

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-2	SRP-LR 3.3	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 disposition of NEI comments G-XI.M12-1 through G-XI.M12-4 in this Appendix B, Table B.2.9-2.
S3.3-3	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Boraflex Monitoring	GALL Section VII A2.1.1 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-VII A2.1.1 in this Appendix B, Table B.2.6.
S3.3-4	SRP-LR 3.3	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 disposition of NEI comments G-XI.M5-1 through G-XI.M5-2 in this Appendix B, Table B.2.9-2.
S3.3-5	SRP-LR 3.3	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 disposition of NEI comments G-XI.M4-1 through G-XI.M4-2 in this Appendix B, Table B.2.9-2.
S3.3-6	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Compressed air inspection and maintenance	GALL Section VII D.1.1 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-VIID-2 in this Appendix B, Table B.2.6.
S3.3-7	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Fire Protection	GALL Section VII.G applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-VIIG-1 through G-VIIG-12 in this Appendix B, Table B.2.6.
S3.3-8	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Fire Water System	GALL Section XI.M.10 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M10-1 through G-XI.M10-2 in this Appendix B, Table B.2.9-2.
S3.3-9	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Fuel oil Chemistry	GALL Section XI.M.9 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.M9-1 through G-XI.M9-4 in this Appendix B, Table B.2.9-2.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-10	SRP-LR 3.3	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?	Chapter 1 of GALL, Vol. 2, “Application of the ASME Code,” does not give specifics of a 10-element inservice inspection program. XI.M1, “ASME, Section XI, Inservice Inspection, Subsections IWB, IWC, and IWD” in NUREG-1801, Vol. 2, does. In places where ISI is acceptable, no further evaluation is noted in the further evaluation column. The SRP-LR was not revised to address this comment.
S3.3-11	SRP-LR 3.3	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.	There were no NEI comments on the GALL report, chapter G-XI.M3. The SRP-LR was not revised to address this comment.
S3.3-12	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Outer surface of aboveground carbon steel tanks	GALL Section XI.M.7 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-XI.M7-1 in this Appendix B, Table B.2.9-2.
S3.3-13	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Outer surface of buried piping and components	GALL Section XI.M.8 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-XI.M8-1 in this Appendix B, Table B.2.9-2.
S3.3-14	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Overhead and gantry cranes inspection and maintenance	GALL Section VII B.1.1 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comment G-VII B.1.1 in this Appendix B, Table B.2.6.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-15	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Protective coating monitoring and maintenance	GALL Section XI.S.8 applies. Refer to comments on Aging Management programs.	Because the condition of the coating does not directly affect the intended function, coating degradation and the Protective Coating Monitoring and Maintenance program were deleted as an aging mechanism of concern and AMP for auxiliary systems. Coatings are covered under the maintenance rule. The SRP-LR was revised to address this comment.
S3.3-16	SRP-LR 3.3	AMPs Evaluated in the GALL Report that are Relied on for License Renewal – Structural Monitoring	GALL Section XI.S.6 applies. Refer to comments on Aging Management programs.	See NRC disposition of NEI comments G-XI.S6-1 through G-XI.S6-6 in this Appendix B, Table B.2.9-3.
S3.3-17	SRP-LR 3.3	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 of NEI comments G-XI.M11-1 through G-XI.M11-2 in this Appendix B, Table B.2.9-2.
S3.3-18	SRP-LR 3.3	Section 3.3.2.2.1 Loss of Material from General, MIC, Galvanic, Pitting, and Crevice Corrosion	See generic comments concerning water chemistry program. No objective evidence has been provided in GALL VII A3.2.1 that supports this additional inspection.	See NRC disposition of NEI comments G-XI.M11-1 through G-XI.M11-2 in this Appendix B, Table B.2.9-2.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-19	SRP-LR 3.3	Section 3.3.2.2.2 Hardening, and Cracking from Material Degradation	No objective evidence has been provided in GALL VII A3.3.3, F1.1.3, and F2.1.3 that supports this additional inspection.	<p>Page 5.18-16 (Spent Fuel Cooling System) of BG&E LR states “Long term exposure of rubber to water will result in water absorbing and swelling, blistering, hardening, and eventually cracking. Exposure to radiation can result in degradation of material properties such as tensile strength, hardness etc.” These are credible aging effects/mechanisms on elastomer lining as mentioned in the BG&E LR.</p> <p>The SRP-LR was not revised to address this comment.</p>
S3.3-20	SRP-LR 3.3	<p>Section 3.3.2.2.4 Crack Initiation and Growth from SCC</p> <p>2nd paragraph is inconsistent with Table 3.3-1 and GALL report which also refer to “unanticipated cyclic loading” for this item.</p> <p>Inconsistency needs to be corrected.</p> <p>3rd paragraph concerns SCC that could occur in external surfaces adhered with electrical tape. This item should be deleted.</p>	<p>Unanticipated cyclic loading should not be considered an aging effect that needs to be managed for the period of extended operation. This is an abnormal event per SRP-LR A.1.</p> <p>No objective evidence in GALL VII E1.4.1 provided to support that this is an aging effect. Also, per SRP-LR A1, abuse due to human activity is an abnormal event and aging effects from such abuse need not be postulated for license renewal.</p>	<p>See NRC disposition of NEI comments G-VIIE1-5, G-VIIE1-6, and G-VIIE1-11 in this Appendix B, Table B.2.6.</p> <p>See NRC disposition of NEI comments G-VIIE1-8 and G-VIIE1-9 in this Appendix B, Table B.2.6.</p>

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-21	SRP-LR 3.3	Section 3.3.2.2.5 Loss of Material from MIC, Galvanic, Pitting, and Crevice Corrosion, Wear and Erosion/Corrosion	Moist air required. Movement required in order to have mechanical wear.	See NRC disposition of NEI comment G-VIID-2 in this Appendix B, Table B.2.6.
S3.3-22	SRP-LR 3.3	Section 3.3.2.2.6 Loss of Iodine Retention Capacity from 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-VIIF1-3 in this Appendix B, Table B.2.6.
S3.3-23	SRP-LR 3.3	Section 3.3.2.2.7 Loss of Material from General, Galvanic, Pitting, and Crevice Corrosion	RCP Oil Collection Tank inspection at ONS.	See NRC disposition of NEI comments G-VIIG-12 and G-VIIH2-15 in this Appendix B, Table B.2.6.

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-24	SRP-LR 3.3	<p>Section 3.3.2.2.8 Induced cracking from vibration and wall thinning from Erosion/Corrosion</p> <p>Vibration induced cracking should be deleted.</p> <p>Erosion /corrosion should be deleted.</p>	<p>Unanticipated cyclic loading should not be considered an aging effect that needs to be managed for the period of extended operation. This is an abnormal event per SRP-LR A.1. Vibration induced cracking is a design problem not an aging management issue.</p> <p>GALL Section VII H2.1.1 and H2.1.2 apply.</p> <p>No objective evidence is provided that supports the determination that either of these aging effects is of concern for the period of extended operation.</p> <p>Erosion / corrosion is plant specific and can be managed by the Flow Accelerated Corrosion program. However, the operating experience described in GALL XI.M6 does include any incidents with Diesel engine cooling water systems.</p>	<p>See NRC disposition of NEI comment G-VIIH2-6 in this Appendix B, Table B.2.6.</p> <p>See NRC disposition of NEI comment G-VIIH2-12 in this appendix, Table B.2.6.</p>
S3.3-25	SRP-LR 3.3	<p>Section 3.3.2.2.9 Loss of Material from corrosion or Buildup of Deposits from Biofouling</p> <p>Delete this item.</p>	<p>No objective evidence in GALL H1.4.1 provided to support that this is an aging effect.</p>	<p>See NRC disposition of NEI comment G-VIIH1-6 in this Appendix B, Table B.2.6.</p>

Table B.2.12-3: Disposition of NEI Comments on Chapter 3, Section 3.3, of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S3.3-26	SRP-LR 3.3	Table 3.3-1, page 3.3-13, Diesel engine cooling water system item Delete entire line item.	Unanticipated cyclic loading should not be considered an aging effect that needs to be managed for the period of extended operation. This is an abnormal event per SRP-LR A.1. Vibration induced cracking is a design problem not an aging management issue. Consistent with comments made on SRP-LR 3.3.2.2.8.	See NRC disposition of NEI comment G-VIIH2-6 in this Appendix B, Table B.2.6.
S3.3-27	SRP-LR 3.3	Table 3.3-1, page 3.3-14, BWR, Closure Bolting item. The Bolting integrity program as written cannot manage the effects of aging identified in this item. Another program or activity must be provided.	The bolting integrity program only includes ASME Class 1 bolting and ASME Class 2 bolting greater than 2 inches in diameter.	See NRC disposition of NEI comment S3.2-18 in this Appendix B, Table B.2.12-2.
S3.3-28	SRP-LR 3.3	Table 3.3-2, page 3.3-18, Fuel Oil Chemistry Delete the statement concerning ASTM Standards.	Required ASTM Standards are also in ITS Section 5.5, Programs.	See NRC disposition of NEI comments G-XI.M9-1 through G-XI.M9-4 in this Appendix B, Table B.2.9-2.

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