

# Industry Comments on GALL-SLR Supplement Appendix J AMP

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NRC One White Flint North

# Appendix J Comments 2 & 3

## Industry Comment

- Program Description, page XI.S4-1: Delete sentence discussing Type C testing being performed under a different AMP
- Element 1, page XI.S4-2: Delete the requirement in AMP XI.S4 element 1 to identify other SLR AMPs for components that are not managed for aging by AMP XI.S4

## Staff Response:

- The Staff agrees with the comment in part (Staff technical basis agreed with the comment for deletion)
- The Staff agrees with the comment in part

# Appendix J Comments 2 & 3 (cont.)

## Discussion

- Staff technical basis noted the insertion of Type B or C testing is accepted as it clarifies the type of excluded testing. For the suggested deletion, the Staff agrees there are a number of AMPs or TLAAAs that could support the management of aging effects of the excluded pressure boundary components. However, it is important that the applicant identifies one or more of these for the Staff to evaluate their adequacy for reasonable assurance that the integrity of the containment pressure boundary is maintained.
- Industry agrees with the removal of the following from the 5<sup>th</sup> paragraph of the program description : Type C tests that are not performed under this program, could be included under an Inservice Testing Program for systems containing CIVs.
- The changes to be made AMP XI.S4 element 1 are not clear.

# Appendix J Comments 2 & 3 (cont.)

## Technical Basis

- SLR-SRP Appendix A (BTP RSLB-1 ) notes the following for AMPs Element 1: “The scope of the program should include the specific SCs, the aging of which the program manages.”
- NUREG-2191 Chapter V.C. (Containment Isolation Components) identifies aging management programs for mechanical containment isolation components.
- The introduction to NUREG-2191 Chapter V.C. notes:
  - AMPs for hatchways, hatch doors, penetration sleeves, penetration bellows, seals, gaskets, and anchors are addressed in II.A and II.B
  - Containment isolation valves for in-scope systems are addressed in the appropriate Section in IV, VII and VIII.
- The mechanical portions of GALL-SLR noted above identify AMPs other than Appendix J to manage the aging of containment isolation components pressure boundaries (e.g. valves and piping).

## Appendix J Comments 2 & 3 (cont.)

- Other than listing the mechanical containment isolation components and their proposed AMP, no new aging management requirements are imposed by AMP XI.S4.
- A second check of aging management program adequacy for mechanical containment isolation components by structural Staff appears to be duplicate effort and is recommended for deletion from AMP XI.S4 Element 1.
- Use of the IPA process to identify redundant program testing/examination coverage was not intended by NEI 95-10 or 10 CFR 54.

Are there questions that require technical discussion?