

March 6, 2000

Mr. Douglas J. Walters  
Nuclear Energy Institute  
1776 I Street, N.W., Suite 400  
Washington, DC 20006-3708

SUBJECT: LICENSE RENEWAL ISSUE NO. 98-0051, "EVALUATION OF JURISDICTION  
OF ASME SECTION XI, SUBSECTIONS IWE AND IWF, FOR LICENSE  
RENEWAL"

Dear Mr. Walters:

Enclosed is the staff's evaluation and proposed resolution of the subject issue. The staff plans to incorporate the recommended changes to the Standard Review Plan for License Renewal in a future revision. Accordingly, if there are any industry comments on the evaluation basis or the proposed resolution, we request that you document those comments within 30 days following your receipt of this letter to ensure a timely resolution of this issue. If you have any questions regarding this matter, please contact Peter Kang at 301-415-2779, or Sam Lee at 301-415-3109.

Sincerely,

**/RA/**

Christopher I. Grimes, Chief  
License Renewal and Standardization Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Project No. 690

Enclosure: As stated

cc w/enc: See next page

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LICENSE RENEWAL ISSUE NO. 98-0051  
EVALUATION OF JURISDICTION OF ASME SECTION XI, SUBSECTIONS IWE AND IWF,  
FOR LICENSE RENEWAL

## 1. BACKGROUND

On May 8, 1998, Nuclear Energy Institute (NEI) provided the staff with comments on the working draft of the "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants," dated September 1997. For managing the aging effects of boiling-water reactor (BWR) containment structure components in Chapter 3.4, the draft standard review plan for license renewal (SRP-LR) states that ASME Section XI, Subsections IWE and IWF be used for lockup caused by mechanical wear while only Subsection IWE is used for loss of material caused by corrosion. NEI commented that ASME Section XI, Subsection IWF should be added in the Sections 3.4.II.C.10, "Acceptance Criteria" and 3.4.III.C.10, "Review Procedures" of the aforementioned Chapter 3.4 of the SRP-LR as an adequate program for managing the aging effects of loss of material.

The staff's rationale for managing the aging effects of the lockup and loss of material for BWR containment structures in the draft SRP-LR was based on the recommendations provided by NUREG-1611, "Aging Management of Nuclear Power Plant Containments for License Renewal," in which the lockup (page 46) of containment pressure retaining components and their supports is managed with the implementation of ASME Section XI, Subsections IWE and IWF, respectively while the loss of material (pages 33 and 34) of structural steel and liner is managed by Subsection IWE but it does not address any component supports.

## 2. EVALUATION

The scope of ASME Section XI, Subsection IWE provides the rules and requirements for inservice inspection, repair, and replacement of Class MC pressure retaining components and their integral attachments, and of metal shell and penetration liners of Class CC pressure retaining components and their integral attachments. ASME Section XI, Subsection IWF provides requirements for periodic examinations (inservice inspection of Class 1, 2, and 3) of metal support components, including downcomer bracings, column and saddle supports, seismic restraints, and vent system supports.

The staff has reviewed BWR containment structure components listed in Sections 3.4.II.C.10 and 3.4.III.C.10 of the draft SRP-LR for managing the aging effects of loss of material and finds that the list includes both pressure retaining components and support components such as vent system supports for Mark 1 steel containments. Therefore, the staff agrees with NEI that ASME Section XI, Subsection IWF should be added to the Sections 3.4.II.C.10, "Acceptance Criteria" and 3.4.III.C.10, "Review Procedures," as acceptable aging management of component supports for "Loss of Material" in the draft SRP-LR.

## 3. RESOLUTION

The staff will revise the affected pages of Sections 3.4.II.C.10 ("Acceptance Criteria") and Section 3.4.III.C.10 ("Review Procedures") of the draft SRP-LR to add ASME Section XI, Subsection IWF. On this basis, the staff considers License Renewal Issue No. 98-0051 (MA2399) on the jurisdiction of ASME Section XI, Subsections IWE and IWF, resolved.

NUCLEAR ENERGY INSTITUTE  
(License Renewal Steering Committee)

Project No. 690

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