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Subject: Draft RAI Appendix J
Date: Tuesday, April 16, 2019 2:54:23 PM
Attachments: [044 SPS RAI Appendix J Prinaris Pettis 03 20 2019 ERO.docx](#)

For your review.

Want a clarification call?

Thanks

Manny

DRAFT RAI B2.1.32-1

10 CFR 54.21(d) states, “[t]he FSAR supplement for the facility must contain a summary description of the programs and activities for managing the effects of aging...”

Background:

SLRA Section A2.1.32, “10 CFR Part 50, Appendix J,” does not state that it is “subject to the requirements of 10 CFR Part 54.”

GALL-SLR Table X-01, “FSAR Supplement Summaries for GALL-SLR Report Chapter XI Aging Management Programs,” for AMP XI.S4 recommends that the UFSAR supplement includes a statement about 10 CFR Part 54, “Requirements for Renewal of Operating Licenses for Nuclear Power Plants.” Specifically, it omitted a statement regarding its conformance to the “requirements of 10 CFR Part 54.”

Issue:

The licensing basis for this program for the subsequent period of extended operation will not be consistent with staff issued guidance documents if the UFSAR supplement does not include the missing text, “subject to the requirements of 10 CFR Part 54.” The staff cannot complete its review of the “10 CFR Part 50, Appendix J,” UFSAR supplement without additional information or reviewing the changes to SLRA Section A2.1.32 necessary to address conformance of the AMP to 10 CFR Part 54.

Request:

State the basis why SLRA Section A2.1.32 does not cite “subject to the requirements of 10 CFR Part 54.” Alternatively, what are the changes that will be incorporated into SLRA Section A2.1.32 to include these requirements?