



NUCLEAR ENERGY INSTITUTE

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October 26, 2000

Ms. Annette L. Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: NRC Request for Public Comments on the Draft Guidance Documents
for License Renewal (65 FR 53047, August 31, 2000)

Dear Ms. Vietti-Cook:

In our letter dated October 13, 2000, NEI provided comments on numerous license renewal guidance documents that were noticed in the August 31, 2000, *Federal Register Notice*.

One of the documents we commented on was the Generic Aging Lessons Learned (GALL) report. Unfortunately, the comments on GALL Chapter X were inadvertently omitted from our October 13 letter. A copy of those comments is provided as Enclosure 1 to this letter.

Please contact me at 202-739-8080 (am@nei.org) or Doug Walters at 202-739-8093 (djw@nei.org) if you have any questions or desire further clarification of these comments.

Sincerely,

Alex Marion

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Rules and Directives

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Add Raj Anand - RKA
Steve Koenick - SS K2

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COMMENT NUMBER	ITEM NUMBER	PROPOSED CHANGE	JUSTIFICATION FOR PROPOSED CHANGE
G X-1	GALL X	Revise the title of the Chapter to be "Chapter X Programs that Support TLAAs"	The programs identified in this section are not necessarily in support of Option (iii). Cycle counting and EQ are programs that can also be used to confirm design basis assumptions in support of Options (i and ii). See comment S 4.3-9 above.
G X.M1-1	GALL X.M1	GALL X.M1 Metal Fatigue of Reactor Coolant Pressure boundary intermingles thermal cycle counting with the addressing of reactor water effects. Delete the information in X.M1 associated with reactor water effects. Specifically: 1. Program Description: Delete the second paragraph and the reference in the third paragraph to environmental effects. 2. Evaluation and Technical basis: Adjust the numbered topics as follows: (2) Preventive Actions: Delete the phrase "and considering the effect of the reactor water environment, as described under program description above." (3) In the third sentence, delete "local," revise "of the plant transient" to "of plant transients" and delete "for	The thermal cycle count method of managing the existing fatigue design basis has been found acceptable for renewal and can be used by the majority of the industry. When reworded, the attributes in X.M1 can clearly be referenced by renewal applicants beginning near-term. Addressing reactor water effects is less clear and has been done differently by the initial applicants. Additionally, it is the subject of ongoing industry and NRC efforts (Reference Christopher I. Grimes July 18, 2000 letter, <i>Summary of Meeting with the Nuclear Energy Institute (NEI) to Discuss Fatigue of Metal Components for 60-year Plant Life</i>, Adams Accession #ML003733789). Given the current state of awareness on the ways to address reactor water effects, the near-term applicants can not use X.M1 the way it is currently structured. Since the GALL report was designed to create materials that

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		each transient”. (4) Detection of Aging Effects: Reword to “not applicable for a preventive management program.” (5) Monitoring and Trending: Reword to “The program should be provided for periodic assessment of actual accumulated cycles versus the design calculation values.” (6) Acceptance Criteria: Delete the phrase “considering environmental fatigue effects.” (7) Corrective Actions: Replace the second sentence with the following, “Acceptable corrective actions may include a more rigorous analysis of the component to demonstrate that the design code limit will not be exceeded, inspection coupled with appropriate flaw tolerance assessment, repair, or replacement of the component. ASME Section XI Appendix L provides methods and criteria for performing these activities.” Delete the last sentence. (10) Operating Experience: In the last sentence, replace the phrase “in selecting the monitored locations” with “by the program.” 3. References: Delete the three	can be referenced by renewal applicants, removing the information associated with reactor water effects from the GALL and maintaining them only in the SRP-LR until a future time better satisfies this objective. Item (3): For fatigue monitoring programs, the actual transient history may be evaluated, not each specific transient. Item (7): Appendix L permits a licensee to demonstrate that a component is acceptable with regard to cumulative fatigue effects by performing a flaw tolerance evaluation of the component as an alternative to meeting the fatigue requirements of ASME Section III. The NRC has reviewed Appendix L and determined that its use is generally acceptable. Licensees should be aware that the ASME Code is considering revisions to Appendix L concerned with flaw aspect ratio and the influence of reactor water environmental effects on both fatigue usage and crack growth evaluations.

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		references. Add a reference to NUREG-1723, <i>Safety Evaluation Report Related to the License Renewal of Oconee Nuclear Station Units 1, 2 and 3</i> where the thermal cycle count method of fatigue management was accepted by the NRC.	
G X.S1-1	GALL X.S1	Move this program description to Chapter XI.	See detailed comments for SRP Chapter 4.5. The activities described in X.S1 constitute an aging management program and do not address a TLAA.
G X.S1-2	GALL X.S1	Clarify regulatory meaning of the “trend line.”	Under Program Description, last sentence in second paragraph begins “The goal would be to keep the trend line above the PLL,” because “if the trend line crosses the PLL, the existing prestress in the containment could go below the MRV soon after the inspection.” If the extension of the trend line crosses the PLL at some point in the future, then the second part of the sentence about not meeting the criteria “soon after the inspection” would not necessarily be true. Therefore, “trend line” needs to be clarified in this case as to whether it means the trend line only including the last data point, or the extension of the existing data trend line.