSULATION FOR ELECTRICAL CABLES AND**  
2 **CONNECTIONS NOT SUBJECT TO 10 CFR 50.49**  
3 **ENVIRONMENTAL QUALIFICATION REQUIREMENTS USED IN**  
4 **INSTRUMENTATION CIRCUITS**

5 **Program Description**

6 The purpose of this aging management program (AMP) is to provide reasonable assurance that  
7 the intended functions of electrical cables and connections (that are not subject to the  
8 environmental qualification requirements of 10 CFR 50.49 and are used in instrumentation  
9 circuits with sensitive, high-voltage, low-level current signals) are maintained consistent with the  
10 current licensing basis (CLB) through the subsequent period of extended operation.

11 In most areas within a nuclear power plant (NPP) the actual operating environment  
12 (e.g., temperature, radiation, or moisture) is less severe than the plant design bases  
13 environment. However, in a limited number of localized areas, the actual environment may be  
14 more severe than the plant design bases environment. These localized areas are characterized  
15 as “adverse localized environments” that represent a limited plant area where the operating  
16 environment is significantly more severe than the plant design basis environment. An adverse  
17 localized environment is based on the most limiting environment (e.g., temperature, radiation, or  
18 moisture) for the cable or connection insulation.

19 An adverse localized environment is an environment that exceeds based on the most limiting  
20 environment (e.g., temperature, radiation, or moisture) for the insulation of cable and  
21 connections or insulation material. Electrical insulation materials used in electrical cables and  
22 connections may degrade more rapidly than expected when exposed to an adverse localized  
23 environment. Cable or connection electrical insulation material subjected to an adverse  
24 localized environment may increase the rate of aging of a component or have an adverse effect  
25 on operability.

26 Adverse localized environments are identified through the use of an integrated approach. This  
27 approach includes, but is not limited to; (a) the review of EQ program radiation levels,  
28 temperature, and moisture information, (b) recorded information from equipment or plant  
29 instrumentation, (c) as-built and field walk down data (e.g., cable routing data base) (d) a plant  
30 spaces scoping and screening methodology, (e) the review of relevant plant-specific and  
31 industry operating experience including;

- 32 • Identification of work practices that have the potential to subject in-scope cable and  
33 connection electrical insulation to an adverse localized environment (e.g., equipment  
34 thermal insulation removal and restoration)
- 35 • Corrective actions involving in-scope electrical cable and connection electrical insulation  
36 service life (current operating term)
- 37 • Previous walk downs including visual Inspection of accessible cable and connection  
38 electrical insulation
- 39 • Environmental monitoring e.g., periodic environmental monitoring – temperature,  
40 radiation or moisture)

1 Exposure of electrical insulation to adverse localized environments caused by temperature,  
2 radiation, or moisture can result in reduced electrical insulation resistance, moisture intrusion  
3 related connection failures, or errors induced by thermal transients. Reduced electrical  
4 insulation resistance causes an increase in leakage currents between conductors and from  
5 individual conductors to ground. A reduction in electrical insulation resistance is a concern for  
6 all circuits, but especially those with sensitive, high voltage, low-level current signals, such as  
7 radiation monitoring and nuclear instrumentation circuits, because a reduced insulation  
8 resistance (IR) may contribute to signal inaccuracies.

9 In this AMP, in addition to the evaluation and identification of adverse localized environments,  
10 either of two methods can be used to identify the existence of electrical insulation aging effects  
11 for cables and connections. In the first method, calibration results or findings of surveillance  
12 testing programs are evaluated to identify the existence of electrical cable and connection  
13 insulation aging degradation. In the second method, direct testing of the cable system is  
14 performed.

15 This AMP applies to high-range-radiation and neutron flux monitoring instrumentation cables in  
16 addition to other cables used in high voltage, low-level current signal applications that are  
17 sensitive to reduction in electrical insulation resistance. For these cables, GALL-SLR Report  
18 AMP XI.E1 does not apply.

19 As stated in NUREG/CR-5643, "the major concern is that failures of deteriorated cables might  
20 be induced during accident conditions." Since the cable and connection electrical insulation is  
21 not subject to the environmental qualification requirements of 10 CFR 50.49, an AMP is needed  
22 to manage the aging mechanisms and effects for the subsequent period of extended operation.  
23 This AMP provides reasonable assurance that the electrical insulation for electrical cables and  
24 connections will perform its intended function for the subsequent period of extended operation.

## 25 **Evaluation and Technical Basis**

- 26 1. **Scope of Program:** This AMP applies to electrical cables and connections  
27 (cable system) electrical insulation used in circuits with sensitive, high voltage, low-level  
28 current signals. Examples of these circuits include radiation monitoring and nuclear  
29 instrumentation that are subject to aging management review (AMR) and subjected to  
30 adverse localized environments caused by temperature, radiation, or moisture.
- 31 2. **Preventive Actions:** This is a performance monitoring program and no actions are  
32 taken as part of this program to prevent or mitigate aging degradation.
- 33 3. **Parameters Monitored or Inspected:** The parameters monitored are determined from  
34 the specific calibration, surveillances, or testing performed and are based on the  
35 specific instrumentation circuit under surveillance or calibration, as documented in  
36 plant procedures.
- 37 4. **Detection of Aging Effects:** Review of calibration results or findings of surveillance  
38 programs can provide an indication of the existence of aging effects based on  
39 acceptance criteria related to instrumentation circuit performance. By reviewing the  
40 results obtained during normal calibration or surveillance, an applicant may detect  
41 severe aging degradation prior to the loss of the cable and connection intended function.  
42 The first reviews are completed prior to the subsequent period of extended operation

1 and at least every 10 years thereafter. Calibration or surveillance results that do not  
2 meet acceptance criteria are reviewed for aging effects when the results are available.

3 Cable system testing is conducted when the calibration or surveillance program does not  
4 include the cabling system in the testing circuit, or as an alternative to the review of  
5 calibration results described above. A proven cable system test for detecting  
6 deterioration of the electrical insulation system (such as insulation resistance tests, time  
7 domain reflectometry tests, or other testing judged to be effective in determining cable  
8 system insulation condition as justified in the application) is performed. The test  
9 frequency of the cable system is determined by the applicant based on engineering  
10 evaluation, but the test frequency is at least once every 10 years. The first test is to be  
11 completed prior to the subsequent period of extended operation.

12 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP,  
13 because the ability to trend visual inspection and test results is dependent on the test or  
14 visual inspection program selected. However, inspection and test results that are  
15 trendable provide additional information on the rate of cable or connection degradation.

16 6. **Acceptance Criteria:** Calibration results or findings of surveillance and cable system  
17 testing are to be within the acceptance criteria, as set out in the applicant's procedures.

18 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
19 conditions adverse to quality or significant conditions adverse to quality under those  
20 specific portions of the quality assurance (QA) program that are used to meet  
21 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
22 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
23 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
24 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
25 related structures and components (SCs) within the scope of this program.

26 Corrective actions, such as recalibration and circuit trouble-shooting, are implemented  
27 when calibration, surveillance, or cable system test results do not meet the acceptance  
28 criteria. An engineering evaluation is performed when the acceptance criteria are not  
29 met. Such an evaluation is to consider the significance of the calibration, surveillance, or  
30 cable system test results and whether the review of calibration and surveillance results  
31 or the cable system testing frequency needs to be increased.

32 8. **Confirmation Process:** The confirmation process is addressed through those specific  
33 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
34 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
35 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
36 confirmation process element of this AMP for both safety-related and nonsafety-related  
37 SCs within the scope of this program.

38 9. **Administrative Controls:** Administrative controls are addressed through the QA  
39 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
40 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
41 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
42 fulfill the administrative controls element of this AMP for both safety-related and  
43 nonsafety-related SCs within the scope of this program.

1 10. **Operating Experience:** The program is informed and enhanced when necessary  
2 through the systematic and ongoing review of both plant-specific and industry operating  
3 experience, consistent with the discussion in Appendix B of the GALL-SLR Report.

4 Operating experience has identified that a change in temperature across a high range  
5 radiation monitor cable in containment resulted in a substantial change in the reading of  
6 the monitor. Changes in instrument calibration can be caused by degradation of the  
7 circuit cable or connection electrical insulation and represents a possible indication of  
8 electrical cable degradation.

9 This AMP considers the technical information and guidance provided in  
10 EPRI TR-109619, EPRI TR-110379, EPRI TR-112582, IEEE Std. 1205- 2014,  
11 NRC IN 93-33, NUREG/CR-5643, NUREG/CR-5772, NUREG/CR-5461, and  
12 RG 1.218.

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1 **XI.E3A ELECTRICAL INSULATION FOR INACCESSIBLE MEDIUM**  
2 **VOLTAGE POWER CABLES NOT SUBJECT TO 10 CFR 50.49**  
3 **ENVIRONMENTAL QUALIFICATION REQUIREMENTS**

4 **Program Description**

5 The purpose of the aging management program (AMP) is to provide reasonable assurance that  
6 the intended functions of inaccessible power cables (operating voltages of 2kV to 35kV) that are  
7 not subject to the environmental qualification (EQ) requirements of 10 CFR 50.49 are  
8 maintained consistent with the current licensing basis (CLB) through the subsequent period of  
9 extended operation. This AMP applies to all inaccessible or below grade (e.g., direct buried,  
10 buried conduit, duct bank, embedded raceway, cable trench, vaults, or manholes) medium  
11 voltage cable (operating voltages of 2kV to 35kV) within the scope of subsequent license  
12 renewal (SLR) exposed to adverse localized environments primarily due to significant moisture.

13 In most areas within a nuclear power plant (NPP), the actual operating environment  
14 (e.g., temperature, radiation, or moisture) is less severe than the anticipated plant design basis  
15 environment. However, in a limited number of localized areas, the actual environment may be  
16 more severe than the anticipated plant design basis environment. These localized areas are  
17 characterized as “adverse localized environments” that represent a limited plant area where the  
18 operating environment is significantly more severe than the anticipated plant design basis  
19 environment (e.g., temperature, radiation, or moisture) for the cable and applicable connection  
20 electrical insulation.

21 Most electrical cables in NPPs are located in dry environments. However, some cables are  
22 inaccessible or below grade, located in buried conduits, cable trenches, cable troughs, duct  
23 banks, vaults, or direct buried installations that may be exposed to water intrusion due to wetting  
24 or submergence. When an inaccessible medium voltage power cables (and associated  
25 connections) are exposed to wetting, submergence, or other adverse localized environment  
26 conditions for which it was not designed, an accelerated aging effect of reduced insulation  
27 resistance may occur, causing a decrease in the dielectric strength of the electrical insulation.

28 Inaccessible medium voltage power cable electrical insulation may degrade more rapidly than  
29 expected when exposed to an adverse localized environment. Electrical insulation subjected to  
30 an adverse localized environment could increase the rate of aging of a component; have an  
31 adverse effect on operability, or potentially lead to failure of the cable.

32 Adverse localized environments are identified through the use of an integrated approach. This  
33 approach includes, but is not limited to; (a) the review of EQ zone program radiation,  
34 temperature and moisture information for various plant areas as applicable to inaccessible  
35 medium voltage power cable, (b) recorded information from equipment or plant instrumentation  
36 (e.g., applicable periodic environmental monitoring of in-scope inaccessible medium voltage  
37 cable installations), (c) as-built and field walk down data (e.g., cable routing data base), (d) a  
38 plant spaces scoping and screening methodology, and (e) the review of relevant plant-specific  
39 and industry operating experience including:

40 (a) Identification of work practices, including work records that have the potential to subject  
41 in-scope inaccessible medium voltage power cable to an adverse localized environment  
42 (e.g., equipment thermal insulation removal and restoration).

1 (b) Corrective actions involving for scope inaccessible medium voltage electrical insulation  
2 aging degradation on electrical insulation service life (current operating term).

3 (c) Previous inspections (e.g., cable vaults, and manholes) for medium voltage cable electrical  
4 insulation aging degradation associated with cable wetting and submergence.

5 In this AMP, periodic actions are taken to prevent inaccessible medium voltage cables from  
6 being exposed to significant moisture. Significant moisture is defined as exposure to moisture  
7 that lasts more than a few days (i.e., long term wetting or submergence over a continuous  
8 period). Cable wetting or submergence that occurs for a limited time as drainage occurs by  
9 either automatic or passive drains is not considered an adverse localized environment for this  
10 AMP.

11 The inspection frequency for water collection is established and performed based on  
12 plant-specific operating experience over time with cable wetting or submergence. Inspections  
13 are performed periodically based on water accumulation over time. The periodic inspection  
14 occurs at least once annually with the first inspection for SLR completed prior to the subsequent  
15 period of extended operation. Inspection frequencies are adjusted based on inspection results  
16 including plant specific operating experience but with a minimum inspection frequency of at  
17 least once annually. Inspections are also performed after event driven occurrences, such as  
18 heavy rain, thawing of ice and snow, or flooding.

19 Examples of periodic actions to prevent inaccessible medium voltage cable exposure to  
20 significant moisture include inspection for water collection in cable manholes and conduits and  
21 draining water, as needed. However, these periodic actions may not be sufficient to ensure that  
22 water is not trapped elsewhere in the raceways. For example, water accumulation and  
23 submergence could occur from, (a) a duct bank conduit with low points in the routing;  
24 (b) raceways settling or cracking due to soil settling over a long period of time; (c) manhole  
25 covers not being watertight; (d) raceway locations subject to a high water table (e.g., high  
26 seasonal cycles); and (e) uncertainties exist concerning wetting and submergence even when  
27 duct banks are sloped with the intention to minimize water accumulation.

28 Experience has shown that insulation degradation may occur if the cables are exposed to  
29 continuous wetting or submergence. Although variances exist in the aging mechanisms and  
30 effects depending on cable insulation material and manufacture, periodic actions are necessary  
31 to minimize the potential for insulation degradation.

32 In addition to the above periodic actions, in-scope inaccessible medium voltage power cables  
33 exposed to significant moisture are tested to determine the condition of the electrical insulation  
34 (e.g., identify degradation due to reduced electrical insulation resistance). The specific type of  
35 test considered is to be a proven technique for detecting deterioration of the cable insulation  
36 system (e.g., test is applicable to the specific cable construction: shielded and nonshielded and  
37 the insulation material under test). Tests may include combinations of situ or laboratory;  
38 electrical, physical, or chemical testing. Testing may include inspection and testing of cables or  
39 testing of coupons or abandoned or removed cables subjected to the same environment and  
40 exposed to the same or bounding inservice environment.

41 One or more tests may be required per cable construction and electrical insulation material, to  
42 determine the condition of the cable and that in-scope inaccessible medium voltage cable will  
43 continue to meet its intended function during the subsequent period of extended operation. A  
44 plant specific inaccessible medium voltage cable test matrix that documents inspection

1 methods, test methods, and acceptance criteria for the applicant's plant specific in-scope  
2 inaccessible medium voltage power cables is developed as part of this AMP.

3 The first tests for license renewal are to be completed prior to the subsequent period of  
4 extended operation with subsequent tests performed at least once every 6 years thereafter. For  
5 inaccessible medium power cables exposed to significant moisture, test frequencies are  
6 adjusted based on test results (including trending of aging degradation where applicable) and  
7 plant specific operating experience but with a minimum test frequency of at least once every  
8 6 years.

9 As stated in NUREG/CR-5643, "the major concern is that failures of deteriorated cable systems  
10 (cables, connections, and penetrations) might be induced during accident conditions." Because  
11 the cables are not subject to the environmental qualification requirements of 10 CFR 50.49, an  
12 AMP is required to manage the aging effects. This AMP provides reasonable assurance the  
13 insulation material for electrical cables will perform its intended function for the period of  
14 extended operation.

## 15 **Evaluation and Technical Basis**

16 1. **Scope of Program:** This AMP applies to inaccessible or below grade medium voltage  
17 (operating voltages of 2kV to 35kV) power cable installations (e.g., direct buried, buried  
18 conduit, duct bank, embedded raceway, cable trench, vaults, or manholes) within the  
19 scope of license renewal exposed to adverse localized environments primarily due to  
20 significant moisture.

21 Significant moisture is defined as exposure to moisture that lasts more than a few days  
22 (i.e., long term wetting or submergence over a continuous period). Cable wetting or  
23 submergence that occurs for a limited time as demonstrated by either automatic or  
24 passive drainage is not considered an adverse localized environment for this AMP.  
25 In-scope inaccessible medium voltage cable splices subjected to wetting or  
26 submergence are also included within the scope of this program. Submarine or other  
27 cables designed for continuous wetting or submergence are also included in this AMP as  
28 a onetime inspection with additional periodic test and inspections determined by the  
29 onetime test/inspection results and industry and plant specific aging degradation  
30 operating experience with the applicable cable electrical insulation.

31 2. **Preventive Actions:** This is a condition monitoring program. However, periodic actions  
32 are taken to prevent inaccessible medium voltage power cable from being exposed to  
33 significant moisture, such as identifying and inspecting in-scope accessible cable conduit  
34 ends and cable manholes/vaults for water collection, and draining the water, as needed.

35 The inspection frequency for water collection is established and performed based on  
36 plant-specific operating experience with cable wetting or submergence. The inspections  
37 are performed periodically based on water accumulation over time. The periodic  
38 inspection occurs at least once annually with the first inspection for SLR completed prior  
39 to the subsequent period of extended operation. The annual inspection frequency is  
40 consistent with inspection procedure 71111.06.

41 Inspections are also performed after event driven occurrences, such as heavy rain,  
42 thawing of ice and snow, or flooding. Plant specific parameters are established for the  
43 initiation of an event driven inspection. Inspections include direct indication that cables

1 are not wetted or submerged, and that cable/splices and cable support structures are  
2 intact. Dewatering systems (e.g., sump pumps and passive drains) and associated  
3 alarms are inspected and their operation verified periodically. The periodic inspection  
4 includes documentation that either automatic or passive drainage systems are effective  
5 in preventing cable exposure to significant moisture or cables are not found submerged  
6 when water is manually pumped from manholes or vaults.

7 If water is found during inspection (i.e., cable exposed to significant moisture), corrective  
8 actions are taken to keep the cable dry and to assess cable degradation (i.e., through  
9 inspection and additional cable testing). The aging management of the physical  
10 structure, including cable support structures of cable vaults/manholes is managed by  
11 Generic Aging Lessons Learned Subsequent License Renewal (GALL-SLR) Report  
12 AMP XI.S6.

- 13 3. **Parameters Monitored or Inspected:** Inspection for water collection is performed  
14 based on plant-specific operating experience with water accumulation over time.

15 Inaccessible or below grade inaccessible medium voltage power cables within the scope  
16 of license renewal exposed to significant moisture are also tested to determine the  
17 condition of the electrical insulation. The specific type of test to be used is a proven  
18 technique capable of detecting reduced insulation resistance of the cable's insulation  
19 system due to wetting or submergence.

- 20 4. **Detection of Aging Effects:** For inaccessible medium voltage power cables exposed to  
21 significant moisture, test frequencies are adjusted based on test results (including  
22 trending of aging degradation where applicable) and plant specific operating experience.  
23 Cable testing occurs at least once every 6 years. The first tests for license renewal are  
24 to be completed prior to the subsequent period of extended operation with following tests  
25 performed at least once every 6 years thereafter. This is an adequate period to monitor  
26 performance of the cable and take appropriate corrective actions since experience has  
27 shown that although a slow process, aging degradation could be significant.

28 The specific type of test performed is determined prior to the initial test, and is to be a  
29 proven test for detecting aging degradation of the cable electrical insulation system  
30 (e.g., selected test is applicable to the specific cable construction: shielded and  
31 nonshielded, and the insulation material under test). Tests may include combinations of  
32 situ or laboratory electrical, physical, or chemical testing. Testing may include inspection  
33 and testing of cables or testing of coupons or abandoned or removed cables subjected  
34 to the same environment and exposed to the same or bounding inservice environment.  
35 A plant specific inaccessible medium voltage cable test matrix is developed to document  
36 inspections, test methods, and acceptance criteria applicable to in-scope inaccessible  
37 medium voltage cable for each cable type (e.g., electrical insulation,  
38 shielded/nonshielded, or fabrication).

- 39 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP  
40 because the ability to trend visual inspection and test results is dependent on the test or  
41 visual inspection program selected. However, condition monitoring cable test and  
42 inspection results, utilizing the same visual inspection and test methods that are  
43 trendable and repeatable, provide additional information on the rate of cable or  
44 connection insulation degradation.

- 1 6. **Acceptance Criteria:** The acceptance criteria for each test or inspection are defined by  
2 the specific type of test performed and the specific cable tested. Acceptance criteria for  
3 inspections for water accumulation are defined by the direct indication that cable support  
4 structures are intact and cables are not subject to significant moisture. Dewatering  
5 systems (e.g., sump pumps and drains) and associated alarms are inspected and their  
6 operation verified.
- 7 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
8 conditions adverse to quality or significant conditions adverse to quality under those  
9 specific portions of the quality assurance (QA) program that are used to meet  
10 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
11 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
12 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
13 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
14 related structures and components (SCs) within the scope of this program.
- 15 Unacceptable test results and visual indications of electrical insulation material  
16 abnormalities are subject to an engineering evaluation. Such an evaluation considers the  
17 age and operating environment of the component as well as the severity of the  
18 abnormality and whether such an abnormality has previously been correlated to  
19 degradation of cable or connection electrical insulation. When an unacceptable condition  
20 or situation is identified, a determination is made as to whether the same condition or  
21 situation is applicable to additional in-scope accessible and inaccessible cables or  
22 connections (extent of condition).
- 23 Corrective actions may include, but are not limited to, installation of permanent drainage  
24 systems, (e.g., sump pumps, passive drainage systems and alarms), more frequent  
25 cable testing or inspections, repair (e.g., replace degraded cable sections with splices  
26 accessible), replacement of the affected cable, and root cause assessment of cable  
27 failures assessments, including forensic evaluations, with the AMP enhanced as  
28 necessary consistent with the discussion in Appendix B of the GALL-SLR Report.
- 29 8. **Confirmation Process:** The confirmation process is addressed through those specific  
30 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
31 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
32 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
33 confirmation process element of this AMP for both safety-related and nonsafety-related  
34 SCs within the scope of this program.
- 35 9. **Administrative Controls:** Administrative controls are addressed through the QA  
36 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
37 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
38 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
39 fulfill the administrative controls element of this AMP for both safety-related and  
40 nonsafety-related SCs within the scope of this program.
- 41 10. **Operating Experience:** Operating experience has shown that electrical insulation  
42 materials undergo accelerated degradation either through water tree formation or due to  
43 other aging mechanisms when subjected to significant moisture. Inaccessible medium  
44 voltage cable subjected to significant moisture may result in an accelerated decrease in

1 the dielectric strength of the conductor electrical insulation. Minimizing exposure to  
2 moisture mitigates the potential for the development of reduced insulation resistance.

3 The U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2007-001  
4 concerning inaccessible or below grade cables to (a) inform licensees that the failure of  
5 certain power cables can affect the functionality of multiple accident mitigation systems  
6 or cause plant transients and (b) gather information from licensees on the monitoring of  
7 inaccessible or below grade power cable failures for all cables that are within the scope  
8 of the Maintenance Rule. The data obtained from the GL responses show an increasing  
9 trend of cable failures. The GL 2007-01 summary report noted that the predominant  
10 factor contributing to cable failures at nuclear power plants was due to moisture  
11 intrusion/submergence. These cables were failing within the plants' 40-year initial  
12 operating period.

13 The program is informed and enhanced when necessary through the systematic and  
14 ongoing review of both plant-specific and industry operating experience consistent with  
15 the discussion in Appendix B of the GALL-SLR Report.

16 This AMP considers the technical information and generic communication guidance  
17 provided in RG 1.218, NUREG/CR-5643; IEEE Std. 1205-2014; EPRI 109619; EPRI  
18 103834-P1-2; NRC IN 2002-12; NRC IN 2010-26; NRC IN 1986-49; NRC GL 2007-01;  
19 NRC GL 2007-01 Summary Report; NRC Inspection Procedure, Attachment 71111.06,  
20 NRC Inspection Procedure, Attachment 71111.01; RG 1.211, RG 1.218; and  
21 NUREG/CR-7000.

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1 **XI.E3B ELECTRICAL INSULATION FOR INACCESSIBLE INSTRUMENT**  
2 **AND CONTROL CABLES NOT SUBJECT TO 10 CFR 50.49**  
3 **ENVIRONMENTAL QUALIFICATION REQUIREMENTS**

4 **Program Description**

5 The purpose of the aging management program (AMP) is to provide reasonable assurance that  
6 the intended functions of inaccessible or below grade instrument and control cables that are not  
7 subject to the environmental qualification (EQ) requirements of 10 CFR 50.49 are maintained  
8 consistent with the current licensing basis (CLB) through the subsequent period of extended  
9 operation. This AMP applies to all inaccessible or below grade (e.g., installed in buried conduit,  
10 embedded raceway, cable trenches, cable troughs, duct banks, vaults, manholes, or direct  
11 buried installations) instrumentation and control cable within the scope of subsequent license  
12 renewal (SLR) exposed to adverse localized environments primarily due to significant moisture.

13 In most areas within a nuclear power plant (NPP), the actual operating environment  
14 (e.g., temperature, radiation, or moisture) is less severe than the anticipated plant design basis  
15 environment. However, in a limited number of localized areas, the actual environment may be  
16 more severe than the anticipated plant design basis environment. These localized areas are  
17 characterized as “adverse localized environments” that represent a limited plant area where the  
18 operating environment is significantly more severe than the anticipated plant design basis  
19 environment. An adverse localized environment is based on the most limiting environment  
20 (e.g., temperature, radiation, or moisture) for the cable applicable connections electrical  
21 insulation (e.g., splice).

22 Most electrical cables in NPPs are located in dry environments. However, some cables are  
23 inaccessible or below grade, cables located in buried conduits, cable trenches, cable troughs,  
24 duct banks, vaults, or direct buried installations that may be exposed to water intrusion due to  
25 wetting or submergence. When an electrical cable is exposed to wetting, submergence, or  
26 other adverse localized environments for which it was not designed, an aging effect of reduced  
27 electrical insulation resistance may occur, causing a decrease in the dielectric strength of the  
28 conductor electrical insulation. If so equipped, the degradation of the cable shield due to water  
29 intrusion may introduce electrical grounds and noise into the circuit.

30 Inaccessible instrumentation and control cable electrical insulation including shields as  
31 applicable may degrade more rapidly than expected when exposed to an adverse localized  
32 environment. Electrical insulation subjected to an adverse localized environment could have an  
33 adverse effect on operability, or potentially lead to failure of the cable. Although the risk  
34 contribution due to a failure of an inaccessible instrument and control cable is limited due to  
35 system architecture, a common aging stressor such as submergence may represent a common  
36 aging mechanism that if not anticipated in the design or mitigated in service, may lead to  
37 multiple random failures and compromise system defense-in-depth and diversity.

38 Adverse localized environments are identified through the use of an integrated approach. This  
39 approach includes, but is not limited to; (a) the review of EQ program radiation, temperature and  
40 moisture information for various plant areas as applicable to inaccessible instrumentation and  
41 control cable, (b) recorded information from equipment or plant instrumentation (e.g., applicable  
42 periodic environmental monitoring of in-scope inaccessible instrumentation and control cable  
43 installations), (c) as-built and field walk down data (e.g., cable routing data base), (d) a plant

- 1 spaces scoping and screening methodology, and (d) the review of relevant plant-specific and  
2 industry operating experience including;
- 3 • Identification of work practices, including work records that have the potential to subject  
4 in-scope inaccessible instrumentation and control cable to an adverse localized  
5 environment (e.g., equipment thermal insulation removal and restoration).
  - 6 • Corrective actions involving in-scope inaccessible instrumentation and control electrical  
7 insulation aging degradation on electrical insulation service life (current operating term).
  - 8 • Previous inspections (e.g., cable vaults, and manholes) for instrumentation and control  
9 cable electrical insulation aging degradation associated with cable wetting and  
10 submergence.

11 In this AMP, periodic actions are taken to prevent inaccessible instrumentation and control  
12 cables from being exposed to significant moisture. Significant moisture is defined as exposure  
13 to moisture that lasts more than a few days (i.e., long term wetting or submergence over a  
14 continuous period). Cable wetting or submergence that occurs for a limited time as  
15 demonstrated by either automatic or passive drains is not considered an adverse localized  
16 environment for this AMP.

17 The inspection frequency for water collection is established and performed based on plant-  
18 specific operating experience over time with cable wetting or submergence. Inspections are  
19 performed periodically based on water accumulation over time. The periodic inspection occurs  
20 at least once annually with the first inspection for SLR completed prior to the subsequent period  
21 of extended operation. Inspection frequencies are adjusted based on inspection results  
22 including plant specific operating experience but with a minimum inspection frequency of at  
23 least once annually. Inspections are also performed after event driven occurrences, such as  
24 heavy rain, thawing of ice and snow, or flooding.

25 Examples of periodic actions to prevent inaccessible instrumentation and control cable  
26 exposure to significant moisture include inspection for water collection in cable manholes,  
27 vaults, and conduits and draining water, as needed. However, these periodic actions may not  
28 be sufficient to ensure that water is not trapped elsewhere in the raceways. For example water  
29 accumulation and submergence could occur from, (a) a duct bank conduit with low points in the  
30 routing; (b) raceway settling or cracking due to soil settling over a long period of time;  
31 (c) manhole and cable trench covers not being watertight; (d) raceway locations subject to a  
32 high water table (e.g., high seasonal cycles), and (e) uncertainties concerning wetting and  
33 submergence even when duct banks are sloped with the intention to minimize water  
34 accumulation.

35 Although aging mechanisms and effects due to significant moisture appear limited compared  
36 with inaccessible medium voltage cable (e.g., lower instrument and control voltage levels do not  
37 support water tree formation for example), operating experience has shown that insulation  
38 degradation may occur if inaccessible instrumentation and control cables are exposed to  
39 continuous wetting or submergence. Although variances may exist in the aging mechanisms  
40 and effects depending on electrical insulation material, manufacture, and application, periodic  
41 actions are necessary to minimize the potential for insulation degradation due to significant  
42 moisture.

1 In addition to the above periodic actions, in-scope inaccessible instrumentation and control  
2 cables exposed to significant moisture are tested to determine the condition of the electrical  
3 insulation (e.g., identify degradation due to reduced electrical insulation resistance). The  
4 specific type of test considered is to be a proven technique for detecting deterioration of the  
5 cable insulation system (e.g., test is applicable to the specific cable construction: shielded and  
6 nonshielded and the electrical insulation under test). Tests may include combinations of *in-situ*  
7 or laboratory, electrical, physical, or chemical testing. Testing may include inspection and  
8 testing of cables or testing of coupons or abandoned or removed cables subjected to the same  
9 environment and exposed to the same or bounding inservice environment.

10 For a large installed number of inaccessible instrumentation and control cable, a sample test  
11 methodology may be employed. A technical justification of the methodology and sample size  
12 used for selecting inaccessible instrumentation and control cables under test is included as part  
13 of the applicant's AMP's basis documentation. Inaccessible instrument and control cable  
14 factors are considered for sampling (e.g., voltage level, cable construction, cable type, insulation  
15 material, and location). If an unacceptable condition or situation is identified in the selected  
16 sample, a determination is made as to whether the same condition or situation is applicable to  
17 other inaccessible instrumentation and control cable not tested and whether the tested sample  
18 population should be expanded.

19 One or more tests may be required per cable construction and electrical insulation material to  
20 determine the condition of the cable and that in-scope inaccessible instrumentation and control  
21 cable will continue to meet its intended function during the subsequent period of extended  
22 operation. A plant specific inaccessible instrumentation and control cable test matrix that  
23 documents inspection methods, test methods, and acceptance criteria is developed as part of  
24 this AMP.

25 The first tests for SLR are to be completed prior to the subsequent period of extended operation  
26 with subsequent tests performed at least once every 6 years thereafter. For inaccessible  
27 instrumentation and control cables exposed to significant moisture, test frequencies are  
28 adjusted based on test results (including trending of aging degradation where applicable) and  
29 plant specific operating experience but with a minimum test frequency of at least once every  
30 6 years.

31 As stated in NUREG/CR-5643, "the major concern is that failures of deteriorated cable systems  
32 (cables, connections, and penetrations) might be induced during accident conditions." Because  
33 the cables are not subject to the EQ requirements of 10 CFR 50.49, an AMP is required to  
34 manage the aging effects. This AMP provides reasonable assurance that insulation material for  
35 electrical cables will perform its intended function for the period of extended operation.

## 36 **Evaluation and Technical Basis**

37 1. **Scope of Program:** This AMP applies to all inaccessible or below grade (e.g., installed  
38 in buried conduit, embedded raceway, cable trenches, cable troughs, duct banks, vaults,  
39 manholes, or direct buried installations) instrumentation and control cable within the  
40 scope of subsequent license renewal exposed to adverse localized environments  
41 primarily due to significant moisture.

42 Significant moisture is defined as exposure to moisture that lasts more than a few days  
43 (i.e., long term wetting or submergence over a continuous period). Cable wetting or

1 submergence that occurs for a limited time as demonstrated by either automatic or  
2 passive drainage is not considered an adverse localized environment for this AMP.

3 In-scope inaccessible instrumentation and control cable splices subjected to wetting or  
4 submergence are included within the scope of this program. Cables designed for  
5 continuous wetting or submergence are also included in this AMP as a onetime  
6 inspection with additional periodic tests and inspections determined by the  
7 test/inspection results and industry and plant specific aging degradation operating  
8 experience with the applicable cable electrical insulation.

9 2. **Preventive Actions:** This is a condition monitoring program. However, periodic actions  
10 are taken to prevent inaccessible instrumentation and control cable from being exposed  
11 to significant moisture, such as identifying and inspecting in-scope accessible cable  
12 conduit ends and cable manholes/vaults for water collection, and draining the water,  
13 as needed.

14 The inspection frequency for water collection is established and performed based on  
15 plant-specific operating experience with cable wetting or submergence. The inspections  
16 are performed periodically based on water accumulation over time. The periodic  
17 inspection occurs at least once annually with the first inspection for SLR completed prior  
18 to the subsequent period of extended operation. The annual inspection frequency is  
19 consistent with inspection procedure 71111.06.

20 Inspections are performed after event driven occurrences, such as heavy rain, thawing  
21 of ice and snow, or flooding. Plant specific parameters are established for the initiation  
22 of an event driven inspection. Inspections include direct indication that cables are not  
23 wetted or submerged, and that cable/splices and cable support structures are intact.  
24 Dewatering systems (e.g., sump pumps and passive drains) and associated alarms are  
25 inspected and their operation verified periodically. The periodic Inspection includes  
26 documentation that either automatic or passive drainage systems, or manually pumping  
27 of manholes or vaults is effective in preventing inaccessible cable exposure to significant  
28 moisture.

29 If water is found during inspection (i.e., cable exposed to significant moisture), corrective  
30 actions are taken to keep the cable dry and to assess cable degradation (i.e., through  
31 inspection and additional cable testing). The aging management of the physical  
32 structure, including cable support structures, of cable vaults/manholes is managed by  
33 Generic Aging Lessons Learned for Subsequent Licensing Renewal (GALL SLR) Report  
34 AMP XI.S6.

35 3. **Parameters Monitored or Inspected:** Inspection for water collection is performed  
36 based on plant-specific operating experience with water accumulation over time.  
37 Inaccessible or below grade instrumentation and control cables within the scope of SLR  
38 exposed to significant moisture are tested to determine the condition of the conductor  
39 electrical insulation. The specific type of test(s) to be used is a proven technique  
40 capable of detecting reduced insulation resistance of the cable's insulation system due  
41 to wetting or submergence.

42 4. **Detection of Aging Effects:** For inaccessible instrumentation and control cables  
43 exposed to significant moisture, test frequencies are adjusted based on test results  
44 (including trending of degradation where applicable) and plant specific operating

1 experience. Cable testing occurs at least once every 6 years. The first tests for SLR are  
2 to be completed prior to the subsequent period of extended operation with tests  
3 performed at least once every 6 years thereafter. This is an adequate period to monitor  
4 performance of the cable and take appropriate corrective actions since experience has  
5 shown that although a slow process, but that aging degradation could be significant.

6 The specific type of test performed is determined prior to the initial test, and is to be a  
7 proven test for detecting aging degradation of the cable insulation system (e.g., the  
8 selected test is applicable to the specific cable construction: shielded and nonshielded,  
9 and the insulation material under test). Tests may include combinations of *in-situ* or  
10 laboratory, electrical, physical, or chemical testing. Testing may include inspection and  
11 testing of cables or testing of coupons or abandoned or removed cables subjected to the  
12 same environment and exposed to the same or bounding inservice environment. A plant  
13 specific instrumentation and control test matrix is developed to document inspections,  
14 test methods, and acceptance criteria applicable to the applicant's in-scope inaccessible  
15 instrumentation and control cable for each type (e.g., electrical insulation,  
16 shielded/nonshielded, or fabrication).

17 For a large installed number of inaccessible instrumentation and control cable, a sample  
18 test methodology may be employed. A technical justification of the methodology and  
19 sample size used for selecting inaccessible instrumentation and control cables under  
20 test should be included as part of the applicant's AMP's basis documentation.  
21 Inaccessible instrument and control cable factors are considered for sampling  
22 (e.g., voltage level, cable construction, cable type, insulation material, and location). If  
23 an unacceptable condition or situation is identified in the selected sample, a  
24 determination is made as to whether the same condition or situation is applicable to  
25 other inaccessible instrumentation and control cable not tested and whether the tested  
26 sample population should be expanded. The corrective action program is used to  
27 evaluate the condition and determine appropriate corrective action.

28 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP  
29 because the ability to trend visual inspection and test results is dependent on the test or  
30 visual inspection program selected. However, condition monitoring cable test and  
31 inspection results utilizing the same visual inspection and test methods that are  
32 trendable and repeatable provide additional information on the rate of cable or  
33 connection insulation degradation.

34 6. **Acceptance Criteria:** The acceptance criteria for each test or inspection are defined by  
35 the specific type of test performed and the specific cable tested. Acceptance criteria for  
36 inspections for water accumulation are defined by the direct indication that cable support  
37 structures are intact and cables are not subject to significant moisture. Dewatering  
38 systems (e.g., sump pumps and drains) and associated alarms are inspected and their  
39 operation verified.

40 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
41 conditions adverse to quality or significant conditions adverse to quality under those  
42 specific portions of the QA program that are used to meet Criterion XVI, "Corrective  
43 Action," of 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes  
44 how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
45 corrective actions element of this AMP for both safety-related and nonsafety-related SCs  
46 within the scope of this program.

1 Unacceptable test results and visual indications of electrical insulation material  
2 abnormalities are subject to an engineering evaluation. Such an evaluation considers the  
3 age and operating environment of the component as well as the severity of the  
4 abnormality and whether such an abnormality has previously been correlated to  
5 degradation of cable or connection electrical insulation. When an unacceptable condition  
6 or situation is identified, a determination is made as to whether the same condition or  
7 situation is applicable to additional in-scope accessible and inaccessible cables or  
8 connections (extent of condition).

9 Corrective actions may include, but are not limited to, installation of permanent drainage  
10 systems, (e.g., sump pumps, passive drainage systems and alarms), more frequent  
11 cable testing or inspections, repair (e.g., replace degraded cable sections), replacement  
12 of the affected cable, and root cause assessment of cable failures including forensic  
13 evaluations as applicable, with the AMP enhanced as necessary consistent with the  
14 discussion in Appendix B of the GALL-SLR Report.

15 8. **Confirmation Process:** The confirmation process is addressed through those specific  
16 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
17 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
18 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
19 confirmation process element of this AMP for both safety-related and nonsafety-related  
20 SCs within the scope of this program.

21 9. **Administrative Controls:** Administrative controls are addressed through the QA  
22 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
23 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
24 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
25 fulfill the administrative controls element of this AMP for both safety-related and  
26 nonsafety-related SCs within the scope of this program.

27 10. **Operating Experience:** Operating experience has shown that electrical insulation  
28 materials undergo accelerated degradation either through water tree formation or due to  
29 other aging mechanisms when subjected to significant moisture. Inaccessible  
30 instrumentation and control cable subjected to significant moisture may result in an  
31 accelerated decrease in the dielectric strength of the conductor electrical insulation.  
32 Minimizing exposure to significant moisture mitigates the potential for the development  
33 of reduced insulation resistance and, if so equipped, the degradation of the cable shield  
34 due to water intrusion which may introduce unwanted grounds and noise into the circuit.

35 The U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2007-001  
36 concerning inaccessible or below grade cables to (a) inform licensees that the failure of  
37 certain power cables can affect the functionality of multiple accident mitigation systems  
38 or cause plant transients and (b) gather information from licensees on the monitoring of  
39 inaccessible or below grade power cable failures for all cables that are within the scope  
40 of the Maintenance Rule. The data obtained from the GL responses show an increasing  
41 trend of cable failures. The GL 2007-01 summary report noted that the predominant  
42 factor contributing to cable failures at NPPs was due to moisture intrusion/submergence.  
43 These cables were failing within the plants' 40-year initial licensing period.

1 The program is informed and enhanced when necessary through the systematic and  
2 ongoing review of both plant-specific and industry operating consistent with the  
3 discussion in Appendix B of the GALL-SLR Report.

4 This AMP considers the technical information and generic communication guidance  
5 provided in RG 1.218, NUREG/CR-5643; IEEE Std. 1205-2014; EPRI 109619; EPRI  
6 103834-P1-2; NRC IN 2002-12; NRC IN 2010-26; NRC IN 1986-49; NRC GL 2007-01;  
7 NRC GL 2007-01 Summary Report; NRC Inspection Procedure, Attachment 71111.06,  
8 NRC Inspection Procedure, Attachment 71111.01; RG 1.211, RG 1.218; and  
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1 **XI.E3C ELECTRICAL INSULATION FOR INACCESSIBLE LOW**  
2 **VOLTAGE POWER CABLES NOT SUBJECT TO 10 CFR 50.49**  
3 **ENVIRONMENTAL QUALIFICATION REQUIREMENTS**

4 **Program Description**

5 The purpose of the aging management program (AMP) is to provide reasonable assurance that  
6 the intended functions of inaccessible or below grade low voltage power cables (i.e., typical  
7 operating voltage of less than 1,000v—but no greater than 2kV) that are not subject to the  
8 environmental qualification (EQ) requirements of 10 CFR 50.49 are maintained consistent with  
9 the current licensing basis (CLB) through the subsequent period of extended operation. This  
10 AMP applies to all inaccessible or below grade (e.g., installed in buried conduit, embedded  
11 raceway, cable trenches, cable troughs, duct banks, vaults, manholes, or direct buried  
12 installations) low voltage power cable within the scope of subsequent license renewal (SLR)  
13 exposed to adverse localized environments primarily due to significant moisture.

14 In most areas within a nuclear power plant (NPP), the actual operating environment  
15 (e.g., temperature, radiation, or moisture) is less severe than the anticipated plant design basis  
16 environment. However, in a limited number of localized areas, the actual environment may be  
17 more severe than the anticipated plant design basis environment. These localized areas are  
18 characterized as “adverse localized environments” that represent a limited plant area where the  
19 operating environment is significantly more severe than the anticipated plant design basis  
20 environment (e.g., temperature, radiation, or moisture) for the cable electrical insulation.

21 Most electrical cables in NPPs are located in dry environments. However, some cables are  
22 inaccessible or below grade, cables located in buried conduits, cable trenches, cable troughs,  
23 duct banks, vaults, or direct buried installations that may be exposed to water intrusion due to  
24 wetting or submergence. When an inaccessible electrical cable is exposed to wetting,  
25 submergence, or other adverse localized environments for which it was not designed, an aging  
26 effect of reduced electrical insulation resistance may occur causing a decrease in the dielectric  
27 strength of the conductor electrical insulation. Therefore, this AMP considers inaccessible low  
28 voltage power cable exposed to wetting or submergence or other adverse localized  
29 environments for which the cable was not designed, as potentially subject to an aging effect of  
30 reduced insulation resistance causing a decrease in the dielectric strength of the conductor  
31 electrical insulation.

32 Inaccessible low voltage power cable electrical insulation may degrade more rapidly than  
33 expected when exposed to an adverse localized environment. Electrical insulation subjected to  
34 an adverse localized environment could have an adverse effect on operability, or potentially  
35 lead to failure of the cable’s insulation system.

36 Adverse localized environments are identified through the use of an integrated approach. This  
37 approach includes, but is not limited to; (a) the review of EQ program radiation, temperature and  
38 moisture information for various plant areas as applicable to inaccessible low voltage power  
39 cable, (b) recorded information from equipment or plant instrumentation (e.g., applicable  
40 periodic environmental monitoring of in-scope inaccessible low voltage power cable  
41 installations), (c) as-built and field walk down data (e.g., cable routing data base), (d) a plant  
42 spaces scoping and screening methodology, and (d) the review of relevant plant-specific and  
43 industry operating experience including;

- 1 • Identification of work practices, including work records that have the potential to subject  
2 in-scope inaccessible low voltage power cable to an adverse localized environment  
3 (e.g., equipment thermal insulation removal and restoration).
- 4 • Corrective actions involving in-scope inaccessible low voltage power cable electrical  
5 insulation aging degradation on electrical insulation service life (current operating term).
- 6 • Previous inspections (e.g., cable vaults, and manholes) for inaccessible low voltage  
7 cable electrical insulation aging degradation associated with cable wetting and  
8 submergence.

9 In this AMP, periodic actions are taken to prevent inaccessible low voltage power cables from  
10 being exposed to significant moisture. Significant moisture is defined as exposure to moisture  
11 that lasts more than a few days (i.e., long term wetting or submergence over a continuous  
12 period). Cable wetting or submergence that occurs for a limited time as demonstrated by either  
13 automatic or passive drains is not considered an adverse localized environment for this AMP.

14 The inspection frequency for water collection is established and performed based on  
15 plant-specific operating experience over time with cable wetting or submergence. The  
16 inspections are performed periodically based on water accumulation over time. The periodic  
17 inspection occurs at least annually with the first inspection for SLR completed prior to the  
18 subsequent period of extended operation. Inspection frequencies are adjusted based on  
19 inspection results including plant specific operating experience but with a minimum inspection  
20 frequency of at least annually. Inspections are also performed after event driven occurrences,  
21 such as heavy rain, thawing of ice and snow, or flooding.

22 Examples of periodic actions are inspecting for water collection in cable manholes, vaults, and  
23 conduits and draining water, as needed. However, the periodic actions may not be sufficient to  
24 ensure that water is not trapped elsewhere in the raceways. For example, (a) if a duct bank  
25 conduit has low points in the routing, there could be potential for continuous submergence at  
26 these low points; (b) raceways may settle or crack due to soil settling over a long period of time;  
27 (c) manhole and cable trench covers may not be watertight; (d) raceway locations subject to a  
28 high water table (e.g., high seasonal cycles); and (e) uncertainties concerning wetting and  
29 submergence even when duct banks are sloped with the intention to minimize water  
30 accumulation.

31 Although specific aging mechanisms and effects due to significant moisture are not documented  
32 for low voltage power cable and the voltage levels are considered low enough not to support  
33 water tree formation. Operating experience suggests that insulation degradation may occur if  
34 inaccessible low voltage power cables are exposed to continuous wetting or submergence.  
35 Although variances may exist in the aging mechanisms and effects depending on cable  
36 electrical insulation material, manufacture, and application, periodic actions are necessary to  
37 minimize the potential for insulation degradation due to significant moisture.

38 In addition to the above periodic actions, in-scope inaccessible low voltage power cables  
39 exposed to significant moisture are tested to determine the condition of the electrical insulation  
40 (e.g., identify degradation due to reduced electrical insulation resistance). The specific type of  
41 test considered is to be a proven technique for detecting deterioration of the cable insulation  
42 system (e.g., test is applicable to the specific cable construction and electrical insulation under  
43 test). Tests may include combinations of *in-situ* or laboratory, electrical, physical, or chemical  
44 testing. Testing may include inspection and testing of cables or testing of coupons or

1 abandoned or removed cables subjected to the same environment and exposed to the same or  
2 bounding inservice environment. One or more tests, as required per cable construction and  
3 insulation material, are used to determine the condition of the cable and ensure that in-scope  
4 inaccessible low voltage power cables will continue to meet their intended function during the  
5 subsequent period of extended operation. A plant specific inaccessible low voltage power cable  
6 test matrix that documents inspection methods, test methods, and acceptance criteria is  
7 developed as part of this AMP.

8 The first tests for SLR are to be completed prior to the subsequent period of extended operation  
9 with subsequent tests performed at least once every 6 years thereafter. For inaccessible low  
10 voltage power cables exposed to significant moisture, test frequencies are adjusted based on  
11 test results (including trending of aging degradation where applicable) and plant specific  
12 operating experience but with a minimum test frequency of at least once every 6 years.

13 As stated in NUREG/CR-5643, "the major concern is that failures of deteriorated cable systems  
14 (cables, connections, and penetrations) might be induced during accident conditions." Because  
15 the cables are not subject to the EQ requirements of 10 CFR 50.49, an AMP is required to  
16 manage the aging effects. This AMP provides reasonable assurance that insulation material for  
17 electrical cables will perform its intended function for the period of extended operation.

## 18 **Evaluation and Technical Basis**

19 1. **Scope of Program:** This AMP applies to all inaccessible or below grade (e.g., installed  
20 in buried conduit, embedded raceway, cable trenches, cable troughs, duct banks, vaults,  
21 manholes, or direct buried installations) low voltage power cable within the scope of  
22 SLR exposed to adverse localized environments primarily due to significant moisture.

23 Significant moisture is defined as exposure to moisture that lasts more than a few days  
24 (i.e., long term wetting or submergence over a continuous period). Cable wetting or  
25 submergence that occurs for a limited time as demonstrated by either automatic or  
26 passive drainage is not considered an adverse localized environment for this AMP.

27 In-scope inaccessible low voltage power cable splices subjected to wetting or  
28 submergence are included within the scope of this program. Cables designed for  
29 continuous wetting or submergence are also included in this AMP as a onetime  
30 inspection with additional periodic test and inspections determined by the test/inspection  
31 results and industry and plant specific aging degradation operating experience with the  
32 applicable cable electrical insulation.

33 2. **Preventive Actions:** This is a condition monitoring program. However, periodic actions  
34 are taken to prevent inaccessible low voltage power cable from being exposed to  
35 significant moisture, such as identifying and inspecting in-scope accessible cable conduit  
36 ends and cable manholes/vaults for water collection, and draining the water, as needed.

37 The inspection frequency for water collection is established and performed based on  
38 plant-specific operating experience with cable wetting or submergence. The inspections  
39 are performed periodically based on water accumulation over time. The periodic  
40 inspection occurs at least once annually with the first inspection for SLR completed prior  
41 to the subsequent period of extended operation. The annual inspection frequency is  
42 consistent with inspection procedure 71111.06.

1 Inspections are performed after event driven occurrences, such as heavy rain, thawing  
2 of ice and snow, or flooding. Plant specific parameters are established for the initiation  
3 of an event driven inspection. Inspections include direct indication that cables are not  
4 wetted or submerged, and that cable/splices and cable support structures are intact.  
5 Dewatering systems (e.g., sump pumps and passive drains) and associated alarms are  
6 inspected and their operation verified periodically. The periodic Inspection includes  
7 documentation that either automatic or passive drainage systems, or manually pumping  
8 of manholes or vaults is effective in preventing inaccessible cable exposure to significant  
9 moisture.

10 If water is found during inspection (i.e., cable exposed to significant moisture), corrective  
11 actions are taken to keep the cable dry and to assess cable degradation (i.e., through  
12 inspection and cable testing). The aging management of the physical structure,  
13 including cable support structures, of cable vaults/manholes is managed by Generic  
14 Aging Lessons Learned for Subsequent Licensing Renewal (GALL-SLR) Report  
15 AMP XI.S6.

- 16 3. **Parameters Monitored or Inspected:** Inspection for water collection is performed  
17 based on plant-specific operating experience with water accumulation over time.  
18 Inaccessible or below grade low voltage power cables within the scope of SLR exposed  
19 to significant moisture are tested to determine the condition of the electrical conductor  
20 insulation. The specific type of test(s) to be used is a proven technique capable of  
21 detecting reduced insulation resistance of the cable's insulation system due to wetting  
22 or submergence.

- 23 4. **Detection of Aging Effects:** For inaccessible low voltage power cables exposed to  
24 significant moisture, test frequencies are adjusted based on test results  
25 (including trending of degradation where applicable) and plant specific operating  
26 experience. Cable testing occurs at least once every 6 years. The first tests for SLR are  
27 to be completed prior to the subsequent period of extended operation with tests  
28 performed at least once every 6 years thereafter. This is an adequate period to monitor  
29 performance of the cable and take appropriate corrective actions since experience has  
30 shown that although a slow process, aging degradation could be significant.

31 The specific type of test performed is determined prior to the initial test, and is to be a  
32 proven test for detecting aging degradation of the cable electrical insulation system  
33 (e.g., the selected test is applicable to the specific cable construction: shielded and  
34 nonshielded, and the insulation material under test).

35 Tests may include combinations of *in-situ* or laboratory; electrical, physical, or chemical  
36 testing. Testing may include inspection and testing of cables or testing of coupons or  
37 abandoned or removed cables subjected to the same environment and exposed to the  
38 same or bounding inservice environment. A plant specific inaccessible low voltage test  
39 matrix is developed to document inspections, test methods, and acceptance criteria  
40 applicable to the applicant's in-scope inaccessible low voltage power cable types.

- 41 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP  
42 because the ability to trend visual inspection and test results is dependent on the test or  
43 visual inspection program selected. However, condition monitoring cable test and  
44 inspection results utilizing the same visual inspection and test methods that are

1 trendable and repeatable provide additional information on the rate of cable or  
2 connection insulation degradation.

3 6. **Acceptance Criteria:** The acceptance criteria for each test or inspection are defined by  
4 the specific type of test performed and the specific cable tested. Acceptance criteria for  
5 inspections of manholes are defined by the direct indication that cable support structures  
6 are intact and cables are not submerged. Dewatering systems (e.g., sump pumps and  
7 drains) and associated alarms are inspected and their operation verified.

8 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
9 conditions adverse to quality or significant conditions adverse to quality under those  
10 specific portions of the quality assurance (QA) program that are used to meet  
11 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
12 GALL-SLR Report describes how an applicant may apply its 10 CFR Part 50,  
13 Appendix B, QA program to fulfill the corrective actions element of this AMP for both  
14 safety-related and nonsafety-related structures and components within the scope of this  
15 program.

16 Corrective actions may include, but are not limited to, installation of permanent drainage  
17 systems, (e.g., sump pumps, passive drainage systems and alarms), more frequent  
18 cable testing or inspections, repair (e.g., replace degraded cable sections), replacement  
19 of the affected cable, and root cause assessment of cable failures including forensic  
20 evaluations as applicable, with the AMP enhanced as necessary consistent with the  
21 discussion in Appendix B of the GALL-SLR Report.

22 8. **Confirmation Process:** The confirmation process is addressed through those specific  
23 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
24 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
25 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
26 confirmation process element of this AMP for both safety-related and nonsafety-related  
27 SCs within the scope of this program.

28 9. **Administrative Controls:** Administrative controls are addressed through the QA  
29 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
30 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
31 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
32 fulfill the administrative controls element of this AMP for both safety-related and  
33 nonsafety-related SCs within the scope of this program.

34 10. **Operating Experience:** Operating experience has shown that electrical insulation  
35 materials are susceptible water intrusion failures including water tree formation. Aging  
36 effects of reduced insulation resistance due to other aging mechanisms and effects may  
37 also result in a decrease in the dielectric strength of the conductor insulation. Minimizing  
38 exposure to moisture mitigates the potential for the development of reduced  
39 insulation resistance.

40 The U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2007-001  
41 concerning inaccessible or below grade cables to (a) inform licensees that the failure of  
42 certain power cables can affect the functionality of multiple accident mitigation systems  
43 or cause plant transients and (b) gather information from licensees on the monitoring of  
44 inaccessible or below grade power cable failures for all cables that are within the scope

1 of the Maintenance Rule. The data obtained from the GL responses show an increasing  
2 trend of cable failures. The GL 2007-01 summary report noted that the predominant  
3 factor contributing to cable failures at NPPs was due to moisture intrusion/submergence.  
4 These cables are failing within the plants' 40-year initial licensing period.

5 The program is informed and enhanced when necessary through the systematic and  
6 ongoing review of both plant-specific and industry operating experience, consistent with  
7 the discussion in Appendix B of the GALL-SLR Report.

8 This AMP considers the technical information and generic communication guidance  
9 provided in RG 1.218, NUREG/CR-5643; IEEE Std. 1205-2014; EPRI 109619; EPRI  
10 103834-P1-2; NRC IN 2002-12; NRC IN 2010-26; NRC IN 1986-49; NRC GL 2007-01;  
11 NRC GL 2007-01 Summary Report; NRC Inspection Procedure, Attachment 71111.06,  
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13 NUREG/CR-7000.

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4 Washington, DC: U.S. Nuclear Regulatory Commission. June 1986.

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6 Electrical Cable and Terminations." Albuquerque, New Mexico: Sandia National Laboratories.  
7 September 1996.



## 1 **XI.E4 METAL ENCLOSED BUS**

### 2 **Program Description**

3 The purpose of this aging management program (AMP) is to provide an internal and external  
4 inspection of metal enclosed bus (MEB) within the scope of subsequent license renewal (SLR)  
5 to identify age-related degradation of electrical insulating material (i.e., porcelain, xenoy,  
6 thermoplastic organic polymers), and metallic and elastomer components (e.g., gaskets, boots,  
7 and sealants). This AMP provides reasonable assurance that in-scope MEBs will be maintained  
8 consistent with the current licensing basis (CLB) through the subsequent period of extended  
9 operation.

10 MEBs are electrical buses installed on electrically insulated supports that are constructed with  
11 each phase conductor enclosed in a separate metal enclosure (isolated phase bus), all  
12 conductors enclosed in a common metal enclosure (nonsegregated bus), or all phase  
13 conductors in a common metal enclosure, but separated by metal barriers between phases  
14 (segregated bus). The conductors are adequately separated and insulated from ground by  
15 insulating supports or bus electrical insulation. The MEBs are used in power systems to  
16 connect various elements in electric power circuits, such as switchgear, transformers, main  
17 generators, and diesel generators.

18 Cable bus is a variation on MEB which is similar in construction to an MEB, but instead of  
19 segregated or nonsegregated electrical buses, cable bus is comprised of a fully enclosed metal  
20 enclosure that utilizes three-phase insulated power cables installed on insulated support blocks.  
21 Cable bus may omit the top cover or use a louvered top cover and enclosure. Both the cable  
22 bus and enclosures are not sealed against intrusion of dust, industrial pollution, moisture, rain,  
23 ice and therefore may introduce debris into the internal cable bus assembly.

24 Consequently, cable bus construction and arrangements are such that it may not readily fall  
25 under a specific Generic Aging Lessons Learned (GALL) Report AMP (e.g., GALL-SLR Report  
26 AMP XI.E1, GALL-SLR Report AMP XI.E4, or GALL-SLR Report AMP XI.E6). GALL-SLR  
27 Report AMP XI.E1 calls for a visual inspection of accessible insulated cables and connections  
28 subject to an adverse localized environment which may not be applicable to cable bus due to  
29 inaccessibility or applicability of the aging mechanisms and effects addressed by GALL-SLR  
30 Report AMP XI.E1. GALL-SLR Report AMP XI.E4 includes tests and inspections of the internal  
31 and external portions of the MEB. The MEB Internal and external inspections and tests may not  
32 be entirely applicable to cable bus aging mechanisms and effects. GALL-SLR Report AMP  
33 XI.E6 applies to the metallic parts of cable connections at equipment termination points. As a  
34 result, cable bus due to its construction, constitutes a component with possible aging  
35 mechanisms and effects that may not be addressed by GALL-SLR Report AMP XI.E6.  
36 Therefore, the GALL-SLR Report recommends cable bus aging mechanisms and effects be  
37 evaluated as a plant specific further evaluation including further evaluation of a plant specific  
38 AMP and any associated AMPs (e.g., GALL-SLR Report AMP XI.S6, "Structures Monitoring,"  
39 XI.M38, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components," and  
40 GALL-SLR Report AMP XI.S6, "Structures Monitoring") as applicable.

41 Industry operating experience indicates that the primary failure modes of MEBs have been  
42 caused by cracked electrical insulation, moisture, debris, loose connections, corrosion, or  
43 excessive dust buildup internal to the bus housing. Cracked insulation has resulted from high  
44 ambient temperature and contamination from bus bar joint compounds. Cracked electrical  
45 insulation in the presence of moisture or debris has caused phase-to-phase or phase-to-ground

1 electrical paths, which has resulted in catastrophic failure of the buses. Significant ohmic  
2 heating of bus work may result in loosening of bolted connections associated with repeated  
3 cycling of connected loads. (Bus failure has led to loss of power to electrical loads connected to  
4 the buses, causing subsequent reactor trips and initiating unnecessary challenges to plant  
5 systems and operators.)

6 MEBs may experience increased resistance of connection due to loosening of bolted bus duct  
7 connections caused by repeated thermal cycling of connected loads. This phenomenon can  
8 occur in heavily loaded circuits (i.e., those exposed to appreciable ohmic heating). For  
9 example, SAND 96-0344 identified instances of termination loosening at several plants due to  
10 thermal cycling and NRC Information Notice (IN) 2000-14 identified torque relaxation of splice  
11 plate connecting bolts as one potential cause of MEB failures.

12 This AMP includes the inspection of all bus duct and MEB bolted connections within the scope  
13 of license renewal for increased resistance of connections.

## 14 **Evaluation and Technical Basis**

15 1. **Scope of Program:** This AMP manages the age-related degradation effects for  
16 electrical bus bar bolted connections, bus bar electrical insulation, bus bar insulating  
17 supports, bus enclosure assemblies (internal and external), and elastomers. This  
18 program does not manage the aging effects on external bus structural supports, which  
19 are managed under GALL-SLR Report AMP XI.S6, "Structures Monitoring."  
20 Alternatively, the aging effects on elastomers can be managed under GALL-SLR Report  
21 AMP XI.M38, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting  
22 Components," and the external portions of MEB enclosure assemblies can be managed  
23 under GALL-SLR Report AMP XI.S6, "Structures Monitoring."

24 2. **Preventive Actions:** This is a condition monitoring program and no actions are taken  
25 as part of this program to prevent or mitigate aging degradation.

26 3. **Parameters Monitored or Inspected:** This AMP provides for the inspection of the  
27 internal and external portions of the MEB. Internal portions (bus enclosure assemblies)  
28 of the MEB are inspected for cracks, corrosion, foreign debris, excessive dust buildup,  
29 and evidence of water intrusion. The bus electrical insulation material is inspected for  
30 signs of reduced insulation resistance due to thermal/thermooxidative degradation of  
31 organics/thermoplastics, radiation-induced oxidation, moisture/debris intrusion, or ohmic  
32 heating, as indicated by embrittlement, cracking, chipping, melting, discoloration, or  
33 swelling, indicate overheating or aging degradation. The internal bus insulating supports  
34 are inspected for structural integrity and signs of cracks. Bolted connections are  
35 inspected for increased resistance of connection (e.g., loose or corroded MEB bolted  
36 connections and hardware including cracked or split washers). Alternatively, bolted  
37 connections covered with heat shrink tape, sleeving, insulating boots, etc., may be  
38 visually inspected for electrical insulation material surface abnormalities. The external  
39 portions of the MEB, including accessible gaskets, boots, and sealants, are inspected for  
40 hardening and loss of strength due to elastomer degradation that could permit water or  
41 foreign debris to enter the bus. MEB external surfaces are inspected for loss of material  
42 due to general, pitting, and crevice corrosion. MEBs are generally accessible structures  
43 and as such are inspected and tested in their entirety. However, depending on particular  
44 plant configurations, some segments of the MEB may be considered inaccessible due to  
45 close proximity to other permanent structures (e.g., nearby walls, ducts, cable trays,

1 equipment or other structural elements). For inaccessible MEB internal or external  
2 segments, the applicant demonstrates (e.g., through alternative analysis, inspection, test  
3 or plant operating experience) that the inaccessible MEB segments evaluation, together  
4 with the accessible MEB inspection and test program, will continue to maintain the MEB  
5 consistent with the current licensing basis during the subsequent period of extended  
6 operation.

- 7 4. **Detection of Aging Effects:** MEB internal surfaces are visually inspected for aging  
8 degradation including cracks, corrosion, foreign materials debris, excessive dust buildup,  
9 and evidence of moisture intrusion. MEB insulating material is visually inspected for  
10 signs of embrittlement, cracking, chipping, melting, discoloration, swelling, or surface  
11 contamination. Internal bus insulating supports are visually inspected for structural  
12 integrity and signs of cracks. MEB external surfaces are visually inspected for loss of  
13 material due to general, pitting, and crevice corrosion. Accessible elastomers  
14 (e.g., gaskets, boots, and sealants) are inspected for degradation including surface  
15 cracking, crazing, scuffing, dimensional change (e.g., “ballooning” and “necking”),  
16 shrinkage, discoloration, hardening and loss of strength.

17 Bolted connections are inspected for increased resistance of connection by using  
18 thermography or by measuring connection resistance using a micro ohmmeter. When  
19 thermography is employed by the applicant, the applicant demonstrates with a  
20 documented evaluation that thermography is effective in identifying MEB increased  
21 resistance of connection (e.g., infrared viewing windows installed, or demonstrated test  
22 equipment capability). In addition to thermography or resistance measurement, bolted  
23 connections not covered with heat shrink tape or boots are visually inspected for  
24 increased resistance of connection (e.g., loose or corroded bolted connections and  
25 hardware including cracked or split washers).

26 The first inspection for measuring connection resistance is completed prior to the  
27 subsequent period of extended operation and every 10 years thereafter. This is an  
28 adequate period to preclude failures of the MEBs since experience has shown that MEB  
29 aging degradation is a slow process.

30 As an alternative to measuring connection resistance of bolted connections, for  
31 accessible bolted connections covered with heat shrink tape, sleeving, insulating boots,  
32 etc., the applicant may use visual inspection of insulation material to detect surface  
33 anomalies, such as embrittlement, cracking, chipping, melting, discoloration, swelling, or  
34 surface contamination. When alternative visual inspection is used to check MEB bolted  
35 connections, the first inspection is completed prior to the subsequent period of extended  
36 operation and every 5 years thereafter.

- 37 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP  
38 because the ability to trend inspection results is limited. However, results that are  
39 trendable provide additional information on the rate of degradation.

- 40 6. **Acceptance Criteria:** MEB electrical insulation materials are free from regional  
41 indications of surface anomalies such as embrittlement, cracking, chipping, melting,  
42 discoloration, and swelling, or surface contamination. MEB internal surfaces show no  
43 indications of corrosion, cracks, foreign debris, excessive dust buildup, or evidence of  
44 moisture intrusion. Accessible elastomers (e.g., gaskets, boots, and sealants) show no  
45 indications of surface cracking, crazing, scuffing, dimensional change (e.g., “ballooning”

1 and “necking”), shrinkage, discoloration, hardening, and loss of strength. MEB external  
2 surfaces are free from loss of material due to general, pitting, and crevice corrosion.

3 MEB bolted connections are below the maximum allowed temperature (e.g., comparison  
4 of compartment temperatures, trending of temperature over time, or comparison to a  
5 baseline thermography signature) for the application when thermography is used or a  
6 low resistance value appropriate for the application when resistance measurement is  
7 used. Visual inspection of bolted connections not covered with heat shrink tape,  
8 sleeving, insulating boots, etc., are free from corrosion, loose connections and hardware  
9 including cracked or split washers.

10 When the visual inspection alternative for MEB bolted connections is used, the absence  
11 of embrittlement, cracking, chipping, melting, discoloration, swelling, surface  
12 contamination of the electrical insulation material provides positive indication that the  
13 bolted connections are not loose.

14 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
15 conditions adverse to quality or significant conditions adverse to quality under those  
16 specific portions of the quality assurance (QA) program that are used to meet  
17 Criterion XVI, “Corrective Action,” of 10 CFR Part 50, Appendix B. Appendix A of the  
18 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
19 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
20 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
21 related structures and components (SCs) within the scope of this program.

22 Corrective actions are taken and an engineering evaluation is performed when the  
23 acceptance criteria are not met. Corrective actions include, but are not limited, to  
24 cleaning, drying, increased inspection frequency, replacement, or repair of the affected  
25 MEB components. An engineering evaluation is performed when the acceptance criteria  
26 are not met to ensure that the MEB intended function can be maintained consistent with  
27 the CLB. The engineering evaluation considers the significance of the calibration,  
28 surveillance, inspection or test results; the operability of the component; the report ability  
29 of the event; the extent of the concern; the potential root causes for not meeting the  
30 acceptance criteria; the corrective actions required; and the likelihood of recurrence. If  
31 an unacceptable condition or situation is identified, (e.g., internal surface degradation  
32 including cracks, corrosion, foreign debris, excessive dust buildup, moisture intrusion,  
33 insulating material embrittlement, cracking, chipping, melting, discoloration, swelling, or  
34 surface contamination) a determination is made as to whether the same condition or  
35 situation is applicable to MEB bolted connections not inspected or tested. Further, when  
36 acceptance criteria are not met, a determination is made as to whether the surveillance,  
37 inspection, or test, including frequency intervals, needs to be modified.

38 8. **Confirmation Process:** The confirmation process is addressed through those specific  
39 portions of the QA program that are used to meet Criterion XVI, “Corrective Action,” of  
40 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
41 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
42 confirmation process element of this AMP for both safety-related and nonsafety-related  
43 SCs within the scope of this program.

44 9. **Administrative Controls:** Administrative controls are addressed through the QA  
45 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,

1 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
2 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
3 fulfill the administrative controls element of this AMP for both safety-related and  
4 nonsafety-related SCs within the scope of this program.

- 5 10. **Operating Experience:** The program is informed and enhanced when necessary  
6 through the systematic and ongoing review of both plant-specific and industry operating  
7 experience, consistent with as discussed in Appendix B of the GALL-SLR Report.

8 Industry experience has shown that failures have occurred on MEBs caused by cracked  
9 electrical insulation and moisture or debris buildup internal to the MEB. Experience also  
10 has shown that bus connections in the MEBs exposed to appreciable ohmic heating  
11 during operation may experience loosening due to repeated cycling of connected loads.

## 12 **References**

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- 3 Commission. July 1990.
  
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- 5 U.S. Nuclear Regulatory Commission. September 1989.

## 1 **XI.E5 FUSE HOLDERS**

### 2 **Program Description**

3 The purpose of this aging management program (AMP) is to provide reasonable assurance that  
4 that the intended functions of fuse holders within the scope of subsequent license renewal  
5 (SLR) are maintained consistent with the current licensing basis (CLB) through the subsequent  
6 period of extended operation. The fuse holder program was developed specifically to address  
7 aging management of fuse holder insulation material and fuse holder metallic clamp aging  
8 mechanisms and effects. This AMP utilizes visual inspection and testing to identify age-related  
9 degradation for both fuse holder electrical insulation material and fuse holder metallic clamps.  
10 Visual inspection and testing provides reasonable assurance that the applicable aging effects  
11 are identified and fuse holder insulator and metallic clamp are age managed.

12 Fuse holders (fuse blocks) are classified as a specialized type of terminal block because of the  
13 similarity in fuse holder design and construction to that of a terminal block. Fuse holders are  
14 typically constructed of blocks of rigid insulating material, such as phenolic resins. Metallic  
15 clamps (clips) are attached to the blocks to hold each end of the fuse. The clamps, which are  
16 typically made of copper, are either (a) spring-loaded clips which allow the fuse ferrules or  
17 (b) blades to slip in and be held in place, bolt lugs, to which the fuse ends are bolted.

18 The scope of GALL-SLR Report AMP XI.E1, "Electrical Insulation for Electrical Cables and  
19 Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," includes  
20 cable and connection electrical insulation material but not the metallic portion of cables and  
21 connections. This AMP inspects both the fuse holder electrical insulation material and the  
22 metallic portion of the fuse holder (metallic clamps).

23 Industry operating experience has shown that repetitive removal and reinsertion of fuses during  
24 maintenance or surveillance activities can lead to degradation of the fuse holders. Fuse holders  
25 where fuses are removed and replaced frequently for maintenance or surveillance activities are  
26 also included in this AMP to manage the aging effects of these repetitive activities.

27 The metallic portion of fuse holders that are within the scope of SLR and subject to aging  
28 management are tested for the following aging stressors: increased resistance of connection  
29 due to chemical contamination, corrosion, and oxidation or fatigue caused by ohmic heating,  
30 thermal cycling, electrical transients, and frequent removal and insertion, or vibration. The  
31 specific type of test performed is determined prior to the initial test and is to be a proven test for  
32 detecting increased resistance of connection of fuse holder metallic clamps, such as  
33 thermography, contact resistance testing, or other appropriate testing justified in the application.

34 Fuse holders within the scope of SLR are visually inspected to provide an indication of the  
35 condition of the electrical insulation portion of the fuse holders. Fuse holders are visually  
36 inspected for electrical insulation surface anomalies indicating signs of reduced insulation  
37 resistance due to thermal/thermooxidative degradation of organics, radiolysis and photolysis  
38 [ultraviolet (UV) sensitive materials only] of organics; radiation-induced oxidation, and moisture  
39 intrusion as indicated by signs of embrittlement, discoloration, cracking, melting, swelling or  
40 surface contamination.

41 As stated in NUREG-1760, "Aging Assessment of Safety-Related Fuses Used in Low and  
42 Medium-Voltage Applications in Nuclear Power Plants," licensees have experienced a number  
43 of age-related failures. The major concern is that failures of a deteriorated cable system

1 (cables, connections including fuse holders, and penetrations) might be induced during accident  
2 conditions. Since they are not subject to the environmental qualification (EQ) requirements of  
3 10 CFR 50.49, an AMP is required to manage the aging effects. This AMP ensures that fuse  
4 holders, including both the insulation and metallic components will maintain the ability to  
5 perform their intended function for the period of extended operation.

## 6 **Evaluation and Technical Basis**

- 7 1. **Scope of Program:** This AMP manages the metallic portion (metallic clamps) of in-  
8 scope fuse holders that are susceptible to the following aging effects; increased  
9 resistance of connection due to chemical contamination, corrosion, and oxidation or  
10 fatigue caused by ohmic heating, thermal cycling, electrical transients, frequent removal  
11 and replacement, or vibration. The electrical insulation portion of the fuse holder is  
12 visually inspected for electrical insulation surface abnormalities indicating signs of  
13 reduced insulation resistance due to thermal/thermooxidative degradation of organics,  
14 radiolysis and photolysis [ultraviolet (UV) sensitive materials only] of organics; radiation-  
15 induced oxidation, and moisture intrusion as indicated by signs of embrittlement,  
16 discoloration, cracking, melting, swelling or surface contamination.
- 17 2. **Preventive Actions:** This is a condition monitoring program and no actions are taken  
18 as part of this program to prevent or mitigate aging degradation.
- 19 3. **Parameters Monitored or Inspected:** The metallic portion (metallic clamps) of the fuse  
20 holder is tested to provide an indication of increased resistance of connection due to  
21 chemical contamination, corrosion, and oxidation or fatigue caused by ohmic heating,  
22 thermal cycling, electrical transients, frequent removal and replacement or vibration.  
23 The electrical insulation material portion of the fuse holder is visually inspected to  
24 identify insulation surface anomalies indicating signs of reduced insulation resistance  
25 due to thermal/thermooxidative degradation of organics, radiolysis and photolysis  
26 (UV sensitive materials only) of organics; radiation-induced oxidation, and moisture  
27 intrusion as indicated by signs of embrittlement, discoloration, cracking, melting, swelling  
28 or surface contamination.
- 29 4. **Detection of Aging Effects:** Fuse holders within the scope of license renewal are  
30 visually inspected and tested at least once every 10 years to provide an indication of the  
31 condition of the fuse holder. Testing of the fuse holder metallic portion includes  
32 thermography, contact resistance testing, or other appropriate testing methods. Visual  
33 inspection includes inspection for electrical insulation surface anomalies indicating signs  
34 of reduced insulation resistance. Visual inspection and testing at least once every  
35 10 years is an adequate period to preclude failures of the fuse holders since experience  
36 has shown that aging degradation is a slow process. The first visual inspections and  
37 tests for SLR are to be completed prior to the subsequent period of extended operation.
- 38 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP  
39 because the ability to trend visual inspection and test results is dependent on the  
40 inspection and specific type of test chosen. However, results that are trendable provide  
41 additional information on the rate of degradation.
- 42 6. **Acceptance Criteria:** The acceptance criteria for each visual inspection and test are  
43 defined by the specific type of inspection or test performed and the specific type of fuse  
44 holder tested. When thermography is used, the metallic clamp of the fuse holder needs

1 to be below the maximum allowed temperature for the application; otherwise, a low  
2 resistance value appropriate for the application is applicable when resistance  
3 measurement is used. Test acceptance criteria show that fuse holders are free from the  
4 aging effects of increased resistance of connection due to chemical contamination,  
5 corrosion, and oxidation or fatigue caused by ohmic heating, thermal cycling, electrical  
6 transients, frequent removal and replacement, or vibration. Visual inspection  
7 acceptance criteria show that fuse holders are free of electrical insulation surface  
8 anomalies indicating signs of reduced insulation resistance due to  
9 thermal/thermooxidative degradation of organics, radiolysis and photolysis (UV sensitive  
10 materials only) of organics; radiation-induced oxidation, and moisture intrusion as  
11 indicated by signs of embrittlement, discoloration, cracking, melting, swelling or  
12 surface contamination.

13 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
14 conditions adverse to quality or significant conditions adverse to quality under those  
15 specific portions of the quality assurance (QA) program that are used to meet  
16 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
17 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
18 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
19 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
20 related structures and components (SCs) within the scope of this program.

21 Corrective actions, such as recalibration and circuit trouble-shooting, are implemented  
22 when calibration, surveillance, cable or component inspection or test results do not meet  
23 the acceptance criteria. An engineering evaluation is performed when the acceptance  
24 criteria are not met in order to ensure that the intended functions of the electrical cable  
25 system can be maintained consistent with the current licensing basis. Such an  
26 evaluation is to consider the significance of the calibration, surveillance, or cable system  
27 inspection or test results; the operability of the component; the reportability of the event;  
28 the extent of the concern; the potential root causes for not meeting the acceptance  
29 criteria; the corrective actions required; and likelihood of recurrence. When an  
30 unacceptable condition or situation is identified, a determination is made as to whether  
31 the calibration, surveillance, inspection, or the cable system test frequency needs to be  
32 modified.

33 8. **Confirmation Process:** The confirmation process is addressed through those specific  
34 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
35 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
36 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
37 confirmation process element of this AMP for both safety-related and nonsafety-related  
38 SCs within the scope of this program.

39 9. **Administrative Controls:** Administrative controls are addressed through the QA  
40 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
41 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
42 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
43 fulfill the administrative controls element of this AMP for both safety-related and  
44 nonsafety-related SCs within the scope of this program.

1 10. **Operating Experience:** The program is informed and enhanced when necessary  
2 through the systematic and ongoing review of both plant-specific and industry operating  
3 experience, consistent with the discussion in Appendix B of the GALL-SLR Report.

4 Operating experience has shown that loosening of fuse holder metallic clamps due to  
5 chemical contamination, corrosion, oxidation or fatigue caused by ohmic heating,  
6 thermal cycling, electrical transients, frequent removal and replacement, vibration, and  
7 electrical insulation surface (i.e., fuse blocks) abnormalities indicate signs of reduced  
8 insulation resistance are aging mechanisms which if left unmanaged, can lead to a loss  
9 of electrical continuity function. NUREG–1760 documents fuse holder failures due to  
10 fatigue and recommends the review of maintenance procedures (e.g., fuse control  
11 programs) to minimize removal and reinsertion of fuses to de-energize components  
12 (as this can lead to degradation of the fuse holder assembly).

### 13 **References**

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1 **XI.E6 ELECTRICAL CABLE CONNECTIONS NOT SUBJECT TO**  
2 **10 CFR 50.49 ENVIRONMENTAL QUALIFICATION**  
3 **REQUIREMENTS**

4 **Program Description**

5 The purpose of the this aging management program (AMP) is to provide reasonable assurance  
6 that the intended functions of the metallic parts of electrical cable connections that are not  
7 subject to the environmental qualification requirements of 10 CFR 50.49 and susceptible to  
8 age-related degradation resulting in increased resistance of the connection This AMP manages  
9 the aging mechanisms and effects associated with the metallic portion of electrical connections  
10 that result in increased resistance of connection due to thermal cycling, ohmic heating, electrical  
11 transients, vibration, chemical contamination, corrosion, or oxidation such that the metallic  
12 portions of the electrical cable connections are maintained consistent with the current licensing  
13 basis (CLB) through the subsequent period of extended operation.

14 Cable connections are used to connect cable conductors to other cable conductors or electrical  
15 devices. Connections associated with cables within the scope of license renewal are part of this  
16 AMP. Examples of connections used in nuclear power plants (NPPs) include bolted connectors,  
17 coaxial/triaxial connections, compression/cripped connectors, splices butt or bolted), stress  
18 cone, and terminal block. Most connections involve insulating material and metallic parts. This  
19 AMP focuses on the metallic parts of the electrical cable connections. This AMP provides  
20 testing, on a sampling basis, to ensure that either aging of metallic cable connections is not  
21 occurring and/or that the existing preventive maintenance program is effective. Testing  
22 confirms the absence of age-related degradation of cable connections resulting in increased  
23 resistance of connection due to thermal cycling, ohmic heating, electrical transients, vibration,  
24 chemical contamination, corrosion, or oxidation.

25 GALL-SLR Report AMP XI.E1, "Electrical Insulation Material for Electrical Cables and  
26 Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements,"  
27 manages the aging of insulating material but not the metallic parts of the electrical connections  
28 and is based on a visual inspection of accessible cables and connections. However, visual  
29 inspection alone may not be sufficient to detect the aging effects from thermal cycling, ohmic  
30 heating, electrical transients, vibration, chemical contamination, corrosion, or oxidation on the  
31 metallic parts of cable connections.

32 Electrical cable connections exposed to appreciable ohmic or ambient heating during operation  
33 may experience increased resistance of connection caused by repeated cycling of connected  
34 loads or of the ambient temperature environment. Different materials used in various cable  
35 system components can produce situations where stresses between these components change  
36 with repeated thermal cycling. For example, under loaded conditions, ohmic heating may raise  
37 the temperature of a compression terminal and cable conductor well above the ambient  
38 temperature, thereby causing thermal expansion of both components. Thermal expansion  
39 coefficients of different materials may alter mechanical stresses between the components and  
40 may adversely impact the termination. When the current is reduced, the affected components  
41 cool and contract. Repeated cycling in this fashion can cause loosening of the termination and  
42 may lead to increased resistance of connection or eventual separation of compression-type  
43 terminations. Threaded connectors may also loosen if subjected to significant thermally-  
44 induced stress and cycling.

1 Cable connections within the scope of license renewal are tested at least once every 10 years  
2 or at least once every 5 years if only visual inspection is used to provide an indication of the  
3 integrity of the cable connections. The first visual inspections and tests for license renewal are  
4 to be completed prior to the subsequent period of extended operation.

5 The specific type of test to be performed is a proven test for detecting increased resistance of  
6 connection, such as thermography, contact resistance testing, or another appropriate test. As  
7 an alternative to measurement of cable connections, for the accessible cable connections that  
8 are covered with insulation materials such as tape, the applicant may perform visual inspection  
9 of insulation material to detect aging effects for covered cable connections. The basis for  
10 performing only a periodic visual inspection is documented.

11 This AMP, as described, is a sampling program. The following factors are considered for  
12 sampling: voltage level (medium and low voltage), circuit loading (high loading), connection  
13 type and location (high temperature, high humidity, vibration, etc.). The technical basis for the  
14 sample selections should be documented. If an unacceptable condition or situation is identified  
15 in the selected sample, a determination is made as to whether the same condition or situation is  
16 applicable to other connections not tested. The corrective action program is used to evaluate  
17 the condition and determine appropriate corrective action.

18 This AMP is not applicable to cable connections in harsh environments since they are already  
19 addressed by the requirements of 10 CFR 50.49. Even though cable connections may not be  
20 exposed to harsh environments, increased resistance of connection is a concern due to the  
21 cable connection aging mechanisms and effects discussed above.

## 22 **Evaluation and Technical Basis**

23 1. **Scope of Program:** Cable connections associated with cables within the scope of  
24 license renewal that are external connections terminating at active or passive devices,  
25 are in the scope of this AMP. Wiring connections internal to an active assembly are  
26 considered part of the active assembly and, therefore, are not within the scope of this  
27 AMP. This AMP does not include high-voltage (>35 kilovolts) switchyard connections.  
28 The cable connections covered under the environmental qualification (EQ) program are  
29 not included in the scope of this program.

30 2. **Preventive Actions:** This is a condition monitoring program, and no actions are taken  
31 as part of this program to prevent or mitigate aging degradation.

32 3. **Parameters Monitored or Inspected:** This AMP focuses on the metallic parts of the  
33 connection. Periodic testing provides an indication of increased resistance of connection  
34 due to thermal cycling, ohmic heating, electrical transients, vibration, chemical  
35 contamination, corrosion, or oxidation. Representative samples of each type of electrical  
36 cable connection are tested. The following factors are considered for sampling: voltage  
37 level (medium and low voltage), circuit loading (high load), connection type, and location  
38 (high temperature, high humidity, vibration, etc.). The technical basis for the sample  
39 selection is documented.

40 4. **Detection of Aging Effects:** A representative sample of electrical connections within  
41 the scope of license renewal are tested prior to and during the SLR period of extended  
42 operation. Periodic testing of in scope connections manages the aging mechanisms and  
43 effects requiring management during the SLR period of extended operation. Testing

1 may include thermography, contact resistance testing, or other appropriate testing  
2 methods without removing the connection insulation. Periodic testing provides additional  
3 confirmation to support industry operating experience that shows that electrical  
4 connections have not experienced a high degree of failures, and that existing installation  
5 and maintenance practices are effective. Twenty percent of a connector type population  
6 with a maximum sample of 25 constitutes a representative connector sample size.  
7 Otherwise a technical justification of the methodology and sample size used for selecting  
8 components under test should be included as part of the applicant's AMP's  
9 documentation.

10 A representative sample of electrical connections within the scope of license renewal will  
11 be tested at least once every 10 years. The first tests for license renewal are to be  
12 completed prior the SLR period of extended operation.

13 As an alternative to measurement testing for accessible cable connections that are  
14 covered with heat shrink tape, sleeving, insulating boots, etc., the applicant may use a  
15 visual inspection of insulation materials to detect surface anomalies, such as  
16 embrittlement, cracking, chipping, melting, discoloration, swelling or surface  
17 contamination. When this alternative visual inspection is used to check cable  
18 connections, the first inspection is completed prior to the SLR period of extended  
19 operation and at least every 5 years thereafter. The basis for performing only the  
20 alternative periodic visual inspection to monitor age-related degradation of cable  
21 connections is documented.

22 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP,  
23 because the ability to trend visual inspection and test results is dependent on the  
24 specific test or visual inspection program selected. However, condition monitoring  
25 inspection or test results that are trendable provide additional information on the rate of  
26 electrical connection degradation.

27 6. **Acceptance Criteria:** Cable connections should not indicate abnormal temperatures for  
28 the application when thermography is used. Alternatively, connections should exhibit a  
29 low resistance value appropriate for the application when resistance measurement is  
30 used. When the visual inspection alternative for covered cable connections is used, the  
31 absence of embrittlement, cracking, chipping, melting, discoloration, swelling or surface  
32 contamination indicates that the covered cable connection components are not loose.

33 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
34 conditions adverse to quality or significant conditions adverse to quality under those  
35 specific portions of the quality assurance (QA) program that are used to meet  
36 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
37 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
38 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
39 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
40 related structures and components (SCs) within the scope of this program.

41 Corrective actions, such as sample expansion, increased inspection frequency, and  
42 replacement or repair of the affected cable connection components are implemented  
43 when calibration, surveillance, or cable system inspection or test results do not meet the  
44 acceptance criteria. An engineering evaluation is performed when the acceptance  
45 criteria are not met in order to ensure that the intended functions of the electrical cable

1 system can be maintained consistent with the CLB. Such an evaluation is to consider  
2 the significance of the calibration, surveillance, or cable system inspection or test results;  
3 the operability of the component; the reportability of the event; the extent of the concern;  
4 the potential root causes for not meeting the acceptance criteria; the corrective actions  
5 required; and likelihood of recurrence. When an unacceptable condition or situation is  
6 identified, a determination is also made as to whether the tested sample size calibration,  
7 surveillance, inspection, or the cable system test frequency needs to be modified.

8 8. **Confirmation Process:** The confirmation process is addressed through those specific  
9 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
10 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
11 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
12 confirmation process element of this AMP for both safety-related and nonsafety-related  
13 SCs within the scope of this program.

14 9. **Administrative Controls:** Administrative controls are addressed through the QA  
15 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
16 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
17 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
18 fulfill the administrative controls element of this AMP for both safety-related and  
19 nonsafety-related SCs within the scope of this program.

20 10. **Operating Experience:** The program is informed and enhanced when necessary  
21 through the systematic and ongoing review of both plant-specific and industry operating  
22 experience, consistent with the discussion in Appendix B of the GALL-SLR Report.

23 Electrical cable connections exposed to thermal cycling, ohmic heating, electrical  
24 transients, vibration, chemical contamination, corrosion, or oxidation during operation  
25 may experience increased resistance of connection. There have been limited numbers  
26 of age-related failures of cable connections reported. An applicant's operating  
27 experience with connection reliability and aging effects should be adequate to  
28 demonstrate the AMP effectiveness of GALL-SLR Report AMP XI.E6, "Electrical Cable  
29 Connections Not Subject To 10 CFR 50.49 Environmental Qualification Requirements "  
30 including the program's capability to detect the presence or noting the absence of aging  
31 effects for electrical cable connections.

32 The program includes provisions for the continuous review of plant-specific and industry  
33 operating experience, including research and development results (for instance, aging  
34 prediction model development, new acceptability criteria, nondestructive test methods,  
35 etc.) such that the effectiveness of the program is evaluated and any necessary actions  
36 or modifications to the AMP are performed.

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1 **XI.E7 HIGH VOLTAGE INSULATORS**

2 **Program Description**

3 The purpose of the aging management program (AMP) is to provide reasonable assurance that  
4 the intended functions of high voltage insulators within the scope of subsequent license renewal  
5 (SLR) are maintained consistent with the current licensing basis (CLB) through the subsequent  
6 period of extended operation. The high voltage insulator program was developed specifically to  
7 age manage high voltage insulators susceptible to adverse localized environments.

8 The High Voltage Insulators program includes visual inspections to identify insulation and  
9 metallic component degradation. Visual inspection provides reasonable assurance that the  
10 applicable aging effects are identified and high voltage insulator age degradation is managed.  
11 Insulation materials used in high voltage insulators may degrade more rapidly than expected in  
12 an adverse environment. The component parts of the insulator are made of porcelain,  
13 malleable iron, aluminum, galvanized steel, and cement. Loss of material due to mechanical  
14 wear or various airborne contaminants such as dust, salt, fog, cooling tower plume, and  
15 industrial effluent can contaminate the insulator surface leading to reduced insulation  
16 resistance. Surface rust in metallic parts may appear where galvanizing is worn. With  
17 significant airborne contamination such as salt, surface rust in metallic parts may become  
18 significant such that the insulator no longer will support the conductor. Excessive surface  
19 contaminates or loss of material can lead to insulator flashover.

20 The high-voltage insulators within the scope of this program are to be visually inspected at least  
21 twice per year. For high voltage insulators that are coated, the visual inspection is performed at  
22 least once every 5 years. The first inspections for the subsequent period of extended operation  
23 are to be completed prior to the subsequent period of extended operation. The high voltage  
24 insulator program provides reasonable assurance that adverse environments are identified and  
25 high voltage insulator aging effects are age managed during the subsequent period of extended  
26 operation.

27 **Evaluation and Technical Basis**

- 28 1. **Scope of Program:** This AMP manages the age related degradation effects of within  
29 scope high voltage insulators susceptible to airborne contaminants including dust, salt,  
30 fog, cooling tower plume, industrial effluent or loss of material. The high voltage  
31 insulators within the scope of the subsequent period of extended operation are those  
32 credited for recovery of offsite power.
- 33 2. **Preventive Actions:** The High Voltage Insulators AMP is a condition monitoring  
34 program that relies on visual inspections and high voltage insulator coating and cleaning  
35 to manage high voltage insulator aging effects. High Voltage Insulator periodic visual  
36 inspections are performed to prevent the buildup of contaminants on the insulator  
37 surface. The periodic coating or cleaning of high voltage insulators limits high voltage  
38 insulator surface contamination and may reduce the frequency of periodic visual  
39 inspection and cleaning depending on plant operating experience.
- 40 3. **Parameters Monitored or Inspected:** The high-voltage insulators within the scope of  
41 this program are visually inspected at least twice per year. For high voltage insulators  
42 that are coated, the visual inspection is performed at least once every 5 years. This is  
43 an adequate period to detect aging effects before a loss of component intended function

1 occurs since operating experience has shown that high voltage insulator aging  
2 degradation is a slow process. High Voltage Insulator surfaces are visually inspected to  
3 detect reduced insulation resistance aging effects including cracks, foreign debris, and  
4 significant salt, dust, cooling tower plume and industrial effluent contamination. Metallic  
5 parts of the insulator are visually inspected to detect loss of material due to mechanical  
6 wear or corrosion.

7 4. **Detection of Aging Effects:** Visual inspection is used to detect insulator loss of  
8 material and reduced insulation resistance due to presence of insulator surface  
9 contamination. Visual inspections may be supplemented with infrared thermography  
10 inspections to detect high voltage insulator reduced insulation resistance. The first  
11 inspection for SLR is to be completed prior to the subsequent period of extended  
12 operation.

13 5. **Monitoring and Trending:** Trending actions are not included as part of this AMP,  
14 because the ability to trend visual inspection results is limited. However, inspection  
15 results that are trendable provide additional information on the rate of insulator  
16 degradation including optimization of inspection frequencies.

17 6. **Acceptance Criteria:** High voltage insulator surfaces are free of contamination such as  
18 significant salt or dust buildup or other contaminants. Metallic parts must be free of loss  
19 of materials due to pitting, crevice, and general corrosion. Acceptance criteria will be  
20 based on temperature rise above a reference temperature for the application when  
21 thermography is used. The reference temperature will be ambient temperature or a  
22 baseline temperature based on data from the same type of high voltage insulator  
23 being inspected.

24 7. **Corrective Actions:** Results that do not meet the acceptance criteria are addressed as  
25 conditions adverse to quality or significant conditions adverse to quality under those  
26 specific portions of the quality assurance (QA) program that are used to meet  
27 Criterion XVI, "Corrective Action," of 10 CFR Part 50, Appendix B. Appendix A of the  
28 Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report  
29 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
30 fulfill the corrective actions element of this AMP for both safety-related and nonsafety-  
31 related structures and components (SCs) within the scope of this program.

32 Corrective actions are taken and an engineering evaluation is performed when the  
33 acceptance criteria are not met. Corrective actions will be based on the observed  
34 degradation. The evaluation will consider the significance of the inspection results, the  
35 extent of the concern, the potential root causes, and the corrective actions required. If  
36 an unacceptable condition is identified, a determination is made as to whether the same  
37 condition or situation is applicable to other high voltage insulators. Corrective actions  
38 will be implemented when inspection results do not meet the acceptance criteria.

39 8. **Confirmation Process:** The confirmation process is addressed through those specific  
40 portions of the QA program that are used to meet Criterion XVI, "Corrective Action," of  
41 10 CFR Part 50, Appendix B. Appendix A of the GALL-SLR Report describes how an  
42 applicant may apply its 10 CFR Part 50, Appendix B, QA program to fulfill the  
43 confirmation process element of this AMP for both safety-related and nonsafety-related  
44 SCs within the scope of this program.

- 1 9. **Administrative Controls:** Administrative controls are addressed through the QA  
2 program that is used to meet the requirements of 10 CFR Part 50, Appendix B,  
3 associated with managing the effects of aging. Appendix A of the GALL-SLR Report  
4 describes how an applicant may apply its 10 CFR Part 50, Appendix B, QA program to  
5 fulfill the administrative controls element of this AMP for both safety-related and  
6 nonsafety-related SCs within the scope of this program.
- 7 10. **Operating Experience:** The program is informed and enhanced when necessary  
8 through the systematic and ongoing review of both plant-specific and industry operating  
9 experience, consistent with the discussion in Appendix B of the GALL-SLR Report.
- 10 This AMP considers the technical information and guidance provided in  
11 NUREG/CR-5643, IEEE Std. 1205-2000, SAND96-0344, EPRI 1001997, EPRI 1013475,  
12 and EPRI TR-109619.

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<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
XI.E1	Electrical Insulation for Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	<p>The program provides reasonable assurance that the intended functions of electrical cable insulating material (e.g., power, control, and instrumentation) and connection insulating material that are not subject to the environmental qualification requirements of 10 CFR 50.49 are maintained consistent with the current licensing basis through the subsequent period of extended operation.</p> <p>The program is a cable and connection insulation material condition monitoring program that utilizes sampling. The component sampling methodology utilizes a population that includes a representative sample of in-scope electrical cable and connection types regardless of whether or not the component was included in a previous aging management or maintenance program. The technical basis for the sample selection is documented.</p> <p>The program applies to accessible electrical cable and connection electrical insulation material within the scope of license renewal including in-scope cables and connections subjected to an adverse localized environment. Accessible in-scope electrical cable and connection electrical insulation material is visually inspected and tested for cable and connection insulation surface anomalies indicating signs of reduced electrical insulation resistance.</p> <p>Visual Inspection and testing may include thermography and one or more proven condition monitoring test methods applicable to the cable and connection insulation material. Electrical cable and connection insulation material test results are to be within the acceptance criteria, as identified in the applicant's procedures. Visual inspection results show that accessible cable and connections insulation material are free from visual indications of surface</p>	<p>First inspection for license renewal completed prior to the subsequent period of extended operation</p>
			<p>Applicable GALL-SLR Report and SRP-SLR Chapter References</p> <p>GALL VI / SRP 3.6</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>abnormalities that indicate cable or connection electrical insulation aging effects exist. When acceptance criteria are not met, a determination is made as to whether the surveillance, inspection, or tests, including frequency intervals, need to be modified.</p> <p>The program is informed and enhanced when necessary through the systematic and ongoing review of both plant-specific and industry operating experience including research and development (e.g., test methods, aging models, acceptance criterion) such that the effectiveness of the AMP is evaluated consistent with the discussion in Appendix B of the GALL-SLR Report. [The FSAR Summary description also includes a plant specific discussion of applicable commitments, license conditions, enhancements, or exceptions applied to the applicants aging management program]</p>	
XI.E2	<p>Electrical Insulation for Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits</p>	<p>The program applies to electrical cables and connections (cable system) electrical insulation material used in circuits with sensitive, high voltage, low-level current signals. Examples of these circuits include radiation monitoring and nuclear instrumentation that are subject to aging management review and subjected to adverse localized environments caused by temperature, radiation, or moisture.</p> <p>The program evaluates electrical insulation material for cable and connection subjected to an adverse localized environment. In addition to the evaluation and identification of adverse localized environments, either of two methods can be used to identify the existence of cable and</p>	<p>First review of calibration results or findings of surveillance test results or cable tests for license renewal completed prior to the subsequent period of extended operation</p>
			<p>GALL VI / SRP 3.6</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>		<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>
		<p>connection insulation material aging degradation.</p> <p>In the first method, calibration results or findings of surveillance testing programs are evaluated to identify the existence of electrical cable and connection insulation material aging degradation.</p> <p>In the second method, direct testing of the cable system is performed. By reviewing the results obtained during normal calibration or surveillance, an applicant may detect severe aging degradation prior to the loss of the cable and connection intended function. The review of calibration results or findings of surveillance tests is performed at least once every 10 years.</p> <p>The test frequency of the cable system is determined by the applicant based on engineering evaluation, but the test frequency is at least once every 10 years. In cases where cables are not included as part of calibration or surveillance program testing circuit, a proven cable test shown to be effective in determining cable system electrical insulation condition as justified in the applicant's aging management program is performed. The first reviews and tests are completed prior to the subsequent period of extended operation.</p> <p>The program is informed and enhanced when necessary through the systematic and ongoing review of both plant-specific and industry operating experience including research and development (e.g., test methods, aging models, acceptance criterion) such that the effectiveness of the AMP is evaluated consistent with the discussion in</p>
		<b>Implementation Schedule*</b>

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*  Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>Appendix B of the GALL-SLR Report.</p> <p>[The FSAR Summary description also includes a plant specific discussion of applicable commitments, license conditions, enhancements, or exceptions applied to the applicants aging management program]</p>	
XI.E3A	<p>Electrical Insulation for Inaccessible Medium Voltage Power Cables Not Subject To 10 CFR 50.49 Environmental Qualification Requirements</p>	<p>The program applies to inaccessible or underground (e.g., installed in buried conduits, cable trenches, cable troughs, duct banks, underground vaults, or direct buried installations) medium voltage power cable (operating voltage; 2.3kV to 35kv) within the scope of license renewal exposed to adverse localized environments due primarily to significant moisture.</p> <p>An adverse localized environment is based on the most limiting environment (e.g., temperature, radiation, or moisture) for the cable electrical insulation. Significant moisture is considered an adverse localized environment for these in scope inaccessible cables. The cables included in this program are not subject to the environmental qualification requirements of 10 CFR 50.49.</p> <p>Electrical insulation subjected to an adverse localized environment could increase the rate of aging of a component and therefore have an adverse effect on operability, or potentially lead to failure of the cable's insulation system.</p> <p>Although a condition monitoring program, periodic inspections are performed to prevent inaccessible</p>	<p>First tests or first inspections for subsequent license renewal completed prior to the subsequent period of extended operation</p> <p>GALL VI / SRP 3.6</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>cable from being exposed to significant moisture. These inspections are performed periodically based on water accumulation over time. The periodic inspection occurs at least annually with the first inspection for subsequent license renewal completed prior to the subsequent period of extended operation. Inspections are performed after event driven occurrences, such as heavy rain, thawing of ice and snow, or flooding.</p> <p>Both the periodic and event driven inspections include direct indication that cables are not wetted or submerged, and that cable/splices and cable support structures are intact. Dewatering systems (e.g., sump pumps and drains) and associated alarms are inspected and their operation verified. Inspections include documentation that either automatic or passive drainage systems, or manually pumping manholes and vaults is effective in preventing inaccessible cable submergence.</p> <p>Test frequencies are adjusted based on test results (including trending of degradation where applicable) and plant specific operating experience. The first tests for subsequent license renewal are to be completed prior to the subsequent period of extended operation with tests performed at least every 6 years thereafter. The specific type of test performed is determined prior to the initial test, and is to be a proven test for detecting deterioration of the cable insulation system (e.g., one or more tests may be required depending to the specific cable construction: shielded and non-shielded, and the</p>		

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>insulation material under test).</p> <p>Tests may include combinations of situ or laboratory; electrical, physical, or chemical testing. Testing may include inspection and testing of cables or testing of coupons or abandoned or removed cables subjected to the same environment and exposed to the same or bounding inservice environment. A plant specific inaccessible medium voltage test matrix is developed to document inspections, test methods, and acceptance criteria applicable to the applicant's in-scope inaccessible medium voltage power cable types.</p> <p>[The FSAR Summary description also includes a plant specific discussion of applicable commitments, license conditions, enhancements, or exceptions applied to the applicants aging management program]</p>	
XI.E3B	<p>Electrical Insulation for Inaccessible Instrument and Control Cables Not Subject To 10 CFR 50.49 Environmental Qualification Requirements</p>	<p>The program applies to inaccessible or underground (e.g., installed in buried conduits, cable trenches, cable troughs, duct banks, underground vaults, or direct buried installations) instrument and control cable, within the scope of license renewal exposed to adverse localized environments due primarily to significant moisture.</p> <p>An adverse localized environment is based on the most limiting environment (e.g., temperature, radiation, or moisture) for the cable electrical insulation. Significant moisture is considered an adverse localized environment for these in scope inaccessible cables. The cables included in this</p>	<p>First tests or first inspections for subsequent cense renewal completed prior to the subsequent period of extended operation</p> <p>GALL VI / SRP 3.6</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>program are not subject to the environmental qualification requirements of 10 CFR 50.49.</p> <p>Electrical insulation subjected to an adverse localized environment could increase the rate of aging of a component and therefore have an adverse effect on operability, or potentially lead to failure of the cable's insulation system.</p> <p>In scope inaccessible instrument and control cables submarine or other cables designed for continuous wetting or submergence are also included in this program as a onetime inspection with additional test and inspection frequencies determined by the onetime test, inspection results, and plant specific operating history</p> <p>Although a condition monitoring program, periodic inspections are performed to prevent inaccessible cable from being exposed to significant moisture. These inspections are performed periodically based on water accumulation over time. The periodic inspection occurs at least annually with the first inspection for subsequent license renewal completed prior to the subsequent period of extended operation. Inspections are performed after event driven occurrences, such as heavy rain, thawing of ice and snow, or flooding. Both the periodic and event driven inspections include direct indication that cables are not wetted or submerged, and that cable/splices and cable support structures are intact, Dewatering systems (e.g., sump pumps and drains) and associated alarms are inspected and their operation verified. Inspections include</p>		

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>documentation that either automatic or passive drainage systems, or manually pumping manholes and vaults is effective in preventing inaccessible cable submergence.</p> <p>Test frequencies are adjusted based on test results (including trending of degradation where applicable) and plant specific operating experience. The first tests for subsequent license renewal are to be completed prior to the subsequent period of extended operation with tests performed at least every 6 years thereafter. The specific type of test performed is determined prior to the initial test, and is to be a proven test for detecting deterioration of the cable insulation system (e.g., one or more tests may be required depending to the specific cable construction: shielded and non-shielded, and the insulation material under test).</p> <p>Tests may include combinations of situ or laboratory; electrical, physical, or chemical testing. Testing may include inspection and testing of cables or testing of coupons or abandoned or removed cables subjected to the same environment and exposed to the same or bounding inservice environment. For a large installed number of inaccessible instrumentation and control cables, a sample test methodology may be employed. A plant specific inaccessible instrument and control cables voltage test matrix is developed to document inspections, test methods, and acceptance criteria applicable to the applicant's in-scope inaccessible instrument and control cable types.</p>		

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*  Applicable GALL-SLR Report and SRP-SLR Chapter References
XI.E3C	Electrical Insulation for Inaccessible Low Voltage Power Cables Not Subject To 10 CFR 50.49 Environmental Qualification Requirements	<p>The program applies to inaccessible or underground (e.g., installed in buried conduits, cable trenches, cable troughs, duct banks, underground vaults, or direct buried installations) low voltage power cable (operating voltage; 1000v – but less than 2kV) within the scope of license renewal exposed to adverse localized environments due primarily to significant moisture.</p> <p>An adverse localized environment is based on the most limiting environment (e.g., temperature, radiation, or moisture) for the cable electrical insulation. Significant moisture is considered an adverse localized environment for these in scope inaccessible cables. The cables included in this program are not subject to the environmental qualification requirements of 10 CFR 50.49.</p> <p>Electrical insulation subjected to an adverse localized environment could increase the rate of aging of a component and therefore have an adverse effect on operability, or potentially lead to failure of the cable's insulation system. In-scope inaccessible low voltage power cable splices subjected to wetting or submergence are also included within the scope of this program. In scope inaccessible low voltage submarine or other cables designed for continuous wetting or submergence are also included in this program as a onetime inspection with additional test and inspection frequencies determined by the onetime test, inspection results, and plant specific operating history</p> <p>Although a condition monitoring program, periodic inspections are performed to prevent inaccessible cable from being exposed to significant moisture. These inspections are performed periodically based on water</p>	<p>First tests or first inspections for license renewal completed prior to the subsequent period of extended operation</p> <p>GALL VI / SRP 3.6</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>accumulation over time. The periodic inspection occurs at least annually with the first inspection for subsequent license renewal completed prior to the subsequent period of extended operation. Inspections are performed after event driven occurrences, such as heavy rain, thawing of ice and snow, or flooding. Both the periodic and event driven inspections include direct indication that cables are not wetted or submerged, and that cable/splices and cable support structures are intact. Dewatering systems (e.g., sump pumps and drains) and associated alarms are inspected and their operation verified. Inspections include documentation that either automatic or passive drainage systems, or manually pumping manholes and vaults is effective in preventing inaccessible cable submergence.</p> <p>Test frequencies are adjusted based on test results (including trending of degradation where applicable) and plant specific operating experience. The first tests for subsequent license renewal are to be completed prior to the subsequent period of extended operation with tests performed at least every 6 years thereafter. The specific type of test performed is determined prior to the initial test, and is to be a proven test for detecting deterioration of the cable insulation system (e.g., one or more tests may be required depending to the specific cable construction: shielded and non-shielded, and the insulation material under test).</p> <p>Tests may include combinations of situ or laboratory, electrical, physical, or chemical testing. Testing may include inspection and testing of cables or testing of coupons or abandoned or removed cables subjected to the same environment and exposed to the same or bounding inservice environment. For a large installed number of</p>		

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<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>inaccessible low voltage power cables, a sample test methodology may be employed. A plant specific inaccessible low voltage test matrix is developed to document inspections, test methods, and acceptance criteria applicable to the applicant's in-scope inaccessible low voltage power cable types.</p>		
XI.E4	Metal Enclosed Bus	<p>The program requires the visual inspection of metal enclosed bus (MEB) internal surfaces to detect age- related degradation, including cracks, corrosion, foreign debris, excessive dust buildup, and evidence of moisture intrusion. MEB insulating material is visually inspected for signs of embrittlement, cracking, chipping, melting, swelling, discoloration, or surface contamination, which may indicate overheating or aging degradation. The internal bus insulating supports are visually inspected for structural integrity and signs of cracks. MEB external surfaces are visually inspected for loss of material due to general, pitting, and crevice corrosion.</p> <p>Accessible elastomers (e.g., gaskets, boots, and sealants) are inspected for degradation, including surface cracking, crazing, scuffing, and changes in dimensions (e.g., "ballooning" and "necking"), shrinkage, discoloration, hardening and loss of strength. Bolted connections are inspected for increased resistance of connection by using thermography or by measuring connection resistance using a micro-ohmmeter. When thermography is employed by the applicant, the applicant demonstrates with a documented evaluation that thermography is effective in identifying MEB increased resistance of connection (e.g., infrared viewing windows installed, or demonstrated test equipment capability).</p>	<p>First inspection for subsequent license renewal completed prior to the subsequent period of extended operation</p>	<p>GALL VI / SRP 3.6</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>The first inspection using thermography or measuring connection resistance is completed prior to the subsequent period of extended operation and at least every 10 years thereafter.</p> <p>As an alternative to thermography or measuring connection resistance of accessible bolted connections covered with heat shrink tape, sleeving, insulating boots, etc., the applicant may use visual inspection of the electrical insulation to detect surface anomalies, such as embrittlement, cracking, chipping, melting, discoloration, swelling, or surface contamination. When alternative visual inspection is used to check MEB bolted connections, the first inspection is completed prior to the subsequent period of extended operation and every 5 years thereafter.</p> <p>Cable bus is a variation on MEB with similar in construction to an MEB, but instead of segregated or non-segregated electrical buses, cable bus is comprised of a fully enclosed metal enclosure that utilizes three-phase insulated power cables installed on insulated support blocks. Cable bus may omit the top cover or use a lowered top cover and enclosure. Both cable bus enclosures are not sealed against the intrusion of dust, industrial pollution, moisture, rain, or ice and therefore may be allow debris into the internal cable bus assembly. Cable bus construction and arrangement are such that it does not readily fall under a specific GALL Report AMP (e.g., GALL-SLR Report AMP XI.E4 or GALL-SLRT Report AMP XI.E1). Therefore, cable bus is evaluated as a plant specific aging management program with a plant specific further evaluation.</p> <p>The program is informed and enhanced when necessary through the systematic and ongoing review of both plant-</p>		

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
XI.E5	Fuse Holders	<p>specific and industry operating experience including research and development (e.g., test methods, aging models, acceptance criterion) such that the effectiveness of the AMP is evaluated consistent with the discussion in Appendix B of the GALL-SLR Report.</p> <p>[The FSAR Summary description also includes a plant specific discussion of applicable commitments, license conditions, enhancements, or exceptions applied to the applicants aging management program]</p> <p>The program was developed to specifically address aging management of fuse holder insulation material and fuse holder metallic clamp aging mechanisms and effects. In scope fuse holders located inside an active device (e.g., switchgear, power supplies, power inverters, control boards, battery chargers) and subject to fatigue caused by frequent fuse removal and replacement (e.g., surveillance, functional testing, and calibration) are also within the scope of this AMP.</p> <p>The scope of GALL-SLR Report AMP XI.E1, "Electrical Insulation for Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," includes cable and connection electrical insulation material but not the metallic portion of cables and connections. This AMP inspects both the fuse holder electrical insulation material and the metallic portion of the fuse holder (metallic clamps).</p> <p>The program utilizes visual inspection and testing to identify age-related degradation for both fuse holder electrical insulation material and fuse holder metallic clamps. The</p>	<p>First tests for subsequent license renewal completed prior to the subsequent period of extended operation</p>	<p>GALL VI / SRP 3.6</p>



Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR		Applicable GALL-SLR Report and SRP-SLR Chapter References
AMP	<p><b>GALL-SLR Program</b> 50.49 Environmental Qualification Requirements</p> <p><b>Description of Program</b> 10 CFR 50.49 and susceptible to age-related degradation resulting in increased resistance of the connection are adequately managed. External cable connections associated with in-scope cables that terminate at active or passive devices are in the scope of this AMP. Wiring connections internal to an active assembly are considered part of the active assembly and, therefore, are not within the scope of this AMP.</p> <p>The cable connections covered under the Environmental Qualification (EQ) program are not included in the scope of this program. This AMP does not include high-voltage (&gt;35 kilovolts) switchyard connections.</p> <p>This program is a sampling program. The following factors are considered for sampling: voltage level (medium and low voltage), circuit loading (high loading), connection type, and location (high temperature, high humidity, vibration, etc.). Twenty percent of a connector type population with a maximum sample of 25 constitutes a representative connector sample size. Otherwise a technical justification of the methodology and sample size used for selecting components under test should be included as part of the applicant's AMP documentation. The specific type of test to be performed is a proven test for detecting increased resistance of connection.</p> <p>As an alternative to thermography or resistance measurement of cable connections for the accessible cable connections that are covered with electrical insulation materials such as tape, the applicant may perform visual inspection of the electrical insulation material to detect aging effects for covered cable connections. The basis for</p>	<p><b>Implementation Schedule*</b> prior to the subsequent period of extended operation</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
XI.E7	High Voltage Insulators New AMP	<p>performing only a periodic visual inspection is documented.</p> <p>A representative sample of electrical connections within the scope of license renewal will be tested at least once every 10 years or at least once every 5 years if only visual inspection is used to provide an indication of the connection integrity. The first visual inspections and tests for license renewal are to be completed prior to the subsequent license renewal period of extended operation.</p> <p>This program is informed and enhanced when necessary through the systematic and ongoing review of both plant-specific and industry operating experience including research and development (e.g., test methods, aging models, acceptance criterion) such that the effectiveness of the AMP is evaluated consistent with the discussion in Appendix B of the GALL-SLR Report.</p> <p>[The FSAR Summary description also includes a plant specific discussion of applicable commitments, license conditions, enhancements, or exceptions applied to the applicants aging management program]</p> <p>The program was developed specifically to address aging management of high voltage insulator aging mechanisms and effects. This AMP manages the age related degradation effects of within scope high voltage insulators susceptible to airborne contaminants including dust, salt, fog, cooling tower plume, industrial effluent or loss of material. The high voltage insulators within the scope of the subsequent period of extended operation are those credited for recovery of offsite power.</p>	New AMP	GALL VI / SRP 3.6



<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
	Subsections IWB, IWC, and IWD	Engineers (ASME) Class 1, 2, and 3 pressure-retaining components, including welds, pump casings, valve bodies, integral attachments, and pressure-retaining bolting for assessment, signs of degradation, and corrective actions. This program is in accordance with the ASME Code Section XI edition and addenda approved in accordance with provisions of 10 CFR 50.55a during the period of extended operation.	3.1 GALL VII / SRP 3.3
XI.M2	Water Chemistry	This program mitigates aging effects of loss of material due to corrosion, cracking due to stress corrosion cracking (SCC), and related mechanisms, and reduction of heat transfer due to fouling in components exposed to a treated water environment. Chemistry programs are used to control water chemistry for impurities (e.g., chloride, fluoride, and sulfate) that accelerate corrosion. This program relies on monitoring and control of water chemistry to keep peak levels of various contaminants below the system-specific limits, based on Electric Power Research Institute (EPRI) guidelines (a) BWRVIP-190 (EPRI 1016579, BWR Water Chemistry Guidelines – 2008 Revision) for BWRs or (b) EPRI 1014986 (PWR Primary Water Chemistry – Revision 6) and EPRI 1016555 (PWR Secondary Water Chemistry – Revision 7) for pressurized water reactors (PWRs).	GALL IV / SRP 3.1  SLR program is implemented prior to the subsequent period of extended operation
XI.M3	Reactor Head Closure Stud Bolting	The program includes (a) in-service inspection (ISI) in conformance with the requirements of the ASME Code, Section XI, Subsection IWB, Table IWB-2500-1, and (b) preventive measures to mitigate cracking. The program also relies on recommendations to address reactor head stud bolting degradation as delineated in NRC Regulatory Guide (RG) 1.65, Revision 1.	GALL IV / SRP 3.1  SLR program is implemented prior to the subsequent period of extended operation

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR		Applicable GALL-SLR Report and SRP-SLR Chapter References
AMP	GALL-SLR Program	Description of Program
XI.M4	BWR Vessel ID Attachment Welds	<p>The program is a condition monitoring program that manages cracking in the reactor vessel inside diameter attachment welds. This program relies on visual examinations to detect cracking. The examination scope, frequencies, and methods are in accordance with ASME Code, Section XI, Table-IWB-2500-1, Examination Category B-N-2, and BWRVIP-48-A, "Vessel ID Attachment Weld Inspection and Flaw Evaluation Guidelines," dated November 2004. The scope of the examinations is expanded when flaws are detected.</p> <p>Any indications are evaluated in accordance with ASME Code, Section XI, or the guidance in BWRVIP 48-A. Crack growth evaluations follow the guidance in BWRVIP-14-A, "Evaluation of Crack Growth in BWR Stainless Steel RPV Internals," dated September 2008; BWRVIP-59-A, "Evaluation of Crack Growth in BWR Nickel-Base Austenitic Alloys in RPV Internals," dated May 2007; or BWRVIP-60-A, "BWR Vessel and Internals Project, Evaluation of Crack Growth in BWR Low Alloy Steel RPV Internals," dated June 2003; as appropriate. The acceptance criteria are in BWRVIP-48-A and ASME Code, Section XI, Subarticle IWB-3520. Repair and replacement activities are conducted in accordance with BWRVIP-52-A, "Shroud Support and Vessel Bracket Repair Design Criteria," dated September 2005.</p>
XI.M5	BWR Feedwater Nozzle	<p><i>Description for plants that do not have single sleeve interference fit feedwater spargers:</i></p> <p>This program is a condition monitoring program that manages the effects of cracking in the reactor vessel feedwater nozzles. This program implements the guidance in GE-NE-523-A71-0594-A, Revision 1, "Alternate BWR</p>
		Implementation Schedule*
		SLR program is implemented prior to the subsequent period of extended operation
		SLR program is implemented prior to the subsequent period of extended operation
		GALL IV / SRP 3.1
		GALL IV / SRP 3.1

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>Feedwater Nozzle Inspection Requirements," dated May 2000. Cracking is detected through ultrasonic examinations of critical regions of the BWR feedwater nozzle, as depicted in Zones 1, 2, and 3 on ["Figure 4-1," if the nozzle is clad, or "Figure 4-2," if the nozzle is un-clad] of GE NE 523 A71-0594-A, Revision 1. The ultrasonic examination procedures, equipment, and personnel are qualified by performance demonstration in accordance with ASME Code, Section XI, Appendix VIII. The examination frequency for all three zones is once every 10-year ASME Code, Section XI, in-service inspection interval. Examination results are evaluated in accordance with ASME Code, Section XI, Subsection IWB-3130.</p> <p><i>Description for plants that have single sleeve interference fit feedwater spargers:</i></p> <p>This program is a condition monitoring program that manages the effects of cracking in the reactor vessel feedwater nozzles. This program implements the guidance in GE-NE-523-A71-0594-A, Revision 1, "Alternate BWR Feedwater Nozzle Inspection Requirements," dated May 2000. Cracking is detected through ultrasonic examinations of critical regions of the BWR feedwater nozzle, as depicted in Zones 1, 2, and 3 on ["Figure 4-1," if the nozzle is clad, or "Figure 4-2," if the nozzle is un-clad] of GE NE 523 A71-0594-A, Revision 1.</p> <p>The ultrasonic examination procedures, equipment, and personnel are qualified by performance demonstration in accordance with ASME Code, Section XI, Appendix VIII. The examination frequency for Zones 1 and 2 is once every [X] years, and the examination frequency for Zone 3 is once every [Y] years. Examination results are evaluated</p>		

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*
		in accordance with ASME Code, Section XI, Subsection IWB-3130.	
XI.M7	BWR Stress Corrosion Cracking	<p>The program manages cracking due to intergranular stress corrosion cracking (IGSCC) for all BWR piping and piping welds made of austenitic stainless steel and nickel alloy that are 4 inches or larger in nominal diameter containing reactor coolant at a temperature above 93 °C (200 °F) during power operation, regardless of code classification.</p> <p>The program performs volumetric examinations to detect and manage IGSCC in accordance with NRC Generic Letter (GL) 88-01. Modifications to the extent and schedule of inspection in GL 88-01 are allowed in accordance with the inspection guidance in staff-approved BWRVIP-75-A. This program relies on the staff-approved positions that are described in NUREG-0313, Revision 2, and GL 88-01 and its Supplement 1 regarding selection of IGSCC-resistant materials, solution heat treatment and stress improvement processes, water chemistry, weld overlay reinforcement, partial replacement, clamping devices, crack characterization and repair criteria, inspection methods and personnel, inspection schedules, sample expansion, leakage detection, and reporting requirements.</p>	<p>GALL IV / SRP 3.1</p> <p>GALL V / SRP 3.2</p> <p>GALL VII / SRP 3.3</p> <p>SLR program is implemented prior to the subsequent period of extended operation</p>
XI.M8	BWR Penetrations	The program includes BWR instrumentation penetrations, control rod drive (CRD) housing and incore-monitoring housing (ICMH) penetrations, and standby liquid control nozzles/Core ΔP nozzles. The program manages cracking due to cyclic loading or stress corrosion cracking by performing inspection and flaw evaluation in accordance	<p>GALL IV / SRP 3.1</p> <p>SLR program is implemented prior to the subsequent period of extended operation</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>with the guidelines of staff-approved BWRVIP-49-A, BWRVIP-47-A and BWRVIP-27-A and the requirements in the ASME Code, Section XI. The examination categories include volumetric examination methods (ultrasonic testing or radiography testing), surface examination methods (liquid penetrant testing or magnetic particle testing), and visual examination methods.</p> <p>The program includes inspections and flaw evaluations in conformance with the guidelines of applicable staff-approved BWRVIP documents, and to ensure the long-term integrity and safe operation of BWR vessel internal components that are fabricated of nickel alloy and stainless steel (including martensitic stainless steel, cast stainless steel and associated welds).</p> <p>The program manages the effects of cracking due to stress corrosion cracking (SCC), intergranular stress corrosion cracking (IGSCC), or irradiation-assisted stress corrosion cracking (IASCC), cracking due to cyclic loading (including flow-induced vibration), loss of material due to wear, loss of fracture toughness due to neutron or thermal embrittlement, and loss of preload due to thermal or irradiation-enhanced stress relaxation.</p> <p>The program performs inspections for cracking and loss of material in accordance with the guidelines of applicable staff-approved BWRVIP documents and the requirements of ASME Code, Section XI, Table IWB 2500-1. The impact of loss of fracture toughness on component integrity is indirectly managed by using visual or volumetric examination techniques to monitor for cracking in the components. This program also manages loss of preload for core plate rim holddown bolts and jet pump assembly</p>	
XI.M9	BWR Vessel Internals		<p>SLR program is implemented prior to the subsequent period of extended operation</p> <p>GALL IV / SRP 3.1</p>

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*
		<p>holddown beam bolts by performing visual inspections or stress analyses to ensure adequate structural integrity.</p> <p>This program performs evaluations to determine whether supplemental inspections in addition to the existing BWRVIP examination guidelines are necessary to adequately manage loss of fracture toughness due to thermal or neutron embrittlement and cracking due to IASCC for the subsequent period of extended operation. If the evaluations determine that supplemental inspections are necessary for certain components based on neutron fluence, cracking susceptibility and fracture toughness, the program conducts the supplemental inspections for adequate aging management.</p>	
XI.M10	Boric Acid Corrosion	<p>This program relies, in part, on the response to NRC Generic Letter 88-05, "Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants," to identify, evaluate, and correct boric acid water leaks that could cause corrosion damage to reactor coolant pressure boundary components. The program also includes inspections, evaluations, and corrective actions for all components subject to aging management review that may be adversely affected by some form of boric acid water leakage.</p> <p>This program includes provisions to initiate evaluations and assessments when leakage is discovered by activities not associated with the program. This program follows the guidance described in Section 7 of WCAP-15988-NP, Revision 2, "Generic Guidance for an Effective Boric Inspection Program for Pressurized Water Reactors."</p>	<p>GALL IV / SRP 3.1</p> <p>GALL V / SRP 3.2</p> <p>GALL VI / SRP 3.6</p> <p>GALL VII / SRP 3.3</p> <p>GALL VIII / SRP 3.4</p> <p>GALL III / SRP 3.5</p> <p>SLR program is implemented prior to the subsequent period of extended operation</p>

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR		Applicable GALL-SLR Report and SRP-SLR Chapter References
AMP	GALL-SLR Program	Description of Program
XI.M11B	Cracking of Nickel-Alloy Components and Loss of Material due to Boric Acid-Induced Corrosion in Reactor Coolant Pressure Boundary Components (PWRS only)	<p>This program addresses operating experience of degradation due to primary water stress corrosion cracking (PWSCC) of components or welds constructed from certain nickel alloys (e.g., Alloy 600/82/182) and exposed to pressurized water reactor primary coolant at elevated temperature. The scope of this program includes the following groups of components and materials: (a) all nickel alloy components and welds which are identified in EPRI MRP-126; (b) nickel alloy components and welds identified in ASME Code Cases N-770, N-729 and N-722, as incorporated by reference in 10 CFR 50.55a; and (c) components that are susceptible to corrosion by boric acid and may be impacted by leakage of boric acid from nearby or adjacent nickel alloy components previously described. This program is used in conjunction with GALL-SLR Report AMP XI.M2, "Water Chemistry" because water chemistry can affect the cracking of nickel alloys. The completeness of the plant's EPRI MRP-126 program is also verified prior to entering the subsequent period of extended operation.</p> <p>For nickel alloy components and welds addressed by the regulatory requirements of 10 CFR 50.55a, inspections are conducted in accordance with 10 CFR 50.55a. Unless required at a greater frequency by 10 CFR 50.55a, all susceptible nickel alloy components and welds (e.g., Alloy 600/82/182 branch connection nozzles and welds) are volumetrically inspected at an interval not to exceed 10 years if such components or welds are: (a) in contact with reactor coolant; and (b) relied upon for substantial strength of the components or welds, and are of sufficient size to create a loss of coolant accident (LOCA) through a completed failure (guillotine break) or ejection of the component. Other nickel alloy components and welds within the scope of this program are inspected in</p>
		<p>SLR program is implemented prior to the subsequent period of extended operation</p>
		GALL IV / SRP 3.1

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>				
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>accordance with EPRI MRP-126.</p> <p>This program also performs an inspection of bottom-mounted instrumentation (BMI) nozzles of reactor pressure vessels using a qualified volumetric examination method. The inspection is conducted on all BMI nozzles prior to the subsequent period of extended operation to ensure adequate management of cracking due to PWSCC. If this inspection indicates the occurrence of PWSCC, periodic volumetric inspections are performed on these nozzles and adequate inspection periodicity is established. Alternatively, plant-proposed and staff-approved mitigation methods may be used to manage the aging effect for these components.</p>		
XI.M12	Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)	<p>The program consists of the determination of the susceptibility potential significance of loss of fracture toughness due to thermal aging embrittlement of CASS piping, piping components, and piping elements in both the BWR and PWR reactor coolant pressure boundaries emergency core cooling system (ECCS) systems, including interfacing pipe lines to the chemical and volume control system and to the spent fuel pool; and in BWR ECCS systems, including interfacing pipe lines to the suppression chamber and to the drywell and suppression chamber spray system in regard to thermal aging embrittlement based on the casting method, molybdenum content, and ferrite percentage. For potentially susceptible piping, piping components, and piping elements, aging management is accomplished either through enhanced volumetric examination, enhanced visual examination, or a component-specific flaw tolerance evaluation.</p>	SLR program is implemented prior to the subsequent period of extended operation	GALL IV / SRP 3.1 GALL V / SRP 3.2
XI.M17	Flow-Accelerated	The program is based on the response to NRC Generic Letter	SLR program is	GALL IV / SRP

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program Corrosion (FAC)	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>89-08, "Erosion/Corrosion-Induced Pipe Wall Thinning," and relies on implementation of the Electric Power Research Institute guidelines in the Nuclear Safety Analysis Center 202L [(as applicable) Revision 2, 3, or 4], "Recommendations for an Effective Flow Accelerated Corrosion Program."</p> <p>The program includes the use of predictive analytical software [(as applicable) CHECWORKS™, BRT CICERO™, COMSY]. [(if applicable) This program also manages wall thinning caused by mechanisms other than FAC, in situations where periodic monitoring is used in lieu of eliminating the cause of various erosion mechanisms.]</p> <p>This program includes (a) identifying all susceptible piping systems and components; (b) developing FAC predictive models to reflect component geometries, materials, and operating parameters; (c) performing analyses of FAC models and, with consideration of operating experience, selecting a sample of components for inspections; (d) inspecting components; (e) evaluating inspection data to determine the need for inspection sample expansion, repairs, or replacements, and to schedule future inspections; and (f) incorporating inspection data to refine FAC models.</p>	<p>implemented prior to the subsequent period of extended operation</p>	<p>3.1 GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP 3.4</p>
XI.M18	Bolting Integrity	<p>This program focuses on closure bolting for pressure-retaining components and relies on recommendations for a comprehensive bolting integrity program, as delineated in NUREG-1339, and industry recommendations, as delineated in EPRI NP-5769, with the exceptions noted in NUREG-1339 for safety-related bolting. The program also relies on industry recommendations for comprehensive bolting maintenance, as delineated in the EPRI TR-104213, 1015336 and 1015337.</p>	<p>SLR program is implemented prior to the subsequent period of extended operation</p>	<p>GALL IV / SRP 3.1 GALL V / SRP 3.2 GALL VII / SRP 3.3</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>The program generally includes periodic inspection of closure bolting for indications of loss of preload, cracking, and loss of material due to corrosion, rust, etc. The program also includes preventive measures to preclude or minimize loss of preload and cracking.</p> <p>A related aging management program (AMP) XI.M1, "ASME Section XI Inservice Inspection (ISI) Subsections IWB, IWC, and IWD," includes inspections of safety-related and non-safety-related closure bolting and supplements this bolting integrity program. Other related programs, AMPs XI.S1, "ASME Section XI, Subsection IWE"; XI.S3, "ASME Section XI Subsection IWF"; XI.S6, "Structures Monitoring"; XI.S7, "Inspection of Water-Control Structures Associated with Nuclear Power Plant"; and XI.M23, "Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems," manage the inspection of safety-related and non-safety related structural bolting.</p>		<p>GALL VIII / SRP 3.4</p>
<p>XI.M19</p>	<p>Steam Generators</p>	<p>This program consists of aging management activities for the steam generator tubes, plugs, sleeves, and secondary side components. This program is governed by plant technical specifications, commitments to NEI 97-06, Revision 3, and the associated EPRI guidelines. The program also includes foreign material exclusion as a means to inhibit wear degradation, and secondary side maintenance activities, such as sludge lancing, for removing deposits that may contribute to component degradation. The program performs volumetric examination on steam generator tubes in accordance with the requirements in the technical specifications to detect aging effects, if they should occur. The technical specifications require condition monitoring and operational assessments to be performed to ensure that the tube integrity will be maintained until the</p>	<p>SLR program is implemented prior to the subsequent period of extended operation</p>	<p>GALL IV / SRP 3.1</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>				
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>next inspection. Condition monitoring and operational assessments are done in accordance with the technical specification requirements and guidance in NEI 97-06, Revision 3. The program also includes inspections of steam generator components in accordance with the guidance in NEI 97-06, Revision 3.</p>		
XI.M20	Open-Cycle Cooling Water System	<p>The program relies, in part, on implementing the response to NRC Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment," [(if applicable) and includes nonsafety-related portions of the open-cycle cooling water system]. The program includes (a) surveillance and control of biofouling, (b) tests to verify heat transfer of heat exchangers, (c) routine inspection and maintenance to ensure that corrosion, erosion, protective coating failure, fouling, and biofouling cannot degrade the performance of systems serviced by the open-cycle cooling water system. This program includes enhancements to the guidance in NRC GL 89-13 that address operating experience to ensure aging effects are adequately managed.</p>	SLR program is implemented prior to the subsequent period of extended operation	<p>GALL IV / SRP 3.1</p> <p>GALL V / SRP 3.2</p> <p>GALL VII / SRP 3.3</p> <p>GALL VIII / SRP 3.4</p>
XI.M21A	Closed Treated Water Systems	<p>This is a mitigation program that also includes a condition monitoring program to verify the effectiveness of the mitigation activities. The program consists of (a) water treatment, including the use of corrosion inhibitors, to modify the chemical composition of the water such that the effects of corrosion are minimized; (b) chemical testing of the water to ensure that the water treatment program maintains the water chemistry within acceptable guidelines; and (c) inspections to determine the presence or extent of</p>	Program should be implemented prior to subsequent period of extended operation	<p>GALL IV / SRP 3.1</p> <p>GALL V / SRP 3.2</p> <p>GALL VII / SRP 3.3</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>				
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP- SLR Chapter References</b>
		<p>degradation. The program uses (as applicable) e.g., EPRI 1007820, Closed Cooling Water Chemistry Guideline, and corrosion coupon testing and microbiological testing).</p>		GALL VIII / SRP 3.4
XI.M22	Boraflex Monitoring	<p>The program consists of (a) neutron attenuation testing (“blackness testing”) to determine gap formation, (b) sampling for the presence of silica in the spent fuel pool along with boron loss, and (c) monitoring and analysis of criticality to assure that the required 5% sub-criticality margin is maintained. This program is implemented in response to NRC GL 96-04.</p>	SLR program is implemented prior to the subsequent period of extended operation	GALL VII / SRP 3.3
XI.M23	Inspection of Overhead Heavy Load and Light Load Handling Related to Refueling) Handling Systems	<p>The program evaluates the effectiveness of maintenance monitoring activities for cranes and hoists. The program includes periodic visual inspections to detect degradation of bridge, rail, and trolley structural components and loss of preload on bolted connections. Volumetric or surface examinations confirm the absence of cracking in high strength bolts. This program relies on the guidance in NUREG-0612, ASME B30.2, and other appropriate standards in the ASME B30 series. These cranes must also comply with the maintenance rule requirements provided in 10 CFR 50.65.</p>	SLR program is implemented prior to the subsequent period of extended operation	GALL VII / SRP 3.3
XI.M24	Compressed Air Monitoring	<p>The program consists of monitoring moisture content and corrosion, and performance of the compressed air system, including (a) preventive monitoring of water (moisture), and other contaminants to keep within the specified limits and (b) inspection of components for indications of loss of material due to corrosion. This program is in response to NRC GL 88-14 and INPO’s Significant Operating Experience Report (SOER) 88-01. It also relies on the guidance from the American Society of Mechanical</p>	SLR program is implemented prior to the subsequent period of extended operation	GALL VII / SRP 3.3



<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>flushes performed in accordance with the 2011 Edition of NFPA 25. Testing or replacement of sprinklers that have been in place for 50 years is performed in accordance with NFPA 25. In addition to NFPA codes and standards, portions of the water-based fire protection system that are: (a) normally dry but periodically subjected to flow and (b) cannot be drained or allow water to collect are subjected to augmented testing beyond that specified in NFPA 25, including: (a) periodic system full flow tests at the design pressure and flow rate or internal visual inspections and (b) piping volumetric wall-thickness examinations.</p> <p>The water-based fire protection system is normally maintained at required operating pressure and is monitored such that loss of system pressure is immediately detected and corrective actions initiated. Piping wall thickness measurements are conducted when visual inspections detect surface irregularities indicative of unexpected levels of degradation. When the presence of sufficient organic or inorganic material sufficient to obstruct piping or sprinklers is detected, the material is removed and the source is detected and corrected. Non-code inspections and tests follow site procedures that include inspection parameters for items such as lighting, distance offset, presence of protective coatings, and cleaning processes that ensure an adequate examination.</p>	<p>of wetted normally dry piping segments that cannot be drained or that allow water to collect begin 5 years before the subsequent period of extended operation. The program's remaining inspections begin during the subsequent period of extended operation</p>
XI.M29	Aboveground Metallic Tanks	This program is a condition monitoring program that manages aging effects associated with outdoor tanks sited on soil or concrete and indoor large-volume tanks containing water designed with internal pressures approximating atmospheric pressure that are sited on concrete or soil, including the [applicant to list the specific tanks that are in the program scope]. The program includes	<p>GALL V / SRP 3.2</p> <p>GALL VII / SRP 3.3</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>preventive measures to mitigate corrosion by protecting the external surfaces of steel components per standard industry practice. Sealant or caulking is used for outdoor tanks at the concrete-component interface.</p> <p>This program manages loss of material and cracking by conducting periodic internal and external visual and surface examinations. Inspections of caulking or sealant are supplemented with physical manipulation. Surface exams are conducted to detect cracking when susceptible materials are used. Thickness measurements of tank bottoms are conducted to ensure that significant degradation is not occurring. The external surfaces of insulated tanks are periodically sampling-based inspected. Inspections not conducted in accordance with ASME Code Section XI requirements are conducted in accordance with plant-specific procedures including inspection parameters such as lighting, distance, offset, and surface conditions.</p>		GALL VIII / SRP 3.4
XI.M30	Fuel Oil Chemistry	<p>This program relies on a combination of surveillance and maintenance procedures. Monitoring and controlling fuel oil contamination in accordance with the guidelines of American Society for Testing and Materials (ASTM) Standards D1796, D2276, D2709, and D4057 maintains the fuel oil quality. Exposure to fuel oil contaminants, such as water and microbiological organisms, is minimized by periodic cleaning/drainage of tanks and by verifying the quality of new oil before its introduction into the storage tanks.</p>	SLR program is implemented prior to the subsequent period of extended operation	GALL VII / SRP 3.3

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*
XI.M31	Reactor Vessel Material Surveillance	<p>This program requires implementation of a reactor vessel material surveillance program to monitor the changes in fracture toughness to the ferritic reactor vessel beltline materials which are projected to receive a peak neutron fluence at the end of the design life of the vessel exceeding <math>10^{17}</math> n/cm<sup>2</sup> (E &gt; 1MeV). The surveillance capsules must be located near the inside vessel wall in the beltline region so that the material specimens duplicate, to the greatest degree possible, the neutron spectrum, temperature history, and maximum neutron fluence experienced at the reactor vessel's inner surface. Because of the resulting lead factors, surveillance capsules receive equivalent neutron fluence exposures earlier than the inner surface of the reactor vessel. This allows surveillance capsules to be withdrawn prior to the inner surface receiving an equivalent neutron fluence and therefore test results may bound the corresponding operating period in the capsule withdrawal schedule.</p> <p>This surveillance program must comply with ASTM International (formerly American Society for Testing and Materials) Standard Practice E 185-82, as incorporated by reference in 10 CFR Part 50, Appendix H. Because the withdrawal schedule in Table 1 of ASTM E 185-82 is based on plant operation during the original 40-year initial license term, standby capsules may need to be incorporated into the Appendix H program to ensure appropriate monitoring during the subsequent period of extended operation. Surveillance capsules are designed and located to</p>	<p>The surveillance capsule withdrawal schedule revised before the subsequent period of extended operation</p>
			<p>Applicable GALL-SLR Report and SRP-SLR Chapter References</p> <p>Reactor Vessel Surveillance</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
		<p>permit insertion of replacement capsules. If standby capsules will be incorporated into the Appendix H program for the subsequent period of extended operation and have been removed from the reactor vessel, these should be reinserted so that appropriate lead factors are maintained and test results will bound the corresponding operating period. This program includes removal and testing of at least one capsule during the subsequent period of extended operation, with a neutron fluence of the capsule between one and two times the projected peak vessel neutron fluence at the end of the subsequent period of extended operation.</p> <p>As an alternative to a plant-specific surveillance program complying with ASTM E 185-82, an integrated surveillance program (ISP) may be considered for a set of reactors that have similar design and operating features, in accordance with 10 CFR Part 50, Appendix H, Paragraph III.C. The plant-specific implementation of the ISP is consistent with the latest version of the ISP plan that has received approval by the NRC for the subsequent period of extended operation.</p> <p>The objective of this Reactor Vessel Material Surveillance program is to provide sufficient material data and dosimetry to (a) monitor irradiation embrittlement to neutron fluences greater than the projected neutron fluence at the end of the subsequent period of operation, and (b) provide adequate dosimetry monitoring during the operational period. If surveillance capsules are</p>		

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>not withdrawn during the subsequent period of extended operation, provisions are made to perform dosimetry monitoring.</p> <p>This program is a condition monitoring program that measures the increase in Charpy V-notch 30 foot-pound (ft-lb) transition temperature and the drop in the upper-shelf energy as a function of neutron fluence and irradiation temperature. The data from this surveillance program are used to monitor neutron irradiation embrittlement of the reactor vessel, and are inputs to the neutron embrittlement time-limited aging analyses (TLAAs) described in Section 4.2 of the Standard Review Plan for Subsequent License Renewal (SRP-SLR). The Reactor Vessel Material Surveillance program is also used in conjunction with AMP X.M2, "Neutron Fluence Monitoring," which monitors neutron fluence for reactor vessel components and reactor vessel internal components.</p> <p>In accordance with 10 CFR Part 50, Appendix H, all surveillance capsules, including those previously removed from the reactor vessel, must meet the test procedures and reporting requirements of ASTM E 185-82, to the extent practicable, for the configuration of the specimens in the capsule. Any changes to the capsule withdrawal schedule, including the conversion of standby capsules into the Appendix H program and extension of the surveillance program for the subsequent period of extended operation, must be approved by the Nuclear Regulatory Commission (NRC) prior to implementation, in accordance with 10 CFR Part 50, Appendix H, Paragraph III.B.3. Standby capsules placed in storage (e.g., removed from the reactor vessel)</p>		

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*
		are maintained for possible future insertion.	
XI.M32	One-Time Inspection	<p>The program is a condition monitoring program consisting of a one-time inspection of selected components to verify: (a) the system-wide effectiveness of an AMP that is designed to prevent or minimize aging to the extent that it will not cause the loss of intended function during the subsequent period of extended operation; (b) the insignificance of an aging effect; and (c) that long-term loss of materials will not cause a loss of intended function for steel components exposed to environments that do not include corrosion inhibitors as a preventive action, and where periodic wall thickness measurements on a representative sample of each environment are not conducted every 5 years up to at least 10 years prior to the subsequent period of extended operation. This program provides inspections that verify that unacceptable degradation is not occurring. It also may trigger additional actions that ensure the intended functions of affected components are maintained during the subsequent period of extended operation.</p> <p>The elements of the program include (a) determination of the sample size of components to be inspected based on an assessment of materials of fabrication, environment, plausible aging effects, and operating experience, (b) identification of the inspection locations in the system or component based on the potential for the aging effect to</p>	<p>GALL IV / SRP 3.1</p> <p>GALL V / SRP 3.2</p> <p>GALL VII / SRP 3.3</p> <p>GALL VIII / SRP 3.4</p> <p>Inspections should be conducted prior to the subsequent period of extended operation</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>occur, (c) determination of the examination technique, including acceptance criteria that would be effective in managing the aging effect for which the component is examined, and (d) an evaluation of the need for follow-up examinations to monitor the progression of aging if age-related degradation is found that could jeopardize an intended function before the end of the subsequent period of extended operation.</p> <p>This program is not used for structures or components with known age-related degradation mechanisms or when the environment in the subsequent period of extended operation is not expected to be equivalent to that in the prior operating periods. Periodic inspections are conducted in these cases. Inspections not conducted in accordance with ASME Code Section XI requirements are conducted in accordance with plant-specific procedures including inspection parameters such as lighting, distance, offset, and surface conditions.</p>	
XI.M33	Selective Leaching	<p>This program is a condition monitoring program that includes a one-time inspection for components exposed to a closed-cycle cooling water or treated water environment when plant-specific operating experience has not revealed selective leaching in these environments. Opportunistic and periodic inspections are conducted for raw water, waste water, soil, and groundwater environments, and for closed-cycle cooling water and treated water environments when plant-specific operating experience has revealed selective leaching in these environments. Visual inspections coupled with mechanical examination techniques such as chipping or scraping are conducted. Periodic destructive examinations of components for physical properties (i.e., degree of dealloying, depth of</p>	<p>GALL IV / SRP 3.1</p> <p>GALL V / SRP 3.2</p> <p>GALL VII / SRP 3.3</p> <p>GALL VIII / SRP 3.4</p> <p>SLR program should be implemented prior to the subsequent period of extended operation</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
XI.M35	ASME Code Class 1 Small Bore-Piping	<p>dealloying, through wall thickness, and chemical composition) are conducted for components exposed to raw water, waste water, soil, and groundwater environments, or for closed-cycle cooling water and treated water environments when plant-specific operating experience has revealed selective leaching in these environments. Inspections and tests are conducted to determine whether loss of material will affect the ability of the components to perform their intended function for the subsequent period of extended operation. Inspections are conducted in accordance with plant-specific procedures including inspection parameters such as lighting, distance, offset and surface conditions. When the acceptance criteria are not met such that it is determined that the affected component should be replaced prior to the end of the subsequent period of extended operation, additional inspections are performed.</p> <p>This program augments the existing ASME Code, Section XI requirements and is applicable to small-bore ASME Code Class 1 piping and systems with a nominal pipe size diameter less than 4 inches (NPS&lt;4) and greater than or equal to NPS 1. This program provides a one-time volumetric inspection of a sample of this Class 1 piping. This program includes pipes, fittings, branch connections, and all full and partial penetration (socket) welds. The program includes measures to verify that degradation is not occurring, thereby either confirming that there is no need to manage aging-related degradation or validating the effectiveness of any existing program for the subsequent period of extended operation. The one-time inspection program for ASME Code Class 1 small-bore piping includes</p>		GALL IV / SRP 3.1

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*
		<p>Locations that are susceptible to cracking. This program is applicable to systems that have not experienced cracking of ASME Code Class 1 small-bore piping. This program can also be used for systems that experienced cracking but have implemented design changes to effectively mitigate cracking. (Measure of effectiveness includes (1) the one-time inspection sampling is statistically significant; (2) samples will be selected as described in Element 5; and (3) no repeated failures over an extended period of time.) For systems that have experienced cracking and operating experience indicates design changes have not been implemented to effectively mitigate cracking, periodic inspection is proposed, as managed by a plant-specific AMP. Should evidence of cracking be revealed by a one-time inspection, a periodic inspection is also proposed, as managed by a plant-specific AMP.</p>	
XI.M36	External Surfaces Monitoring of Mechanical Components	<p>This program is a condition monitoring program that manages loss of material, cracking, changes in material properties (of cementitious components), hardening and loss of strength (of elastomeric components), and reduced thermal insulation resistance. Periodic visual inspections, not to exceed a refueling outage interval, of metallic, polymeric, insulation jacketing (insulation when not jacketed), and cementitious components are conducted.</p> <p>For certain materials, such as flexible polymers, physical manipulation or pressurization to detect hardening or loss of strength is used to augment the visual examinations conducted under this program. A sample of outdoor component surfaces that are insulated and a sample of indoor insulated components exposed to condensation (due to the in-scope component being operated below the dew point), are periodically inspected every 10 years during the</p>	<p>Program is implemented 6 months before the subsequent period of extended operation and inspections begin during the subsequent period of extended operation.</p>
			<p>GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP 3.4</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>subsequent period of extended operation. Inspections not conducted in accordance with ASME Code Section XI requirements are conducted in accordance with plant-specific procedures including inspection parameters such as lighting, distance, offset, and surface conditions. Acceptance criteria are such that the component will meet its intended function until the next inspection or the end of the subsequent period of extended operation. Qualitative acceptance criteria are clear enough to reasonably ensure a singular decision is derived based on observed conditions.</p>	
XI.M37	Flux Thimble Tube Inspection	<p>The program inspects for the thinning of flux thimble tube walls, which provides a path for the in-core neutron flux monitoring system detectors and forms part of the reactor coolant system pressure boundary. Flux thimble tubes are subject to loss of material at certain locations in the reactor vessel where flow-induced fretting causes wear at discontinuities in the path from the reactor vessel instrument nozzle to the fuel assembly instrument guide tube. A periodic nondestructive examination methodology, such as eddy current testing or other applicant-justified and US NRC-accepted inspection methods is used to monitor flux thimble tube wear. This program implements the recommendations of NRC Bulletin 88-09, "Thimble Tube Thinning in Westinghouse Reactors."</p>	SLR program is implemented prior to the subsequent period of extended operation
XI.M38	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	<p>This program is a condition monitoring program that manages loss of material, cracking, and hardening and loss of strength of polymeric materials. This program consists of visual inspections of all accessible internal surfaces of metallic piping, piping components, ducting, heat exchanger components, polymeric and elastomeric components, and other components that are exposed to environments of uncontrolled indoor air, outdoor air, air with borated water</p>	<p>GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
		<p>leakage, condensation, moist air, diesel exhaust, and any water environment other than open-cycle cooling water, closed-cycle cooling water, and fire water. Elastomers exposed to open-cycle, closed-cycle cooling water, and fire water are managed by this program.</p> <p>These internal inspections are performed during the periodic system and component surveillances or during the performance of maintenance activities when the surfaces are made accessible for visual inspection. At a minimum, in each 10-year period during the period of extended operation a representative sample of 20 percent of the population (defined as components having the same combination of material, environment, and aging effect) or a maximum of 25 components per population is inspected. Where practical, the inspections focus on the bounding or lead components most susceptible to aging because of time in service, and severity of operating conditions. Opportunistic inspections continue in each period despite meeting the sampling limit. For certain materials, such as flexible polymers, physical manipulation or pressurization to detect hardening or loss of strength is used to augment the visual examinations conducted under this program. If visual inspection of internal surfaces is not possible, a plant-specific program is used.</p> <p>Inspections not conducted in accordance with ASME Code Section XI requirements are conducted in accordance with plant-specific procedures including inspection parameters such as lighting, distance, offset and surface conditions. Acceptance criteria are such that the component will meet its intended function until the next inspection or the end of the subsequent period of extended operation. Qualitative acceptance criteria are clear enough to reasonably ensure a</p>	<p>operation.</p>	<p>3.4 GALL VI / SRP 3.6</p>

<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>				
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP- SLR Chapter References</b>
		singular decision is derived based on observed conditions.		
XI.M39	Lubricating Oil Analysis	This program ensures that the oil environment in the mechanical systems is maintained to the required quality. This program ensures that oil systems are maintained free of contaminants (primarily water and particulates), thereby preserving an environment that is not conducive to loss of material or reduction of heat transfer. Testing activities include sampling and analysis of lubricating oil for detrimental contaminants. The presence of water or particulates may also indicate in-leakage and corrosion product buildup.	SLR program is implemented prior to the subsequent period of extended operation	GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP 3.4
XI.M40	Monitoring of Neutron-Absorbing Materials other than Boraflex	This program relies on periodic inspection, testing, monitoring, and analysis of the criticality design to assure that the required 5 percent sub-criticality margin is maintained. This program consists of inspecting the physical condition of the neutron-absorbing material, such as visual appearance, dimensional measurements, weight, geometric changes (e.g., formation of blisters, pits, and bulges), and boron areal density as observed from coupons or in situ.	SLR program should be implemented prior to the subsequent period of extended operation	GALL VII / SRP 3.3
XI.M41	Buried and Underground Piping and Tanks	This program is a condition monitoring program that manages the aging effects associated with the external surfaces of buried and underground piping and tanks such as loss of material, cracking and changes in material properties (for cementitious piping). It addresses piping and tanks composed of any material, including metallic, polymeric, and cementitious materials.  The program also manages aging through preventive and mitigative actions, (i.e., coatings, backfill quality, and	SLR program should be implemented before the subsequent period of extended operation	GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP 3.4

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
<p>XI.M42</p>	<p>Internal Coatings/Linings for In Scope Piping, Piping Components, Heat Exchangers, and Tanks</p>	<p>cathodic protection) The number of inspections is based on the effectiveness of the preventive and mitigative actions. Annual cathodic protection surveys are conducted. Where the acceptance criteria for the effectiveness of the cathodic protection is other than -850 mV instant off, actual loss of material rates are measured from in-situ coupons.</p> <p>Inspections are conducted by qualified individuals. Adverse inspection results result in additional inspections. If a reduction in the number of inspections recommended in GALL-SLR Report AMP XI.M41, Table XI.M41-2, is claimed based on a lack of soil corrosivity as determined by soil testing, soil testing is conducted once in each 10-year period starting 10 years prior to the subsequent period of extended operation.</p>		
		<p>This program is a condition monitoring program that manages degradation of coatings/linings that can lead to loss of material of base materials and downstream effects such as reduction in flow, reduction in pressure or reduction in heat transfer when coatings/linings become debris.</p> <p>This program manages these aging effects by conducting periodic visual inspections of all coatings/linings applied to the internal surfaces of in-scope components exposed to closed-cycle cooling water, raw water, treated water, treated borated water, waste water, lubricating oil or fuel oil where loss of coating or lining integrity could impact the component's or downstream component's current licensing basis intended function(s). For tanks and heat exchangers, all accessible surfaces are inspected. Piping inspections are sampling-based. The training and qualification of individuals involved in coating/lining inspections of non-cementitious coatings/linings are conducted in accordance</p>	<p>Program is implemented no later than six months before the subsequent period of operation and inspections begin no later than the last refueling outage before the subsequent period of extended</p>	<p>GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP 3.4</p>

**Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR**

AMP	GALL-SLR Program	Description of Program	Implementation Schedule*	Applicable GALL-SLR Report and SRP-SLR Chapter References
XI.S1	ASME Section XI, Subsection IWE Inservice Inspection (IWE)	<p>with ASTM International Standards endorsed in RG 1.54 including guidance from the staff associated with a particular standard. For cementitious coatings, training and qualifications are based on an appropriate combination of education and experience related to inspecting concrete surfaces. Peeling and delamination is not acceptable. Blisters are evaluated by a coatings specialist with the blisters being surrounded by sound material and with the size and frequency not increasing. Minor cracks in cementitious coatings are acceptable provided there is no evidence of debonding. All other degraded conditions are evaluated by a coatings specialist. For coated/lined surfaces determined to not meet the acceptance criteria, physical testing is performed where physically possible (i.e., sufficient room to conduct testing) in conjunction with repair or replacement of the coating/lining.</p> <p>This program is in accordance with ASME Section XI, Subsection IWE, consistent with 10 CFR 50.55a "Codes and standards," with supplemental recommendations. The AMP includes periodic visual, surface, volumetric examinations, and leak rate testing, where applicable, of metallic pressure-retaining components of steel containments and concrete containments for signs of degradation, damage, irregularities including liner plate bulges, and for coated areas distress of the underlying metal shell or liner, and corrective actions. Acceptability of inaccessible areas of steel containment shell or concrete containment steel liner is evaluated when conditions found in accessible areas, indicate the presence of, or could result in, flaws or degradation in inaccessible areas.</p> <p>This program also includes aging management for the potential loss of material due to corrosion in the</p>	operation.	
			<p>SLR program is implemented prior to the subsequent period of extended operation</p>	GALL II / SRP 3.5





<b>Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR</b>			
<b>AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule*</b>
		<p>taken prior to loss of intended functions. Inspections also include seismic joint fillers, elastomeric materials; and steel edge supports and steel bracings associated with masonry walls, and periodic evaluation of groundwater chemistry and opportunistic inspections for the condition of below grade concrete, and of protective coatings for substrate materials. Quantitative results (measurements) and qualitative data from periodic inspections are trended with photographs and surveys for the type, severity, extent, and progression of degradation. The acceptance criteria are derived from applicable consensus codes and standards. For concrete structures, the program includes personnel qualifications and quantitative acceptance criteria of ACI 349.3R.</p>	<p>3.5 GALL VI / SRP 3.6</p>
XI.S7	<p>Inspection of Water-Control Structures Associated with Nuclear Power Plants</p>	<p>This program consists of inspection and surveillance of raw-water control structures associated with emergency cooling systems or flood protection. The program also includes structural steel and structural bolting associated with water-control structures. In general, parameters monitored should be in accordance with Section C.2 of R.G. 1.127 and quantitative measurements should be recorded for all applicable parameters monitored or inspected. Inspections should occur at least once every 5 years. Structures exposed to aggressive water require additional plant-specific investigation.</p>	<p>GALL III / SRP 3.5</p> <p>SLR program is implemented prior to the subsequent period of extended operation</p>
XI.S8	<p>Protective Coating Monitoring and Maintenance</p>	<p>This program ensures that a monitoring and maintenance program implemented in accordance with RG 1.54 is adequate for the subsequent period of extended operation. The program consists of guidance for selection, application, inspection, and maintenance of protective coatings. Maintenance of Service Level I coatings applied to carbon steel and concrete surfaces inside containment (e.g., steel liner, steel containment shell, structural steel, supports,</p>	<p>GALL III / SRP 3.5</p> <p>SLR program is implemented prior to the subsequent period of extended operation</p>

Table XI-01. FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management of Applicable Systems for SLR			
AMP	GALL-SLR Program	Description of Program	Implementation Schedule*
SRP-SLR Appendix A	Plant-Specific AMP	<p>penetrations, and concrete walls and floors) serve to prevent or minimize loss of material due to corrosion of carbon steel components and aids in decontamination. Degraded coatings in the containment are assessed periodically to ensure post-accident operability of the ECCS.</p> <p>The [fill in name of program] Program is a [prevention, mitigation, condition monitoring, performance monitoring] program that manages aging effects associated with [list component type or system as applicable that are in the scope of the program]. Preventive or mitigative actions include [fill in key actions when applicable]. The program manages [list the AERM] by conducting [periodic, one-time] [describe inspection methods and tests] of [all components or a representative sample of components] within the scope of the program. [When applicable, periodic inspections are conducted every XX years commencing prior to or during the subsequent period of extended operation.] [Describe how inspection and test implementing procedures are controlled (e.g., non-ASME Code inspections and tests follow site procedures that include inspection parameters for items such as lighting, distance offset, presence of protective coatings, and cleaning processes that ensure an adequate examination).] Qualitative acceptance criteria are clear enough to reasonably ensure a singular decision is derived based on observed conditions. When the acceptance criteria are not met such that it is determined that the affected component should be replaced prior to the end of the subsequent period of extended operation, additional inspections are performed.</p>	<p>Program should be implemented prior to subsequent period of extended operation</p> <p>GALL IV / SRP 3.1 GALL V / SRP 3.2 GALL VII / SRP 3.3 GALL VIII / SRP 3.4 GALL II-III / SRP 3.5 GALL VI / SRP 3.6</p>
<p>*An applicant need not incorporate the implementation schedule into its FSAR. However, the reviewer should verify that the applicant has identified and committed in the license renewal application to any future aging management activities to be completed before the subsequent period of extended operation. The staff expects to impose a license condition on any renewed license to ensure that the applicant will complete these activities no later than the committed date.</p>			

1

**APPENDIX A**

2

**QUALITY ASSURANCE FOR AGING MANAGEMENT PROGRAMS**



# 1 **QUALITY ASSURANCE FOR AGING MANAGEMENT PROGRAMS**

2 The subsequent licensing renewal (SLR) applicant must demonstrate that the effects of aging  
3 on structure and component (SC) subject to an aging management review (AMR) will be  
4 managed in a manner that is consistent with the current licensing basis (CLB) of the facility for  
5 the subsequent period of extended operation. Therefore, those aspects of the AMR process  
6 that affect the quality of safety-related SCs are subject to the quality assurance (QA)  
7 requirements of Appendix B of 10 CFR Part 50. For nonsafety-related SCs subject to an AMR,  
8 the existing 10 CFR Part 50, Appendix B, QA program may be used to address the elements of  
9 corrective actions, confirmation process, and administrative controls on the following bases:

- 10 • Criterion XVI of 10 CFR Part 50, Appendix B, requires that measures be established to  
11 ensure that conditions adverse to quality, such as failures, malfunctions, deviations,  
12 defective material and equipment, and nonconformances, are promptly identified and  
13 corrected. In the case of significant conditions adverse to quality, measures must be  
14 implemented to ensure that the cause of the condition is determined and that corrective  
15 action is taken to preclude repetition. In addition, the cause of the significant condition  
16 adverse to quality and the corrective action implemented must be documented and  
17 reported to appropriate levels of management.

18 To preclude repetition of significant conditions adverse to quality, the confirmation process  
19 element (Element 8) for SLR aging management programs (AMPs) consists of follow-up actions  
20 to verify that the corrective actions implemented are effective in preventing a recurrence. As an  
21 example, for the management of internal piping corrosion, the GALL-SLR Report AMP XI.M2,  
22 "Water Chemistry," may be used to minimize the piping's susceptibility to corrosion. However, it  
23 also may be necessary to institute a condition monitoring program that uses ultrasonic  
24 inspection to verify that corrosion is indeed insignificant.

- 25 • As required by 10 CFR 50.34(b)(6)(i), the final safety analysis report (FSAR) submitted  
26 by a nuclear power plant license applicant includes information on the applicant's  
27 organizational structure, allocations of responsibilities and authorities, and personnel  
28 qualification requirements. 10 CFR 50.34(b)(6)(ii) also notes that Appendix B of  
29 10 CFR Part 50 sets forth the requirements for managerial and administrative controls  
30 used for safe operation. Pursuant to 10 CFR 50.36(c)(5), administrative controls related  
31 to organization and management, procedures, record keeping, review and audit, and  
32 reporting ensure the safe operation of the facility. Programs that are consistent with the  
33 requirements of 10 CFR Part 50, Appendix B, also satisfy the administrative controls  
34 element necessary for AMPs for SLR.

35 Notwithstanding the suitability of its provisions to address quality-related aspects of the AMR  
36 process for SLR, 10 CFR Part 50, Appendix B, covers only safety-related SCs. Therefore,  
37 absent a commitment by the applicant to expand the scope of its 10 CFR Part 50, Appendix B,  
38 QA program to include nonsafety-related SCs subject to an AMR for SLR, the AMPs applicable  
39 to nonsafety-related SCs include alternative means to address corrective actions, confirmation  
40 processes, and administrative controls. Such alternate means are subject to review by the NRC  
41 on a case-by-case basis.

1 An example summary program description of the QA program for the FSAR supplement is shown below.

<b>GALL-SLR AMP</b>	<b>GALL-SLR Program</b>	<b>Description of Program</b>	<b>Implementation Schedule</b>	<b>Applicable GALL-SLR Report and SRP-SLR Chapter References</b>
GALL-SLR Appendix A	Quality Assurance	The QA program, developed in accordance with the requirements of 10 CFR Part 50, Appendix B, provides the basis for the corrective actions, confirmation process, and administrative controls elements of AMPs. The scope of this existing QA program is expanded to also include nonsafety-related SCs subject to AMPs.	Existing program	GALL-SLR IV / SRP-SLR 3.1 GALL-SLR V / SRP-SLR 3.2 GALL-SLR VII / SRP-SLR 3.3 GALL-SLR VIII / SRP-SLR 3.4 GALL-SLR II-III/ SRP-SLR 3.5 GALL-SLR VI / SRP-SLR 3.6

1

**APPENDIX B**

2

**OPERATING EXPERIENCE FOR AGING MANAGEMENT PROGRAMS**



## 1 OPERATING EXPERIENCE FOR AGING MANAGEMENT PROGRAMS

2 Operating experience is a crucial element of an effective aging management program (AMP). It  
3 provides the basis to support all other elements of the AMP and, as a continuous feedback  
4 mechanism, drives changes to these elements to ensure the overall effectiveness of the AMP.  
5 Operating experience should provide objective evidence to support the conclusion that the  
6 effects of aging are managed adequately so that the structure- and component-intended  
7 function(s) will be maintained during the subsequent period of extended operation.  
8 Pursuant to Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power  
9 Plants," Section 21(a)(3), of Title 10 of the *Code of Federal Regulations* (10 CFR 54.21(a)(3)),  
10 licensing renewal applicants are required to implement programs for the ongoing review of  
11 operating experience, such as those established in accordance with Item I.C.5, "Procedures for  
12 Feedback of Operating Experience to Plant Staff," of NUREG-0737, "Clarification of TMI Action  
13 Plan Requirements."

14 The systematic review of plant-specific and industry operating experience concerning aging  
15 management and age-related degradation ensures that the SLR AMPs are, and will continue to  
16 be, effective in managing the aging effects for which they are credited. The AMPs should either  
17 be enhanced or new AMPs developed, as appropriate, when it is determined through the  
18 evaluation of operating experience that the effects of aging may not be adequately managed.  
19 AMPs should be informed by the review of operating experience on an ongoing basis,  
20 regardless of the AMP's implementation schedule.

### 21 Acceptable Use of Existing Programs

22 Programs and procedures relied upon to meet the requirements of 10 CFR Part 50, Appendix B,  
23 and provisions in NUREG-0737, Item I.C.5, may be used for the capture, processing, and  
24 evaluation of operating experience concerning age-related degradation and aging management  
25 during the term of a renewed operating license. As part of meeting the provisions of NUREG-  
26 0737, Item I.C.5, the applicant should actively participate in the Institute of Nuclear Power  
27 Operations' (INPOs') operating experience program (formerly the Significant Event Evaluation  
28 and Information Network (SEE-IN) program endorsed in NRC Generic Letter 82-04, "Use of  
29 INPO SEE-IN Program"). These programs and procedures may also be used for the translation  
30 of recommendations from the operating experience evaluations into plant actions  
31 (e.g., enhancement of AMPs and development of new AMPs). While these programs and  
32 procedures establish a majority of the functions necessary for the ongoing review of operating  
33 experience, they are also subject to further review as discussed below.

### 34 Areas of Further Review

35 To ensure that the programmatic activities for the ongoing review of operating experience are  
36 adequate for SLR, the following points should be addressed:

- 37 • The programs and procedures relied upon to meet the requirements of 10 CFR Part 50,  
38 Appendix B, and provisions in NUREG-0737, Item I.C.5, explicitly apply to and  
39 otherwise would not preclude the consideration of operating experience on age-related  
40 degradation and aging management. Such operating experience can constitute  
41 information on the structures and components (SCs) identified in the integrated plant  
42 assessment; their materials, environments, aging effects, and aging mechanisms; the  
43 AMPs credited for managing the effects of aging; and the activities, criteria, and  
44 evaluations integral to the elements of the AMPs. To satisfy this criterion, the applicant

- 1 should use the option described in the “Standard Review Plan for Review of Subsequent  
2 License Renewal Applications for Nuclear Power Plants,” Section A.2, “Quality  
3 Assurance for Aging Management Programs (Branch Technical Position IQMB-1),”  
4 Position 2, to expand the scope of its 10 CFR Part 50, Appendix B, program to include  
5 nonsafety-related SCs.
- 6 • All final license renewal interim staff guidance documents and revisions to the  
7 GALL-SLR Report should be considered as sources of industry operating experience  
8 and evaluated accordingly. There should be a process to identify such documents and  
9 process them as operating experience.
  - 10 • All incoming plant-specific and industry operating experience should be screened to  
11 determine whether it may involve age-related degradation or impacts to aging  
12 management activities.
  - 13 • A means should be established within the corrective action program to identify, track,  
14 and trend operating experience that specifically involves age-related degradation. There  
15 should also be a process to identify adverse trends and to enter them into the corrective  
16 action program for evaluation.
  - 17 • Operating experience items identified as potentially involving aging should receive  
18 further evaluation. This evaluation should specifically take into account the following:  
19 (a) systems, structures, and components, (b) materials, (c) environments, (d) aging  
20 effects, (e) aging mechanisms, (f) AMPs, and (g) the activities, criteria, and evaluations  
21 integral to the elements of the AMPs. The assessment of this information should be  
22 recorded with the operating experience evaluation. If it is found through evaluation that  
23 any effects of aging may not be adequately managed, then a corrective action should be  
24 entered into the 10 CFR Part 50, Appendix B, program to either enhance the AMPs or  
25 develop and implement new AMPs.
  - 26 • Assessments should be conducted on the effectiveness of the aging management  
27 programs and activities. These assessments should be conducted on a periodic basis  
28 that is not to exceed once every five years. They should be conducted regardless of  
29 whether the acceptance criteria of the particular AMPs have been met. The  
30 assessments should also include evaluation of the aging management program or  
31 activity against the latest NRC and industry guidance documents and standards that are  
32 relevant to the particular program or activity. If there is an indication that the effects of  
33 aging are not being adequately managed, then a corrective action is entered into the  
34 10 CFR Part 50, Appendix B, program to either enhance the AMPs or develop and  
35 implement new AMPs, as appropriate.
  - 36 • Training on age-related degradation and aging management should be provided to those  
37 personnel responsible for implementing the AMPs and those personnel who may submit,  
38 screen, assign, evaluate, or otherwise process plant-specific and industry operating  
39 experience. The scope of training should be linked to the responsibilities for processing  
40 operating experience. This training should occur on a periodic basis and include  
41 provisions to accommodate the turnover of plant personnel.
  - 42 • Guidelines should be established for reporting plant-specific operating experience on  
43 age-related degradation and aging management to the industry. This reporting should  
44 be accomplished through participation in the INPOs’ operating experience program.

1 • Any enhancements necessary to fulfill the above criteria should be put in place no later  
2 than the date the subsequently renewed operating license is issued and implemented on  
3 an ongoing basis throughout the term of the subsequently renewed license.

4 The programmatic activities for the ongoing review of plant-specific and industry experience  
5 concerning age-related degradation and aging management should be described in the  
6 subsequent license renewal application (SLRA), including the Final Safety Analysis Report  
7 (FSAR) supplement. Alternate approaches for the future consideration of operating experience  
8 are subject to NRC review on a case-by-case basis. An example summary program description  
9 of the operating experience program for the FSAR supplement is shown below.

GALL-SLR AMP	GALL-SLR Program	Description of Program	Implementation Schedule	Applicable GALL-SLR Report and SRP-SLR Chapter References
GALL-SLR Appendix B	Operating Experience	<p>This program captures the operating experience from plant-specific and industry sources and is systematically reviewed on an ongoing basis in accordance with the QA program, which meets the requirements of 10 CFR Part 50, Appendix B, and the operating experience program, which meets the provisions of NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff."</p> <p>This program interfaces with and relies on active participation in the INPO operating experience program, as endorsed by the NRC. In accordance with these programs, all incoming operating experience items are screened to determine whether they may involve age-related degradation or aging management impacts. Items so identified are further evaluated and the AMPs are either enhanced or new AMPs are developed, as appropriate, when it is determined through these evaluations that the effects of aging may not be adequately managed. Training on age-related degradation and aging management is provided to those personnel responsible for implementing the AMPs and who may submit, screen, assign, evaluate, or otherwise process plant-specific and industry operating experience. Plant-specific operating experience associated with aging management and age-related degradation is reported to the industry in accordance with guidelines established in the operating experience program.</p>	Existing Program	<p>GALL-SLR IV / SRP-SLR 3.1  GALL-SLR V / SRP-SLR 3.2  GALL-SLR VII / SRP-SLR 3.3  GALL-SLR VIII / SRP-SLR 3.4  GALL-SLR II-III/ SRP-SLR 3.5  GALL-SLR VI / SRP-SLR 3.6</p>

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11 ABSTRACT (200 words or less)

The Generic Aging lessons Learned for Subsequent License Renewal (GALL-SLR) Report contains the staff's generic evaluation of the aging management programs for subsequent license renewal (i.e., for operation from 60 to 80 years). The guidance documents for first license renewal (i.e., for operation from 40 to 60 years) have been reviewed to determine where the programs for first license renewal should be augmented for subsequent license renewal. The report recognizes that there will be new issues due to long-term exposure to radiation and high temperature that will present new challenges to nuclear power plant managers in maintaining safety and reliability. This document identifies the structures and components in the scope of license renewal and provides generic programs for addressing these aging issues. Where it was not possible to develop a generic program, this document suggests that aging issues be addressed by a further evaluation or a plant-specific aging management program. The aging management programs in this document are intended for utilities wishing to submit subsequent license renewal applications. However, the programs described in this document may be used for applications for first license renewal.

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