

SLR Document Changes: Extent of Selective Leaching Inspections

Overview of purpose of change: Revise AMP XI.M33 to recommend a technical justification for using the extent of inspections in the GALL-SLR AMP when inspections during initial LR were not consistent with GALL Rev. 2 guidance.

Basis Document Revise NUREG-2221 to add a new row to Table 2-29 as follows:

XI.M33 Selective Leaching		
Location of Change	Summary of Significant Changes	Technical Bases for Changes
<u>Detection of Aging Effects</u>	<u>Revise AMP XI.M33 to recommend a technical justification for using the extent of inspections in the GALL-SLR AMP when inspections during initial LR were not consistent with GALL Rev. 2 guidance.</u>	<u>GALL Rev. 2 recommended a sample size of 20 percent (with maximum of 25 components) for the one-time inspections for selective leaching conducted prior to the initial LR period. The staff reduced the extent of inspections in GALL-SLR (i.e., 3 percent with a maximum of 10 components) based on several factors. One of these factors was that one-time inspections will be performed prior to the initial LR period in accordance with GALL Rev. 2 guidance.</u> <u>The staff recognizes that not all applicants for SLR were committed to GALL Rev. 2 during initial LR (e.g., pre-GALL plants). Therefore, the AMP was revised to recommend that a technical justification for using the extent of inspections in the GALL-SLR AMP is provided when inspections during initial LR were not conducted in accordance with GALL Rev. 2 guidance.</u>

Document Changes:

SRP-SLR

None.

GALL-SLR

Add the following paragraph to the “detection of aging effects” program element:

Opportunistic and periodic inspections are conducted for components exposed to raw water, waste water, or soil, and for components in CCCW or treated water where XI.M33-3 plant-specific OE includes selective leaching in these environments...

The recommended extent of inspections in this AMP (i.e., 3 percent with a maximum of 10 components) is based on one-time inspections for selective leaching being performed prior to the initial LR period in accordance with GALL Rev. 2 guidance (i.e., 20 percent with maximum of 25 components for each population). A technical justification for using the extent of inspections in this AMP is submitted when inspections during the initial LR period were not conducted in accordance with GALL Rev. 2 guidance.

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For multi-unit sites where the sample size is not based on the percentage of the population and the inspections are conducted periodically (not one-time inspections), it is acceptable to reduce the total number of inspections at the site as follows. For two unit sites, eight visual and...

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