

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
1	Weitze-1	ML23236A517	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 1	Correction of issue date for NUREG/CR-6909 Rev. 1, and replacement of notes "If and when published as RG 1.207, Revision 1 Final" or similar wording, with the issuance date as Regulatory Guide 1.207 Revision 1 was issued final on June 2018.	7 Editorial/Administrative
2	Smith-1	ML23242A041	NA	NA	Rev. 1	NEI request to extend comment period. Extension was granted.	7 Editorial/Administrative
3	Gallagher-1	ML23242A043	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M2, "Water Chemistry;" XI.M30, "Fuel Oil Chemistry;" and XI.M39, "Lubricating Oil Analysis;" programs.	Rev. 0	Elimination of One Time Inspections.	2 Remove one time inspections
4	Gallagher-2	ML23242A046	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M3, "Reactor Head Closure Stud Bolting."	Rev. 0	Modification of preventative action 2d, to eliminate many unnecessary exceptions in industry SLR applications.	6 Substantive technical change
5	Gallagher-3	ML23242A047	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M17, "Flow-Accelerated Corrosion."	Rev. 0	In the Detection of Aging Effects Element, the staff added in the SLR GALL 2017 the need to perform a reassessment to ensure that adequate bases exist to justify the exclusion from wall thickness monitoring for piping systems that are operated for less than 2 percent of plant operating time. This exclusion is allowed by NSAC 202L. This assessment is unnecessary.	6 Substantive technical change
6	Gallagher-4	ML23242A048	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminate prescriptive follow-up inspections specified in SLR Gall and instead allow determination by the corrective action program based on analysis of information available at the time.	1 Remove prescriptive corrective actions

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7	Gallagher-5	ML23242A049	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
8	Gallagher-6	ML23242A051	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions

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9	Gallagher-7	ML23242A053	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	XI.M27 Fire Water System, Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
10	Gallagher-8	ML23242A054	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
11	Gallagher-9	ML23242A056	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M2, "Water Chemistry;" XI.M30, "Fuel Oil Chemistry;" and XI.M39, "Lubricating Oil Analysis;" programs.	Rev. 0	Elimination of One Time Inspections.	2 Remove one time inspections
12	Gallagher-10	ML23242A057	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M2, "Water Chemistry;" XI.M30, "Fuel Oil Chemistry;" XI.M32, "One-Time Inspection," and XI.M39, "Lubricating Oil Analysis;" programs.	Rev. 0	Elimination of One Time Inspections.	2 Remove one time inspections

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13	Gallagher-11	ML23242A059	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
14	Gallagher-12	ML23242A060	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M35 ASME Code Class 1 Small-Bore Piping	Rev. 1	Modification of Table XI.M35-1 Note (a), to put a limit on the term "no history," 10 years should be sufficient rather than the entire operating history.	6 Substantive technical change
15	Gallagher-13	ML23242A062	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions

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16	Gallagher-14	ML23242A065	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
17	Gallagher-15	ML23242A066	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M2, "Water Chemistry;" XI.M30, "Fuel Oil Chemistry;" XI.M32, "One-Time Inspection," and XI.M39, "Lubricating Oil Analysis;" programs.	Rev. 0	Elimination of One Time Inspections.	2 Remove one time inspections
18	Gallagher-16	ML23242A068	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping.	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
19	Gallagher-17	ML23242A070	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.S6, "Structures Monitoring."	Rev. 1	For structures that are in scope for 10 CFR 54.4(a)(2) only, change inspection frequency from "not to exceed 5 years" to "not to exceed 10 years."	9 General testing and inspections
20	Gallagher-18	ML23242A071	NA	NA	Rev. 0	Reduction of NRC staff review time for SLR applications using existing corrective action programs, operating experience program, and targeted scope and screening.	7 Editorial/Administrative

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21	Gallagher-19	ML23242A073	NUREG-2192, R1	NUREG-2192, Rev. 1, A.1.2.2.	Rev. 0	Reduction of NRC staff review time for SLR applications, generic reviews with SRP-SLR branch technical positions and operating experience for AMPs	7 Editorial/Administrative
22	Gallagher-20	ML23262A744	NUREG-2191, Vol 2, R1	XI.M32, "One-Time Inspection"	Rev. 1	Recommendation to eliminate unnecessary additional detail in XI.M32 Element 4, "Detection of Aging Effects."	7 Editorial/Administrative
23	Gallagher-21	ML23262A745	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M21a, "Closed Treated Water Systems," XI.M29, "Outdoor And Large Atmospheric Metallic Storage Tanks," XI.M33, "Selective Leaching," XI.M36, "External Surfaces Monitoring Of Mechanical Components," XI.M38, "Inspection Of Internal Surfaces In Miscellaneous Piping And Ducting Components."	Rev. 1	Recommendation to eliminate unnecessary detail to the SLR GALL, "samples are taken from multiple locations to ensure that a representative sample is examined, focusing on components most susceptible to the applicable aging effect."	7 Editorial/Administrative
24	Gallagher-22	ML23262A746	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI. M18 Bolting Integrity, XI.M20 Open-Cycle Cooling Water System, XI.M.21A Closed Treated Water Systems, XI.M27 Fire Water System, XI.M29 Outdoor and Large Atmospheric Metallic Storage Tanks, XI.M32 One-Time Inspection, XI.M33 Selective Leaching, XI.M36 External Surfaces Monitoring, XI.M38 Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, XI.M42 Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers and Tanks, XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping	Rev. 0	Eliminating prescriptive corrective actions.	1 Remove prescriptive corrective actions
25	Gallagher-23	ML23262A748	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	XI.M43 High- Density Polyethylene (HDPE) Piping And Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping	Rev. 1	Recommendation to eliminte new AMP.	6 Substantive technical change
26	Gallagher-24	ML23272A001	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 1	Recommendation on clarifying how NRC Technical Staff uses industry Operating Experience.	6 Substantive technical change
27	NRC-1	ML23284A374	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 1	NRC Staff comments on AMP XI.M19, "Steam Generators."	7 Editorial/Administrative
28	NRC-2	ML23284A376	NUREG-2191, Vol 2	Various	Rev. 1	NRC Staff comments on AMP XI.M26, "Fire Protection."	6 Substantive technical change

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33	NUGEQ-1	ML23347A176	NUREG-2191, Vol 2, R1	Section X.E1 / Page X-3; Section IX.F / page IX-33 Significant Aging Mechanisms; Section X.E1 / page X-3 Program Description	Rev. 1	Nuclear Utility Group on Equipment Qualification ("NUGEQ"), comments related to preparation and maintenance of a list of in-scope equipment "mechanical" (e.g., gaskets, seals, O-rings, etc.), and aging mechanisms during licene period.	6 Substantive technical change
29-001	EPRI-1	ML23284A377	NUREG-2191, Vol 1, R1	Chapter II.A Chapter title	Rev. 1	Correct Typo, Chapter II.A Chapter title: "PRESSURIZED WATER REACTOR CONTAMINANTS."	7 Editorial/Administrative
29-002	EPRI-2	ML23284A377	NUREG-2191, Vol 1, R1	Page IV-36, Line IV.B2.RP-285	Rev. 1	Material Stellite recommended clarification.	8 Aging Managemt Review
29-003	EPRI-3	ML23284A377	NUREG-2191, Vol 1, R1	Page IV-36, Line IV.B2.RP-285	Rev. 1	Deletion of added clarification in "Aging Effect/Mechanism" column.	8 Aging Managemt Review
29-004	EPRI-4	ML23284A377	NUREG-2191, Vol 1, R1	Page IV-41, Line IV.B2.RP-302	Rev. 1	Page IV-41, Line IV.B2.RP-302, Typo, change SSC to SCC (stress corrosion cracking).	7 Editorial/Administrative
29-005	EPRI-5	ML23284A377	NUREG-2191, Vol 1, R1	AMR Line Items: VII.C1.AP-239, Page VII-29, VII.C1.A-739, Page VII- 33, VII.G.A-648, Page VII- 209	Rev. 0	Recommendation to delete "flow blockage due to fouling."	8 Aging Managemt Review
29-006	EPRI-6	ML23284A377	NUREG-2191, Vol 1, R1	AMR Line Items VII.I.AP-175, Page VII-257, VII.I.A-406, Page VII- 258, VII.G.A-648, Page VII- 209	Rev. 1	Recommendation to delete "loss of material due to exposure to temperature or moisture" from Aging Effects/Mechanisms.	8 Aging Managemt Review
29-007	EPRI-7	ML23284A377	NUREG-2191, Vol 1, R1	AMR Line Items: VII.I.AP-182, Page VII-258, VII.I.A-420, Page VII- 258, VII.I.A-538, Page VII- 263	Rev. 1	Recommendation to delete "moisture" from the mechanisms.	8 Aging Managemt Review
29-008	EPRI-8	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.E1,"Program Description," Page XI-5, line 18-20	Rev. 1	Recommend to delete "that are coated with fire- retardant material"	6 Substantive technical change
29-009	EPRI-9	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.E1, Element 4, Page XI-7, line 29-31	Rev. 1	Recommendation to delete "coated with fire-retardant material."	6 Substantive technical change
29-010	EPRI-10	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.E3A, "Program Description," Page XI-15, lines 14	Rev. 1	Recommendation to delete "potentially" or provide guidance on what this means.	7 Editorial/Administrative
29-011	EPRI-11	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M4, "BWR Vessel ID Attachment Welds," Page XI-71, line 23-25,	Rev. 1	Revise reference, latest correlations in Code Case N-896 instead of BWRVIP-60-A	5 Update references
29-012	EPRI-12	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M7, "BWR Penetrations," Page XI-80, line 1-3	Rev. 1	Revise reference, latest correlations in Code Case N-896 instead of BWRVIP-60-A	5 Update references
29-013	EPRI-13	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M8, "BWR Penetrations," Page XI-84, line 21-23	Rev. 1	Revise reference, latest correlations in Code Case N-896 instead of BWRVIP-60-A	5 Update references
29-014	EPRI-14	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M8, "BWR Penetrations," Page XI-84, line 24-26	Rev. 1	Recommendation to update reference to BWR Water Chemistry Guideline Rev. 1.	5 Update references
29-015	EPRI-15	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M9, "BWR Vessel Internals," Page XI-93, line 34-36	Rev. 1	Recommendation to update BWRVIP-100-A to Rev. 1-A.	5 Update references
29-016	EPRI-16	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M9, "BWR Vessel Internals," Page XI-94, line 7-9	Rev. 1	Recommendation to update reference to BWRVIP-180, Rev. 1.	5 Update references
29-017	EPRI-17	ML23284A377	NUREG-2191, Vol 2, R1	Section XI.M9, "BWR Vessel Internals," Page XI-94, line 15-17	Rev. 1	Recommendation to update BWR Water Chemistry Guidelines-2008 to Revision 1.	5 Update references

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29-018	EPRI-18	ML23284A377	NUREG-2191, Vol 2, R1	XI.M12, "Thermal Aging Embrittlement Of Cast Austenitic Stainless Steel" Page XI-111, line 43-44	Rev. 1	Recommendation to revise description of Nonmandatory Appendix C to the 2019 ASME Code, Section XI.	6 Substantive technical change
29-019	EPRI-19	ML23284A377	NUREG-2191, Vol 2, R1	XI.M12, Page XI-112, line 1	Rev. 1	Correction of revision number of NUREG/CR-4513	5 Update references
29-020	EPRI-20	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M17, "Flow Accelerated Corrosion" Page XI-125, lines 23-24	Rev. 1	Correction of cited EPRI report, replace "EPRI 3002005530" with "EPRI 3002023786"	7 Editorial/Administrative
29-021	EPRI-21	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M17, Page XI-124, lines 37-40	Rev. 1	Recommendation to revise 2% exclusion criterion.	6 Substantive technical change
29-022	EPRI-22	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M17, Page XI-125, lines 24-25	Rev. 1	Recommendation to revise safety factor for erosion.	6 Substantive technical change
29-023	EPRI-23	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M17, Page XI-126, lines 39-40	Rev. 1	Revise EPRI report reference, update the reference to EPRI 3002023786.	7 Editorial/Administrative
29-024	EPRI-24	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M33, "Selective Leaching," Element 4 Page XI-218 Line 12-20	Rev. 0	Recommendation to include additional non-destructive examination (NDE) techniques.	4 Use new techniques
29-025	EPRI-25	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M33, Element 4 Page XI-218 Line 12, and Element 6 Page XI-220, Line 12	Rev. 0	Addition of visual indicators of selective leaching for copper-alloy materials.	4 Use new techniques
29-026	EPRI-26	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M33, References Page XI-222	Rev. 0	Recommendation to reference additional EPRI reports.	5 Update references
29-027	EPRI-27	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M41 "Buried and Underground Piping and Tanks," Element 4 Page XI-262 Lines 35-43	Rev. 0	Recommendation to make internal volumetric exams treated equivalent to external visual exams with regard to length of inspections requirements.	9 General testing and inspections
29-028	EPRI-28	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M41, Element 4, Page XI-262, Lines 35-43	Rev. 0	Recommendation to revise Element 4 to include alternative inspection approaches for cementitious piping. Lines 35-43	4 Use new techniques
29-029	EPRI-29	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M41, References, Page XI-267, line 31	Rev. 0	Recommendation to reference the most current version of EPRI report, 3002018352.	5 Update references
29-030	EPRI-30	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M43, "High- Density Polyethylene (HDPE) Piping and Carbon Fiber - Reinforced Polymer (CFRP) Repaired Piping," Page XI-279, lines 21-25, and Page XI-281, lines 2-4.	Rev. 1	Recommendation on clarifying which AMP should be credited with managing any effects of aging for buried non- safety related HDPE, as well as for aboveground HDPE piping.	6 Substantive technical change
29-031	EPRI-31	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M43, Page XI-281, line 7 & 21	Rev. 1	Recommendation to delete "loss of material due to radiation, temperature, and moisture".	6 Substantive technical change
29-032	EPRI-32	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M43, Page XI-281, line 10 & 29	Rev. 1	Recommendation to delete "accumulation of particulate fouling (raw water systems)."	6 Substantive technical change
29-033	EPRI-33	ML23284A377	NUREG-2191, Vol 2, R1	AMP XI.M43, Page XI-279, line 25 & 26	Rev. 1	Recommendation that program scope also address external applications of CFRP; not just internal applications.	6 Substantive technical change

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29-034	EPRI-34	ML23284A377	NUREG-2192, R1	Section 3.1.2.2.14, "Loss of Preload Due to Thermal or Irradiation- Enhanced Stress Relaxation," Page 3.1-10 & 11	Rev. 0	Recommendation to revise section to reflect BWRVIP- 25, Rev. 1-A on NRC-approved methodology to justify elimination of core plate holddown bolt inspections.	5 Update references
30-001	AMS-1	ML23284A379	NUREG-2191, Vol 2, R1	XI.E1, "Electrical Insulation for Electrical Cables and Connections Not Subject To 10 CFR 50.49 Environmental Qualification Requirements," Page XI-5 line 18 - line 20 and Page XI-7 line 29 - 31.	Rev. 1	Clarification of the definition of adverse localized environment.	6 Substantive technical change
30-002	AMS-2	ML23284A379	NUREG-2191, Vol 2, R1	XI.E1 - Page XI-6 lines 8 - 12, Page XI-7 lines 7 - 9, lines 26 - 29, lines 37 - 39; XI.E3B - Page XI-21 lines 30 - 33, Page XI-23 lines 35 - 37, Page XI-24 lines 17 - 19; XI.E3C - Page XI-27 lines 28 - 30, Page XI-29 lines 30 - 32, Page XI-30 lines 11 - 13.	Rev. 0	Recommendation to use condition monitoring techniques used to assess the aged condition of cable insulation materials	4 Use new techniques
30-003	AMS-3	ML23284A379	NUREG-2191, Vol 2, R1	XI.E1 - Page XI-8 line 1; XI.E2 - Page XI-11 line 31, Page XI-12 lines 11 - and lines 39 - 40, Page XI- 13 lines 3 - 8 and 23 - 25; XI.E3B - Page XI-22 lines 14 - 20, Page XI-24 lines 29 - 35; XI.E3C - Page XI-28 lines 11 - 16, Page XI-30 lines 23 - 28	Rev. 0	Clarification of existing maintenance, calibration, or surveillance programs that may be credited in lieu of testing.	9 General testing and inspections
30-004	AMS-4	ML23284A379	NUREG-2191, Vol 2, R1	XI.E2, "Electrical Insulation for Electrical Cables and Connections Not Subject To 10 CFR 50.49 Environmental Qualification Requirements Used In Instrumentation Circuits," Page XI-12 lines 26 - 29.	Rev. 0	Use of new techniques in addition to insulation resistance (IR) testing for detecting age-related degradation of electrical cable insulations.	5 Update references
30-005	AMS-5	ML23284A379	NUREG-2191, Vol 2, R1	XI.E3A - Page XI-16 line 9; XI.E3B - Page XI-21 line 34, Page XI-23 line 46, and Page XI-25 line 19; XI.E3C - Page XI-27 line 31, Page XI-29 line 41, and Page XI-31 line 10	Rev. 0	Clarification of statements on the evaluation and condition of inaccessible electrical cables exposed to significant moisture.	6 Substantive technical change
30-006	AMS-6	ML23284A379	NUREG-2191, Vol 2, R1	XI.E1 - Page XI-6 line 37 and 38	Rev. 1	Clarification of expectations, which AMPs should be followed, and what actions should be taken for plants that have mostly inaccessible cables.	6 Substantive technical change
30-007	AMS-7	ML23284A379	NUREG-2191, Vol 2, R1	XI.E3B - Page XI-23 line 35, Page XI-23 line 46, Page XI-25 line 19; XI.E3C - Page XI-29 line 30, Page XI-29 line 41, Page XI-31 line 10	Rev. 0	Recommendation to provide additional guidance in how cables that cannot be visually inspected in the location of harshest environmental condition should be evaluated for age related degradation.	9 General testing and inspections

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
30-008	AMS-8	ML23284A379	NUREG-2191, Vol 2, R1	XI.E3B Page XI-24 line 8 - 10; XI.E3C Page XI-30 line 3 - 5	Rev. 0	Recommendation to replace the statement "to perform a one-time test" with "periodic testing "as a one-time testing may not provide a suitable means of evaluating the condition of a cable over time.	9 General testing and inspections
30-009	AMS-9	ML23284A379	NUREG-2191, Vol 2, R1	XI.E7 – page XI-49 lines 38 through 40, page XI-51 lines 20 through 23	Rev. 0	XI.E7, "High Voltage Insulators," Statements should be added in the XI.E7 AMP so that, along with or as an alternative to visual inspections, other test methods that have been demonstrated to be effective in determining the aged condition of insulations can be used to evaluate the health of high-voltage insulators.	4 Use new techniques
31-001	ENERCON-1	ML23284A380	NUREG-2191, Vol 1, R1	Page II-6, Item II.A1.CP-68	Rev. 1	Recommendation to identify the AMR modification that was made so that evaluation of the modification for comment can be made, or indicate that marking this item as modified was made in error.	7 Editorial/Administrative
31-002	ENERCON-2	ML23284A380	NUREG-2191, Vol 1, R1	Page II- 6, Item II.A1.CP- 32	Rev. 1	Clarification or confirmation of the aging effect/mechanism for this item indicates, "Increase in porosity and permeability; loss of strength due to leaching of calcium hydroxide and carbonation." Focus on the significance of "and."	8 Aging Managemt Review
31-003	ENERCON-3	ML23284A380	NUREG-2191, Vol 1, R1	Page II-6, Item II.A1.CP- 32	Rev. 0	Clarification or confirmation of the aging effect/mechanism for this item indicates, "Increase in porosity and permeability; loss of strength due to leaching of calcium hydroxide and carbonation." Focus on the significance of "carbonation."	8 Aging Managemt Review
31-004	ENERCON-4	ML23284A380	NUREG-2191, Vol 1, R1	Page II- 7, Item II.A1.CP- 147	Rev. 1	Clarification of what specific enhancements are expected in either the XI.S2 or XI.S6 programs if used to manage the aging of concrete due to the freeze-thaw aging mechanism.	4 Use new techniques
31-005	ENERCON-5	ML23284A380	NUREG-2191, Vol 1, R1	Page II- 7, Item II.A1.CP- 67	Rev. 1	Editorial enhancements to tables for improved readability. Table name at the top of every continuing page.	7 Editorial/Administrative

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
31-006	ENERCON-6	ML23284A380	NUREG-2191, Vol 1, R1	Page III- 24, Item III.A4.TP- 305	Rev. 1	Clarification of AMR item related to containment internal structures considered as exterior above and below-grade inaccessible areas, clarification of which containment internal structures are exposed to a water flowing environment, and clarification why containment foundation is included here when it appears to be addressed by other items in other tables.	8 Aging Managemt Review
31-007	ENERCON-7	ML23284A380	NUREG-2191, Vol 1, R1	Page III- 27, Item III.A4.T- 36	Rev. 1	Clarification of why the environment for this item listed as Air – indoor uncontrolled.	8 Aging Managemt Review
31-008	ENERCON-8	ML23284A380	NUREG-2191, R1; NUREG-2192, R1	General	Rev. 0	NRC issued RAs or audit comments regarding the use of SRP-SLR and GALL-SLR item numbers from IPA sections that are different from the IPA section for an AMR table of an application, recommendation to consolidate these items into a single line item applicable to all listed IPA groups.	5 Update references
31-009	ENERCON-9	ML23284A380	NUREG-2191, R1; NUREG-2192, R1	General	Rev. 0	NUREG-1800 and 1801, clearly identify what items are required to be addressed in NUREG-2191/2192.	7 Editorial/Administrative
31-010	ENERCON-10	ML23284A380	NUREG-2191, Vol 1, R1	Page VII- 22, Item VII.B.A- 07	Rev. 1	Revision of aging effects and aging mechanisms listed to follow the standard convention using semicolon delimiters before each of them to indicate the beginning of a new aging effect.	7 Editorial/Administrative
31-011	ENERCON-11	ML23284A380	NUREG-2192, R1	Page 3.5-36, Item 027	Rev. 1	SRP-SLR, Table 3.5-1, "Summary of Aging Management Programs for Containments, Structures and Component Supports Evaluated in Chapters II and III of the Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR Report)" item 027, clarification of the AMP column, which indicates AMP XI.S1 "ASME Section XI, Subsection IWE" and AMP XI.S4, "10 CFR Part 50, Appendix J." Confirm the word "and."	6 Substantive technical change
31-012	ENERCON-12	ML23284A380	NUREG-2192, R1	Page 3.5-8, Section 3.5.2.2.2.7	Rev. 1	Recommendation to swap the order of sections 3.5.2.2.2.7 and 3.5.2.2.2.8 to allow Group IV - Containment Internal Structures to flow from one to the other and are not separated by an unrelated further evaluation section.	7 Editorial/Administrative

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
31-013	ENERCON-13	ML23284A380	NUREG-2192, R1	Page 3.5-9, Section 3.5.2.2.2.8	Rev. 1	Recommendation to revise further evaluation section as loss of material of carbon or low alloy steel is not associated with irradiation but with a corrosive environment, such as potential boric acid buildup.	6 Substantive technical change
32-000	NEI-0	ML23291A071	NA	NA	Rev. 0	Future Workload Necessitates Increased Efficiency of Application Reviews, particularly removal of opportunistic inspections, prescriptive actions.	7 Editorial/Administrative
32-001	NEI-1	ML23291A071	NUREG-2191, Vol 2, R1, NUREG-2192, R1	IX.E, Page IX-26	Rev. 1	Table IX.E, "Aging Effects," remove cracking as an applicable aging effect for CFRP.	8 Aging Managemt Review
32-002	NEI-2	ML23291A071	NUREG-2191, Vol 2, R1, NUREG-2192, R1	IX.E, Page IX-26	Rev. 1	IX.E, "Aging Effects," remove flow blockage as an applicable aging effect for CFRP and the reference to delamination or disbonding of CFRP from the flow blockage definition in Table IX.E.	8 Aging Managemt Review
32-003	NEI-3	ML23291A071	NUREG-2191, Vol 2, R1	IX.E, Page IX-28	Rev. 1	IX.E, "Aging Effects," remove the reference to delamination or disbonding of CFRP from the loss of material definition.	8 Aging Managemt Review
32-004	NEI-4	ML23291A071	NUREG-2191, Vol 1, R1	Table G.1, Page VII- 211	Rev. 1	Table G.1, "Fire Protection," item VII.G.A-789 mixes steel and stainless steel. SCC applies only to stainless steel as described in NUREG-2221, Table 2-10.	8 Aging Managemt Review
32-005	NEI-5	ML23291A071	NUREG-2191, Vol 2, R1	XI.M9, Page XI-86	Rev. 1	XI.M9 "BWR Vessel Internals," reference correct EPRI report, replace ML21153A003 with ML21147A008.	5 Update references
32-006	NEI-6	ML23291A071	NUREG-2191, Vol 2, R1	XI.M9, Page XI-87	Rev. 0	XI.M9 "BWR Vessel Internals," add reference to BWRVIP-58-A, it provides guidelines for CRD Internal Access Weld Repairs and is used by plants for design repairs guidelines.	5 Update references
32-007	NEI-7	ML23291A071	NUREG-2191, Vol 2, R1	XI.M9, Page XI-89, XI- 90	Rev. 1	XI.M9 "BWR Vessel Internals," revise to reference Revision of BWRVIP-84, the latest version of BWRVIP-84 is Rev 3.	5 Update references
32-008	NEI-8	ML23291A071	NUREG-2191, Vol 2, R1	XI.M9, Page XI-90	Rev. 1	XI.M9 "BWR Vessel Internals," revise to reference Revision 2 of BWRVIP-18, the latest version of BWRVIP-18 is Rev 2.	5 Update references
32-009	NEI-9	ML23291A071	NUREG-2191, Vol 2, R1	XI.M12, Page XI-111	Rev. 0	XI.M12, "Thermal Aging Embrittlement of Cast Austenitic Stainless Steel," delete the third sentence in the first paragraph on page XI-111. ASME Section XI no longer requires surface examination of valve bodies less than 4 inches NPS.	6 Substantive technical change

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32-010	NEI-10	ML23291A071	NUREG-2191, Vol 2, R1	XI.M17, Page XI-124	Rev. 1	XI.M17 "Flow Accelerated Corrosion," remove reference to erosion susceptibility analysis. Reliance on an erosion susceptibility analysis, as described in EPRI 300205530, to determine which piping segments should be monitored for erosion through the FAC AMP is contrary to the LR-ISG-2012-01 guidance and leads to overly broad/unfocused results.	6 Substantive technical change
32-011	NEI-11	ML23291A071	NUREG-2191, Vol 2, R1	XI.M17, Page XI-124	Rev. 1	XI.M17 "Flow Accelerated Corrosion," Remove reference to exclusion criteria for erosion. As discussed in LR-ISG-2012-01, erosion is associated with improper operation and is a design issue rather than an aging issue.	6 Substantive technical change
32-012	NEI-12	ML23291A071	NUREG-2191, Vol 2, R1	XI.M17, Page XI-124	Rev. 1	XI.M17 "Flow Accelerated Corrosion," Eliminate recommended reassessment of the FAC exclusion criteria for piping lines operating for less than 2% of plant operating time.	6 Substantive technical change
32-013	NEI-13	ML23291A071	NUREG-2191, Vol 2, R1	XI.M17, Page XI-124	Rev. 0	XI.M17 "Flow Accelerated Corrosion," Remove opportunistic inspections whenever components are made accessible from the XI.M17 guidance. The FAC program is a very mature program that effectively predicts and monitors FAC in susceptible systems. Addition of opportunistic inspections is not warranted.	3 Remove opportunistic inspections
32-014	NEI-14	ML23291A071	NUREG-2191, Vol 2, R1	XI.M17, Page XI-125	Rev. 1	XI.M17 "Flow Accelerated Corrosion," Remove the minimum safety factor of 2.0 for erosion mechanisms. The draft revision specifies a minimum safety factor for evaluating remaining service life of piping where erosion has been identified based on EPRI 3002005530.	6 Substantive technical change
32-015	NEI-15	ML23291A071	NUREG-2191, Vol 2, R1	XI.M17, Page XI-125	Rev. 0	XI.M17 "Flow Accelerated Corrosion," Clarify periodic monitoring guidance for components where erosion is identified and the component is replaced with a more resistant material.	6 Substantive technical change
32-016	NEI-16	ML23291A071	NUREG-2191, Vol 2, R1	XI.M18, Page XI-130, XI-131	Rev. 0	XI.M18, Bolting Integrity," Remove opportunistic inspections whenever components are made accessible from the XI.M18 guidance.	3 Remove opportunistic inspections

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-017	NEI-17	ML23291A071	NUREG-2191, Vol 2, R1	XI.M18, Page XI-132	Rev. 0	XI.M18, Bolting Integrity," Remove prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue	1 Remove prescriptive corrective actions
32-018	NEI-18	ML23291A071	NUREG-2191, Vol 2, R1	XI.M18 , XI.S1, XI.S3, XI.S6	Rev. 0	XI.M18, Bolting Integrity," Remove guidance related to cracking of high-strength bolting from various AMPs	6 Substantive technical change
32-019	NEI-19	ML23291A071	NUREG-2191, Vol 2, R1	XI.M2, Page XI-59	Rev. 1	XI.M2, "Water Chemsity," Remove reference to specific revisions of EPRI Reports 3002002623, 3002000505, and 3002010645. Stations typically commit to implement the latest water chemistry guidelines. Referencing the specific guidelines leads to unnecessary exceptions to GALL-SLR guidance when later versions are released.	5 Update references
32-020	NEI-20	ML23291A071	NUREG-2191, Vol 2, R1	XI.M21A, Page XI-156	Rev. 0	Removal of inspection guidance for the XI.M21A, "Closed Treated Water Systems," AMP, as it relies on control of chemistry parameters and use of corrosion inhibitors and biocides to prevent age-related degradation, and sampling of closed-cycle cooling water for iron and copper content effectively monitors for any unexpected corrosion.	6 Substantive technical change
32-021	NEI-21	ML23291A071	NUREG-2191, Vol 2, R1	XI.M21A, Page XI- 156, XI-157	Rev. 0	XI.M21A, "Closed Treated Water Systems," removal of opportunistic inspections whenever components are made accessible from the AMP guidance.	3 Remove opportunistic inspections
32-022	NEI-22	ML23291A071	NUREG-2191, Vol 2, R1	XI.M24, Page XI-169	Rev. 0	XI.M24, "Compressed Air Monitoring," Remove opportunistic inspections whenever components are made accessible from the AMP guidance.	3 Remove opportunistic inspections
32-023	NEI-23	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Element 4, Page XI-183	Rev. 0	XI.M27, "Fire Water System," Remove the paragraph concerning Fire Water System components that only have license renewal intended functions of leakage boundary or structural integrity. These components are not within the scope of the Fire Water System aging management program so the guidance in XI.M27 does not need to address them.	6 Substantive technical change
32-024	NEI-24	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Element 4, Table XI.M27-1/ XI-182, XI-184	Rev. 0	XI.M27, "FWS," Revise the recommendation in Table XI.M27-1 to perform internal inspections of sprinkler system piping as a one-time inspection.	2 Remove one time inspections

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32-025	NEI-25	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Element 7, Page XI-186	Rev. 0	XI.M27, "FWS," Remove prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue.	1 Remove prescriptive corrective actions
32-026	NEI-26	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Elements 3, 4, 5, Page XI-181, XI-182, XI-186	Rev. 0	XI.M27, "FWS," Remove reference to flushing in Elements 3, 4, and 5. Flushing is performed as a preventive action to mitigate or prevent flow blockage and loss of material by removing foreign material and sediment.	6 Substantive technical change
32-027	NEI-27	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Table XI.M27-1, Page XI-184	Rev. 1	XI.M27, "FWS," Reinstate Footnote 6 to Table XI.M27-1 from GALL-SLR Revision 0. The deleted footnote related to functional testing of foam-based fire suppression systems and provided an option to perform air testing of foam sprinkler systems.	6 Substantive technical change
32-028	NEI-28	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Table XI.M27-1, Page XI-184	Rev. 1	XI.M27, "FWS," Revise the recommendation to perform mainline strainer inspections to consider plant-specific configurations.	9 General testing and inspections
32-029	NEI-29	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Table XI.M27-1, Page XI- 184, XI-185	Rev. 1	XI.M27, "FWS," Eliminate recommendation to perform fire protection pump suction strainer inspections. Inspection of the fire protection pump suction strainers for vertical fire pumps annually and after system actuation is not feasible and is unnecessary.	9 General testing and inspections
32-030	NEI-30	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Table XI.M27-1, Page XI- 184, XI-185	Rev. 1	XI.M27, "FWS," Eliminate recommendation to perform fire protection pump intake screen inspections.	9 General testing and inspections
32-031	NEI-31	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Table XI.M27-1, Page XI-185	Rev. 1	XI.M27, "FWS," Remove the new Footnote f to Table XI.M27-1. Footnote f refers to sample flow testing of hose stations.	6 Substantive technical change
32-032	NEI-32	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Table XI.M27-1, Page XI-185	Rev. 0	XI.M27, "FWS," Include language to acknowledge alternative methods of verifying fire water system intended functions are available to nuclear stations beyond those in the generic NFPA Code due to the design of nuclear station fire water systems and that there are limitations on the types of testing that are feasible at nuclear stations.	6 Substantive technical change

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32-033	NEI-33	ML23291A071	NUREG-2191, Vol 2, R1	XI.M27, Page XI-181	Rev. 1	XI.M27, "FWS," Clarify the first sentence of the second paragraph of the Program Description. Dry sprinklers, fast response sprinklers, and standard sprinklers each have different testing or replacement frequencies in NFPA 25 (different sub-sections of the code).	6 Substantive technical change
32-034	NEI-34	ML23291A071	NUREG-2191, Vol 2, R1	XI.M29, Page XI-192 - XI-195	Rev. 1	XI.M29, "Outdoor And Large Atmospheric Metallic Storage Tanks," Editorial comment to review and correct footnote numbering for Table XI.M29-1.	7 Editorial/Administrative
32-035	NEI-35	ML23291A071	NUREG-2191, Vol 2, R1	XI.M32, Page XI-211	Rev. 0	Revise "just prior" to "ten years prior" to eliminate subjective language. Refer to NUREG-2221 Table 2-33 discussion on page 2-68.	7 Editorial/Administrative
32-036	NEI-36	ML23291A071	NUREG-2191, Vol 2, R1	XI.M32, Page XI-211 - XI-216	Rev. 0	Reduce the number of one-time inspections, up to complete elimination of inspection recommendations, for material and environment combinations in which there is adequate operating experience indicating there is no aging concern.	2 Remove one time inspections
32-037	NEI-37	ML23291A071	NUREG-2191, Vol 2, R1	XI.M32, Page XI-212	Rev. 0	Add heat transfer testing as an inspection method option for reduction of heat transfer due to fouling.	4 Use new techniques
32-038	NEI-38	ML23291A071	NUREG-2191, Vol 2, R1	XI.M32, Page XI-212	Rev. 0	Add lubricating oil sampling for corrosion products as an inspection method for loss of material for components in lubricating oil environment.	4 Use new techniques
32-039	NEI-39	ML23291A071	NUREG-2191, Vol 2, R1	XI.M32, Page XI-213	Rev. 0	XI.M32, "One-Time Inspection," inclusion of stainless steel as part of the steel sample population, steel is the bounding material managed by XI.M32 and, as such, if degradation is not occurring in steel, then there is reasonable assurance that no degradation is occurring in stainless steel exposed to the same service environment.	6 Substantive technical change
32-040	NEI-40	ML23291A071	NUREG-2191, Vol 2, R1	XI.M32, Page XI-215, XI-216	Rev. 0	XI.M32, "One-Time Inspection," removal of prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue.	1 Remove prescriptive corrective actions
32-041	NEI-41	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-217, XI-218, XI-219	Rev. 0	XI.M33, "Selective Leaching," removal of opportunistic inspections whenever components are made accessible from the XI.M33 guidance.	3 Remove opportunistic inspections

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32-042	NEI-42	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-218	Rev. 0	XI.M33, "Selective Leaching," Include hardness testing as an available option for performing inspections for selective leaching with acceptance criteria that remains the same as previously contained in NUREG-1801, Revision 2.	4 Use new techniques
32-043	NEI-43	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-218, XI-219, XI-220	Rev. 0	XI.M33, "Selective Leaching," Rephrase Element 4 to present the information in a simple structure, similar to AMP XI.M41; breaking the contents of the element into shorter paragraphs, bullets, tables for inspection quantities by time period, and footnotes to the table.	7 Editorial/Administrative
32-044	NEI-44	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-218, XI-220	Rev. 0	XI.M33, "Selective Leaching," Remove the presence of green copper oxide as an acceptance criterion for detecting selective leaching of copper alloys and replace with the presence of a "white/gray meringue deposit."	6 Substantive technical change
32-045	NEI-45	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-219	Rev. 1	XI.M33, "Selective Leaching," Delete recommendation stating that samples are taken from multiple locations. The GALL-SLR already requires that a representative sample be inspected. The new guidance that states that samples are taken from multiple locations is unnecessary.	9 General testing and inspections
32-046	NEI-46	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-219	Rev. 1	XI.M33, "Selective Leaching," Remove the increased sample size for buried gray cast iron components.	9 General testing and inspections
32-047	NEI-47	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-219	Rev. 1	XI.M33, "Selective Leaching," If the NRC elects not to remove the new recommended increased sample size for buried gray cast iron, then the guidance should be revised to recommend a sample size for the entire station rather than on a per unit basis.	9 General testing and inspections
32-048	NEI-48	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-219	Rev. 1	XI.M33, "Selective Leaching," The new bullet point recommending the increased sample size for buried gray cast iron states that a technical justification for a reduced sample size can be provided and must be included in the SLRA.	9 General testing and inspections

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32-049	NEI-49	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-219	Rev. 1	XI.M33, "Selective Leaching," Clarify the new bullet point recommending the increased sample size for buried gray cast iron and state that mechanical inspections of buried cast iron components are not required if the coating is intact.	9 General testing and inspections
32-050	NEI-50	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-220	Rev. 0	XI.M33, "Selective Leaching," Tabulate Element 6 to be structured like the proposed mark-up of XI.M33 previously submitted to the NRC by NEI in its letter dated January 12, 2022 (ML22019A292). The intent of this recommendation is to improve readability.	6 Substantive technical change
32-051	NEI-51	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-220	Rev. 0	XI.M33, "Selective Leaching," Remove prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue.	1 Remove prescriptive corrective actions
32-052	NEI-52	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Page XI-220, XI-221	Rev. 0	XI.M33, "Selective Leaching," If the NRC elects not to remove the prescriptive corrective action guidance in XI.M33, it is recommended that sample expansion inspections for unacceptable results of inspections performed in the latter half of the 10-year inspection interval be performed within the first 4 years of the next 10-year inspection interval.	9 General testing and inspections
32-053	NEI-53	ML23291A071	NUREG-2191, Vol 2, R1	XI.M33, Element 4, Page XI-218	Rev. 0	XI.M33, "Selective Leaching," Revise Element 4 to provide for the use of NDE techniques to monitor for selective leaching.	4 Use new techniques
32-054	NEI-54	ML23291A071	NUREG-2191, Vol 2, R1	XI.M38, Page XI-241 - XI-245	Rev. 0	XI.M38, "Inspection Of Internal Surfaces In Miscellaneous Piping And Ducting Components," removal of opportunistic inspections whenever components are made accessible from the XI.M38 guidance.	3 Remove opportunistic inspections
32-055	NEI-55	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-255	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," elimination or clarification of the coating recommendation for buried cementitious piping.	6 Substantive technical change
32-056	NEI-56	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-255 - XI-268	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," clarification of NRC recommendations with respect to cathodic protection, GALL-SLR guidance implies that cathodic protection may not be needed for certain stations or buried piping systems.	6 Substantive technical change

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-057	NEI-57	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-256	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," Remove reference to carbonate/bicarbonate environment. Operating experience from the gas pipeline industry indicates that high-pH stress corrosion cracking can occur in a carbonate bicarbonate environment in piping directly downstream of compressor stations.	6 Substantive technical change
32-058	NEI-58	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-258	Rev. 1	XI.M41, "Buried And Underground Piping And Tanks," Remove HDPE guidance from XI.M41. The AMP still includes guidance related to aging effects for HDPE buried piping but this material has been removed from the AMP.	7 Editorial/Administrative
32-059	NEI-59	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-261, XI-262	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," Eliminate the recommended minimum length of piping for inspections (10 linear feet).	6 Substantive technical change
32-060	NEI-60	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-262	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," Recommend greater credit be given to volumetric examinations performed in lieu of external visual inspections.	9 General testing and inspections
32-061	NEI-61	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-262	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," Provide alternative inspection options to be performed in lieu of external visual inspections for buried cementitious piping.	4 Use new techniques
32-062	NEI-62	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-263, XI-265 XI.M41, Page XI-263, XI-265	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," removal of reference to National Association of Corrosion Engineers (NACE) qualifications, as NACE no longer exists as a stand-alone organization.	7 Editorial/Administrative
32-063	NEI-63	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-263, XI-265	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," Recommend changing the acceptance criteria for buried piping inspections to be based on projection of wall loss through the next scheduled inspection (10 years).	6 Substantive technical change
32-064	NEI-64	ML23291A071	NUREG-2191, Vol 2, R1	XI.M41, Page XI-265, XI-266	Rev. 0	XI.M41, "Buried And Underground Piping And Tanks," Remove prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue.	1 Remove prescriptive corrective actions

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-065	NEI-65	ML23291A071	NUREG-2191, Vol 2, R1	XI.M42, Page XI-271	Rev. 0	XI.M42, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, And Tanks," Add another bullet for piping system components such as valves, pump casings, flow elements, etc., that recommends a sample-based inspection approach for these components like the sample-based approach used for piping (X% up to Y maximum number of inspections).	9 General testing and inspections
32-066	NEI-66	ML23291A071	NUREG-2191, Vol 2, R1	XI.M42, Page XI-272	Rev. 1	XI.M42, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, And Tanks," Clarify the definitions in lines 6-10, Note (c) Inspection Categories A and B. In SLR-ISG-2021-02-MECHANICAL Appendix H, the same note explicitly defined note (c), sub-notes 1 and 2 as Category A and B, respectively.	7 Editorial/Administrative
32-067	NEI-67	ML23291A071	NUREG-2191, Vol 2, R1	XI.M42, Page XI-274, XI-275, XI-276	Rev. 0	XI.M42, "Internal Coatings/Linings for In-Scope Piping, Piping Components, Heat Exchangers, And Tanks," Remove prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue.	1 Remove prescriptive corrective actions
32-068	NEI-68	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Delete new GALL-SLR AMP XI.M43. The NRC's aging management guidance is based on generally applicable operating experience indicating age-related issues requiring management to ensure intended functions are maintained.	6 Substantive technical change
32-069	NEI-69	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," In place of GALL-SLR AMP XI.M43, aging management of HDPE and CFRP should be addressed as a TLAA.	6 Substantive technical change
32-070	NEI-70	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," For CFRP piping, while a TLAA approach works well for the CFRP itself, potential age-related degradation of the host pipe at the terminal ends would need to be managed.	6 Substantive technical change

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-071	NEI-71	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Delete cathodic protection recommendations contained in XI.M43 for CFRP replacement piping. Cathodic protection of the terminal ends is already adequately addressed by the XI.M41 Buried and Underground Piping and Tanks AMP and does not need to be repeated here.	6 Substantive technical change
32-072	NEI-72	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Eliminate contradictory statements within XI.M43 and contradictions between the new XI.M43 AMP and the proposed revision to XI.M41.	6 Substantive technical change
32-073	NEI-73	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Revise AMP guidance such that exceptions or plant-specific AMPs would not be required.	6 Substantive technical change
32-074	NEI-74	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279 - XI-290	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Remove reference to CFRP "repaired" piping. CFRP can be used to repair piping as a semi-structural repair that reinforces the original host pipe such that it meets design basis loading requirements.	6 Substantive technical change
32-075	NEI-75	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279, XI-280, XI-284 - XI-286	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Delete coating inspection of the host pipe as a detection of aging effects recommendation for internally applied CFRP replacement piping.	9 General testing and inspections
32-076	NEI-76	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-279, XI-281	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Delete reference to flow blockage/fouling. HDPE and CFRP are not susceptible to flow blockage/fouling.	6 Substantive technical change
32-077	NEI-77	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-280, XI-283 - XI-286	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Delete backfill preventive action recommendation for CFRP internal replacement piping. The CFRP piping addressed by this AMP are full- structural replacements where no credit is taken for the host pipe.	6 Substantive technical change
32-078	NEI-78	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-281	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Clarify if the frequency and scope in Table XI.M43-2 apply to the tests and inspections in Element 3 paragraphs (a) and (b).	9 General testing and inspections

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-079	NEI-79	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-281, XI-285	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," element 4 paragraph c.iii contradiction to element 3 paragraph b.ii. element 4 paragraph c.iii states "...the terminal ends of CFRP must be inspected by ultrasonic examination during each inspection interval."	9 General testing and inspections
32-080	NEI-80	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-282	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," The paragraph numbering for CFRP piping in Element 3 is confusing: a. paragraphs 3.c and 3.d appear to be numbered incorrectly.	7 Editorial/Administrative
32-081	NEI-81	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-283, XI-287	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Remove copper alloy and aluminum alloy from Table XI.M43-3. Table XI.M43-2 only refers to steel piping while Table XI.M43-3 refers to steel, copper alloy, and aluminum alloy piping.	6 Substantive technical change
32-082	NEI-82	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-284	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Revise the AMP to eliminate all testing and inspections for HDPE or CFRP piping fully backfilled in controlled low-strength material.	9 General testing and inspections
32-083	NEI-83	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-284 XI-286	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Remove reference to coatings in the acceptance criterion for HDPE piping provided in Element 6, paragraph (a)(ii). HDPE piping is not coated. Also, delete reference to coatings in Note C.b.i for Table XI.M43-2 which states, "coatings and backfill are provided in accordance with the "preventive actions" program element of this AMP".	7 Editorial/Administrative
32-084	NEI-84	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-284, XI-285	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Eliminate the recommended minimum length of piping for inspections (10 linear feet).	9 General testing and inspections
32-085	NEI-85	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-285	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Delete the second sentence of paragraph (d) of Element 4. The piping inspection location selection guidance in Element 4, paragraph (d) does not apply to HDPE and CFRP piping.	7 Editorial/Administrative
32-086	NEI-86	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-286	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Revise to state that the acceptance criterion provided in Element 6, paragraph (b)(i) only applies to the terminal ends.	6 Substantive technical change

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-087	NEI-87	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-286	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Revise the acceptance criterion provided in Element 6, paragraph (b)(iii) to state that it only applies to the terminal ends.	6 Substantive technical change
32-088	NEI-88	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-286, XI-288	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Remove reference to NACE qualification for coating inspectors and CP4 since NACE no longer exists.	7 Editorial/Administrative
32-089	NEI-89	ML23291A071	NUREG-2191, Vol 2, R1	XI.M43, Page XI-288	Rev. 1	XI.M43, "HDPE Piping and CFRP Repaired Piping," Remove prescriptive corrective action recommendations since the appropriate corrective actions are highly dependent on the specific details of the issue.	1 Remove prescriptive corrective actions
32-090	NEI-90	ML23291A071	NUREG-2191, Vol 2, R1	Table A.4, Page III- 27	Rev. 1	Table A.4, "Spent Fuel Pool Cooling and Cleanup (BWR)," combination of GALL lines III.A4.T-36 and III.A4.T-37 into one consolidated item, or alternatively provide additional justification or explanation for maintaining both entries.	6 Substantive technical change
32-091	NEI-91	ML23291A071	NUREG-2191, Vol 1, R1	XI.E1, Page XI-5	Rev. 1	XI.E1, "Electrical Insulation for Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," revision to clarify inspections and aging management of cables that are coated with fire retardant material.	9 General testing and inspections
32-092	NEI-92	ML23291A071	NUREG-2191, Vol 2, R1	X.E1, Page X-3 & E-8	Rev. 1	XI.E1, "Electrical Insulation for Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," revision to clarify the inclusion of mechanical components associated with electrical equipment (such as gaskets, seals, O-rings, etc.), that are in the scope of this AMP.	6 Substantive technical change
32-093	NEI-93	ML23291A071	NUREG-2191, Vol 2, R1	XI.E3, Page XI-16	Rev. 1	XI.E3A, XI.E3B and XI.E3C, on Electrical Insulation for Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements, removal of requirement for level control alarm at central location or control room.	6 Substantive technical change

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-094	NEI-94	ML23291A071	NUREG-2191, Vol 2, R1	XI.E3, Page XI-16	Rev. 1	XI.E3A, XI.E3B and XI.E3C, on Electrical Insulation for Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements, deletion of the word "continuous" from the level monitoring device description, as use of this word could imply that any temporary interruption of level detection systems would negate their use in justifying less frequent inspections.	9 General testing and inspections
32-095	NEI-95	ML23291A071	NUREG-2191, Vol 2, R1	XI.E3A, Page XI-15 & XI-16	Rev. 1	XI.E3A, "Electrical Insulation For Inaccessible Medium-Voltage Power Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," Delete the word "potentially" from line 14 on page XI-15 and line 42 on page XI-16, in relation to exposure to moisture, wetting, or submergence of cables. This insertion is ambiguous and Tech. Basis doc (NUREG-2221) does not explain why "potentially" was inserted.	6 Substantive technical change
32-096	NEI-96	ML23291A071	NUREG-2191, Vol 2, R1	XI.E3B, Page XI-21 & XI-22	Rev. 1	XI.E3B, "Electrical Insulation For Inaccessible Instrument and Control Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," Delete the word "potentially" from line 13 on page XI-21 and line 30 on page XI-22 in relation to cable exposed to significant moisture. This insertion is ambiguous and Tech. Basis doc (NUREG-2221) does not explain why "potentially" was inserted	6 Substantive technical change

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-097	NEI-97	ML23291A071	NUREG-2191, Vol 2, R1	XI.E3C, Page XI-27 & XI-28	Rev. 1	XI.E3C, "Electrical Insulation For Inaccessible Low-Voltage Power Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements," deletion the word "potentially" in relation to cable exposed to significant moisture the word "potentially," and deletion of the words "multiple random," in relation to failures of the cable insulation systems, these are not supported by or explained by the Tech. Basis doc (NUREG-2221); correction of "low voltage" to allow for testing on other cable types (medium-voltage power or instrument and control) in-lieu of low-voltage power cable direct-testing if all the other listed caveats are met.	6 Substantive technical change
32-098	NEI-98	ML23291A071	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 0	Add additional AMR rows similar to VII.C1.A-409 to allow other AMPs (i.e., XI.M20, XI.M27, XI.M38) to manage wall thinning due to erosion for non-FAC systems.	6 Substantive technical change
32-099	NEI-99	ML23291A071	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 0	Reference to VT-1 and VT-3 inspections for non-ASME Code components should be deleted and instead should refer to inspections similar to VT-1 and VT-3. VT-1 and VT-3 examinations are ASME Code Examinations and, therefore, reference to VT-1 and VT-3 implies all the related requirements of the ASME Code are followed.	4 Use new techniques
32-100	NEI-100	ML23291A071	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 0	Simplify GALL-SLR AMR lines to consolidate all similar air environments environments such as Air-Indoor Uncontrolled, Air-Outdoor, and Condensation.	7 Editorial/Administrative
32-101	NEI-101	ML23291A071	NUREG-2191, Vol 1, R1; NUREG-2191, Vol 2, R1; NUREG-2192, R1; NUREG-2222, S1	Various	Rev. 0	Deletion of "Long-term loss of material due to general corrosion" from GALL-SLR AMR lines, associated SRP-SLR lines, and applicable AMPs; general corrosion is a slow-acting long-term aging effect that is adequately addressed through the normal "loss of material" AMR lines and is adequately managed through existing AMPs without any specific guidance.	8 Aging Managemt Review

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-102	NEI-102 (SRP-SLR 1)	ML23291A071	NUREG-2192, R1	3.2.2.2.7, 3.3.2.2.7, 3.4.2.2.6	Rev. 0	Elimination of further evaluation sections 3.2.2.2.7, 3.3.2.2.7, and 3.4.2.2.6 addressing recurring internal corrosion, because Operating Experience Feedback Reports (NUREG-1275) document these issues and similar known/well-understood aging issues, they are unnecessary as since GALL-SLR and the SRP-SLR already address these issues, "recurring" is a misnomer as local corrosion issues occurring in multiple discrete locations in a raw water system is not a recurring issue but rather a well-known and expected degradation mechanism presenting in different locations due to the similar materials and environmental stressors, and the guidance is overly conservative. corrosion.	8 Aging Managemt Review
32-103	NEI-103 (SRP-SLR 2)	ML23291A071	NUREG-2192, R1	3.5.2.2.2.8, Page 3.5-10	Rev. 1	SRP-SLR section 3.5.2.2.2.8, clarify the NRC's intent with respect to justification for the use of NUREG-1509 generic nil-ductility temperature values in lieu of those from plant-specific materials testing data.	8 Aging Managemt Review
32-104	NEI-104 (SRP-SLR 3)	ML23291A071	NUREG-2192, R1	3.5.2.2.2.8, Page 3.5-10	Rev. 1	SRP-SLR section 3.5.2.2.2.8, Change the threshold value at which neutron damage could be a concern from 2×10^{-5} dpa to 10^{-4} dpa. NUREG-1509 Figure 3-1 shows no measured data below 10^{-4} dpa and the upper-bound curve was drawn with an arbitrary zero embrittlement shift at 10^{-5} , and conservative screening for effect of embrittlement being more appropriate.	8 Aging Managemt Review
32-105	NEI-105 (SRP-SLR 4)	ML23291A071	NUREG-2192, R1	3.5.2.2.2.8, Page 3.5-11	Rev. 1	SRP-SLR section 3.5.2.2.2.8, Delete the fourth sentence in the second paragraph on page 3.5-11 on lines 17-19. There is no information correlating alloying elements on embrittlement of RPV support steels.	8 Aging Managemt Review

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-106	NEI-106 (SRP-SLR 5)	ML23291A071	NUREG-2192, R1	3.5.2.2.2.8, Page 3.5-9, 3.5-10, 3.5-11	Rev. 1	SRP-SLR section 3.5.2.2.2.8, revision of the further evaluation section to focus only on embrittlement rather than on "combined effects of aging," other aging effects are adequately managed by existing aging management programs in GALL-SLR such that these aging effects do not need to be combined in this further evaluation.	8 Aging Managemt Review
32-107	NEI-107 (SRP-SLR 6)	ML23291A071	NUREG-2192, R1	3.5.2.2.2.8, Page 3.5-9, 3.5-10, 3.5-11	Rev. 1	Revise the further evaluation to exclude skirt supported reactors. As discussed in NUREG-1509, skirt-supported reactor supports would not experience high exposure to irradiation such that embrittlement would not be a concern for this design.	8 Aging Managemt Review
32-108	NEI-108 (SRP-SLR 7)	ML23291A071	NUREG-2192, R1	4.7.4.1, Page 4.7-5	Rev. 1	SRP-SLR section 4.7.4.1, "Leak-before-break Analysis," Rephrase item (v) in the final sentence of the third paragraph in Section 4.7.4.1 to say, "critical locations for LBB evaluation." The current phrasing implies the existence of cracks in critical locations.	10 Time-Limited Aging Analysis
32-109	NEI-109 (SRP-SLR 8)	ML23291A071	NUREG-2192, R1	4.7.4.1, Page 4.7-5	Rev. 1	Delete item (ii) in final sentence of the fourth paragraph in Section 4.7.4.1. This phrase could imply that fatigue crack growth should be performed.	10 Time-Limited Aging Analysis
32-110	NEI-110 (SRP-SLR 9)	ML23291A071	NUREG-2192, R1	4.7.4.2, Page 4.7-6	Rev. 1	SRP-SLR section 4.7.4.2, "Pump Casing Flaw Tolerance Analysis," Rephrase the text in the parenthesis in the final sentence of the first paragraph on page 4.7-6, line 8 as follows "fatigue crack growth transient cycles, and fatigue crack growth crack sizes." The recommended wording improves clarity.	10 Time-Limited Aging Analysis
32-111	NEI-111 (Tech Basis 1)	ML23291A071	NUREG-2222, S1	Table 2-29, Page 2-66	Rev. 1		7 Editorial/Administrative
32-112	NEI-112 (Tech Basis 2)	ML23291A071	NUREG-2222, S1	Table 2-29, Page 2-66	Rev. 1	The technical basis for the change to the Flow Blockage definition refers to Table-2-29 for the technical basis for the new proposed XI.M43 AMP. This statement is made in Table 2-29. Confirm this is supposed to refer to Table 2-33?	7 Editorial/Administrative
32-113	NEI-113 (Tech Basis 3)	ML23291A071	NUREG-2222, S1	Table 2-29, Page 2-66	Rev. 1	Without supporting operating experience delamination or disbonding of CFRP should be removed from the Loss of Material definition.	8 Aging Managemt Review

FRN Comment No.	Source Comment No.	Comment ADAMS No.	Document	Location in NUREG	Change Scope	Summary	BIN
32-114	NEI-114 (Tech Basis 4)	ML23291A071	NUREG-2222, S1	Table 2-33, XI.M17, Page 2-77	Rev. 1	The summary of significant changes column of the first change to the XI.M17 AMP states that the NRC is clarifying that commitments made in response to GL 89-08 were for an ongoing FAC program. While it is expected that the majority of stations made ongoing programmatic commitments in response to GL 89-08, no changes made to the GALL- SLR guidance would retroactively change the plant-specific commitments made in the responses to GL 89-08.	7 Editorial/Administrative
32-115	NEI-115 (Tech Basis 5)	ML23291A071	NUREG-2222, S1	Table 2-33, XI.M33, Page 2-89, 2-90, 2-91	Rev. 1	Substantial changes to the XI.M33 guidance imposing significant burden on stations based on a single isolated event in which selective leaching was identified as a contributing cause to the failure.	6 Substantive technical change
32-116	NEI-116 (Tech Basis 6)	ML23291A071	NUREG-2222, S1	Table 2-33, XI.M43, Page 2-98	Rev. 1	No adequate technical basis is provided for the new proposed AMP XI.M43.	6 Substantive technical change