

April 11, 2000

MEMORANDUM TO: Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

FROM: Ashok C. Thadani, Director */RA/*
Office of Nuclear Regulatory Research

SUBJECT: USER REQUEST RELATED TO THE GENERIC AGING LESSONS
LEARNED (GALL) REPORT

In response to your user request related to the review of the Generic Aging Lessons Learned (GALL) report, RES provided its first set of inputs to you in my memorandum dated March 2, 2000. The attachments to that memorandum contained two items: (1) an analysis of licensee event reports (LERs) from 1994 to 1999 and information relevant to aging of long-lived passive components and structures within the scope of license renewal, and (2) an advance marked-up copy of Section VI of the draft GALL report on Electrical Components.

Attached to this memorandum are some general comments and a marked-up copy of all pertinent sections of the draft GALL report with specific comments. Our inputs are based upon: (1) RES technical staff reviews and (2) evaluation of aging-related information derived from the research programs completed during 1994 to 1999 (post NPAR).

Among the several comments provided in the attachment there were two items I wanted to bring to your attention. First, we note that the draft Gall report is silent on the subject of aging management of inaccessible and buried cables within the scope of license renewal. The recent experience at Davis-Besse suggests that medium voltage (4 KV to 15 KV) buried cables can be susceptible to long-term moisture intrusion, causing degradation of the jacket and main conductor insulation. We suggest that a section be added to the draft GALL report addressing this subject.

Second, in Chapter VI D1, addressing recirculating steam generators, items D1.1.1 and D1.1.2 address the subject of fatigue of the Top Head Steam Nozzle and Safe End. It is recognized in the draft report that the environment is 300°C steam and references are cited to the ASME Code Section III (1989). However, the fatigue curves do not represent a steam environment. Further, the available fatigue data on low alloy steels also is not representative of this environment. Since the staff has concluded that environmental effects on fatigue needs to be addressed as part of an aging management program, we suggest that this issue needs to be more fully addressed in the draft Gall report.

CONTACT: J. Vora, MEB/DET/RES 415-5833

Samuel J. Collins

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By transmittal of this memorandum and attachment, RES considers that the requested information in the NRR memorandum of October 12, 1999, has been provided and the user need should be considered as closed.

Attachments: As stated

cc: C. Grimes, w/atts

Distribution: w/o Attachment

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