

## DOCKET NUMBER

PETITION RULE PRM 54-1

(65FR 42305)

Proposed Rulemaking: Revise 10 CFR Parts 51 and 54 to include aging management for liquid and gaseous radioactive waste systems.

The petitioner detailed specific concerns about potential aging degradation of the liquid and gaseous radwaste systems at the Hatch Nuclear Plant that may result in an increased probability and/or consequences from design and licensing bases events. This potential aging degradation may also apply to liquid and gaseous radwaste systems at other operating nuclear power plants in the United States. The petitioner requests that the NRC initiate rulemaking actions necessary to revise 10 CFR Parts 51 and 54 to incorporate aging management for liquid and gaseous radioactive waste systems.

In 10 CFR 51 Appendix B to Subpart A, "Environment Effect of Renewing the Operating License of a Nuclear Power Plant," the NRC concluded that radiation exposures to the public and occupational exposures to workers during the license renewal term will continue at current levels below regulatory limits. This conclusion is predicated on the assumption that the components of the liquid and gaseous radwaste systems do not experience greater failure rates during the license renewal term. The aging degradation concerns described in Contentions Nos. 1 and 2 above can invalidate that assumption by increasing component failure rates. Hence, the conclusion of the NRC staff can only be valid when the liquid and gaseous radwaste systems are covered by aging management programs during the license renewal term.

10 CFR 54.4, "Scope," states:

(a) Plant systems, structures, and components within the scope of this part are --

(1) Safety-related systems, structures, and components which are those relied upon to remain functional during and following design-bases events (as defined in 10 CFR 50.49(b)(1)) to ensure the following functions --

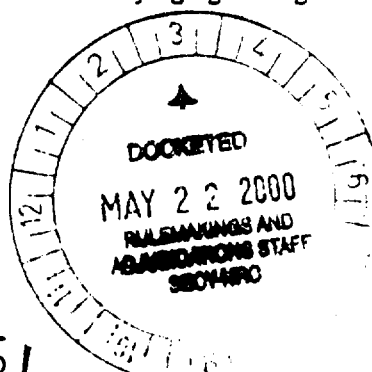
(i) The integrity of the reactor coolant pressure boundary;

(ii) The capability to shut down the reactor and maintain it in a safe shutdown condition; or

(iii) The capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposure comparable to the guidelines in §50.34(a)(1) or §100.11 of this chapter, as applicable.

(2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section.

From a review of the license renewal applications submitted by the owners of the Calvert Cliffs, Oconee, and Hatch nuclear plants, it appears that 10 CFR 54.4(a)(1)(iii) has been consistently interpreted to exclude the liquid and gaseous radwaste systems from aging management consideration under the rule. The petitioner requests the NRC to revise 10 CFR Part 54, and Part 51 if appropriate, to clarify that the liquid and gaseous radwaste systems must be covered by aging management programs during the license renewal term.



May 3, 2000

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Gaseous Radwaste System Schematic

