
Analysis of Public Comments on the Improved License Renewal Guidance Documents

U.S. Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

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(NRC to supply)

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Manuscript Completed: April 2001
Date Published:

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ABSTRACT

This report contains the staff's analysis of the stakeholder's comments on the license renewal guidance documents, which are the draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses," the draft Standard Review Plan for License Renewal, the draft Generic Aging Lessons Learned (GALL) report, and the Nuclear Energy Institute (NEI) document 95-10, Rev. 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule." The license renewal guidance documents were issued for public comment on August 31, 2000 (65 FR 53047). The staff's analysis is presented in a tabular format and contained in five appendices: Appendix A addresses the participant comments from the license renewal public workshop on September 25, 2000; Appendix B addresses the specific written comments submitted by NEI; Appendix C addresses the written comments submitted by various stakeholders, such as the Union of Concerned Scientists, utilities, and private citizens; Appendix D addresses five technical reports provided by the Union of Concerned Scientists; and Appendix E addresses the Advisory Committee on Reactor Safety consultants' structural and electrical comments. The April 2001 version of the license renewal guidance documents incorporated the information in this report.

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ABBREVIATIONS

ACI	American Concrete Institute
ACRS	Advisory Committee on Reactor Safeguards
ADAMS	Agencywide Document Access and Management System
AE	architect engineer
AEA	Atomic Energy Act
AEOD	NRC Office for Analysis and Evaluation of Operational Data
AEP	American Electric Power
AFWS	auxiliary feedwater system
AMP	aging management program
ANL	Argonne National Laboratory
ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
AUX	auxiliary system
BNL	Brookhaven National Laboratory
BWR	boiling water reactor
BWRVIP	Boiling Water Reactor Vessel and Internals Project
CAN	Citizens Awareness Network
CASS	cast austenitic stainless steel
CCCW	closed-cycle cooling water
CFR	Code of Federal Regulations
CLB	current licensing basis
CM	condition monitoring
CNS	Constellation Nuclear Services
COMED	Commonwealth Edison Company
CP&L	Carolina Power and Light Company
CRD	control rod drive
CVCS	chemical and volume control system
DE	NRC/NRR Division of Engineering
DET	NRC/RES Division of Engineering Technology
DG	Draft Regulatory Guide
DOR	Division of Operating Reactors
DP	Duke Power Company
DRIP	NRC/NRR Division of Regulatory Improvement Programs
DSSA	NRC Division of Systems Safety and Analysis
ECCS	emergency core cooling system
EDG	emergency diesel generator
EMCB	NRC/NRR/DE Materials and Chemical Engineering Branch
EMEB	NRC/NRR/DE Mechanical and Civil Engineering Branch
EOP	emergency operating procedure
EPRI	Electric Power Research Institute
ESF	engineered safety feature
EQ	environmental qualification
FPC	fire pump control
FR	Federal Register

ABBREVIATIONS (continued)

FSAR	final safety analysis report
GALL	Generic Aging Lessons Learned
GDC	general design criteria
GE	General Electric
GEIS	generic environmental impact statement
GL	generic letter
GSI	generic safety issue
HLW	NRC/NMSS Division of High-Level Waste
I&C	instrumentation and control
I&M	Indiana Michigan Power
IEB	IE bulletin
IEEE	Institute of Electrical and Electronics Engineers
IN	information notice
INEEL	Idaho National Environmental and Engineering Laboratory
IPE	individual plant examination
KOPEC	Korea Power Engineering Company
LER	licensee event report
LOCA	loss of coolant accident
LR	license renewal
LRA	license renewal application
LR-PW	license renewal public workshop
LWR	light water reactor
NEI	Nuclear Energy Institute
NEPA	National Environmental Policy Act
NESF	normal engineered safety feature
NIRS	Nuclear Information and Resource Service
NMC	Nuclear Management Company
NMSS	NRC Office of Nuclear Material Safety and Safeguards
NNECO	Northeast Nuclear Energy Company
NPAR	nuclear plant aging research
NRC	Nuclear Regulatory Commission
NRR	NRC Office of Nuclear Reactor Regulation
NUMARC	Nuclear Management and Resources Council
NUS	NUS Information Services
ODSCC	outside diameter stress corrosion cracking
PBPM	planning, budgeting, and performance management
PC	plugging criteria
PECO	Philadelphia Energy Company
PRA	probabilistic risk analysis
PTS	pressurized thermal shock
PWR	pressurized water reactor

ABBREVIATIONS (continued)

PWSCC	primary water stress corrosion cracking
QA	quality assurance
RII	NRC Region II (Atlanta, Georgia)
RAI	request for additional information
RCS	reactor coolant system
RES	NRC Office of Nuclear Regulatory Research
RG	Regulatory Guide
RG&E	Rochester Gas and Electric
RGEB	NRC/NRR/DRIP Generic Issues, Environmental, Financial, and Rulemaking Branch
RHR	residual heat removal
RLSB	NRC/NRR/DRIP License Renewal and Standardization Branch
RROP	Revised Reactor Oversight Program
RWST	refueling water storage tank
SAMG	severe accident management guidelines
SCC	stress corrosion cracking
SER	safety evaluation report
SG	steam generator
SOC	statements of consideration
SNC	Southern Nuclear Company
SPCS	steam and power conversion system
SRM	staff requirements memorandum
SRP-LR	standard review plan
SRP-LR-LR	standard review plan for license renewal
SS	stainless steel
SSC	systems, structures, and components
TLAA	time-limited aging analysis
UCS	Union of Concerned Scientists
UFSAR	updated final safety analysis report
USAEC	U.S. Atomic Energy Commission
UT	ultrasonic testing
VP	Virginia Power
W&S	Winston & Strawn
WEPCO	Wisconsin Electric Power Company
WESCO	Westinghouse Electric Company

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EXECUTIVE SUMMARY

OVERVIEW

On August 31, 2000, the Nuclear Regulatory Commission (NRC) announced the issuance and availability of a draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"; a draft Standard Review Plan for License Renewal (SRP-LR-LR), "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants"; a draft Generic Aging Lessons Learned (GALL) report for public comment (65 FR 53047); and DG-1104, which proposed to endorse NEI 95-10, Rev. 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule." These improved license renewal guidance documents describe methods acceptable to NRC staff for implementing the license renewal rule (10 CFR Part 54), as well as techniques used by NRC staff in evaluating applications for license renewals. The staff also held public meetings with stakeholders to discuss their comments.

The NRC has taken into consideration all comments received as a result of the solicitation described above and incorporated their NRC dispositions into the April 2001 version of the license renewal guidance documents.

This report provides the evaluation and disposition of all public comments received by the NRC on the license renewal guidance documents.

NATURE AND SCOPE OF COMMENTS

In total, 1,084 comments were received and docketed from stakeholders on or before October 16, 2000. The nuclear industry provided 860 comments, with the majority of those from the Nuclear Energy Institute. The public, including public interest groups, provided 177 comments, with 125 of those comments coming from individuals representing themselves and public interest groups. Those 125 general comments were concerned with the validity of the license renewal process. The remainder of the comments (or 47 of the comments) came from the ACRS consultants. This NUREG includes written comments from 128 commentators, which represent comments from 101 individuals, 15 public interest groups, and 12 industry groups that responded to the request for public comments (65 FR 53047).

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1. INTRODUCTION

1.1 BACKGROUND

On August 31, 2000, the Nuclear Regulatory Commission (NRC) announced the issuance and availability of a draft Regulatory Guide DG-1104, "Standard Format and Content for Applications to Renew Nuclear Power Plant Operating Licenses"; a draft Standard Review Plan for License Renewal (SRP-LR-LR), "Standard Review Plan for the Review of License Renewal Applications for Nuclear Power Plants"; a draft Generic Aging Lessons Learned (GALL) report for public comment (65 FR 53047); and DG-1104, which proposed to endorse NEI 95-10, Rev. 3, "Industry Guideline for Implementing the Requirements of 10 CFR Part 54 – The License Renewal Rule." These improved license renewal guidance documents describe methods acceptable to NRC staff for implementing the license renewal rule (10 CFR Part 54), as well as techniques used by NRC staff in evaluating applications for license renewals. The NRC also announced a public workshop that was held on September 25, 2000, to facilitate gathering public comment on the draft documents. The NRC was especially interested in stakeholder comments that would improve the safety, effectiveness, and efficiency of the license renewal process. The staff also held public meetings with stakeholders to discuss their comments.

1.2 ORGANIZATION OF REPORT

This report contains the NRC assessment of the stakeholder comments. The evaluation and dispositions are prepared in a tabular format and contained in the following five appendices: Appendix A addresses the participant comments from the license renewal public workshop on September 25, 2000; Appendix B addresses the specific written comments submitted by the Nuclear Energy Institute (NEI); Appendix C addresses the written comments submitted by various stakeholders, such as the Union of Concerned Scientists, utilities, and private citizens; Appendix D addresses five technical reports provided by the Union of Concerned Scientists; and Appendix E addresses the Advisory Committee on Reactor Safety (ACRS) consultant comments on the structural and electrical components.

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