



Proposed NRC SLR Changes: Industry Perspectives

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Industry Perspectives



Recommendations for Additional Changes

EPRI Selective Leaching Task Force

Proposed Industry Short List:

- Mechanical
- Structural
- Electrical
- AMR Standard Note F-J & UFSAR Supplement

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Recommendations for Additional Changes



- AMP XI.S8 Protective Coating Monitoring & Maintenance
 - Revise element 4 to state requirements of ASTM Spec D5163-08 paragraph 6
 - Frequency of in-service coating inspections shall be determined by licensee. It is a good practice to perform inspections during each refueling outage
- AMP X.M2 Neutron Fluence Monitoring
 - Address adequacy of RG 1.190 for extended beltline calculations
- AMP XI.E3A/B/C Electrical Insulation Not Subject to EQ
 - Revise to allow manholes with level monitoring and alarms to be inspected at least once every five years.
- Revise structural AMRs to reduce plant-specific AMPs

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EPRI Selective Leaching Task Force



The EPRI Selective Leaching Task Force and the NEI License Renewal Working Groups are working together to provide change recommendations for GALL-SLR and GALL Rev 2 AMP XI.M33 in early 2020

- Propose corrective action thresholds based on a graded approach
- Recommendations and associated justification to amend the 100% opportunistic inspection requirements to perform opportunistic inspections based on engineering evaluation
- Other clarifications could be proposed after the NEI License Renewal Working Group Meetings and SLTF Meeting in 2020

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Proposed Industry Short List



A limited list of changes is requested to be addressed on a priority basis to support near term applicants. The list is based upon the following considerations:

- Incorporate recent changes in Industry guidance documents that have a significant impact to aging management
- Promote a more efficient Staff review or Industry SLRA preparation by reducing AMP exceptions, plant-specific program AMR Lines, or AMR standard notes F-J
- AMP changes that significantly reduce plant operating costs

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Proposed Industry Short List - Mechanical



- XI.M16A PWR Vessel Internals & Associated AMRs
 - Incorporate MRP-227 Rev 1-A as an acceptable basis for the Gap Analysis of PWR Vessel Internals
- EPRI Chemistry Guidance Changes
 - EPRI 3002010645 R8 Secondary Chemistry (XI.M2)
 - EPRI 3002001623 BWRVIP-190 R1 (XI.M2)
 - EPRI 3003000590 R2 Closed-Cycle Cooling (XI.M21A)
- XI.M42 Internal Coatings/Linings
 - Allow Fire Water System Program tests/inspections in lieu of AMP XI.M42 inspections for concrete linings or other coatings in fire water piping.
- XI.M12 Thermal Aging Embrittlement
 - Allow 2019 ASME Code for CASS ferrite > 25%

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Proposed Industry Short List - Structural



- Table 3.5-1 Structural AMRs With Plant Specific AMPS
 - Reduce plant-specific AMP Structural AMRs for Inaccessible areas in SRP-SLR Table 3.5-1 items 3/11/12/14/42/47 thru 51
- FER 3.5.2.2.2.6 Add RPV Structural Steel
 - Revise FER 3.5.2.2.2.6 or add a new FER for loss of fracture toughness & related reduction in strength due to irradiation embrittlement for RPV structural steel
- XI.S1 ASME Section XI, Subsection IWE
 - Revise XI.S1 to perform a fatigue waiver calculation in lieu of the supplemental surface exam for pressure retaining components that are subject to cyclic loading but have no fatigue analysis

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Proposed Industry Short List – Elec, AMRs



- XI.E7 High Voltage Insulators
 - Address polymer and other high voltage insulator materials
 - Clarify AMP can manage medium voltage insulators
- XI.E3A/B/C Electrical Cable Insulation Not Subject to EQ
 - Revise to allow manholes with level monitoring and alarms to be inspected at least once every five years
- AMR Standard Notes F-J
 - Add new AMR lines to incorporate standard note lines F-J from Turkey Point, Peach Bottom & Surry SLRAs
- UFSAR Supplement
 - Incorporate generic changes from Turkey Point, Peach Bottom & Surry SLRAs

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Is there any information that requires follow-up?