

April 3, 2000

ORGANIZATION: Nuclear Energy Institute

SUBJECT: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE (NEI) ON INDUSTRY'S COMMENTS ON THE DRAFT "GENERIC AGING LESSONS LEARNED" (GALL) REPORT - ELECTRICAL EQUIPMENT

On March 29, 2000, representative of NEI met with the Nuclear Regulatory Commission (NRC) staff in Rockville, Maryland, regarding the industry's comments on Chapter VI, "Electrical Components," of the draft GALL report, dated December 6, 1999. By letter dated March 27, 2000, NEI has provided their written comments for discussion at this meeting. A list of meeting attendees is attached.

Chris Grimes of the staff opened the meeting by discussing his expectations. He indicated that the GALL report should contain as much technical information as practical and should not be affected by process issues. Any controversial areas should be identified and worked separately. NEI asked whether an applicant is required to meet the programs described in the GALL report. The staff responded that the GALL report is a reference for the Standard Review Plan for License Renewal (SRP-LR). The SRP-LR will indicate that the programs in the GALL report are one acceptable way to manage aging for license renewal. An applicant may propose alternatives for staff review. NEI indicated that an applicant would have to address any components that are subject to an aging management review for license renewal for its plant but are not included in the GALL report.

The staff asked the industry to clarify certain of NEI's comments on the draft GALL report. Based on the discussions, NEI indicated that the industry would consider revising its comments by taking the following actions:

1. Consider the use of the term "electrical cables and connections" to be consistent with the 10 CFR 54.21(a)(1)(i) language.
2. Consider the addition of a boric acid corrosion management program for electrical connectors.
3. Look into submitting industry-developed reports that are referenced in the GALL report.
4. Consider and develop the environmental qualification (EQ) program as an aging management program under the 10 CFR 54.21(c)(1)(iii) option, as appropriate.
5. Clarify that Generic Safety Issue (GSI) 168 is limited to low-voltage instrumentation and control cables.
6. Clarify that any changes in "activation energy" values should be justified.

7. Reconsider NEI Comment Number 19 to add the Instrument Calibration Program.
8. Delete last sentence on Page VI.A-6, that states: "Due to the low dielectric ... cables."

The staff indicated it would consider NEI's comments on the draft GALL report. NEI discussed that it will be developing an approach for submitting and discussing the industry comments to support the staff schedule for issuing the draft GALL report, SRP-LR, and NEI 95-10, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," for public comment in August of 2000. The staff encouraged NEI to continue to provide their comments on an expedited basis to support the aggressive schedule.

/RA/

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Office of Nuclear Reactor Regulation

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- 7. Reconsider NEI Comment Number 19 to add the Instrument Calibration Program.
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NRC MEETING WITH THE NUCLEAR ENERGY INSTITUTE
ON LICENSE RENEWAL
ATTENDANCE LIST
MARCH 29, 2000

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Project No. 690

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