

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-1	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Bolting Integrity	GALL Section XI.M.12 applies. Refer to comments on Aging Management programs.	See NRC dispositions for NEI comments G-XIM12-1 through G-XIM12-4 in this Appendix B, Table B.2.9-2.
S3.2-2	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Boric Acid Corrosion	GALL Section XI.M.5 applies. Refer to comments on Aging Management programs.	See NRC dispositions for NEI comments G-XI-M5-1 through G-XI-M5-2 in this Appendix B, Table B.2.9-2.
S3.2-3	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Closed Cycle cooling water system	GALL Section XI.M.4 applies. Refer to comments on Aging Management programs.	See NRC dispositions for NEI comments G-XI.M4-1 through G-XI.M4-2 in this Appendix B, Table B.2.9-2.
S3.2-4	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Flow accelerated corrosion (FAC) program	GALL Section XI.M.6 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XI-M6-1 in this Appendix B, Table B.2.9-2.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-5	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Inservice Inspection	GALL Section I applies. The presentation of the Inservice Inspection program in the GALL is different than any other program evaluated in the GALL that is relied upon for license renewal. What specifically is an applicant supposed to do that allows this program to be credited without further review?	Applicant should refer to GALL report, Chapter XI, program M1, “ASME, Section XI, Inservice Inspection, Subsections IWB, IWC, and IWD” in NUREG-1801, Vol. 2, for the evaluation of the inservice inspection program. The SRP-LR (NUREG-1800), Sections 3.2.1.1 through 3.2.1.3 tells the basis for crediting an applicant's program by just referring to GALL report and the justifications required when the GALL report is not bounding. Chapter I of GALL, Vol. 2, “Application of the ASME Code,” does not give specifics of a 10-element inservice inspection program but that is contained in the SRP-LR, Section A.1.2.3. The SRP-LR was not revised to address this comment, but the GALL report, Chapter XI, was modified by updating program M1.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-7	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Open-cycle cooling water system	GALL Section XI.M.3 applies. Refer to comments on Aging Management programs.	The comment on aging management program M3 was not received by the NRC along with other NEI comments on Chapter XI aging management programs. NEI in a subsequent e-mail on February 02, 2001, considered the matter closed indicating there were no comments on aging management program M3. SRP-LR was not revised to address this comment.
S3.2-8	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Protective Coating monitoring and maintenance program	GALL Section XI.S.8 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XI.S8-1 in this Appendix B, Table B.2.9-3.
S3.2-9	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Thermal aging embrittlement of CASS AMP.	GALL Section XI.M.1 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XIM1 in this Appendix B, Table B.2.9-2.
S3.2-10	SRP-LR 3.2	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Water Chemistry	GALL Section XI.M.11 applies. Refer to comments on Aging Management programs.	See NRC disposition for NEI comment G-XIM11-1 and G-XI.M11-2 in this Appendix B, Table B.2.9-2.
S3.2-11	SRP-LR 3.2	Section 3.2.2.2.2 Crack Initiation and Growth Due to SCC Delete this Inservice Inspection.	Inservice inspections do not include tanks within the scope of inspection so it is inappropriate to credit in this instance. See additional comments concerning the water chemistry program.	See NRC disposition of NEI comment G-VD1-3 in this Appendix B, Table B.2.4. SRP-LR was revised to address this comment by deleting Subsection 3.2.2.2.2 as in August 2000 version and modifying Tables 3.2.1 and 3.2.2 accordingly.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-12	SRP-LR 3.2	Section 3.2.2.2.4 Local Loss of Material Due to Pitting and Crevice Corrosion Delete this item.	No objective evidence has been provided in the GALL report Sections VA 2.1, 5.1, VC 2.1, 2.2 to support the requirement to perform additional inspections. See additional comments concerning the water chemistry program.	The one-time inspection is proposed to verify that the water chemistry program is adequately managing the aging effect - loss of material for aging mechanisms - pitting and crevice corrosion per SRP-LR 3.2.2.2.4. However, sections of the GALL report referenced do not require one-time inspection but a plant specific program. It is a reasonable check to verify that chemistry program is suitable before entering extended period of operation. This argument is supported by objective evidence in which pitting has been found on inside surface of low-alloy steel and carbon steel components exposed to secondary water (steam generator girth weld region and feedwater nozzle region). SRP-LR was not revised to address this comment.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-13	SRP-LR 3.2	Section 3.2.2.2.5 Local Loss of Material Due to MIC Delete this item.	No objective evidence has been provided in the GALL report Section VC.2.1 to support the requirement to perform additional inspections.	See NRC disposition to NEI comment S3.2-12 in this Appendix B, Table B.2.12-2. This proposal to do a one-time inspection to verify if evidence of microbiologically influenced corrosion is present, as in SRP-LR 3.2.2.2.5, is supported by objective evidence like IN 85-30 "MIC of Containment Service Water System" and Chapter 3 of EPRI Sourcebook for MIC in Nuclear Power Plants (Case Histories). SRP-LR was not revised to address this comment.
S3.2-14	SRP-LR 3.2	Section 3.2.2.2.6 Changes in Properties Due Elastomer Degradation	BWR item	This elastomer is considered a structural sealant and as such should be addressed by a structural aging management program on a plant -specific basis. NRC agrees that this elastomer is in the standby gas treatment system and thus a BWR component. SRP-LR was not revised to address this comment.
S3.2-15	SRP-LR 3.2	Section 3.2.2.2.7 Loss of Iodine Retention Capacity Due to Moisture Absorption Delete this item.	Charcoal absorber filter media should be considered to be a consumable. See SRP-LR Table 2.1-3.	See NRC disposition of NEI comment G-VB-2 in this Appendix B, Table B.2.4. SRP-LR was revised to address this comment by deleting section 3.2.2.2.7.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-16	SRP-LR 3.2	Section 3.2.2.2.8 Buildup of Deposit from Biofouling Delete this item.	No objective evidence has been provided in the GALL report Sections VC.2.1, VC.2.2 to support the requirement to perform additional inspections.	See NRC disposition of NEI comment G-VC-2 in this Appendix B, Table B.2.4. SRP-LR was revised to address this comment by deleting section 3.2.2.2.8.
S3.2-17	SRP-LR 3.2	Section 3.2.2.2.9 Local Loss of Material Due to Erosion Delete this item.	No objective evidence has been provided in the GALL report Section VD.1.2.3 to support the requirement to perform additional inspections.	Local loss of material due to erosion has been verified to occur as evidenced by LER 50-275/94-023. Because this component requires a plant specific program, the GALL report was modified under aging management program for this component's line item to show this reference. SRP-LR was not revised to address this comment but the GALL report was as stated above.

Table B.2.12-2: Disposition of NEI Comments on Chapter 3, Section 3.2 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.2-18	SRP-LR 3.2	<p>Table 3.2-1, page 3.2-13, BWR/PWR, Closure bolting in high-pressure or high-temperature systems</p> <p>This component description is not consistent with the scope of the actual program. It should be "Class 2 bolting greater than 2 inches in diameter".</p>	See generic comments concerning the Bolting Integrity Program.	<p>See NRC disposition for NEI comments G-XIM12-1 through G-XIM12-4 in this Appendix B, Table B.2.9-2.</p> <p>The scope of the actual program includes volumetric inspection of bolting greater than 2-in. in diameter as mentioned by the comment. The scope also includes visual inspection of all pressure, retaining components during leakage tests. This will include visual inspection of bolting smaller than 2-in. in diameter.</p> <p>SRP-LR was not revised to address this comment.</p>
S3.2-19	SRP-LR 3.2	Section 3.2-3, Tables 3.2-1 and 3.2-2, and the applicable GALL sections need to be revised as necessary to reflect changes made above.	Conforming changes	The SRP-LR was revised to address this comment by making conforming changes to Section 3.2-3, as well as Tables 3.2-1 and 3.2-2, including the applicable GALL sections, to reflect changes made in responses to the NEI comments in this Appendix B, Table B.2.12-2.

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