

# PUBLIC SUBMISSION

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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.M21A CLOSED TREATED WATER SYSTEMS

XI.M29 OUTDOOR AND LARGE ATMOSPHERIC METALLIC STORAGE TANKS

XI.M33 SELECTIVE LEACHING

XI.M36 EXTERNAL SURFACES MONITORING OF MECHANICAL COMPONENTS

XI.M38 INSPECTION OF INTERNAL SURFACES IN MISCELLANEOUS PIPING AND DUCTING COMPONENTS

In programs XI.M21A, XI.M29, XI.M33, XI.M36 and XI.M38 the staff added:

Samples are taken from multiple locations to ensure that a representative sample is examined, focusing on components most susceptible to the applicable aging effect.

This is another example of the NRC staff added unnecessary detail to the SLR GALL. This statement is not needed for the following reasons:

1. Each program already states that a representative sample be taken, For example:

M21A lines 28 to 30: “a representative sample of 20 percent of the 29 population (defined as components having the same material, water treatment program, and 30 aging effect combination)”

M29 lines 39 & 40: sufficient 40 insulation is removed to determine the condition of the exterior surface of the tank,

M33 lines 32 to 34: 32 Inspections, where possible, focus on the bounding or lead components most susceptible to 33 aging based on their time in service and the severity of operating conditions for each 34 population.

2. Too vague to be helpful. What does “multiple locations” mean.

These statements should be deleted. The staff should stop adding unnecessary, prescriptive or vague material to the guidance.

See attachment for text changes.

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## **Attachments**

XI M21A Closed Treated Water Systems 2 Comment

**XI.M21A CLOSED TREATED WATER SYSTEMS**

**XI.M29 OUTDOOR AND LARGE ATMOSPHERIC METALLIC STORAGE TANKS**

**XI.M33 SELECTIVE LEACHING**

**XI.M36 EXTERNAL SURFACES MONITORING OF MECHANICAL COMPONENTS**

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These statements should be deleted. The staff should stop adding unnecessary , prescriptive or vague material to the guidance.

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

<b>NUREG 2191 Volume 2 Revision 1 Draft</b>	<b>Mark up of text</b>	<b>Basis for comment</b>
Page XI.156 lines 35 to 37	35 25 inspections. <del><b><i>Samples are taken from multiple locations to ensure that a representative-36 sample is examined, focusing on components most susceptible to the applicable aging 37 effect.</i></b></del> Technical justification for an alternative sampling methodology is included in the	

Page XI-190 lines 46 to 48	46 surface of the tank. <del>Samples are taken from multiple locations to ensure that a 47 representative sample is examined, focusing on the components most susceptible to the 48 applicable aging effect.</del> Aging effects associated with corrosion under insulation for outdoor	
Page XI-219 lines 8 to 11	8 • When inspections are conducted on piping, inspection of a 1-foot axial length section is 9 considered to be one inspection. <del>Samples are taken from multiple locations to ensure 10 that a representative sample is examined, focusing on the components most susceptible 11 to selective leaching.</del>	
Page XI-231	45 recommended extent of 25 inspections. <del>Samples are taken from multiple locations to ensure 46 that a representative sample is examined, focusing on the components most susceptible to 47 the applicable aging effect.</del> The provisions of GALL-SLR Report AMP XI.M38 to conduct	
XI-232 lines 27 & 28	27 length sections and components for each material type is inspected. <del>Samples are taken 28 from multiple locations to ensure that a representative sample is examined.</del> Inspection	
XI-244 lines 30 to 32	30 meet the recommended extent of 25 inspections. <del>Samples are taken from multiple locations 31 to ensure that a representative sample is examined, focusing on components most 32 susceptible to the applicable aging effect.</del> Opportunistic inspections need not be conducted	