

**From:** [Brian Allik](#)  
**To:** [Bensi, Mark J](#); [Siva Lingam](#)  
**Cc:** [Lauren Gibson](#); [Vaughn Thomas](#); [Austin Im](#); [Steven Bloom](#); [John Wise](#); [James Gavula](#)  
**Subject:** RE: RE: [External] Perry License Renewal  
**Date:** Monday, July 8, 2024 9:33:52 AM  
**Attachments:** [image001.png](#)

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Mark,

GALL Rev. 2 AMP XI.M33 states “[f]or materials and environments where selective leaching is currently occurring or for materials in environments where the component has been repaired with the same material, **a plant-specific program is required.**” I see that you merged SLR guidance into the AMP, but since our guidance for selective leaching is significantly different between LR and SLR, it makes the current program difficult to understand.

In addition, I am counting three populations with selective leaching operating experience (gray cast iron/raw water, gray cast iron/soil, and ductile iron/soil (as was discussed during breakout session question #3)). I’m not sure why only one population is referenced in the update.

Furthermore, as was discussed during breakout session question #2, it appears that ductile iron and gray cast iron are being grouped together, which is not consistent with our current staff position (see *GALL-SLR and SRP-SLR Supplemental Staff Guidance* (ML16041A090) page 2). I didn’t see this addressed in either letter that recently came in.

I can support a meeting during the times you are available, thanks.

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**From:** Bensi, Mark J <mjbensi@energyharbor.com>  
**Sent:** Monday, July 8, 2024 7:11 AM  
**To:** Siva Lingam <Siva.Lingam@nrc.gov>  
**Cc:** Lauren Gibson <Lauren.Gibson@nrc.gov>; Vaughn Thomas <Vaughn.Thomas@nrc.gov>; Austin Im <Austin.Im@nrc.gov>; Steven Bloom <Steven.Bloom@nrc.gov>; Brian Allik <Brian.Allik@nrc.gov>; John Wise <John.Wise@nrc.gov>; James Gavula <James.Gavula@nrc.gov>  
**Subject:** [External\_Sender] RE: [External] Perry License Renewal

Good Morning Siva,

My team and I would be happy to support a call. Currently, we have availability 1000-1300 and after 1500 tomorrow. We are also available 0900-1100 and after 1430 on Wednesday. In the interest of preparation, if there are any source/reference/guidance documents that will be discussed that specify the need for two separate programs, please let us know in advance of the call. I’d like my team to be as prepared as possible to maximize the discussion.

Thank You,

Mark J. Bensi  
Project Manager, Perry License Renewal  
Perry Nuclear Engineering Department  
Perry Nuclear Power Plant

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**From:** Siva Lingam <[Siva.Lingam@nrc.gov](mailto:Siva.Lingam@nrc.gov)>  
**Sent:** Wednesday, July 3, 2024 2:40 PM  
**To:** Bensi, Mark J <[mjbensi@energyharbor.com](mailto:mjbensi@energyharbor.com)>  
**Cc:** Lauren Gibson <[Lauren.Gibson@nrc.gov](mailto:Lauren.Gibson@nrc.gov)>; Vaughn Thomas <[Vaughn.Thomas@nrc.gov](mailto:Vaughn.Thomas@nrc.gov)>; Austin Im <[Austin.Im@nrc.gov](mailto:Austin.Im@nrc.gov)>; Steven Bloom <[Steven.Bloom@nrc.gov](mailto:Steven.Bloom@nrc.gov)>; Brian Allik <[Brian.Allik@nrc.gov](mailto:Brian.Allik@nrc.gov)>; John Wise <[John.Wise@nrc.gov](mailto:John.Wise@nrc.gov)>; James Gavula <[James.Gavula@nrc.gov](mailto:James.Gavula@nrc.gov)>  
**Subject:** [External] Perry License Renewal

We have a major issue with the new classification of the Selective Leaching AMP as both consistent and plant-specific. If you are proposing a plant-specific program for certain material/environment combinations where you have adverse operating experience, we need a new program to review the program elements individually. This is the case at Diablo Canyon where they have two Selective Leaching programs (one consistent w/ GALL-LR and one plant-specific). We would like to have a clarification call or public meeting on this issue as early as possible. Please let me know.



Thank you.

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