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Draft NUREG : Revision 1 of Subsequent License Renewal Guidance Documents, and Supplement 1 to Associated Technical Basis Document

Comment On: NRC-2023-0096-0001

Draft NUREG: Revision to Subsequent License Renewal Guidance Documents, and Supplement to Associated Technical Bases Document

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Comment on FR Doc # 2023-14577

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General Comment

XI.M32 ONE-TIME INSPECTION

The staff added the following statement to XI.M32 Element 4 Detection of Aging Effects:

For recently installed repairs/replacements that may not be bounded by other population samples, the one-time inspection should be performed after sufficient operational exposure to provide reasonable confidence in inspection results.

This is an example of the prescriptive nature that the staff continually strives for that provides little or no value. This additional detail is totally unnecessary for the following reasons:

1. Lines 9 to 12 of page XI-213 already adequately covers the issue. It says:

9 The inspection includes a representative sample of each population (defined as components 10 having the same material, environment, and aging effect combination) and, where practical, 11 focuses on the bounding or lead components most susceptible to aging due to time in 12 service, and the severity of operating conditions.

2. Is it even possible to have “recently installed repairs/replacements that may not be bounded by other population samples”. Other components are older. If it is a new material/environment and recently replaced, then One time inspections shouldn’t be needed since this program is used to verify the lack of significance of an aging effect and recently installed repairs/replacements shouldn’t have any significant degradation.

3. What does “recently” mean? It is too vague to implement.

See Attachment for changes to text.

Attachments

XI M32 One-Time Inspection 2 Comment

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Note: Proposed changes to text are indicated by ***bold italicized text***.

NUREG 2191 Volume 2 Revision 1 Draft	Mark up of text	Basis for comment
XI-215 & 215 Lines 41 to 4	41 With respect to inspection timing, the sample of components are inspected before the end of 42 the current operating term to provide reasonable assurance that the aging effect will not 43 compromise any intended function during the subsequent period of extended operation. 44 Inspections need to be timed to allow the inspected components to attain sufficient age such 45 that the aging effects with long incubation periods (i.e., those that may affect intended 46 functions near the end of the subsequent period of extended operation) are identified. Within 47 these	Delete added clarification since it is unnecessary prescriptive detail as indicated above.

