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March 15, 2016

Ms. Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Additional Industry Feedback on Changes to GALL-SLR (Draft NUREG-2191) and SLR-SRP (Draft NUREG-2192); Federal Register Notice 80 FR 79956; Docket ID: NRC-2015-0251

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ is providing the attached additional comments on draft NUREG-2191, "Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report," and draft NUREG-2192, "Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants (SRP-SLR)." The attachment identifies two additional comments associated with aging management reviews for AMP XI.M30 Fuel Oil Chemistry and AMP XI.M39 Lubricating Oil Analysis Program.

We appreciate the opportunity to provide comments for your consideration, as well as the opportunity to continue the technical dialogue with the NRC staff. If you have any questions, please contact me.

Sincerely,

Jerud Hanson

Attachment

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

Attachment 1
Additional NUREG-2191 and NUREG-2192 Mechanical Comments

| GALL / SRP comments | | | |
|---------------------|--|---|--|
| # | Location of Change | Description of Change | Justification For Change |
| 42 | SLR-SRP Table 3.3.1-68 GALL VII.G.AP-234 SLR-SRP Table 3.3.1-69 GALL VII.G.AP-132 VII.H1.AP-132 VII.H2.AP-132 SLR-SRP Table 3.3.1-70 GALL VII.H1.AP-105 VII.H2.AP-105 SLR-SRP Table 3.3.1-71 GALL VII.G.AP-136 VII.H1.AP-129 VII.H1.AP-136 VII.H2.AP-129 VII.H2.AP-136 AMP XI.M30 AMP XI.M32 | <p>Revise the Aging Management Program (AMP) reference for the SLR-SRP Table 3.3.1-68, Table 3.3.1-69, Table 3.3.1-70, and Table 3.3.1-71 from AMP XI.M30, Fuel Oil Chemistry, and XI.M32, One-Time Inspection, to only reference AMP XI.M30, Fuel Oil Chemistry. Revise the GALL-SLR AMR lines associated with SLR-SRP Table 3.3.1-68, Table 3.3.1-69, Table 3.3.1-70, and Table 3.3.1-71 to delete AMP XI.M32 One-Time Inspection and only reference AMP XI.M30, Fuel Oil Chemistry</p> <p>Also revise GALL-SLR AMP XI.M30, Fuel Oil Chemistry, program description second paragraph to delete the reference to one-time inspection as an acceptable verification program. In addition, revise AMP.XI.M32, One-Time Inspection program description and associated elements to delete the reference to the fuel oil environment.</p> | <p>A one-time inspection of selected components is not required as a verification program for AMP XI.M30, Fuel Oil Chemistry. AMP XI.M30 requires each diesel fuel oil tank to be periodically cleaned and inspected on a 10 year frequency. Periodic cleaning of the tanks allows removal of water collected at the bottom of the tank to minimize the amount of time water has to collect and the length of contact time. Periodic inspections of tank internal surfaces and thickness measurements are also conducted on a 10 year frequency to ensure loss of material is not occurring. Any degradation of the tank internal surfaces is reported and is evaluated using the corrective action program.</p> <p>In addition water and microbiological activity are routinely monitored. If accumulated water is found in a fuel oil storage tank, it is immediately removed. Biocides or corrosion inhibitors may also be added as a preventive measure.</p> <p>Other than ground water in-leakage or inadvertent introduction, there are limited opportunities for introduction of water into fuel oil systems. Industry operating experience and one-time inspections for the initial license renewal period have confirmed the effectiveness of the Fuel Oil Chemistry Program. This operating experience has not resulted in any plant specific program for control of degradation in fuel oil systems due to water accumulation or microbiological activity.</p> <p>Periodic inspections, removal of water, chemistry controls for water accumulation or microbiological activity, and operating experience support the removal of the one-time inspection requirement from SLR-SRP Table 3.3.1-68, Table 3.3.1-69, Table 3.3.1-70, and Table 3.3.1-71 and associated GALL-SLR lines.</p> |

| GALL / SRP comments | | | |
|----------------------------|--|---|--|
| # | Location of Change | Description of Change | Justification For Change |
| 43 | SLR-SRP Table 3.2.1-49 Table 3.2.1-50 Table 3.2.1-51 Table 3.3.1-97 Table 3.3.1-98 Table 3.3.1-99 Table 3.3.1-100 Table 3.3.1-101 Table 3.4.1-40 Table 3.4.1-41 Table 3.4.1-42 Table 3.4.1-43 Table 3.4.1-44 Table 3.4.1-45 Table 3.4.1-46 And associated GALL-SLR AMR lines AMP XI.M39 AMP XI.M32 | <p>Revise the Aging Management Program (AMP) reference for the referenced SLR-SRP Table line items from AMP XI.M39, Lubricating Oil Analysis, and XI.M32, One-Time Inspection, to only reference AMP XI.M39, Lubricating Oil Analysis. Revise the GALL-SLR AMR lines associated with referenced SLR-SRP Table line items to delete AMP XI.M32 One-Time Inspection and only reference AMP XI.M39, Lubricating Oil Analysis.</p> <p>Also revise GALL-SLR AMP XI.M39, Lubricating Oil Analysis, program description second paragraph to delete the reference to one-time inspection as an acceptable verification program. In addition, revise AMP.XI.M32, One-Time Inspection program description and associated elements to delete the reference to the lubricating oil environment.</p> | <p>A one-time inspection of selected components is not required as a verification program for AMP XI.M39, Lubricating Oil Analysis. Water and particulate concentration should not exceed limits based on equipment manufacturer's recommendations or industry standards. Phase-separated water in any amount is not acceptable and addressed by the corrective action program. Corrective actions may include increased monitoring, corrective maintenance, further laboratory analysis, and engineering evaluation of the system.</p> <p>Other than lube oil heat exchanger failures or inadvertent introduction, there are limited opportunities for introduction of water into lubricating oil systems. Heat exchanger lube failures would be immediately repaired/corrected and lubricating oil parameters restored to acceptable levels. Industry operating experience and one-time inspections for the initial license renewal period have confirmed the effectiveness of the Lubricating Oil Analysis Program. This operating experience has not resulted in any plant specific program for control of degradation in lubricating oil systems due to water accumulation.</p> <p>Chemistry controls for water accumulation, zero tolerance for phase separated water, and operating experience support the removal of the one-time inspection requirement from the referenced SLR-SRP Table line items.</p> |