

July 19, 2000

MEMORANDUM TO: Docket Files

FROM: Sam Lee, Sr. Materials Engineer
Engineering Section
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

SUBJECT: NUCLEAR ENERGY INSTITUTE (NEI) COMMENTS ON LICENSE
RENEWAL ISSUE NO. 98-0085, "REACTOR VESSEL SURVEILLANCE
PROGRAM"

By letter dated December 3, 1999, the staff provided NEI with an evaluation and proposed resolution of the subject license renewal issue. On July 19, 2000, I received an electronic mail from Mr. Douglas Walters of NEI transmitting industry comments on the subject issue for staff information. (See enclosure) The staff plans on considering these comments in developing the draft Generic Aging Lessons Learned (GALL) report and Standard Review Plan for License Renewal for public comment in August.

Project No. 690

Enclosure: As stated

cc: PUBLIC

Sam:

I just wanted to follow-up with you on the vessel surveillance topic.

Your letter to NEI dated December 3, 1999 provides guidance on an acceptable reactor vessel surveillance program for renewal. Paragraph 6 of the guidance states:

6. If an applicant has a surveillance program which consists of capsules with a projected fluence exceeding the 60-year fluence at the end of 40 years, the applicant should pull these capsules when they reach the 60-year fluence and test one capsule to meet the requirements of ASTM E185 and place the remaining capsules in storage without testing. Any changes in anticipation of additional renewals, however, should be discussed with the staff.

Feedback from the industry is that a capsule may be pulled that has a 58-year fluence or a 62-year fluence. Since the capsules will be pulled during an outage, licensees will pull them closest to the 60-year fluence as possible but it may not be exactly 60-years.

A second comment is that the guidance should consider that licensees may elect to renew a second time – out to 80 years. Paragraph 6 does acknowledge additional renewal but merely states the licensee should discuss with the staff.

If a licensee has 6 capsules installed in the vessel n start-up, the first 4 could be pulled to comply with ASTM E 185. The fourth capsule would be pulled at the 60-year fluence. There are a number of potential options for the remaining two capsules none the least of which is to pull them at the 80-year fluence level. Paragraph 6 could be re-written to account for these options.

Enclosure