

May 18, 2001

Mr. Douglas J. Walters  
Nuclear Energy Institute  
1776 I Street, N.W., Suite 400  
Washington, DC 20006-3708

SUBJECT: PLAN AND SCHEDULE FOR NUCLEAR ENERGY INSTITUTE (NEI) ON  
CONTINUED DIALOG TOPICS IN THE GENERIC AGING LESSONS  
LEARNED (GALL) REPORT

Dear Mr. Walters:

During the license renewal steering committee meeting with NEI on April 18, 2001, the staff discussed one follow-up issue concerning the license renewal guidance documents that may involve both NEI and NRC staff's effort. The issue involves a continued dialog with NEI on the five topics identified by NEI in the GALL report. To help reach a common understanding of these topics and to begin dialog for a prompt resolution, the staff has enclosed a summary of each of the topics that represents current staff understanding.

In order to ensure the success of the continued dialog on these five topics in a timely manner, NEI is requested to provide a plan and schedule for its completion. If you have any questions regarding this matter, please contact Peter Kang at 301-415-2779.

Sincerely,

**/RA/**

Christopher I. Grimes, Chief  
License Renewal and Standardization Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure: As stated

c w/encl: See next page

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NUCLEAR ENERGY INSTITUTE

Project No. 690

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1. Individual Plant Examination (IPE) or Individual Plant Examination for External Events (IPEEE) as a source document to consider for scoping

- NEI considers it inappropriate for an applicant to establish a license renewal scoping and screening criterion that relies on plant-specific probabilistic analyses like IPEs and IPEEEs since they are not part of the Current Licensing Basis and only reflect the estimated core damage frequency for the plant configuration at that time.
- NEI contends that IPEs and IPEEEs may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency but these recommendations are to be implemented only after approved under a 10 CFR 50.59 or 10 CFR 50.90 review.
- Standard Review Plan for License Renewal, page 2.1-3 states that although the License Renewal Rule is “deterministic,” probabilistic methods, on a plant-specific basis, may help assess the relative importance of structures and components subject to an aging management review by drawing attention to specific vulnerabilities.
- Reviewing an IPE or IPEEE can help a reviewer determine what equipment is relied on for mitigation of design basis and severe accidents.

Enclosure

2. Operating experience with cracking of small-bore piping

- NEI's position is that Inservice Inspections (ISI) and Chemistry Control at BWRs are adequate as an aging management program. Operating experience does not justify doing more.
- GALL recommends a volumetric one-time inspection for evidence of no cracking to verify the effectiveness of chemistry control. The one-time inspection augments the aging management program consisting of primary water chemistry and inservice inspections for Class 1 components at BWRs.

3. Management of loss of preload on reactor vessel internals bolting using the loose parts monitoring system

- NEI believes that ISI Visual Inspections are adequate for management of loss of preload on reactor vessel internals bolting.
- GALL recommends that loss of preload on reactor vessel internals bolting be managed by ISI and loose parts monitoring.
- NRC staff accepted Westinghouse Owners Group topical report WCAP-14577 which recommends loose parts monitoring as one of the surveillance techniques used to detect loss of preload and other aging effects on certain reactor vessel internals components as part of several aging management programs
- ASME Code, Section XI, Category B-N-3 requires visual inspections of core support structures every 10 years.

4. Operating experience with cracking in bolting

- NEI's position is that crack initiation/growth due to stress corrosion cracking for carbon steel closure bolting is not an aging effect/mechanism.
- GALL recommends that crack initiation/growth be managed by the EPRI bolting integrity program



5. Inspection of fire protection systems

- NEI's position is that National Fire Protection Association (NFPA) Codes are adequate for managing aging effects in fire water systems
- NFPA Codes do not provide guidance for assessing internal corrosion of fire water systems which are not routinely subject to flow.
- GALL recommends continuous system monitoring, internal inspection, and flow testing of fire water systems to ensure that corrosion (including microbiological influenced corrosion (MIC)) and biofouling are not occurring.