

**From:** <erachp@comcast.net>  
**To:** Jim Davis <jad@nrc.gov>, Peter Wen <pxw@nrc.gov>  
**Date:** Thu, May 4, 2006 8:20 PM  
**Subject:** PNPS Template for not consistent with GALL AMRs

Peter/Jim,

The attached reflects our discussion this morning regarding a template for AMR audit report section 3.X.2.3 - AMRs not consistent with GALL Report or not included in the GALL Report. The format reflects what we discussed. There are no subsections assigned to those paragraphs that address "not applicable" for AEs in Table 1, and for those paragraphs that address "none-none" for AE/AMP in Table 2's.

Subsections start with section 3.X.2.3.1 for Table 3.X.2-1, 3.X.2.3.2 for Table 3.X.2-2, and so on. There may be some Table 2's where all line items may be consistent with GALL (footnotes A-E). Should we still address these Tables with its associated sub-section number? If we do not, then the subsection number and Table number will not match.

Let me know what you think or call me tomorrow and we can discuss any changes you may want.

Erach

**CC:** Joe Zabel <JZabel@atlintl.com>, Mark Orr <MPORr@atlintl.com>

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**Created By:** erachp@comcast.net

**Recipients**

nrc.gov

OWGWPO01.HQGWDO01

JAD (James Davis)

nrc.gov

TWGWPO02.HQGWDO01

PXW (Peter Wen)

atlintl.com

MPOrr CC (Mark Orr)

JZabel CC (Joe Zabel)

**Post Office**

OWGWPO01.HQGWDO01

TWGWPO02.HQGWDO01

**Route**

nrc.gov

nrc.gov

atlintl.com

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TEXT.htm	1128	
Template_for_not_consistent_with_GALL.wpd	14340	
Mime.822	23566	

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### **3.3.2.3 AMR Results That Are Not Consistent With The GALL Report Or Not Addressed In The GALL Report**

#### Summary of Information in the Application

In PNPS LRA Table 3.3.1, Summary of Aging Management Evaluations for the Auxiliary Systems, the applicant provided information regarding components or material/environment combination in the GALL Report that it evaluated and identified as not applicable to its plant.

In PNPS LRA Tables 3.3.2-1 through 3.3.2-14-35, the applicant provided additional details of the results of the AMRs for material, environment, aging effect requiring management, and AMP combinations that are not consistent with the GALL Report. Specifically, the applicant indicated, via Notes F through J, that neither the identified component nor the material/environment combination is evaluated in the GALL Report and provided information concerning how the aging effect requiring management will be managed.

#### Project Team Evaluation

The project team reviewed additional details of the results of the AMRs for material, environment, aging effect requiring management, and AMP combinations that are not consistent with the GALL Report or are not addressed in the GALL Report.

#### Aging Effect/Mechanism in Table 3.3.1 That Are Not Applicable for PNPS

[This section is for write-up of the AMR line-items that the applicant claims are not used or not applicable to its plant in LRA Table 1. The write-up does not include the "further evaluation required" in Table 1 since they are evaluated in Section 3.[Y].2. In addition, the evaluation is not necessary if the plant is of a different vintage (PWR vs. BWR)]

The project team reviewed PNPS LRA Table 3.3.1, which provides a summary of aging management evaluations for the auxiliary systems evaluated in the GALL Report.

In PNPS LRA Table 3.1.1, Item [NUMBER] discussion column, the applicant stated that the [list the aging effect] of [list components] due to [list aging mechanism] is not applicable at PNPS.

[The project team evaluation, if applicable]

On the basis that there [is/are] no [list of applicable components] in the auxiliary systems at PNPS, the project team finds that, for this component type, this aging effect is not applicable to PNPS.

[Repeat the above three paragraphs, if applicable, for all items that the applicant claims is not applicable to its plant]

[If there are RAIs or issues that affect all Tables, provide discussion and evaluation here]

[If the LRA lists a series of components which have no aging effect and therefore do not require aging management, the following writeup may be used, as appropriate.]

#### Auxiliary Systems AMR Line Items That Has No Aging Effect (PNPS LRA Tables 3.3.2-1

through 3.3.2-14-35)

In PNPS LRA Tables 3.3.2-1 through 3.3.2-14-35, the applicant identified line-items where no aging effects were identified as a result of its aging review process.

In PNPS LRA Tables 3.3.2-1 through 3.3.2-14-35, the applicant identified AMR line-items where no aging effects were identified as a result of its aging review process. Specifically, instances in which the applicant states that no aging effects were identified occurred when components fabricated from [list materials] material exposed to [list environments] environment. [Provide evaluation why the LRA claim of no aging effect is valid] in environment for these components and materials. No aging effects are considered to be applicable to components fabricated from [list of material] material exposed to [list of environment] environments.

On the basis of its review of current industry research and operating experience, the project team found that [environments] on [materials] will not result in aging that will be of concern during the period of extended operation. [provide project team evaluation] Therefore, the project team concluded that there are no applicable aging effects requiring management for [materials] components exposed to [list of environment] environments.

On the basis of its audit and review of the applicant's program, the project team found that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained during the period of extended operation, as required by 10 CFR 54.21(a)(3).

3.3.2.3.1 [Table Title] - Summary of Aging Management Evaluation - ([PNPS] LRA Table 3.[Y].2-[S])

The project team reviewed the [PNPS] LRA Table 3.[Y].2-[S], which summarizes the results of AMR evaluations for the [table title] component groups.

In LRA Table 3.[Y].2-[S], the applicant proposed to manage [list aging effect] of [list materials] materials for components types of [list component names] exposed to [list environments] environment using [PNPS] AMP B[NUMBER], " [Applicant AMP Name]."

The project team reviewed [Applicant AMP Name] program and its evaluation is documented in Section [3.0.3.A.A] of this audit and review report. [Briefly provide summary of the program and the project team evaluation]. On the basis of its review of the applicant's plant-specific and industry operating experience, the project team found the aging effect of [list aging effect] of [list materials] material exposed to [list environments] environment are effectively managed using [Applicant AMP Name] program. On this basis, the project team found that management of [list aging effect] in [table title] is acceptable.

3.3.2.3.2 [Table Title] - Summary of Aging Management Evaluation - ([PNPS] LRA Table 3.[Y].2-[S])

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### Conclusion

On the basis of its review, the project team found that the applicant appropriately evaluated AMR results involving material, environment, aging effects requiring management, and AMP combinations that are not addressed in the GALL Report. The project team found that the applicant has demonstrated that the effects of aging will be adequately managed so that the intended functions will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21(a)(3).