

February 27, 2001

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF NUCLEAR REGULATORY COMMISSION (NRC) STAFF
MEETING WITH NEI TO DISCUSS GALL/SRP-LR OPEN ITEMS

BACKGROUND

On February 7, 2001, the NRC staff and NEI met to discuss the items in Attachment 1. The purpose for discussing these items was to reach agreement with NEI regarding changes to NEI's license renewal guidance document, NEI 95-10, Revision 2, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," which the staff believed needed to be made to ensure consistency with the staff license renewal review guidance documents, the Standard Review Plan for License Renewal for Nuclear Power Plants (SRP-LR), and the Generic Aging Lessons Learned report. The desired outcome for obtaining consistency was so that the staff could endorse NEI 95-10 without exception in Regulatory Guide (RG), RG 1.188, "Standard Format and Content for Applications to Renewal Nuclear Power Plant Operating Licenses," to be issued around Summer 2001. A copy of Attachment 1 was made available prior to the meeting through the NRC meeting notification web page, where the meeting was noticed. The attendance list for the meeting is included in Attachment 2.

DISCUSSION

The following is a summary of agreements reached between the staff and NEI regarding each item listed in Attachment 1. NEI made a general qualification during the discussions that after further review internally with its license renewal working group after the February 7 meeting, it may determine that a change could not be made. NEI said that it would notify the staff if this occurred.

Item 1

NEI stated it would clarify NEI 95-10 along the lines the staff has requested so that it is clear that the boundary depends on where the cable is connected to a terminal.

Item 2

NEI stated that it would discuss with its license renewal working group putting the chiller example, illustrating the evaluation of a complex assembly that was previously included in NEI 95-10, Revision 0, back into NEI 95-10. The NRC remarked that while the guidance for complex assemblies in Revision 2 of NEI 95-10 was very helpful, in light of recent experience with ongoing license renewal reviews, an example illustrating how to use the guidance would aid applicants in preparing their applications.

Items 3, 4, and 7

NEI agreed to make the requested changes.

Item 5

NEI agreed to make the change, but remarked that it had a concern as to whether the table could be relied on. The staff said that it was their expectation that it could be relied on, but recognized that it could be misapplied, so effort would need to be expended to ensure it was applied consistently and appropriately.

Item 6

NEI agreed to include additional guidance in NEI 95-10 to specify how applicants should discuss consumables in their application, so it is apparent to the staff how aging management of consumables was handled.

Item 8

Following the meeting, the staff notified NEI that it was withdrawing this requested change because it is re-evaluating the issue of equipment kept in safe storage.

Item 9

NEI said that it would consider the staff's request. The staff also committed to verify that the SRP-LR did not inappropriately state that the list of potential information sources in Table 2.1-1 defined a plant's current licensing basis.

Item 10

NEI said that it would clarify NEI 95-10 as the staff has suggested. In addition, the staff suggested it might be helpful for applicants using NEI's guidance document if it specifically addressed the categories of high and medium safety issues.

Item 11

NEI said that there are some applicants that might consider more equipment to be within the scope of license renewal than what might be determined using the definition of 10 CFR 54.4(a)(1). The staff clarified that the intent of the comment was that, at a minimum, an applicant should consider the current licensing basis to be the definition given in 10 CFR 54.4(a)(1). NEI agreed to clarify NEI 95-10 to reflect that the definition of the current licensing basis should at a minimum be consistent with 10 CFR 54.4(a)(1).

Item 12

NEI agreed to make the change consistent with the requirements of 10 CFR Part 54.

Item 13

NEI said it would consider adding the suggested section to NEI 95-10.

Items 14 - 26

NEI said that since these were essentially editorial changes, it did not foresee any reason that it would not be able to make the changes.

During the meeting, the staff also provided NEI with Attachment 3, which was a categorization of issues discussed during three previous public meetings (see NRC meeting summaries dated January 25, 30, and 31, 2001). The staff requested NEI review the list to ensure the staff and NEI were in agreement regarding the status of each item. During the ensuing discussions, NEI said that as long it was also the NRC's expectation that any items labeled as "Agree to Disagree" would continue to be worked by both parties, there appeared to be no further need at this time for escalation of the issues to NRC Division Director level. However, NEI added that

during an upcoming meeting of the NEI license renewal working group, these issues would be discussed and NEI would have to get back to the staff sometime after that if it determined the need to escalate an issue. The staff stated that it was the staff's expectation that any remaining issues would continue to be worked as fast as possible so that the issuance of the GALL report and SRP-LR could be accomplished on schedule. NEI added that they believed that perhaps some of these items might be considered policy issues, and therefore beyond the scope of the GALL or SRP-LR. NEI said they believed that items 35 and 64 should be categorized as "NEI Action" because NEI needed to discuss the issues internally before pursuing them any further with the staff.

The staff said there were a few additional items, not on the agenda, that it wished to discuss with NEI. First, the staff requested that NEI add guidance to NEI 95-10 to ensure that, if applicants prepared drawings in color, that when the same drawings were printed out in black and white no material information was lost. NEI said it would consider adding the additional guidance requested by the staff. The staff also provided NEI with changes to the SRP-LR table of contents (Attachment 3), which the staff requested NEI use to ensure consistency with NEI 95-10. NEI said that it would be their expectation that NEI 95-10 be consistent with the standard format of the SRP-LR and also said it agreed with the current version of the SRP-LR table of contents.

The staff requested that NEI submit a revised version of NEI 95-10 by February 23, 2000, so that the staff would have sufficient time to review the document and make any necessary changes to RG 1.188 resulting from any exceptions. NEI said that they expected to be able to inform the staff before February 23 if there were any changes it subsequently determined it could not make.

/RA/

David L. Solorio, Senior Reactor Systems Engineer
License Renewal and Standardization Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Attachments: As stated

cc w/atts: See next page

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Agenda for Discussions on Consistency Between SRP-LR and NEI 95-10, Revision 2

February 7, 2001

Meeting Purpose: Discuss the following comments made by both NRC (No. 1-19) and NEI (No. 20-26) to achieve consistency between the SRP-LR and NEI 95-10.

Meeting Outcome: Achieve (1) agreement regarding necessary changes to either SRP-LR or NEI 95-10, (2) understanding of how NEI will reflect resolution of outstanding issues in NEI 95-10, and (3) understanding of how NEI will reflect NRC positions which it does not agree with in NEI 95-10

1. An example in Section 4.1.1, paragraph 4 of NEI 95-10, rev. 2 states "...the component boundary between an electrical cable and a switchgear enclosure is at the point where the cable enters the switchgear enclosure. Electrical cables inside the switchgear enclosure are part of the switchgear and are inspected and maintained as part of the switchgear". However, this is not consistent with the SRP-LR, Table 2.1-2 for Complex Assemblies, which refers to a prior review that would have the component boundary for the cable at the point where it connects inside the enclosure, not at the point where it enters the enclosure. Please make conforming changes to NEI 95-10.
2. NEI removed Appendix C "Examples to Demonstrate the License Renewal Process" from NEI 95-10 rev. 0. On page 5 of NEI 95-10, rev. 2, NEI added the paragraph "Earlier versions of NEI 95-10 included examples to illustrate the different steps involved in preparing a license renewal application. The examples are no longer included. Instead, applicants are encouraged to review applications that have been submitted and the resulting safety evaluation reports that are issued in the form of NUREGs." On page 2.1-13 of the SRP-LR, the staff refers to NUREG-1723 "Safety Evaluation Report Related to the License Renewal of Oconee Nuclear Station Units 1, 2, and 3" from a previous review as an example. Please expand the last sentence on page 5 of NEI 95-10, rev. 2 to include NUREG-1723 as an example for the treatment of complex assemblies or revise NEI 95-10, rev. 2 to reinstate Appendix C "Examples to Demonstrate the License Renewal Process" which was removed from NEI 95-10, rev. 0.
3. SRP-LR has potential Time Limited Aging Analysis (TLAA) examples in Tables 4.1-2 and 4.1-3 which are different from the examples in Table 5.1-2 of NEI 95-10, rev. 2. Please revise Table 5.1-2 of NEI 95-10, rev. 2 to be consistent with the SRP-LR or clearly describe the differences or purpose of these tables.
4. Section 4.2.2 of NEI 95-10, rev. 2 should reference the GALL report as part of the library of reports which document aging management reviews.

5. Please make the following changes to NEI 95-10, rev. 2, Appendix B which is entitled "Typical Structure, Component, and Commodity Groupings and Active/Passive Determinations for the Integrated Plant Assessment ."
- a) Split item 83 for electric heaters and heat tracings into two separate items. For heat tracings, the column entitled "Structure, Component, or Commodity Grouping is Passive? (Yes/No)" should remain "No, See Appendix C Reference 2". For electric heaters, the column entitled "Structure, Component, or Commodity Grouping is Passive? (Yes/No)" should be changed to "No, Yes for a Pressure Boundary if applicable, See Appendix C Reference 2" since reference 2 states that for electric heaters "The pressure boundary intended function would still be subject to an aging management review."
 - b) Item 86, the column entitled "Structure, Component, or Commodity Grouping is Passive? (Yes/No)" states "Reference 1" which is a letter from C. Grimes, NRC to D. Walters, NEI dated November 19, 1999. The correct reference which identifies fuses as not requiring aging management review is the letter from C. Grimes, NRC to D. Walters, NEI dated April 27, 1999.
 - c) Item 107, the column entitled "Structure, Component, or Commodity Grouping is Passive? (Yes/No)" states "No." For Terminal Block this should be "Yes" as stated in the draft SRP-LR.
 - d) The last column in the table entitled "Structure, Component, or Commodity Grouping is Passive? (Yes/No)" should be changed to "Structure, Component, or Commodity Group Meets 10 CFR 54.21(a)(1)(i) (Yes/No)." This will make Appendix D in NEI 95-10, rev. 2 consistent with Table 2.1-5 in the SRP-LR.
6. The table on page 25 of NEI 95-10, rev. 2 lists the disposition of consumables. The left column of the table identifies the consumables and the right column lists the disposition. The disposition of each consumable is in accordance with the letter from S. Koenick, NRC to D. Walters, NEI dated January 20, 2000, with the exception of the statement "This process of addressing this category of consumables during the aging management review should be summarized in the application during the methodology for conducting the aging management review." Please add this statement to each row of the table in the disposition column to ensure the application contains information that each consumable meets the staff position for exclusion from aging management.
7. Please revise sections 4.3.1 through 4.3.3 to be consistent with the 10-element criteria as an Aging Management Program (AMP) by locating the discussions under the appropriate element.
8. Please incorporate the resolution of License Renewal Issue No. 98-0102, "Screening Equipment that is Kept in Storage" in NEI 95-10, rev.2.

9. Table 3.1-1 of NEI 95-10, rev. 2 and Table 2.1-1 of the SRP-LR are both entitled Sample Listing of Potential Information Sources. These tables are inconsistent. Please revise Table 3.1-1 to be consistent with Table 2.1-1.
10. In section 1.5 entitled "Resolution of Current Safety Issues (e.g., GSIs and USIs)", add criteria to review NUREG-0933 and identify GSIs/USIs that need to be addressed in a license renewal application to be consistent with the draft SPR-LR, Appendix A.3.
11. In section 3.1.1 entitled " Safety-Related Systems, Structures and Components", add guidance to clarify that an applicant whose Current Licensing Basis (CLB) definition of safety related does not match the one in 54.4(a)(1) must still scope to the 54.4(a)(1) three-part definition.

Editorial Comments

12. The "Purpose and Scope" section on page 1 of NEI 95-10, rev. 2 should be changed as follows to be consistent with "Table of Contents" on page ii.
 - a) "Identifying the systems, structures, and components within the scope of the Rule (Section 3.1);" should be changed to "Identifying the systems, structures, and components within the scope of license renewal (Section 3.1);"
 - b) "Identifying the intended functions of systems, structures, and components within the scope of the Rule (Section 3.2);" should be changed to "Identifying the intended functions of systems, structures, and components within the scope of license renewal (Section 3.2);"
 - c) "Identifying the structures and components subject to an aging management review (Section 4.1);" should be changed to "Identifying the structures and components subject to an aging management review and intended functions (Section 4.1);"
13. Consider adding the following to Section 4.2.1.2 "Demonstrate that the Effects of Aging are Managed":
 - a) The third paragraph should be changed to: "Aging management programs are generally of four types: prevention, mitigation, condition monitoring, and performance monitoring. Prevention programs preclude the effects of aging from occurring, for example, coating programs to prevent external corrosion of a tank. Mitigation programs attempt to slow the effects of aging, for example, water chemistry programs to mitigate internal corrosion of piping. Condition monitoring programs inspect and examine for the presence and extent of aging effects, for example, visual inspection of concrete structures for cracking and ultrasonic measurement of pipe wall for erosion-corrosion induced wall thinning. Performance monitoring programs test the ability of a structure or component to perform its intended function(s), for example, heat balances on heat exchangers for the heat transfer intended function of

the tubes (see appendix C, reference 1). In many instances, more than one type of aging management programs are implemented to ensure that aging effects are managed. For example, in managing internal corrosion of piping, a mitigation program (water chemistry) may be used to minimize susceptibility to corrosion. However, it may also be necessary to have a condition monitoring program (ultrasonic inspection) to verify that corrosion is indeed insignificant.”

- b) In the last sentence of the sixth paragraph, change the word “may” to “should”
 - c) In the first paragraph after the 10 element list, add that any non-applicable attributes should be discussed.”
14. In Section 4.2.3.1, paragraph number 2, line number 8, change “demonstration” to “demonstrate”
15. In Section 5.1.4, leave a blank space between the third and fourth bullets
16. Table 6.2.1 “Standard License Renewal Application Format” and Table 6.2.2 “Guidance for Preparing the Standard License Renewal Application Format” are not consistent with the SRP-LR format and section titles. Please make the following changes to Table 6.2.1 and Table 6.2.2:
- a) Change “2.0 Structures and Components Subject to Aging Management Review” to “2.0 Scoping and Screening Methodology for Identifying Structures and Components Subject to Aging Management Review, and Implementation Results”
 - b) Change “2.3 System Scoping and Screening Results: Mechanical” to “2.3 Scoping and Screening Results: Mechanical”
 - c) Change “2.4 Structures and Structural Components Scoping and Screening Results” to “2.4 Scoping and Screening Results: Structures”
 - d) Change “2.5 System Scoping and Screening Results: Electrical and Instrumentation and Controls” to “2.5 Scoping and Screening Results: Electrical and Instrumentation and Controls”
 - e) Delete “3.1 Common Aging Management Programs” and the associated subsection which include 3.1.1, 3.1.2, and 3.1.3
 - f) Change “3.2 Reactor Coolant System” to “3.1 Aging Management of Reactor Coolant System”
 - g) Change “3.3 Engineered Safety Features” to “3.2 Aging Management of Engineered Safety Features”

- h) Change “3.4 Auxiliary Systems” to “3.3 Aging Management of Auxiliary Systems”
 - i) Change “3.5 Steam and Power Conversion System” to “3.4 Aging Management of Steam and Power Conversion System”
 - j) Change “3.6 Structure and Structural Components” to “3.5 Aging Management of Structure and Structural Components”
 - k) Change “3.7 Electrical and Instrumentation Controls” to “3.6 Aging Management of Electrical and Instrumentation Controls”
 - l) Change “4.4 Environmental Qualification (EQ)” to “4.4 Environmental Qualification (EQ) of Electric Equipment”
 - m) Change “4.6 Containment Liner Plate Fatigue Analysis” to “4.6 Containment Liner Plate, Metal Containments, and Penetrations Fatigue Analysis”
 - n) Delete “4.7 Aging of Neutron Absorber in Spent Fuel Rack”
 - o) Change “4.8 Other Plant-Specific TLAAs” to “4.7 Other Plant-Specific TLAAs”
17. In Table 6.2.2, the section entitled “Appendix D: Technical Specifications”, the title for Supplement 1 to Regulatory Guide 4.2 should be “Preparation of Supplemental Environmental Reports for Applications to Renew Nuclear Power Plant Operating Licenses.”
 18. The Rule requires the Final Safety Analysis Report (FSAR) Supplement to contain a summary description of the programs and activities for managing the effects of aging. NEI 95-10, rev. 2 should be revised to include examples of description of programs such as those listed on page 3.2-14 of the draft SRP-LR.
 19. Does description regarding the application of GALL need enhancement in SRP-LR (“Application of GALL”)?
 20. NEI 95-10, Section 1.5 discusses resolution of current safety issues. SRP Appendix A.2 provides a similar discussion. The current descriptions are not consistent and the threshold for addressing new issues may be too low. An approach needs to be developed to address any new issues that reveal themselves over the course of the review of license renewal applications.
 21. NEI 95-10, Section 5.1.3 should be revised to delete the following statement: “For example, poisons in the high density spent fuel racks have coupons that are periodically removed and tested to verify that the rack continues to be capable of performing its intended function.” Aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA. Note that Section X of the SRP-LR contains several TLAA program descriptions

22. NEI 95-10, Section 6.2, Table 6.2-1 should be revised to delete Section 3.1 of the Application Table of Contents and renumber the remaining Chapter 3 sections to align with equivalent sections of the SRP-LR. Alignment of the documents. NRC SRP-LR no longer has a section 3.1 describing common aging management programs.
23. NEI 95-10, Section 6.2, Table 6.2-1 should be revised to delete Section 4.7 of the Application Table of Contents and renumber the remaining Chapter 4 section to align with equivalent sections of the SRP-LR. Alignment of the documents – As noted above, aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA.
24. NEI 95-10, Section 6.2, Table 6.2-2 should be revised to delete Section 4.7 of the Application Table of Contents and renumber the remaining Chapter 4 section to align with equivalent sections of the SRP-LR. Alignment of the documents – As noted above, aging of neutron absorber in the spent fuel rack is no longer considered to be a generic TLAA.
25. NEI 95-10, Section 6.2, Table 6.2-2 should be revised to delete Section 3.7 of the Application Table of Contents and renumber the remaining Chapter 3 section to align with equivalent sections of the SRP-LR. Alignment of the documents. NRC SRP-LR no longer has a section 3.1 describing common aging management programs
26. NEI 95-10, Section 6.2, Table 6.2-2 should be revised to offer guidance to applicants for using the GALL report as part of the aging management review. TBD.

NRC LICENSE RENEWAL MEETING
ATTENDANCE LIST
FEBRUARY 7, 2001

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| GOUTAM BAGCHI | NRC/NRR/DE |

Status of 64 License Renewal Issues
2/12/01

| Issue # | Issue | Resolved | NRC Action | NEI Action | Demo Project | Agree to Disagree |
|---------|---|----------|------------|------------|--------------|-------------------|
| 1 | Adequacy of chemistry program – need for one-time inspection | X | | | | |
| 2 | Small bore piping – need for one-time inspection | | | | | X |
| 3 | Adequacy of fuel oil program – need for one-time inspection | X | | | | |
| 4 | Program for buried pipe and components | X | | | | |
| 5 | Threshold for neutron fluence in reactor vessel and internals (10E17) | | | X | | |
| 6 | Bolting – loss of pre-load and cyclic loading SCC | | X | | | |
| 7 | Closure bolting – separate component | X | | | | |
| 8 | Boric acid corrosion program – removing ISI | X | | | | |
| 9 | Vessel flange leak detection line | X | | | | |
| 10 | Program for carbon steel tanks | X | | | | |
| 11 | BWRVIP-74, vessel welds | | | X | | |
| 12 | SRP 4.2.2.1.5 and 4.2.3.1.5 – BWRVIP, vessel welds | | | X | | |
| 13 | Bottom head and pressurizer penetrations | | X | | | |
| 14 | GE RICSIL 055 program not needed | X | | | | |

| Issue # | Issue | Resolved | NRC Action | NEI Action | Demo Project | Agree to Disagree |
|---------|---|----------|------------|------------|--------------|-------------------|
| 15 | Reg Guide 1.65 on material selection | X | | | | |
| 16a | Wear/loss of material – no operating experience | X | | | | |
| 17 | SCC – removing ISI | | | X | | |
| 18 | SCC and water chemistry | | | X | | |
| 19 | SCC in containment spray | | X | | | |
| 20 | SCC in standby liquid control | | X | | | |
| 21 | PWSCC of core support lugs | X | | | | |
| 22 | Delta ferrite limit for cast stainless steel – 25% vs. 40% | X | | | | |
| 23 | Aging of stainless steel in borated water | X | | | | |
| 24 | All carbon steel components should be in Subsection I of GALL | X | | | | |
| 25 | Build up of deposit/flow blockage – impact on heat transfer | | X | | | |
| 26 | Biofouling – preventing intended function | | X | | | |
| 27 | Boraflex visual inspection and “Badger” code | X | | | | |
| 28 | Lubricating oil environment | X | | | | |
| 29 | Fuel oil environment in fuel oil strainer | X | | | | |
| 30 | Temperature for aging mechanism to occur (lower limit 25°C to 93°C) | X | | | | |

| Issue # | Issue | Resolved | NRC Action | NEI Action | Demo Project | Agree to Disagree |
|---------|---|----------|------------|------------|--------------|-------------------|
| 31 | Flow accelerated corrosion in valve bodies | X | | | | |
| 32 | Flow accelerated corrosion in aux feedwater | X | | | | |
| 33 | SRP 4.1.1 – TLAA list information | X | | | | |
| 34 | SRP 4.1.3 – TLAA example tables | X | | | | |
| 35 | Use of IWE with Appendix J and coating program (GI-EMEB) | | | X | | |
| 36 | Inaccessible areas-containment liner (GI-EMEB) | X | | | | |
| 37 | Equipment hatch hinges (GI-EMEB) | X | | | | |
| 38 | Structure Monitoring Program (GI-EMEB) | | | X | | |
| 39 | Structure Monitoring Program, RG 1.160, and Appendix B of 10 CFR 50 (GI-EMEB) | X | | | | |
| 40 | Tendon Gallery (GI-EMEB) | X | | | | |
| 41 | Tendon Pre-Stress Monitoring not a TLAA (GI-EMEB) | | | X | | |
| 42 | Containment dissimilar welds (GI-EMEB) | X | | | | |
| 43 | Spend fuel pool liner water chemistry (GI-EMEB) | | | | | X |
| 44 | Bolting program-IWF not bolting integrity program (GI-EMEB) | | | | | X |
| 45 | Eliminate A-46 scope, acceptance criteria (GI-EMEB) | X | | | | |

| Issue # | Issue | Resolved | NRC Action | NEI Action | Demo Project | Agree to Disagree |
|---------|---|----------|------------|------------|--------------|-------------------|
| 46 | Vibration of supports and cyclic induced cracking-location in GALL (GI-EMEB) | | | | | X |
| 47 | Fatigue and inspections of feedwater and CRDRL nozzles (GI-EMEB) | | | X | | |
| 48 | SRP 4.3.2.1.2.3-wording for cycle counting (GI-EMEB) | X | | | | |
| 49a | WCAP on internals – cast stainless, hold-down spring, wear, rod drop time, loose parts monitoring | | | X | | |
| 49b | WCAP on internals – cast stainless, hold-down spring, wear, rod drop time, loose parts monitoring | | | X | | |
| 49c | WCAP on internals – cast stainless, hold-down spring, wear, rod drop time, loose parts monitoring | X | | | | |
| 49d | WCAP on internals – cast stainless, hold-down spring, wear, rod drop time, loose parts monitoring | | | X | | |
| 16b | Wear/loss of material – no operating experience | | | X | | |
| 50 | Application of GALL | | | | X | |
| 51 | Requirements above regulations | | | | | X |
| 52 | SRP Section A.1.2.1 – applicable aging effects threshold | X | | | | |

| Issue # | Issue | Resolved | NRC Action | NEI Action | Demo Project | Agree to Disagree |
|---------|---|----------|------------|------------|--------------|-------------------|
| 53 | Applicable aging effects and aging effects requiring management | X | | | | |
| 54 | Aging effects in GALL that an applicant determines are not applicable | X | | | | |
| 55 | SRP Section A.1.2.1 – aging effects not need to be managed | X | | | | |
| 56 | SRP Section A.3.2.1 – NUREG-0933 | | | X | | |
| 57 | DBEs on scoping | X | | | | |
| 58 | IPE/IPEEE on scoping | X | | | | |
| 59 | EOPs on scoping | X | | | | |
| 60 | ACRS comments on EOPs/severe accident management on scoping | X | | | | |
| 61 | SECY 96-146 on fire barrier | X | | | | |
| 62 | NFPA commitments | | X | | | |
| 63 | Nominal plant environment terminology for electrical | X | | | | |
| 64 | Complex Assembly | | | X | | |

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Changes to table of contents are in **bold and underlined**.