To: Popova, Alexandra
Subject: RE: 01.20 Service Life Public Meeting Feedback

John Pfabe:

- Although it may not be appropriate for NRC to delineate ALL components (very detailed - likely not all encompassing), based on past observations, the actual NRC inspections / RAIs, sometimes become very resource intensive, time consuming and involved (e.i. additional TAIs, Insp OIs or NC,…) if the individual NRC reviewer doesn't feel (opinion) the licensee demonstrates or justifies a particular basis to their expectations (for the licensee's call).

  To demonstrate a particular component is "still OK" it shouldn't necessarily involve new science projects (again the old challenge to "engineering judgement")
  e.g. vendor states an electrical component has a life of 10 years in a particular environment (150F and 85% RH). However, the component may have been in a 95F / 50% RH area for it's life time.

  Can life history of similar components be used, since the nuclear application may represent a "rare " use of the subject component
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- To demonstrate a particular component is "still OK" it shouldn't necessarily involve new science projects (again the old challenge to "engineering judgement")
  e.g. vendor states an electrical component has a life of 10 years in a particular environment (150F and 85% RH). However, the component may have been in a 95F / 50% RH area for it's life time. Any recommendation to guidance?
- Can life history of similar components be used, since the nuclear application may represent a "rare " use of the subject component ?