

Generic Concrete Aging Management Program

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Meeting to Obtain Stakeholder Input on Potential
Changes to Guidance for Renewal of Spent Fuel Dry
Cask Storage System Licenses and Certificates of
Compliance

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Basis for Development

- **Valid basis include applicable consensus codes/standards and/or NUREG guidance, e.g.:**
 - ACI 349.3R, “Evaluation of Existing Nuclear Safety-Related Concrete Structures”
 - ASME Code Section XI, Subsection IWL, “Requirements for Class CC Concrete Components of Light-Water-Cooled Plants”
 - NUREG-1801, “Generic Aging Lessons Learned (GALL) Report”
- **Applicant may propose AMPs based on alternate criteria:**
 - Exclusion of aging effects/mechanisms in the above codes/standards **should be justified** with a site-specific technical basis (e.g., engineering analysis, operational experience data).
 - Justification should demonstrate that the excluded aging mechanisms will not adversely affect the ability of the in-scope structure to perform its intended function during the license period of extended operation.

Aging Effects/Mechanisms

Mechanism	Effect
Freeze-thaw	Cracking, loss of material (spalling, scaling)
Chemical attack [Cl, SO ₄]	Cracking, loss of material (spalling, scaling)
Aggregate reactions/expansion	Cracking and loss of strength
Corrosion of embedded steel	Cracking, loss of material (spalling, scaling) and loss of bond
Leaching of $\text{Ca(OH)}_2 \rightarrow \text{CaCO}_3$	Increase in porosity/permeability, loss of strength
Long-term settlement	Cracking, distortion
Gamma/neutron irradiation	Cracking, reduction in strength (change in mechanical properties)
High temperature dehydration	Cracking, reduction in strength (change in mechanical properties)

Not necessarily all-inclusive

Aging Effects/Mechanisms

Irradiation/ Thermal Dehydration

- Reductions in strength and elastic modulus **not managed** by this AMP – ***visual examination not sufficient***
- TLAA may be used to demonstrate that no part of the concrete exceeds:
 - Critical cumulative fluences per ACI 349.3R: 10^{17} neutrons/m²; 10^{10} rad (gamma dose)
 - Temperature limits per ACI 349: 150°C (general), 200°C (localized)

“Change in Materials Properties”

- Definition per either ASTM C1562 or EPRI 1002950* **not implicit**, i.e.:
 - increases in permeability and porosity
 - reduction in pH value, tensile strength, compressive strength, modulus of elasticity, and bond strength
- Reference to this “aging effect” **must include proper definition** in the LRA

AMP Element 1:

Scope of the Program



NUREG-1927: The scope of the program should include the specific structures and components subject to an aging management review

1. **Visual inspection** of all above-grade (accessible, inaccessible) and below-grade (underground) concrete areas
 - ACI 349.3R: “All safety-related structures should be visually inspected at intervals not to exceed 10 years”
2. **Groundwater chemistry program** to manage below-grade (underground) effects
 - Corrosion of embedded steel
 - Chemical attack (chloride, sulfate induced degradation)
3. **Periodic radiation surveys**
 - Controlled Area: Compliance with 10 CFR 72.104.
 - Near cask (e.g. 1m): Monitor effectiveness as neutron shield (i.e. dose uptrends); FSAR validation at specific locations

AMP Element 2: Preventive Actions



NUREG-1927: Preventive actions should mitigate or prevent the applicable aging effects

- Program is for **Condition Monitoring**
- Design in accordance to **ACI 318 or ACI 349**, as applicable.
Otherwise,
 - For locations in moderate (100-500 day-inch/yr) and severe (>500 day-inch/yr) weathering conditions, concrete mix design must meet air content & water-to-cement ratio requirements of ASTM C260 or ASME Sect. III, Div. 2.
 - Petrographic examination (ASTM C295 or equivalent) must demonstrate reactive aggregates do not lead to loss of function.
- Site-specific AMP required if:
 - Dewatering system used to prevent long-term settlement
 - Embedded aluminum components without protective insulating coating

AMP Element 3:

Parameters Monitored/ Inspected



NUREG-1927: Parameters monitored or inspected should be linked to the effects of aging on the intended functions of the particular structure and component

- **Quantify effects including cracking, material loss (spalling, scaling), loss of bond, increased porosity/permeability.**
- ACI 201.1R and SEI ASCE 11-99: exemplary visuals of effects.
- **Evaluation should identify**, e.g:
 - affected surface area
 - geometry/depth of defect
 - cracking, crazing, curling
 - delaminations, deflections
 - honeycombing, bug holes
 - popouts, voids
 - exposure of embedded steel
 - staining/ evidence of corrosion
 - dusting, efflorescence of any color
- **Contributing factors should be evaluated/documented**, e.g.:
 - surface geometry supporting ponding, lack of air entrainment
 - widening due to abrasion/ other weather effects

AMP Element 4: Detection of Aging Effects



NUREG-1927: Define method or technique, frequency, sample size, data collection, and timing to ensure timely detection of aging effects

- **Method/technique (meet criteria in ACI 349.3R/ IWL-2512)**
 - ***AMP must include justification that the technique can achieve the acceptance criteria; reference valid calibration methods and frequency.***
 - ABOVE-GRADE (accessible): visual (e.g., feeler gauges, crack comparators)
 - ABOVE-GRADE (inaccessible)/ BELOW-GRADE (underground)
 - Visual: site-qualified system with valid sensitivity/resolution (e.g., video/ fiber optic camera)
 - Ground water monitoring program: qualified chemical analysis method
 - Radiation surveys: calibrated detector, valid energy range
- **Frequency of Inspection (commensurate with ACI 349.3R)**
 - ABOVE-GRADE (accessible and inaccessible): ≤ 5 years
 - BELOW-GRADE (underground): ≤ 10 years, and when excavated for any reason
 - ***Use of opportunistic inspections in lieu of planned inspections must include valid technical basis (engineering justification, operational experience data).***

AMP Element 4: Detection of Aging Effects (cont.)



NUREG-1927: Define method or technique, frequency, sample size, data collection, and timing to ensure timely detection of aging effects

- **Frequency of Inspection (cont.)**
 - Water chemistry program/ radiation survey measurements: justified
 - Daily inspections of inlet/outlet vents to ensure ACI 349 temperature limits (or technical specifications) are not exceeded.
- **Sample size:**
 - All surface areas as stated in scope, or justified size
 - Clearly identify and justify specific locations (specify accessible or inaccessible)
- **Data collection**
 - Commensurate with applicable standards: e.g. ACI 224.1R for quantitative analysis (width, depth, extent), ACI 562, ACI 364.1R.
 - Reference adequate clearinghouse for Operating Experience
- **Timing**
 - Lead canister inspection / frequency specified by AMP
 - Inspection frequencies may be accelerated per site CAP

AMP Element 5: Monitoring & Trending



NUREG-1927: Should provide for prediction of the extent of the effects of aging and timely corrective or mitigative actions

- **Commensurate with:**
 - Defect evaluation standards (e.g. ACI 201.1R, ACI 207.3R, ACI 364.1R, ACI 562, ACI 224.1R - crack evaluation)
 - Acceptance criteria and inspector qualifications (e.g., ACI 349.3R, ASME Code Section XI)
- **AMP should reference plans/procedures used to:**
 - Establish a baseline prior to or at the beginning of the renewal period
 - Track trending of parameter, or effect not corrected in a previous inspection, e.g.:
 - Crack growth rates
 - Corrosion rates
 - Pore density/ affected areas
 - Dose rates

AMP Element 6: Acceptance Criteria



NUREG-1927: Acceptance criteria, against which the need for corrective action will be evaluated; should ensure that SSC functions are maintained

- **Visual: Commensurate with ACI 349.3R (3-Tier Quantitative Criteria):**
 - Acceptance without further evaluation
 - Acceptance after review
 - Acceptance requiring further evaluation
- **Groundwater Chemistry Program: ASME Code Section XI, NUREG-1801**
 - Aggressive below-grade environment: pH < 5.5, chlorides > 500 ppm, or sulfates > 1500 ppm
- **Radiation Surveys**
 - Controlled area: 10 CFR 72.104 (bounding limit)
 - Near cask (e.g., 1 m): A statistically significant uptrend in neutron dose rate, justified criteria (e.g. moving average)
- **Alternative acceptance criteria may be provided, but must:**
 - Include a quantitative basis (justifiable by OE, engineering analysis/standards)
 - Avoid use of non quantifiable phrases (e.g. significant, moderate, minor, little, slight, few, etc.)
 - Be achievable and clearly actionable – Method/technique must be qualified to meet the stated quantitative criteria (i.e. sufficient resolution/sensitivity)

AMP Element 7: Corrective Actions



NUREG-1927: Corrective actions, including root cause determination and prevention of recurrence, should be timely

- **CAP commensurate with 10 CFR 72 Subpart G, or 10 CFR 50 Appendix B.**
 - Justification for non-repairs (e.g., engineering analysis)
- **AMP should reference applicable concrete rehabilitation standards.**
 - Cracking: ACI 224.1R, ACI 562, ACI 364.1R, and ACI RAP Bulletins
 - Spalling/scaling: ACI 562, ACI 364.1R, ACI 506R, and ACI RAP Bulletins
- **AMP should reference criteria used to determine which inspection results will require either:**
 - An Action Request (e.g, Tier 2 Acceptance per ACI 349.3R)
 - Modification to the existing AMP (e.g. increased frequency)
 - Notification to the NRC (e.g., Tier 3 Acceptance per ACI 349.3R)
- **AMP should reference how industry-wide OE will lead to any of the above action items**

AMP Elements 8/9: Confirmation Process/Admin Controls



NUREG-1927:

- The confirmation process should ensure that preventive actions are adequate and appropriate corrective actions have been completed and are effective
- Administrative controls should provide a formal review and approval process

Elements should reference:

- Quality Assurance Program consistent with 10 CFR 72 Subpart G, or 10 CFR 50 Appendix B.
- Methods to confirm adequate actions are taken, and are verified as effective
- Inspector qualifications
 - Commensurate with ACI 349.3R
- Record retention requirements
- Review process of inspection results
- Frequency/methods for:
 - reporting inspection results to NRC
 - evaluating suitability of AMP based on industry-wide OE

AMP Element 10: Operating Experience



NUREG-1927: Include past corrective actions; provide objective evidence to support a determination that the effects of aging will be adequately managed so that the SSC intended functions will be maintained during the period of extended operation

Reference and evaluate applicable OE:

- **Internal and industry-wide CRs**
 - Identify age-related degradation
 - Include justification for CRs not identified as age-related degradation
 - Consider CARs when proposing:
 - Method/technique, acceptance criteria, frequency of inspection
- **NRC Information Notices**
- **Applicable industry initiatives** (e.g. DOE cask demo, EPRI-sponsored inspections)
- **OE presented in LRA should support the proposed AMP**

Reference OE clearinghouse

- **INPO or other adequate system**
- **Methods for capturing and evaluating operating experience from other ISFSIs with similar in-scope SSCs.**

Additional Slides

Radiation Bounding Criteria

[NUREG-1536 \(SRP Spent Fuel Dry Storage Systems/ General License\)](#)

Section 6.5.4.3 – Dose Rates

Guidance for the selection of points at which the dose rates should be calculated.

- For normal and off-normal conditions, applicant should indicate the dose rate at all locations accessible to occupational personnel during cask loading, transport to the ISFSI, and maintenance and surveillance operations.
 - Locations include points at or near various cask components and in the immediate vicinity of the cask and the bottom of the transfer cask.
 - e.g.: vent areas, trunnion areas, peak side of the cask, peak top of the cask, the canister-gap region
 - Calculate dose rates at 1m from these locations.

[NUREG 1567 \(SRP Spent Fuel Dry Storage Facilities\)](#)

Section 11.4.3 – Dose Assessment

- Estimated dose rates should be provided for representative points within the restricted areas as well as on and beyond the perimeter of the controlled area.

Acronyms

- ACI: American Concrete Institute
- AMP: Aging Management Program
- ASCE: American Society of Civil Engineers
- ASME: American Society of Mechanical Engineers
- ASTM: American Society for Testing and Materials
- CAP: Corrective Action Program
- CAR: Corrective Action Report
- CFR: Code of Federal Regulations
- CR: Condition Report
- DOE: Department of Energy
- EPRI: Electric Power Research Institute
- FSAR: Final Safety Analysis Report
- ISFSI: Independent Spent Fuel Storage Installation
- INPO: Institute of Nuclear Power Operations
- ITS: Important to Safety
- LRA: License Renewal Application
- OE: Operating Experience
- RAP: Repair Application Procedure
- SEI: Structural Engineering Institute
- SRP: Standard Review Plan
- SSC: Structure, System, or Component
- TLAA: Time-Limited Aging Analysis