

**APPENDIX B, TABLE B.2.13**

**DISPOSITION OF NEI COMMENTS  
ON CHAPTER 4 OF SRP-LR**

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**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.1-1	SRP-LR 4.1-4.7	Delete qualifying term “plant-specific”. This comment should be noted throughout Chapter 4 of the SRP-LR.	In the first paragraph of section 4.1, the second sentence, and the second paragraph, first sentence, use of the term “plant-specific” incorrectly limits the scope of TLAAs, and adds nothing to the discussion. For example, a CE-generic surge line fatigue calc. (most certainly not plant-specific) was determined to be a TLAA for CCNPP. It may be correct to say, “the list of TLAA is plant specific”.	NEI comment is to revise the term “plant-specific” to read, “the list of TLAA is plant specific.”  A TLAA may not be plant-specific. It is more proper to say that, “the list of TLAA is plant-specific.” This proposed change makes this issue clearer.  The SRP-LR was revised to address this comment.
S 4.1-2	SRP-LR 4.1.1	Delete the last sentence in the first paragraph.	The last sentence in paragraph 1 states, “ <i>The listing of TLAA should provide sufficient detail to identify the type of calculations and a summary result of calculations.</i> ”  Providing a summary result of a calculation that is a TLAA goes beyond the listing requirements of 10 CFR 54.21(c)(1). Details of an analysis would only be necessary for the demonstration portion if demonstration methods (i) or (ii) were chosen for a TLAA. No such details as the type of calculation or a summary of results are required if demonstration method (iii) is chosen.  The information reviewed in SRP-LR 4.1.1 should at most be no more than a table of contents of the	NEI comment is to delete the sentence, “The listing of TLAA should provide sufficient detail to identify the type of calculations and a summary result of calculations.”  The results of analysis and calculation is necessary when demonstration methods (i) or (ii) is chosen and that, the details of the results of analysis and calculations are not required if demonstration method (iii) is chosen.  The SRP-LR was revised to address this comment.

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.1-2 (cont.)			TLAA Chapter. Each TLAA will be addressed in its own Chapter 4 section. The last sentence of paragraph 1 is just not needed.	
S 4.1-3	SRP-LR 4.1.1	In the first paragraph of the section add a sentence to the end as follows, "A listing of specific calculation numbers is not required."	A specific listing of the individual calculations will not be provided. Rather, a listing of the categories of calculations identifying a topical area will be identified. Sufficient information as requested for each category of calculations will be provided. For example, containment liner fatigue is a 'category' of calculations. Several calc numbers may have been used for this category.	See NRC disposition of NEI comment S 4.1-2 in this Appendix B, Table B.2.13.
S 4.1-4	SRP-LR 4.1.1	SRP-LR Section 4.1.1, 3 <sup>rd</sup> paragraph should be revised to read: "an applicant must provide a list of plant-specific exemptions granted under 10 CFR 50.12 that are based on TLAA."	Part 54 limits exemptions to only those granted under 50.12.	<p>NEI commented that SRP-LR Section 4.1.1, third paragraph should be revised to read, "an applicant must provide a list of plant-specific exemptions granted under 10 CFR 50.12 that are based on TLAA."</p> <p>According to 10 CFR 54.21(c)(2), a list of plant-specific exemptions that is granted pursuant to 10 CFR 50.12 must be provided. This proposed change makes this issue clearer.</p> <p>The SRP-LR was revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.1-5	SRP-LR 4.1.3	In the paragraph that starts “The reviewer should use the plant Updated Final Safety Analysis Report ---” add two sentences as follows, “Sections 4.2 through 4.6 identify typical types of TLAAAs for most plants. Information on the licensee’s methodology for identifying TLAAAs may also be useful in identifying calculations that did not meet the six criteria below.”	The reviewer should start with the plant CLB as stated. The use of Tables 4.1-2 and 4.1-3 may start the reviewer on the wrong track as stated in the next comment. Inserting this wording allows the reviewer to quickly retrace the efforts of the licensee in identifying TLAAAs so the reviewer may discover potential omissions.	<p>NEI comment is to add two sentences in the paragraph that starts “The reviewer should use the plant Updated Final Safety Analysis Report ---” to read, “Sections 4.2 through 4.6 identify typical types of TLAAAs for most plants. Information on the licensee’s methodology for identifying TLAAAs may also be useful in identifying calculations that did not meet the six criteria below.”</p> <p>This comment is helpful in the sense that the staff review should start with the plant current licensing bases (CLB.)</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.1-6	SRP-LR 4.1.3	<p>In the paragraph that starts “The number and type of TLAAAs vary ---,” delete the remainder of the paragraph that starts with the sentence, “Table 4.1-2 provides a list ---.”</p> <p>Also, delete Tables 4.1-2 and 4.1-3.</p>	The use of Tables 4.1-2 and 4.1-3 start the reviewer from the wrong place. The search for possible TLAAAs should start from the licensee’s CLB and the reviewer’s knowledge of the six criteria. Of particular concern in retaining these SRP-LR tables, would be the need for each licensee to address each of the items in the tables to preclude questions on the topics listed. The licensee’s efforts start from the CLB, not from the tables. The reviewer should have a reasonable basis for believing that a TLAA exists. This will come from a review of the CLB, not from a review of these tables.	<p>NEI recommends deleting Tables 4.1-2 and 4.1-3 because these tables may mislead the staff reviewer.</p> <p>Examples listed in the Tables 4.1-2 and 4.1-3 are just examples and are not a list of required TLAAAs. These tables may help reviewers to get on the right track, instead of misleading.</p> <p>The SRP-LR was not revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.1-7	SRP-LR 4.1.3	<p>SRP-LR Section 4.1.3, page 4.1-3, statements in the first two examples on the page should be revised to read as follows: "A review of the code and standard reveals that an analysis or calculation is required. Some of these calculations or analyses will be TLAAAs."</p> <p>Similarly, revise the statement in the 2<sup>nd</sup> example to read: "In response to a generic letter, licensee submitted a letter to the NRC committing to perform an analysis or calculation..."</p>	<p>TLAA is a term that is unique to Part 54. Codes and standards do not in and of themselves require a TLAA. Codes and standards often require an analysis or calculation which if the criteria of §54.3 are met then a TLAA exists.</p> <p>Commitments in response to generic letters would not necessarily be a TLAA unless all criteria contained in §54.3 were met.</p>	<p>The proposed change in the first paragraph is helpful in order to clarify the intent of the sentence.</p> <p>The SRP-LR was revised to address this comment.</p> <p>However, in the second paragraph, the sentence is clear that the calculation or analysis should be related to time-limited aging analyses.</p> <p>The SRP-LR was not revised to address this comment.</p>
S 4.2-1	SRP-LR 4.2, 4.3, 4.4, 4.5, 4.6, 4.7	In each of these SRP-LR Sections, there is a statement in the Review Procedures section, FSAR Supplement discussion that begins with: "The staff expects to impose a license condition in the renewed license, if granted, ..."	<p>It is not clear why this statement is included in the review procedure section. It is true information but does not seem to have anything to do with the FSAR summary review. Perhaps it should be relocated or deleted.</p> <p>This statement begins a new thought and if it needs to stay in this section of the SRP-LR, then it should be a new paragraph.</p> <p>Please note that this comment also applies to Chapter 3 of the SRP-LR.</p>	<p>NEI suggests starting the statement as a new paragraph. This proposed change makes the issue clearer. Chapter 3 and 4 of the SRP-LR regarding the FSAR were revised to introduce a new paragraph as suggested.</p> <p>The SRP-LR was revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.2-2	SRP-LR 4.2.2.1.5 and 4.2.3.1.5	Delete these sections from the SRP-LR.	The BWRVIP analysis referred to was to demonstrate the difference between the axial and circumferential welds in a BWR vessel for the purpose of eliminating circumferential weld examinations. The fluence experienced by BWRs is significantly less than PWRs and does not pose a threat to the integrity of the reactor vessel. The axial welds are examined periodically in accordance with ASME Section XI. Finally, the reactor material surveillance program and the assessment of the data monitor the level of embrittlement by evaluating the impact on upper shelf energy. See IV.A1.2.4 of GALL.	<p>NEI recommends deleting Sections 4.2.2.1.5 and 4.2.3.1.5 from the SRP-LR.</p> <p>According to 10 CFR Part 54, the analyses must be performed for a 60-year period and not for 40-year period. SRP-LR sections 4.2.2.1.5 and 4.2.3.1.5 were revised to identify that embrittlement of axial beltline welds need to be monitored and that plant-specific information or a program for monitoring embrittlement is necessary.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.3-1	SRP-LR 4.3.1.2	<p>Insert the language previously provided with regard to the environmental effects of fatigue. Also include conforming changes throughout section 4.3 including deleting sections 4.3.2.2, 4.3.3.2 and the second paragraph of Table 4.3-2. Note that the previous comments suggested that this issue be addressed in Section 3 under the RCS.</p> <p>NOTE: Conforming changes will need to be made to the GALL report sections that reference this section and GALL Chapter X. For example, refer to GALL IV C2.1.1, C2.1.2</p>	None of the industry comments pertaining to GSI-190 were included in the August 2000 version of the SRP-LR. The alternative method to address EAF was not included. Chapter X of the GALL now contains a Fatigue Management Program description (comments are provided below in comments labeled G X.M1-1). Environmental effects are not a TLAA and should not be addressed in the TLAA section. The industry has not closed on a long-term strategy for dealing with environmental effects so the language proposed in the original comments provides the flexibility for	<p>NEI states that environmental effects are not a TLAA and should not be addressed in the TLAA.</p> <p>Environmental concerns relate to conservatism of the fatigue calculation, which is a TLAA. These issues are related and should not be separated.</p> <p>The SRP-LR was not revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.3-1 (cont.)		Fatigue. The language related to environmental effects should be deleted. A new line item related to environmental effects should be added and a site-specific program should be identified with further evaluation set to yes.	applicants to propose methods for addressing the issue.	
S 4.3-2	SRP-LR 4.3.1.2	SRP-LR Section 4.3.1.2 Generic Safety Issue, in the opening paragraph describes the concern that the effects of reactor coolant environment on the fatigue life of components were not adequately addressed by the code of record. This statement is in contrast to the 12/26/99 Thadani letter (Reference 11, SRP-LR Section 4.3) that allows the use of the same code of record for advanced reactor designs, but questions its validity for currently licensed plants. Because Reference 11 provides a confident foundation for the fatigue design basis of the next generation of nuclear plants, it is unclear how this same basis is a cause for concern for the existing plants. Resolution of this disagreement needs to be clearly articulated.	The concern over the fatigue design of the existing plants casts a shadow on the viability of the fatigue design in the next generation of plants. Metal fatigue is a physical issue for both existing and future designs. The apparent conflict in NRC positions should be resolved to assure continuity in plant design.	<p>This comment does not provide any specific recommendation for a change to the SRP-LR. The staff will address ALWRs when it receives an application for an initial operating license.</p> <p>The SRP-LR was not revised to address this comment.</p>



**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.3-3	SRP-LR 4.3.1.2	SRP-LR Section 4.3.1.2 Generic Safety Issue, in the last full paragraph, uses the phrase “the nature of age-related degradation” to indicate the potential for an increase in the frequency of pipe leaks. Please define “nature of age-related degradation.”	The phrase “nature of age-related degradation” has no meaning in the context written. Since it is being used as a justification for further action, the phrase needs to be more fully defined to assist the reviewer.	<p>NEI recommends deleting the phrase; “nature of age-related degradation” from Section 4.3.1.2.</p> <p>The phrase is contained in the GSI-190 closeout letter. There is no objection to eliminating the phrase from the SRP-LR.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.3-4	SRP-LR 4.3.1	SRP-LR Section 4.3.1, “Areas of Review” does not seem to include fatigue analyses associated with the RCP Flywheel.	Confirm that the RCP flywheel fatigue analyses should not be included under Section 4.3 and that it will be considered plant specific and included under Section 4.7.	<p>NEI indicated that the SRP-LR does not discuss the fatigue analysis of the RCP flywheel.</p> <p>According to NEI letter dated June 15, 2000, the following paragraph was added to Section 4.3.1, “The metal fatigue analysis review includes, as appropriate, a review of in service flaw growth analyses, reactor vessel underclad cracking analysis, reactor vessel internals fatigue analysis, postulated high energy line break, leak-before-break, RCP fly wheel, and metal bellows.” This information should be helpful to the reviewer.</p> <p>The SRP-LR was revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.3-5	SRP-LR 4.3.1.1.3	SRP-LR Section 4.3.1.1.3 lists metal bellows designed to ASME NC-3649.4 (e)(3). SRP-LR Section 4.6.1 also lists penetration bellows as within the "Area of Review" for Section 4.6. Bellows should be addressed in only one section.	Clarify which section of the SRP-LR addresses metal bellows.	<p>SRP-LR addresses metal bellows in two separate sections. NEI stated that metal bellows should only be addressed in one section.</p> <p>See NRC disposition of NEI comment S 4.3-4 in this Appendix B, Table B.2.13.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.3-6	SRP-LR 4.3.2.1.1.2 (Typical for other sections)	The last sentence should be revised to read "The resulting CUF remains less than unity for the period of extended operation."	There is a Code requirement to design for a CUF below one, but a CUF below one during operation is not a Code requirement. This comments applies throughout Section 4.2 where the Code is tied with the period of extended operation.	<p>NEI recommends rewording statement regarding CUF to "The resulting CUF remains less than unity for the period of extended operation" in several sections of the SRP-LR.</p> <p>The proposed change is clear and helpful.</p> <p>The SRP-LR was revised to address this comment.</p>
S 4.3-7	SRP-LR 4.3.2.1.2.1 4.3.2.1.2.2	<p>These two paragraphs should be revised to read as follows:</p> <p>4.3.2.1.2.1 The existing fatigue strength reduction factors remain valid because the number of cycles would not be exceeded during the period of extended operation.</p> <p>4.3.2.1.2.2 The fatigue strength reduction factors have been re-evaluated based on an increased number of assumed thermal cycles and</p>	The allowable full cycle thermal stresses calculated during design are adjusted based on fatigue strength reduction factors. If the actual number of full range thermal cycles (e.g. 7000 cycles) remains valid for the 60-year term, then (i) is satisfied. If the fatigue strength reduction factor is increased but the design basis allowable is still met, then (ii) is satisfied.	<p>NEI recommends modification of Sections 4.3.2.1.1.2 and 4.3.2.1.2.2 to address fatigue strength reduction factors instead of allowable stresses.</p> <p>The proposed change makes the issue clearer and it is helpful.</p> <p>The SRP-LR was revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.3-7 (cont.)		Table 4.3-1 to bound the period of extended operation. The adjusted fatigue strength reduction factors are such that the component design basis remains valid during the period of extended operation.		
S 4.3-8	SRP-LR 4.3.2.1.2.3 Also, conforming changes with 4.3.3.1.2.3	Replace the existing text with the text presented in Section 4.3.2.1.1.3.	Piping that was designed to B31.1 can be managed by cycle counting the same as piping designed to ASME Section III. If this change is not accepted as proposed, then delete the second sentence of the first paragraph because there is no requirement to replace piping when the design cycles are reached. ASME XI can be applied the same as if CUF exceeds one. Also, there should be no requirement that if the pipe is replaced it be designed to last until the end of the extended period of operation. It may be economically better to replace the pipe several times during plant lifetime rather than design such that the pipe will last for the entire plant lifetime.	NEI suggests replacing the existing text in 4.3.2.1.2.3 with the text presented in Section 4.3.2.1.1.3. NEI states that, "the piping that was designed to B31.1 can be managed by cycle counting the same as piping designed to ASME Section III."  Staff believes the existing wording does not preclude B31.1 plants from cycle counting. However, the staff is not aware of any instances where applicants plan to monitor cycles for the B31.1 cycle limits. Therefore, the staff has not developed an AMP similar to the AMP used for plants with fatigue analyses (ASME Section III, Class I designs).  The SRP-LR was not revised to address this comment.

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.3-9	SRP-LR 4.3.3.1.1.3 (typical for other sections)	Insert a second sentence as follows, "Cycle counting can be used by the applicant in one of two ways. First, it may be implemented as a confirmation of design assumptions in support of options (i and ii). Secondly, it may be used as an aging management program in support of an option (iii) solution."	This may not be a disposition of fatigue TLAA's (option iii). The only time one would apply (iii) is if a CUF of 1.0 had been exceeded during the period of extended operation, or in the case of monitoring existing flaws. In that case the program could be one, which manages cracking or might involve cycle counting. Cycle counting can also be used to confirm that you are remaining within your design cycle assumptions and supports the (i) and (ii) alternatives.	<p>NEI recommends that cycle counting can be used to satisfy options (i) or (ii) for the fatigue TLAA.</p> <p>However, the staff considers options (i) and (ii) calculations that should be performed prior to the period of extended operation to verify the fatigue analysis remain valid.</p> <p>The intent of cycle counting in option (iii) is to monitor the usage during the extended period of operation to assure that the CUF does not exceed its allow limit.</p> <p>The SRP-LR was not revised to address this comment.</p>
S 4.3-10	SRP-LR Table 4.3-2	The first sentence should begin with "The aging management program..." The phrase "In order to not exceed the design limit on fatigue usage and the number of design cycles" should be deleted.	The fatigue-monitoring program does not have to prevent exceeding the number of design cycles. The purpose of the AMP is to monitor thermal fatigue to identify before the plant exceeds the limit on cycles of CUF, so that appropriate action can be taken. This can include revising the CUF calculations, inspection of the piping per ASME Section XI, or replacement of the pipe.	<p>NEI recommends changing the first sentence in Table 4.3-2 to indicate that the fatigue-monitoring program does not have to prevent exceeding the number of design cycles.</p> <p>This proposed change makes it clearer that the program should prevent exceeding the fatigue design limit.</p> <p>The SRP-LR was revised to address this comment.</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.4-1	SRP-LR 4.4	EQ Component Reanalysis Attributes section of GALL X.E.1 is identical to the information provided in SRP-LR Section 4.4.3.1.2 and Table 4.4-1.  Suggest deleting the information from SRP-LR 4.4.3.1.2 and simply referencing the GALL report	From an administrative perspective, it makes sense to only have this information in one location. Future changes would then need to be made to only one location. It also fits the objective of the overall GALL report. The story in the GALL report makes sense as told and it should remain as is and revise the SRP-LR.	NEI recommends deleting the information from SRP-LR 4.4.3.1.2.  However, the staff considers the information from SRP-LR 4.4.3.1.2 regarding reanalysis is too important relative to 10 CFR 54.21(c)(1)(ii) to be deleted. The SRP-LR is considered to be a stand-alone document.  The SRP-LR was not revised to address this comment.
S 4.4-2	SRP-LR 4.4.1	At the end of the paragraph on "Areas of Review" add a new sentence as follows, "For the purposes of license renewal only those components with a service life of 40 years or greater would be TLAA's."	Please provide a statement that clarifies that only equipment qualified for 40 years or greater meets the 6 TLAA criteria. This statement was included in Chapter X of the GALL	NEI states that for license renewal, only those components with a "qualified" life of 40 years or greater require evaluation as a TLAA.  The proposed change is helpful as long as it addresses the "qualified" life of 40 years or greater vs. "service" life of 40 years or greater.  The SRP-LR was revised to address this comment.
S 4.4-3	SRP-LR 4.4.1.2	Delete the first sentence of Section 4.4.1.2	The first sentence is a true statement, but there are a variety of other reasons that GSI-168 was generated. Highlighting this one reason and not the others implies that it is of most importance. In actuality the difference in EQ requirements between newer and older plants was eliminated as an issue in a letter from the NRC dated 2-5-98.	NEI comments that the first sentence in SRP-LR 4.4.1.2 regarding "older" vs. "newer" requirements was resolved in the staff EQ Task Action Plan and need not be highlighted in the SRP-LR. This proposed change is helpful and clear.  The SRP-LR was revised to address this comment.

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.5-1	SRP-LR Chapter 4.5	<p>Replace Chapter 4.5 with the previously submitted NEI version of Chapter 4.5.</p> <p>NOTE: Conforming changes will also need to be made to the GALL report. For example, in GALL section II A1.3 Loss of Prestress, the evaluation and technical basis description should be revised as follows: Delete the second sentence of the first paragraph. Revise the sentence in the second paragraph to read "...see Chapter XI.S2 and XI.Sx." where "x" refers to the new number for the tendon surveillance program</p>	<p>The latest version of this SRP-LR chapter remains based on a fundamental misconception of what constitutes a TLAA. Based strictly on the definition of a TLAA presented in the Rule, the TLAA for Containment Tendon Prestress consists ONLY of the PLL curves that currently are calculated out to 40 years. The trend lines of the actual measurements, and any comparison of these trend lines to the PLL curves, DO NOT constitute a TLAA, because they are in no way based on the forty-year operating life of the plant. The trend line is based on data taken at individual points in time that have no relation to a forty year life, and the trend line is compared to whatever point on the PLL curve it intersects, not to the point on the PLL curve representing 40 years.</p> <p>In actuality, since the TLAA for Containment Tendon Prestress consists only of the PLL curves, the only options for dispositioning this TLAA should be (i), the PLL curves are already calculated to 60 years, or (ii), we will project the PLL curves to 60 years.</p> <p>The activities described in the SRP-LR under option (iii), with the</p>	<p>NEI recommends replacing Chapter 4.5 of the SRP-LR with the NEI version of the Chapter 4.5. NEI states that based on its interpretation of a TLAA presented in the Rule, the TLAA for Containment Tendon Prestress consists only of the PLL curves that currently are calculated out to 40 years. The trend lines of the actual measurements, and any comparison of these trend lines to the PLL curves, do not constitute a TLAA, because they are in no way based on the forty-year operating life of the plant. The trend line is based on data taken at individual points in time that have no relation to a forty year life, and the trend line is compared to whatever point on the PLL curve it intersects, not to the point on the PLL curve representing 40 years.</p> <p>The estimation of PLLs and MRVs are parts of the basic design calculations, that are required whether the license renewal application is made or not. The purpose of this TLAA is to demonstrate that the time-dependent characteristics of the actually measured prestressing forces remain above the corresponding PLLs and MRVs. As</p>

**Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)**

<b>Comment Number</b>	<b>Item Number</b>	<b>Comment/Proposed Change</b>	<b>Basis for Comment</b>	<b>NRC Disposition</b>
S 4.5-1 (cont.)			<p>exception of projecting the PLL curves, have nothing to do with any TLAA. Rather, they constitute the Aging Management Program that the applicant will have to credit after performing the AMR of the Containment Tendons. The industry does not dispute that these activities will be required, only that they have nothing to do with dispositioning the TLAA for Containment Tendon Prestress. The Aging Management Program aspects of Containment Tendon Prestress, including comparison of the slope of the trend line to the PLL curves, will be considered in the aging management review for the Containment structure, not in this TLAA.</p> <p>With the current version of this SRP-LR chapter, the NRC has presented two options for disposition, (i) and (ii) that will almost certainly be rejected by applicants. This is because they require making conjectures about future equipment performance. Also, option (iii) consists of first, extending the PLL curves to 60 years (which as described above should be listed as option (ii) in its entirety and must be done anyway) and then proceeding with the Tendon Prestress activities that every</p>	<p>a result of an earlier NEI comment on GALL IIA1.3, the staff had agreed to make the trend line comparison with the corresponding MRVs rather than PLLs, as that is required by 10 CFR 50.55a(b)(2)(ix)(B) [August 1996].</p> <p>The SRP-LR was not revised to address this comment.</p>

Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.5-1 (cont.)			<p>licensee is required to perform already.</p> <p>For option (ii), the staff is requiring an extrapolation of data for a time-period that is in excess of the current regulatory requirement in 50.55a.</p> <p>In 50.55a(b)(viii)(B), the trend of data needs to be made out only through the next inspection interval (5 years). With data scatter, there is a large degree of uncertainty in extrapolating out upwards of 40 years. Developing a retensioning plan based on a lengthy extrapolation of data adds no value towards assuring the intended function of the tendons is maintained above and beyond existing regulatory requirements. In the absence of any additional TLAA considerations, licensees would continue to treat the prestress trend results in accordance with the existing regulatory requirements.</p> <p>The industry and NRC are not in disagreement as to the complete set of activities that must be performed for aging management and for TLAA disposition for Containment Tendons. The previous industry rewrite of this SRP-LR chapter intended to allocate those activities that, by the Rule, actually pertain to</p>	



Table B.2.13: Disposition of NEI Comments on Chapter 4 of SRP-LR (continued)

Comment Number	Item Number	Comment/Proposed Change	Basis for Comment	NRC Disposition
S 4.5-1 (cont.)			the TLAA aspects of this issue, and relegate the remainder to the appropriate aging management review process.	

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