

July 7, 2015

Mr. Christopher G. Miller  
Director, Division of License Renewal  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Submittal of Industry Comments on Tables for Subsequent License Renewal (SLR) Guidance Documents

**Project Number: 689**

Dear Mr. Miller:

In a June 18, 2015, public meeting with the U.S. Nuclear Regulatory Commission (NRC), a request was made to provide industry feedback related to identifying the evolution of Generic Aging Lesson Learned (GALL) lines from GALL Rev. 0 through GALL Rev. 1, GALL Rev. 2, to GALL-SLR Tables in SLR guidance documents.

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> is providing the following information for NRC consideration.

- Include an appendix in the Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants (SRP-SLR) that identifies the evolution of GALL lines from GALL Rev. 0 through GALL Rev. 1, GALL Rev. 2, to GALL-SLR Tables.
- Include information in the SLR-GALL Master spreadsheet and SLR-SRP master Excel spreadsheet that allows identification of the evolution of GALL lines from GALL Rev. 0 through GALL Rev. 1, GALL Rev. 2, to GALL-SLR Tables.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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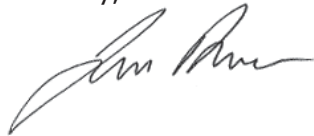
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- It is our understanding that the SLR GALL will provide a column that allows identification of GALL lines as new, modified, deleted or blank. The industry recommends that similar coding be provided in the GALL Rev. 2 column of the SLR-SRP that allows identification of GALL Rev. 2 lines that have been modified by LR-ISGs.
- The basis for GALL lines that have been modified or deleted is requested to be provided in the GALL Technical Basis NUREG. The basis for GALL lines that have been deleted due to being incorporated into another SLR GALL line or group of SLR GALL lines should identify the new SLR GALL line(s) and the reason for their applicability.

We appreciate the opportunity to provide comments and to continue the technical dialogue with the NRC staff regarding the proposed changes to the SLR guidance documents.

If you have questions, please contact either me or Jerud Hanson (202-739-8053; [jeh@nei.org](mailto:jeh@nei.org)).

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Remer", with a stylized, flowing script.

Jason Remer

c: Mr. Steven D. Bloom, NRR/DLR/RSRG, NRC