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April 7, 2017

Mr. Steven D. Bloom
NRR/DLR/RSRG, 11-F1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Feedback on the February 2017 Changes to GALL–SLR (Draft NUREG–2191) and SLR–SRP (Draft NUREG–2192)

Project Number: 689

Dear Mr. Bloom:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ is providing the attached comments on the February 2017 draft of 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 Industry recognizes the substantial Staff comment incorporation effort and appreciates this opportunity to provide feedback. Attachment 1 provides comments on significant items that were not provided in the December 2015 drafts of the GALL-SLR and SRP-SLR. In addition to the new items that are significant, Attachment 1 has also been supplemented with comments that provide to clarify our understanding of several industry positions submitted and discussed during our 2016 public meetings. Our main objective, same as yours, is to ensure the highest quality guidance is made available to the industry by July with particular consideration for the lead plants who are already assembling their applications for submittals in 2018 and 2019.

In addition to the concerns identified in Attachment 1, the following attachments contain additional industry comments on the February 2017 draft documents:

- Attachment 2 – NUREG-2191 and NUREG-2192 mechanical comments
- Attachment 3 – NUREG-2191 and NUREG-2192 structural comments
- Attachment 4 – NUREG-2191 and NUREG-2192 electrical comments.

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

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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,

A handwritten signature in black ink, appearing to read "Jerud Hanson", with a long horizontal flourish extending to the right.

Jerud Hanson

Attachments

c: Mr. George Wilson, NRR/DLR, NRC