

APPENDIX B, TABLE B.2.10

DISPOSITION OF NEI COMMENTS
ON CHAPTER 1 OF SRP-LR

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Table B.2.10: Disposition of NEI Comments on Chapter 1 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-1-1	B.3.7 General	NEI 95-10 should be added as a reference in each section.	This provides the reviewer with insight to the industry recommended process.	The SRP-LR already references NEI 95-10, as appropriate. SRP-LR was revised to address this comment by updating its references to NEI 95-10 to the latest revision.
S-1-2	B.3.7 1.1.3.2	This section should include the 20-year criteria of 1.1.2.2.	Consistency.	10 CFR 54.17(c) does not permit an application for a renewed license to be submitted prior to 20 years before expiration of the current operating license that affects the acceptance of the application for docketing. The timely renewal provision of 10 CFR 2.109(b) does not affect the acceptance of a sufficient application for docketing. An application can be accepted for docketing with less than 5 years of operation remaining under the current license but the provision within 10 CFR 2.109(b) that allows operation beyond the current license period if the staff's review is not complete would not apply. The SRP-LR was revised to address this comment by reformatting and clarifying the SRP-LR, Section 1.1 and Table 1.1-1.
S-1-3	B.3.7 Table 1.1-1	In Item I.4 the 20-year criteria should be moved to Item II Timeliness Provision.	Consistency.	See NRC disposition of NEI comment S-1-2 in this Appendix B, Table B.2.10.

Table B.2.10: Disposition of NEI Comments on Chapter 1 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis For Comment	NRC Disposition
S-1-4	B.3.7 Table 1.1-1	Delete III.1.A.a.and b.	III.1.A.is adequate and consistent with rule requirements. The sufficiency review should verify compliance with the regulation only.	<p>Items III.1.A.a and b have been retained in Table 1.1-1. Although the descriptions of the scoping boundaries for systems and structures discussed in Table 1.1-1, Item III.1.A.a, are not explicitly required by 10 CFR Part 54, both NRC staff and applicant experience with the first renewal applications have established that the boundary information is needed for the staff to verify the completeness and acceptability of the applicant's list of structures and components subject to an AMR (Table III.1.A.b) and the method used to identify them (Table III.1.B).</p> <p>The SRP-LR was revised to address this comment by reformatting and clarifying the SRP-LR, Section 1.1 and Table 1.1-1.</p>
S-1-5	B.3.7 Table 1.1-1	<p>Revise Table 1.1-1, Section III.1.C.b. to read:</p> <p>"Identification of aging effects requiring management based on materials, environment, operating experience, etc."</p>	<p>Section III.1.C.b. states "Identification of applicable aging effects based on materials, environment, operating experience, etc."</p> <p>An "applicable aging effect" is not defined. Suggest substituting the term "aging effects requiring management" as used in NEI 95-10.</p>	See NRC disposition of NEI comment SA.1-2 in this Appendix B, Table B.2.14.