

March 1, 2001

ORGANIZATION: Nuclear Energy Institute (NEI)

SUBJECT: SUMMARY OF NUCLEAR REGULATORY COMMISSION (NRC) STAFF  
MEETING WITH NEI TO DISCUSS GALL/SRP-LR OPEN ITEMS

On January 31, 2001, the NRC staff and NEI met to discuss 11 of the 13 license renewal issues listed in Attachment 1 (issues 50–60, 63, and 64) to this meeting summary. The purpose of the meeting was to determine which issues, if any, needed to be elevated to a higher level of NRC management. Representatives from NEI, current license renewal applicants, and other stakeholders attended the meeting (see Attachment 2). A copy of Attachment 1 with the items through number 63 was made available prior to the meeting through ADAMS, the NRC Agencywide Documents Access and Management System (accession no. ML010190321).

#### BACKGROUND

The NRC staff said that this meeting resulted from a December 21, 2000, meeting where the staff provided NEI with a list of NEI comments together with the staff's draft resolution. The NEI comments concerned the August 31, 2000, version of the draft GALL report (hereafter referred to as GALL), the Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (SRP-LR), and the draft Regulatory Guide (DG-1104) for the standard format and content of a license renewal application (LRA). As a result of the December 21 meeting, NEI indicated that it wished to pursue 63 of these comments with NRC branch chiefs in a subsequent meeting. Following the December 21 meeting, NEI informed the staff that it also wished to discuss how aging management of complex assemblies should be accomplished. This issue was numbered 64.

#### DISCUSSION

Since the December 21 meeting, the staff had revisited the 64 issues and summarized the staff's preliminary resolutions in Attachment 1. At the beginning of the January 31 meeting, NEI said it would need to discuss these issues with its license renewal working group before reaching final conclusions. NEI committed to get back to the staff with a final conclusion once it met with its license renewal working group (The staff learned after the meeting that the working group was expected to meet around mid-February 2001 and the staff could expect final conclusions sometime after that). The staff stated that because of upcoming deadlines, it had to finalize the generic license renewal guidance documents shortly following the NEI working group meeting. Therefore, any changes that NEI might propose to resolve an issue needed to be received very quickly; otherwise the staff would not have time to incorporate new information to support providing these documents to the Commission for their review by April 2001. The staff noted that as lessons were learned through the resolution of outstanding issues and

ongoing and future license renewal reviews, the generic license renewal documents would be periodically revised. The following is a list of the issues, with the status of each issue and an expanded summary of the issue. As a result of the meeting, nine issues were resolved, one issue (issue 51) was left for NEI to determine whether to escalate to a higher level of NRC management was necessary, and one issue was left for NEI action (issue 64).

**Issue 50** - NRC agreed with NEI's proposal to conduct a demonstration project (Attachment 3). NEI proposed a demonstration project to address the details of how applicants could use GALL. No changes to NEI 95-10 or SRP-LR deemed necessary at this time.

NEI said it believed that a previous November 9, 2000, meeting (see ADAMS accession no. ML010080276) was a good meeting in that it provided good guidance on how to use GALL, but industry was still having difficulty with several aspects of using GALL. First, industry wanted to know: when GALL concludes that "no further evaluation" for an aging management program (AMP) is required beyond the attributes described, what does this exactly mean? Industry believed that for an LRA to credit its AMP it would have to look at its program attribute by attribute and compare it to the program attributes provided in GALL. NEI stated that the result is that applicants find themselves defending the GALL program and not their own programs. NEI said that the basic issue was, "Is the conclusion in GALL a generic conclusion?" NEI recognized that GALL is not like the Generic Environmental Impact Statement (GEIS) and that the license renewal rule would need to be changed to use GALL in the same manner. NEI added that from their perspective there appeared to be an inconsistency in that if GALL concluded that no further evaluation was required an applicant would still need to review each attribute of its AMP against GALL's AMP. In this situation industry would ask itself, then why was "no further evaluation" reached as a conclusion? NEI added that the basis for concluding "Yes further evaluation is required," was not clear since they believed that the authors of GALL did not look at every licensee's AMP in developing GALL. NEI repeated that industry perceived that GALL seems to make generic conclusions, but it will still also require an applicant to perform an attribute by attribute review of its programs against the GALL programs. NEI said the industry thought it would be getting generic conclusions in GALL regarding their site-specific programs.

The staff stated that GALL was making generic conclusions regarding AMPs and that it could be codified like the GEIS through rulemaking. The staff said that GALL could be used by an applicant in the same manner as a licensee would use an approved topical report. The NRC would ask the applicant to certify in its application that certain conditions are bounded by the conditions assumed in the topical report. The staff said that an applicant should be able to incorporate by reference when its AMP corresponded to a similar program described in GALL.

NEI suggested that a demonstration project to address issues of implementing GALL, conducted by several licensees interested in submitting LRAs, could provide both the NRC and NEI with valuable insights. NEI then handed out Attachment 3, which provided additional details on the demonstration project. NEI said the demonstration project would be a vertical slice, that would attempt to exercise all aspects of the license renewal guidance documents i.e., GALL, SRP-LR, and DG-1104. Participants would submit example application sections to the NRC in April to get feedback from the staff on their approach. The staff said it hoped that one outcome of the effort would be insights into improving the staff's efficiency in the review of applications because the NRC was expecting a large number of LRAs in the next few years.

A member of NEI's license renewal working group (NEI-LRWG) remarked that one significant benefit he saw from using GALL (based on Turkey Point's experience) was the potential to reduce the number of requests for additional information. He added that applicants who were able to state their programs were bounded by the GALL programs could save resources because the staff's review would focus less on aging management and more on inspections to verify the applicant's statements. In addition, he said the staff would subsequently save time by referencing an application as having the necessary information to support a safety evaluation conclusion on adequate aging management. The staff said that for this case GALL needed to be clear so that inspectors were verifying and not evaluating AMPs. It was the staff's expectation that an applicant should be able to say "I reached the same conclusion as reached in GALL" and be done evaluating their AMPs.

NEI said it believed that there was a slight but important difference in the application of a topical report that made it difficult for an license renewal applicant to apply GALL in a similar manner. Specifically, a topical report was written by members of an owners group from the perspective of ensuring that the AMPs described in the topical report were representative of the programs used by all the licensees with the potential to submit an application referencing the topical report. However, it was not clear what program the staff looked at in developing the AMPs contained in GALL or whether a similar approach was used. The staff remarked that the results from the demonstration project should try to focus on what an applicant needs to verify to be able to say its AMPs look like those in GALL. The staff added that the demonstration project should also result in data to articulate the process for using GALL in constructing an application in order to show the benefits of using GALL. Once that had been achieved, the guidance could then be incorporated into the SRP-LR and NEI 95-10 for the benefit of future application reviews. NEI added that while it was important to establish clarity for applicants and NRC, it was also important to ensure that GALL not take on a higher level of importance or officiality. The staff stated that it expected that GALL would be a reference document not a requirement. The staff and NEI closed the discussion by agreeing that they had found a path to resolution for this issue. The staff added that a major benefit of the demonstration project was that future staff reviewers and applicants might gain additional experience to efficiently and effectively conduct license renewal reviews.

**Issue 51** - NEI will get back to staff whether this issue needs escalation. NRC and NEI agreed to disagree on this issue. No changes to NEI 95-10 or SRP-LR deemed necessary at this time.

NEI said the industry concern is that some aspects of AMPs in GALL appear to be establishing new requirements without sufficient justification. For example, in the case of small bore piping, the industry's position is that since the current licensing basis (CLB) carries forward and since the staff is currently not requiring licensees to do more than recommended activities promulgated by the ASME Code, NEI does not see sufficient basis for the additional inspections included in GALL for small bore piping. NEI said its comment was only related to small bore piping as described in GALL. NEI remarked that it appeared GALL was going beyond what was required currently for small bore piping and industry did not see a good justification for doing that. The staff responded by saying that the license renewal rule (10 CFR Part 54) did not require a backfit analysis in accordance with 10 CFR Part 50.109 because it recognized that for the renewal period additional requirements beyond current requirements might be necessary to manage aging of passive structures, systems, and components (SSCs). The staff added that it

believed that sufficient justification has been provided for the additional inspections in the areas cited by NEI, and that the basis for the additional inspections were clearly articulated during the first few LRA reviews. The staff said that issues like small bore piping reflect current technical disputes between the staff and industry.

**Issue 52** - NEI will provide additional guidance in NEI 95-10 on when an aging effect becomes likely to warrant aging management. No changes to SRP-LR.

NEI remarked that their concern was that the term potential aging effect used in the SRP-LR does not provide a definite threshold for when an aging effect requires management. The staff and NEI discussed this issue and agreed that since there is no certainty when an unseen aging effect becomes likely enough to warrant aging management, this determination will have to involve engineering judgement. NEI promised to provide additional guidance in NEI 95-10 for the applicant to determine when aging effects require management. NEI also noted that 95-10 would be revised to be consistent with the SRP-LR by using the terms “applicable” and “potential aging effects.”

**Issue 53** - Same resolution as for issue 52.

**Issues 54 & 55** - NRC will clarify SRP-LR as described in item 54 of meeting agenda (Attachment 1) to address the issues. NEI agreed with this solution.

A member of the NEI-LRWG said that he believed that the additional clarification would be applicable to aging effects identified as a result of operating events. The staff said that this guidance was applicable to more than operating events, but was intended to ensure the staff provided a reference in its question, to the information source which lead the staff to believe that the aging effect might warrant aging management. The staff said that it believed it had articulated guidance for both the staff and applicants in clarification proposed in item 54. The staff said that NEI should consider adding guidance to NEI 95-10 that applicants might consider it advantageous to describe up front any unusual reasons why an aging effect that would normally be expected to occur for a given SSC did not require aging management due to some particular aspect of the SSC's design, such as stainless steel piping in an irregular location.

**Issue 56** - NRC will revise SRP-LR to clarify how new generic safety issues identified in later versions of NUREG-0933 will be addressed.

Specifically, the following statement proposed by NEI was added in Section A.3.2.1, paragraph 2: “Prior to Safety Evaluation Report (SER) completion, any new issues contained in later versions of NUREG-0933 must be reviewed and resolved if determined to be applicable to the applicant's plant.”

**Issue 57** - NRC will clarify the SRP-LR to be consistent with the requirements of the license renewal rule as discussed below.

A member of the NEI-LRWG said the basis for the NEI comment on the SRP-LR guidance was that fires should not be included in the examples of design basis events because fires are addressed under 10 CFR 54.4(a)(3). The staff agreed to delete fires from the design basis event examples for 54.4(a)(1).

**Issues 58, 59, & 60** - NEI will consider adding these documents to NEI 95-10.

NEI summarized their concern with adding these documents to NEI 95-10, Table 3.1-1, "Sample Listing of Potential Information Sources," was that once they were written down in the SRP-LR or NEI 95-10, they would become a defacto requirement for scoping SSCs within the scope of the license renewal rule. The staff stated that the challenge for staff members reviewing an applicant's scoping and screening was to look for intended functions that had been overlooked. The staff added that by using these documents the staff could gain insights on aspects of SSC operation. Also, reviewing these documents would aid the staff in developing its conclusion that it found no omissions by the applicant. NEI said that there was also a concern that these documents were beyond the design basis of the plant. A member of the NEI-LRWG said that if these documents were listed it could be misinterpreted that you have to use them all. Another member of the NEI-LRWG said that Duke Energy used a plant's individual plant examination of external events in preparing one of its LRAs. The staff requested NEI to add these documents to NEI 95-10. The staff remarked that for the purposes of license renewal scoping, information regarding design basis events is contained in license conditions, exemptions, orders, the updated final safety analysis report, and the Commission's regulations. The additional documents referenced in the SRP-LR assist the reviewer in identifying and understanding the bounds of the CLB. The SRP-LR was revised to reflect this position.

**Issue 63** - NRC will clarify the SRP-LR as described in the meeting agenda to address this issue. NEI agreed with this solution.

**Issue 64** - NEI will wait until issuance of the NRC safety evaluation report (SER) for the Hatch LRA before determining if the issue needs to be escalated.

The staff stated that it believed the SER, to be issued on February 8, 2000, on the Hatch LRA would provide sufficient clarification to NEI regarding the staff's evaluation of complex assemblies. NEI agreed to wait until the issuance of the Hatch SER before determining if the issue needed to be escalated further. NEI added that it believed there were actually two potential issues. One was how NRC expected the aging management of complex assemblies to be evaluated and the other was NRC's handling of aging management for complex assemblies as it relates to piece parts. Specifically, NEI noted that recent requests for information on Hatch suggested that the staff was now suggesting that the license renewal rule requires applicants to look at piece parts to identify sub-components of the parts that are passive and have functions which would require aging management. NEI added that this approach was not consistent with what it believed was the Commission's expectations for how piece-parts should be evaluated.

**/RA/**

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**/RA/**

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## Attachment 1

NEI Issues on Improved License Renewal Guidance Documents for Management Attention (Based on 12/21/00 Public Meeting)			
Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
50	Application of GALL	---	<p>NEI commented that an applicant should be able to say that they have a program evaluated by GALL without having to do a line-by-line review of its program against to GALL program to determine that its program is bounded by GALL. For example, if an applicant has an ISI program that meets Section XI of the ASME Code and GALL calls out an ISI Section XI program is required for adequate aging management, then an applicant should just have to say in their application that they have a ISI Section XI program and not have to do a comparison of program against the program described in GALL. In 11/9/00 meeting with NRC staff (meeting summary dated 1/8/01), NEI was told by staff that GALL should be used in the same manner a topical report is used -- as a reference for accepted aging management programs. In conversation following 11/9/00 meeting with NEI, NEI commented that as long as the staff would provide with GALL the equivalent of application action items, which are provided in staff SERs on topical reports, then an applicant would clearly understand what additional actions are needed to be able to certify/credit that its site specific program met the GALL program (as is done with topical report SERs). In statements made in 12/4/00 Commission meeting on license renewal guidance documents NEI suggested the industry's desire to equate GALL to what was done in the environmental area with Category 1 and Category 2 issues described in the Generic Environmental Impact Statement (GEIS) for license renewal .</p> <p>The NRC staff believes that in order to treat aging management programs in GALL in a similar manner as Category 1 issues were treated in the GEIS would require rulemaking to 10 CFR Part 54 to codify GALL. The staff requests that NEI provide a proposed approach for how an applicant can most effectively use GALL, which might include using something similar to applicant actions items, to verify that the conclusions for the programs described in GALL require no further staff review.</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
51	Requirements a b o v e regulations	---	<p>NEI commented that when GALL aging management programs reference documents like NRC Generic Letters as providing some aspect of an aging management, GALL is going beyond regulatory requirements. An example would be the Boric Acid Corrosion AMP described in GALL Chapter XI section XI.M10. The GALL description of the boric acid program stipulates that NRC Generic Letter 88-05 provides guidelines for scope of program, detection of aging effects, monitoring and trending, corrective actions, and operating experience. Therefore, by using the GL 88-05 as an aging management for boric acid corrosion GALL is establishing new regulatory requirements.</p> <p>The staff believes the purpose of GALL is to provide one acceptable program for managing aging. In that regard, the staff has provided one acceptable program for managing the aging effects caused by boric acid corrosion. In implementing Part 54, the review of existing programs sets up a situation where actions needed to manage aging effects and maintain the current licensing basis for the period of extended operation might be increased beyond those considered necessary for the current term. The staff needs to better understand the nature of NEI's concern; therefore, the staff requests NEI provide additional clarification regarding this concern and potential remedies.</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
52	SRP Section A.1.2.1 – applicable aging effects threshold	SA.1-2	<p>The first sentence in Section A.1.2.1, paragraph 1 which describes applicable aging effects reads: “1. The determination of applicable aging effects is based on degradations that have actually occurred and those that potentially could cause structure and component degradation.”</p> <p>NEI commented that aging effects should be real and be caused by degradations that have actually occurred or that will occur. The term “potentially could” is too vague and subject to too much judgment.</p> <p>Staff considers that applicable aging effects need to include aging effects that have occurred and also those that potentially could occur. “Potentially could” does not mean that all aging effects that “potentially could” occur need to be managed. This statement needs to be further clarified to explain that when a potential aging effect not seen rises to a level of likelihood of occurrence, only then would it require aging management. Since there is no certainty when a “potential aging effect” rises to a level of likelihood of occurrence, this determination will have to involve engineering judgment from both the staff and the applicant.</p>
53	Applicable aging effects and aging effects requiring management	SA.1-8	<p>NEI comment is that in section A.1.2.1 of the SRP, applicable and potential aging effects need to be defined if it is determined that these are the correct terms to use.</p> <p>NEI commented that the use of consistent terminology between SRP and NEI 95-10. NEI 95-10 rev.2 eliminated the terms applicable/potential aging effect and uses the term “aging effect requiring management.” The term “potential” is too vague and subject to too much judgment. This issue is very closely related to issue #52.</p> <p>NRC staff considers that this issue is directly related to issue #52 and staff would like to discuss these issues with NEI in further detail. The definitions or terms that are used in the SRP should be used in NEI 95-10.</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
54	Aging effects in GALL that an applicant determines are not applicable	---	<p>In conversations with NEI following 11/9/00 meeting (described in line item No. 50) NEI clarified that basis for this comment is that not enough credit is being given to the NRC's review and approval of the applicant's scoping methodology. Specifically, the guidance in the SRP (Section A.1.2.1 No. 3, page A.1-2) telling the staff that there is an expectation that an applicant has to provide a basis as to why all aging effects listed in relevant aging information (such as GALL) ARE or ARE NOT managed. SRP Section A.1.2.1 No. 3 states, "If operating experience or other information indicates that a certain aging effect may be potentially applicable and an applicant determines that it is not applicable to its plant, the basis for this determination should be provided." NEI commented that references supporting the aging effects listed in GALL aren't always provided in GALL so that industry can challenge their applicability. In summary, NEI believes that NRC should not use GALL as the basis to tell applicants "tell me why every aging effect listed in GALL is not being managed."</p> <p>The staff believes that SRP Section A.1.2.1 No.1, page A.1-2, provides further clarification that the staff is only interested in applicable aging effects based on experience to date. To provide further clarification the NRC staff is considering to modify No. 3 as follows: "If operating experience or other information indicates that certain aging effects may be applicable and an applicant does not justify the absence of the aging effect in its application, it may be appropriate to question its absence. However, in questioning the absence of the aging effect, a reference and/or basis which provides relevance to aid the applicant in addressing the question shall be provided. For example, the question could cite a previous application review, NRC generic communications, engineering judgment, relevant research information, or other industry experience as the basis for the question. Simply citing that the aging effect is listed in GALL is not a sufficient basis. For example, the aging effect is applicable to a PWR component, but the applicant's plant is a BWR and does not have such a component. In this example, using the GALL report merely as a check list is not relevant."</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
55	SRP Section A.1.2.1 – aging effects not need to be managed	SA.1-9	<p>NEI commented to delete SRP A.1.2.1, paragraph 3 that states “3. If operating experience or other information indicate that a certain aging effect may be potentially applicable and an applicant determines that it is not applicable to its plant, the basis for this determination should be provided.”</p> <p>NEI commented that the Rule does not require an application to state why an aging effect is not applicable to its plant.</p> <p>NRC staff considers this issue is similar to issue #54. The staff preliminary resolution of issue #54 also applies to this issue.</p>
56	SRP Section A.3.2.1 – NUREG-0933	SA.3-1	<p>SRP Appendix A.3, Section A.3.2.1, Item 2, states that “the version of NUREG-0933 that is current on the date 6 months before the date of the license renewal application should be used to identify such issues.”</p> <p>NEI commented that if an applicant follows the SRP which states that a 6 month old version of NUREG-0933 may be used but there are new items in a later version, it will be required to address items in the latest version. Therefore, the statement in the SRP is misleading.</p> <p>NRC staff is considering to revise A.3.2.1, item 2, second sentence to read “The current version of NUREG 0933 should be used to identify such issues.” Also, the staff is considering to revise the SRP to explain the process for handling new items that are added to NUREG-0933 after the application is issued. The outline for this process would be: (1) The application should address issues in the latest version of NUREG-0933 available at the time the application is submitted, and (2) prior to SER completion, any new issues that arise must be reviewed and resolved if determined to be applicable to the applicants plant.</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
57	D B E s o n scoping	S2-2	<p>NEI commented: In the second sentence replace “accident” with “events.” Remove the sentence beginning with “however, events such as fire,” and the next sentence and replace with “Design basis events are defined as conditions of normal operations, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure the functions in 54.4(a)(1). See the Branch Technical position beginning on page A.1-1 of the SRP, specifically the design basis event discussion on page A.1-2 in the second paragraph of item 6.</p> <p>NRC staff is considering revising the SRP as follows: “Accident” will be replaced by “event.” Fire, floods, storms, earthquakes, tornadoes, and hurricanes are <u>examples</u> of design basis events and/or anticipated operational occurrences currently used in NUREG-0800 but not addressed in Chapter 15 (Accident Analysis). As such, they are consistent with the definition in §50.49(b)(1)(ii).</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
58	IPE/IPEEE on scoping	S2-3	<p>NEI commented to Delete item 4. The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." Further, the guidance in item 4 focuses on drawing "attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." These evaluations are not parts of the CLB. . Staff review of these documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage</p> <p>The NRC staff considers that while the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." NEI's comments are addressed at a section of the SRP which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p>



Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
		S2-4	<p>NEI commented to delete item 5. The LR Rule is deterministic not probabilistic. In 60FR22468: "... [The Commission concludes that it is inappropriate to establish a licensee renewal scoping criterion... that relies on plant-specific probabilistic analyses. Therefore, within the construct of the final rule, PRA techniques are of very limited use for license renewal scoping." Staff review of the probabilistic documents may not provide the information it is seeking. The IPE and IPEEE reports reflect the estimated core damage frequency for the plant configuration at the time the evaluation is performed. These reports also may contain recommendations to modify the plant, revise procedures, or develop training to further reduce the estimated core damage frequency. Some plant modifications may reduce the frequency of initiating events and others may improve the reliability of credited mitigation systems. The IPE and IPEEE reports do not change the CLB by themselves. The plants must perform complete 50.59 reviews and may or may not implement the recommended modifications. Those modifications that are implemented will be reflected in plant drawings, FSAR changes, or technical specification changes, as appropriate. The staff is already reviewing these latter documents which provide more current information than that which may be contained in the IPE and IPEEE reports.</p> <p>The NRC staff considers that while the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." NEI's comments are addressed at a section of the SRP which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
		S2-11	<p>NEI commented to delete "Probabilistic Risk Assessment summary report."</p> <p>The NRC staff considers that while the LR Rule is "deterministic," the Commission in the SOC of the Rule also states: "In license renewal, probabilistic methods may be most useful, on a plant-specific basis, in helping to assess the relative importance of structures and components that are subject to an aging management review by helping to draw attention to specific vulnerabilities (e.g. results of an IPE or IPEEE)." NEI's comments are addressed at a section of the SRP which provides <u>guidance</u> to the reviewer as to what sources of information are useful for assessing the applicant's CLB.</p>
59	E O P s on scoping	S2-12	<p>NEI commented to delete "Emergency operating procedures."</p> <p>The NRC staff considers that EOPs were developed to cope with analyzed plant-specific <u>transients and accidents</u> in accordance with NUREG-0737, Item I.C.1 requirements. While EOPs deal with some transients and/or accidents not bound by plant-specific CLB, EOPs nonetheless constitute a valuable source of information regarding both the facility's CLB and its design basis events.</p>
60	A C R S comments on EOPs/severe accident management on scoping	---	<p>NEI commented on the ACRS comments on EOPs/severe accident management on scoping.</p> <p>From Travers response to 11/15/00 ACRS Letter on License Renewal Guidance Documents (Adams Accession ML003776927): ACRS Comment: "The staff and the industry should provide consistent guidance of the use of emergency operating procedures (EOPs) and severe accident management guidelines (SAMGs) as possible information sources to verify that equipment important to safety has not been inadvertently left out by the license renewal rule scoping process." NRC Response: "The staff agrees that these documents are potential information sources for identifying the structures, systems, and components within the scope of the license renewal rule. SRP-LR Table 2.1-1, "Sample Listing of Potential Information Sources," lists EOPs as possible information sources and the staff will add the SAMGs to the table. The staff will also ask NEI to add these documents to NEI 95-10 Table 3.1-1, Sample Listing of Potential Information Sources, as potential information sources."</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
61	SECY 96-146 on fire barrier	G-VII-G-4	To be provided with input from Peter Kang's file with issues 35 to 48
62	N F P A commitments	G-XI-M10-2	To be provided with input from Peter Kang's file with issues 35 to 48
63	Nominal plant environment terminology for electrical	G-XI-E-1	<p>In GALL paragraph 1 of XI.E1 and XI.E2, NEI commented that "nominal plant" should be replaced with "plant design".</p> <p>The NRC staff considers that "plant design environment" is based on the maximum temperature expected so there is no need introduce the term "maximum" since it is inherently understood when the plant design environment is specified.</p>

Issue #	Issue	NEI Comment Number	Staff Preliminary Resolution
64	C o m p l e x Assembly		<p>NEI requested this issue added to the list.</p> <p>NEI's 95-10 (Revision 2) document contains guidance on complex assemblies in Section 4.1.1: "There are structures and components that, when combined, are considered a complex assembly (e.g., diesel generator starting air skids or heating, ventilating, and air conditioning refrigerant units). The Rule and associated SOC do not specifically discuss such assemblies. For purposes of performing an aging management review, it is important to clearly establish the boundaries for review. An applicant should establish the boundaries for such assemblies by identifying each structure or component that makes up the complex assembly and determining whether or not each structure and component is subject to an aging management review." In Revision 0 NEI 95-10 included example 5 in Appendix C which described how this would be applied to a control room chiller.</p> <p>NRC staff agrees with the guidance in 95-10 and had previously endorsed Revision 0 (through publication of DG-1047). The SRP-LR contains guidance which references NEI 95-10 and is as follows: "Some structures and components, when combined, are considered a complex assembly (for example, diesel generator starting air skids or heating, ventilating, and air conditioning refrigerant units). For purposes of performing an AMR, it is important to clearly establish the boundaries of review. An applicant should establish the boundaries for such assemblies by identifying each structure and component that makes up the complex assembly and determining whether or not each structure and component is subject to an AMR (Ref. 1). Section 2.2.3.4.8.2.1 of NUREG-1723, "Safety Evaluation Report Related to the License Renewal of Oconee Nuclear Station, Units 1, 2, and 3," (Ref. 7) provides an example of how a diesel generator complex assembly was evaluated."</p> <p>Since the staff agrees with how NEI 95-10 would evaluate a complex assembly, the staff requests NEI to describe if there are any changes to its previous position or if there are other related issues.</p>

NRC LICENSE RENEWAL MEETING  
ATTENDANCE LIST  
JANUARY 31, 2001

<u>NAME</u>	<u>ORGANIZATION</u>
C. I. GRIMES	NRC/NRR/DRIP/RLSB
ROBERT GILL	DUKE ENERGY
SAM LEE	NRC/NRR/DRIP/RLSB
JOHN RYCYNA	CONSTELLATION NUCLEAR
ALEX MARION	NEI
STEVE HALE	FPL
CHARLES PIERCE	SOUTHERN NUCLEAR
P.T. KUO	NRC/NRR/DRIP/RLSB
DICK WESSMAN	NRC/NRR/DE
MICHAEL MCNEIL	NRC/RES/DET/MEB
TED QUAY	NRC/NRR/DIPM/IQPB
DAN DORMAN	NRC/NRR/DIPM/IQPB
GREG S. GALLETTI	NRC/NRR/DIPM/IQPB
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JIM DAVIS	NRC/NRR/DE/EMCB
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CHARLES WILLBANKS	LICENSING INFORMATION SERVICE
KEN CHANG	CHANG ENG. SERVICES
DOMINIC SO	AEP
DAVID C. JENG	NRC/NRR/DE/EMEB
DONALD P. FERRARO	WINSTON & STRAWN
MANNY COMAR	NRC/NRR/DRIP/RLSB
OMID TABATABAI	NRC/NRR/DRIP/RLSB
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BRIAN THOMAS	NRC/NRR/DSSA
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DAVID L. SOLORIO	NRC/NRR/DRIP/RLSB
JIM STRNISHA	NRC/NRR/DRIP/RLSB

### Attachment 3

The class of 2002 LRA plants met on January 16 to discuss the use of the GALL in the License Renewal Applications that will be submitted in 2002.

We agreed to prepare a set of examples for various sections of the LRA for comment by the NRC on content and format. NEI will present the examples to the staff.

<b>LRA Section</b>
Section 2.1 Methodology
Section 2.2 Scoping
Section 2.3 Scoping and Screening Mechanical
Sections 3.1, 3.2, 3.3, 3.4, Materials, Environments, AERM, Different Program credit for same Aging Effect
Section 3.5 Materials, Environments, AERM, Different Program credit for same Aging Effect
Appendix B Programs Chemistry (Notes 1 and 2) FAC (Note 1) Buried Piping (Note 2) Buried Piping (Note 3) Tank Inspections (Note 1) Tank Inspections (Note 2) Tank Inspections (Note 3)
Note 1 - Program Meets GALL Note 2- Program meets GALL with exceptions Note 3- Program is plant specific

The following schedule is suggested by the group for the NRC feedback to be useful in a 2002 LRA submittal.

End of March - Complete drafts of the sample text.

End of April - Provide to NRC for comment

End of June - Feedback from the NRC

August - Incorporate into guidance document NEI 95-10.