

December 14, 2000

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) ON INDUSTRY'S COMMENTS ON THE DRAFT "GENERIC AGING LESSONS LEARNED (GALL)" REPORT AND STANDARD REVIEW PLAN (SRP) FOR CONTAINMENTS, AND STRUCTURES & COMPONENT SUPPORTS

On November 15, 2000, representative of NEI met with the Nuclear Regulatory Commission (NRC) staff in Rockville, Maryland, regarding the industry's comments on Chapter II "Containments" and Chapter III "Structures and Component Supports" of the draft GALL report and Chapter 3 of the SRP dated August 2000. By letter dated October 13, 2000, NEI has provided their written comments for discussion at this meeting. A list of attendees is enclosed.

The comment numbers listed below were the items discussed and clarified during the meeting. Also, action items are identified.

Chapter II "Containments"

G-IIA1-1 (Inaccessible area):

NEI representatives questioned the need for specific aging management programs for structures and components in inaccessible areas. The staff clarified that the intent is to manage aging effects that may not be evident in the surrounding areas. NEI plans to submit additional information addressing aging management of inaccessible areas.

G-IIA1-10 (Deletion of Appendix J and Coating programs):

NEI proposed to delete Appendix J and Coating programs, as IWE is adequate for aging management of loss of material due to corrosion of steel elements. Discussion focused on leak tightness of containments that requires both Appendix J program and coating program.

G-IIA2-4 (In lieu of ASME XI, IWL):

In lieu of ASME XI, IWL, NEI proposed to credit the Maintenance Rule (10 CFR 50.65), Regulatory Guide 1.160 and NUMARC 93-01 for aging management of concrete elements. The staff clarified that IWL is a requirement for aging management of concrete containments. NEI is to clarify or withdraw the comment.

Chapter III "Structures and Component Supports"

G-III A5-1 (Water chemistry program):

For aging management of the stainless steel liner in the spent fuel pool, discussed merits of using both monitoring of leak chase system and a water chemically program vs. use of just the water chemistry program.

G-III B1-2 (Delete vibration and cyclic induced cracking):

Discussed NEI's proposed deletion of vibration and cyclic induced cracking.

G-III B1-3 (SCC of high strength bolting for NSSS component supports):

The staff indicated that subsection IWF may not address stress corrosion cracking.

G-III B1-6 (Detection of cracking due to cyclic loading):

Discussion was focused on the adequacy of visual examination VT-3 vs. VT-1 for detecting fine cracks.

Chapter XI "Aging Management Program"

G-XI.S5-1 (Deletion of references to A-46 program):

Discussed leaving both IEB 80-11 and USI A-46 as part of the scope of the Chapter XI.S.5-structure monitoring program (SMP).

G-XI.S6-1/2/3 (SMP):

NEI would provide operating experience information on the implementation of SMP developed under the Maintenance Rule per NEI 96-03.

G-XI.S6-4/5/6 (SMP):

Discussed that the SMP should meet 10 CFR 50 Appendix B (QA) and incorporate these comments if appreciated.

The staff indicated that it would consider NEI's comments on the draft GALL report and SRP and incorporate their comments if appropriate.

/RA/

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Office of Nuclear Reactor Regulation

Project No. 690

Enclosure: As stated

cc w/encl: See next page

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*See previous concurrence

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ATTENDANCE LIST
NRC PUBLIC MEETING
November 15, 2000

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1. Bob Whorton	South Carolina Electric & Gas
2. J. E. Wroniewicz	Dominion Virginia Power
3. Partha S. Ghosal	Southern Company
4. Gregory B. Coudret	Florida Power & Light
5. Frank E. Gregor	LCM Technology (EPRI)
6. David C. Jeng	NRC/NRR/DE/EMEB
7. Arnold Lee	NRC/NRR/DE/EMEB
8. J. T. Costello	NRC/RES/DET
9. Herman L. Graves	NRC/RES/DET
10. James A. Davis	NRC/NRR/DE/EMC
11. Rich Morante	BNL
12. Joseph Braverman	BNL
13. Debbie Keiser	Duke
14. Lee Stredevant	CNS
15. Ahmed Ouaou	Exelon
16. Charles Sorrell	Dominion/Virginia Power
17. Hai-Boh Wang	NRC/NRR/DRIP/RLSB
18. Pai-Ying Chen	NRC/NRR/DE/EMEB
19. Doug Walters	NEI
20. Peter Kang	NRC/NRR/DRIP/RLSB
21. P. T. Kuo	NRC/NRR/DRIP/RLSB
22. Hans Asher	NRC/NRR/DE/EMEB
23. Tom Cheng	NRC/NRR/DE/EMEB
24. Sam Lee	NRC/NRR/DRIP/RLSB

Enclosure

NUCLEAR ENERGY INSTITUTE

Project No. 690

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